
ICANN71 | Virtual Policy Forum - GAC Discussion on RDS/WHOIS, Data Protection
Tuesday, June 15, 2021 - 12:30 to 13:30 CEST

GULTEN TEPE: Welcome to this ICANN71 GAC session, a discussion on RDS/WHOIS and Data Protection on Tuesday the 15th of June at 10:30 UTC.

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This session is being recorded and all materials will be available on the ICANN71 meetings page.

Over to you, Manal.

MANAL ISMAIL, GAC CHAIR: Thank you very much, Gulden. And welcome, everyone. We have a 90 minute session now. We will use the first hour for RDS and data protection regarding the latest developments from PDP Phase 1, Phase 2, ODP, and Phase 2a as well as the accuracy track. We will rededicate the last half hour for another quick communicate review. And as you all may have noticed; we are using Zoom webinar for this session. Zoom webinar, we're testing

it to see if it would help topic leads and moderators of the session to better recognize GAC interventions and GAC chat in order to be able to prioritize the GAC input to the discussion. We would very much appreciate your feedback as well as of course feedback of our topic leads, whether this served the purpose. So with this and without any further ado, allow me to hand it over to our topic leads to kickstart our discussion.

Over to you, Laureen. Thank you.

LAUREEN KAPIN:

Thank you, Manal, welcome everyone and thank you for attending this session on these important issues. My name is Laureen Kapin, and I am speaking in my capacities as the member of the GAC small group, I'm from the United States, and I work for the Federal Trade Commission where I focus on consumer protection issues and international issues and I am also co-chair of the Public Safety Working Group. So we have a full agenda today. We will be taking you through some updates on all issues EPDP, expedited policy development process, we will give a brief update on all of the phases but will spend most time on the natural vs legal and unique -- and update on the work and opportunity for a GAC public comment on the interim Phase 2 report.

So this is an overall overview, and you can see that we're taking you from the very beginning of the story which at least started with the implementation of the temporary specification, which was launched in response to the European general data protection regulation. This essentially was because ICANN wanted to ensure complied with relevant laws. Phase 1 took place in February of 2018 and 2019 that launched the temporary specification and that is currently the subject of the IRT, which stands for the implementation review team. That is ongoing, the implementation of the Phase 1 recommendations was launched in May 2019, and the temporary specification is meanwhile now in place while the Phase 1 replications are being implemented.

And just to take a step back, this is a multi-phase process which started with a temporary specification and then there were policy development processes done in an expedited manner which started with Phase 1 which had its recommendations adopted by the Board which are now being implemented, so we have the temporary specification, we have Phase 1, in implementation, and then we had Phase 2 which focused on this standardized access for disclosure system, and you will hear this term SSAD a lot. It doesn't stand for so sad; it stands for as we say on the slides -- and now losing my place on the slides with all these acronyms, stands for standardized system for access and disclosure.

That Phase 2 set of recommendations was the subject of a final report published in July. The GAC had several concerns with those recommendations and issues a minority statement along with several other stakeholder groups including the ALAC, BC, IPC, and SSAC, those are all annexed to the final report and if you haven't looked at those, I encourage to you look at all the statements from all the stakeholder groups, they give you a sense of the diversity of views on these issues.

Taking us to the current place, Phase 2a, there were several important issues that weren't able to be covered in phase 2. And in Phase 2a, the goal was to take up those important issues. Phase 2a focused on the treatment of legal entities. Why is that an issue? It's because the information of legal entities is not necessarily protected under the GDPR, and there was an effort then to consider how that information could be handled and whether it should be made publicly available since it is not necessarily protected up the relevant data protection regulations. Phase 2a also focused on whether pseudonymized emails could be published in the public domain name registration data.

So we're going to take you through all of those phases, and my colleague Chris Lewis-Evans, who is joining our work in the implementation review team, will take on that topic. But a brief

pause; I would be very remiss if I didn't identify Chris and Melina as my colleagues on the GAC small group as well as our other colleagues who back us up in doing a lot of tremendous work and devoting countless hours to these difficult topics. You may not realize the number of hours spent in meetings and reviewing texts and grappling with the diversity of views on these issues, but it does take a lot of time and effort, and you couldn't ask for a more devoted team than the folks working on these issues. So I want to publicly acknowledge them at this point. Take it away, Chris.

CHRIS LEWIS-EVANS:

Thank you, Laureen. Hello, everyone. Chris Lewis-Evans, for the record, and as Laureen said, part of the small group, and to echo those thanks straight back at her really, I think the number of hours Laureen has put in recently is astounding, and she has really led the charge for the GAC small group within the Phase 1 implementation, and really, I have just been supporting her. So as Laureen has said, work started on the implementation back in May 2019, so it's already been going on for a fair amount of time, and that work has been quite widespread. There have been numerous meetings, some studies, reports, and some draft policy document language going on as well as some Work Tracking items that the ICANN org has helped put together.

There are still many interdependencies that hadn't been agreed on and disagreements on policy language in that that we're looking at, and some of those are of high importance to the GAC and I think one of those that we flagged is the time frame for a response to urgent requests. Then what I want to cover next are three overarching issues of importance for the GAC with the IRT. The first is the overall timeline. So in the GAC Montreal communique in November -- the GAC had asked for a detailed work plan, are release of the schedule of the work within the IRT. That was accepted by the ICANN Board in January of last year and a [indiscernible] was provided by them. There was a timeline that was put in place, and as I say, we have a status tracking document but currently there is no detailed scheduled plan for completion or publication of the implementation plan.

So the other one is the impact on the privacy proxy service accreditation policy and implementation otherwise known as PPS AI, and we have mentioned this in numerous of our communiques as being important. And one of the reasons for this is really the amount of impact this causes to Public Safety organizations such as law enforcement, getting access to data and being able to take [indiscernible] of data. There was a lot of work on the community [indiscernible] and been on hold for a long time. So hoping this will be discussed. There was a meeting that highlighted ICANN71, so on the 24th of March.

The third and final item is the impact on thick WHOIS policy implementation here, I just want to call out a couple of parts. The thick WHOIS was adopted way back in 2014 and within the Phase 1 it was noted that we didn't think there were any specific issues to be addressed or -- specific issues should be addressed, sorry, during implementation which was I think recommendation 7 within that final report for the Phase 1. But we didn't think it overturned existing consensus policy of the thick WHOIS. And that was agreed by the ICANN Board. There have been a number of discussions within the IRT around this, and really the IRT has been unable to come to an agreement on whether it rescinded the thick WHOIS policy. And despite that lack of agreement, the GNSO Council determined back in January of this year that recommendation 7 was to modify the thick WHOIS transition policy. So already definitely items there that we would highlight to the back and obviously this work is ongoing and once we get any more details on these, we will certainly update you.

LAUREEN KAPIN:

Thank you. So this slide give you a visual image. Moving now from Phase 1 to Phase 2. This gives you a visual image of the recommendations for the Phase 2 standardized system for access and disclosure. And you can see visually that there were certain recommendations that achieved full consensus and others that diverged and still others that had strong support but significant

opposition and those are highlighted indeed red. And this is, as I said, to give you a picture of the fact that these were contentious issues and on certain of the recommendations there was a real difference of opinion expressed by different stakeholder groups.

The GAC in particular expressed its views in its minority statement in August of 2020. And particularly the GAC was concerned that the current recommendations created a fragmented rather than centralized system. And the reason it's fragmented is because essentially decisions are left to each individual registrar to decide whether information should be disclosed or not. And there are many good reasons for that, because there is liability that can flow from making a decision which impermissibly discloses registrar data. But because each registrar is responsible for their own decisions you can come on a system where different standards being applied. So fragmented rather than centralized a related issues that the recommendations didn't contain enforceable standards to review the disclosure decisions, in fact correspondence to that effect from ICANN CEO expressing concerns that it would be very hard for ICANN compliance to review those decisions.

There were also concerns that the recommendations didn't specifically reflect consumer trust concerns or contain a reliable mechanism for the system to in response to increase legal clarity,

meaning as the law changes and we know certain legislative changes on the horizon, we had a discussion about that yesterday from our European Commission colleague, if the law changes or if there are decisions from data protection authorities providing clarity on what is a complicated set of regulations, that the system should be able to evolve in response to that, but it was viewed that there aren't sufficiently reliable recommendations in the recommendations to take that into the account. And finally, there were concerns about the cost of the system, it might simply be too expensive for the folks who want to use it. So I would encourage if the GAC colleagues haven't read the GAC minority statement to take a look at it. It is a lengthy statement that carefully explains the bases for the concerns and its views.

And the GAC was not alone in its concerns. There were other stakeholder groups that expressed concerns as well, and those are all in annex E of the final report. I know there was a question in the chat pod, a request to post all the links to these reports, so I'm going to request our great support staff at some point that is convenient, if you can post links to the Phase 1 recommendations, the Phase 2 recommendations, and the Phase 2a initial report, as well as the GAC minority statement, in the chats, I think some of our speakers would find that helpful. And the slides actually contain links to all these documents, so the

slides will be made available after this discussion. And then you can use the slides to gain access to those materials also.

Stepping back to the content at issue, other stakeholders joined in expressing their concerns, the ALAC, SSAC, BC, and IPC and some groups voted against recommendation of the -- didn't achieve consensus. Here is where we are with Phase 2. The Board has launched its operational design phase, and we heard a discussion about that just earlier today. And that is basically an aid for ICANN and the community to figure out what are going to be the costs and resources and risks that come with building the recommended system, and that work is currently in process. And we know also that there is going to be an upcoming request for information from the community to give feedback on those issues to determine the feasibility -- the lights are going off in the room I'm in, so I will wave my hands so that won't happen. If they were on my mouth, they never would have gone off.

So there will be this request for information to determine the fees account of these risks, costs and resources, and then the Board will consider the results of the operational design phase. And then the Board in keeping with its role, they're going to decide whether the recommendations are in the best interest of the ICANN community or ICANN. So in our last communique, as part of our advice to the Board, we asked the Board to consider the

concerns expressed in the minority statement and their available options begin their role to address the public policy concerns expressed and if necessary, take appropriate action. And we had a discussion with the Board in response to some of their questions about the GAC minority statement this past April. And then this past May, we received a formal response to the GAC advice. And that was via the Board's scorecard. And it sounded from some of the statements raised in the scorecard that there were still some questions about the GAC minority statement.

What I would point out is that the GAC minority statement is very specific, explains the basis for the GAC's concerns within that document and also contains extensive footnotes citing to our sources, and it is meant to be a comprehensive document. We also note that there are questions raised about certain positions taken, particularly about accuracy issues, and we will have a separate discussion on that. But we want to highlight that these are complex issues, and we know ICANN is engaging with data protection authorities on these complicated issues, on the issue of a centralized model in particular, and we want to underscore that even the Belgian data protection authority noted that there are potential benefits to these systems. And I think we also want to emphasize that it is not the intent of the minority statement to ask the Board to rewrite any of the recommendations. We're well

aware that that is not the Board's role; we just ask that the Board consider the GAC's concerns.

We're going to turn now to Phase 2a, which is the current part of the policy development process in play. That just reached a milestone with publication of the initial report. I'm going to give you some quick context and then turn over to my colleague Melina from the European Commission to talk about more specifically. What you need to know, first of all, is that you can read the initial report which was eventually published and available now. And there is that this was a very, very quick process. It started in December and we're at our initial report in June.

As with any quick process, sometimes it can be a little too quick and, in this case,, there was a lot of new material introduced right near the deadline for the initial report which created some challenges for the team to adequately review and confer and discuss it, particularly because at least for our GAC membership and many of the other stakeholder groups, people are conferring across several time zones. So when you get new material and you have deadlines that in some cases are 24 hours or less to come up with a position, that gets quite challenging. And in particular, there was a lot of disagreement among stakeholder groups as to whether the report clearly flagged the divergence on one of the

proposed recommendations, and indeed the first recommendation is that no changes are recommended to the Phase 1 policy, which, folks may recall, permitted registrar and registry operators to distinguish between but didn't require them to. [reading] most of the time that the group debated was on this very issue. So this continues to be a topic of debate and the stage is set now for public comments, and I think now it is going to be in the GAC's hands not only as a collective entity but for individual countries to weigh in on these issues. And to talk about the issues more specifically, I'm going to turn things over to my colleague Melina Strougni from the European Commission.

Next slide, please.

MELINA STROUGNI:

Yes. Thank you, Laureen. Also thanks for the warm introduction. So my name is Melina Strougni. As Laureen already mentioned, I am a member of the GAC small group, and I have followed the EPDP Phase 2a. By background, data protection lawyer and working at the Internet governance sector at the European Commission. On Phase 2a, I'm going to speak about the first issue, on Phase 2a, the natural vs legal and then my colleague will go over the context. To remind, the right-hand side, to before the entry into force of the GDPR, the general data protection regulation, domain name registration data were publicly

available after the entry of the of course GDPR the data redacted. The data that were redacted also included non-personal data of legal persons not protected under the GDPR, this led to lack of transparency and various problems due to the lack of publicly and available information.

So basically the EPDP had two tasks here under Phase 2a, the first was to determine whether any changes are needed in relation to Phase 1, recommendation 17 which said that registrars and registries are permitted to differentiate between legal and natural persons but not owe obliged to do so this was the first point and then the second task would be what guidance, if any, can be provided to those registries and registrars who is to differentiate between natural vs legal. As Laureen mentioned, one of the recommendations of the initial report concludes that no changes were needed. This did not reflect entirely reality, as we did not reach consensus on that point. So basically there were a lot of groups, including GAC, which believed that such changes are needed and other groups that didn't think so. So basically this point has been now hopefully clarified, as I understand it will be an added clarification point in the initial report to capture there is currently no consensus on whether there should be changes to the Phase 1 recommendation.

So basically the key areas where community input is requested, in total there are five recommendations in the initial report for which public feedback is sought. I'm going to present four of them that concern natural vs legal discussion, the bullet points you see on the slide and then Chris will cover the fifth. So the first is whether changes are needed to the Phase 1 recommendation. So as mentioned, according to the GAC, such changes are needed. The report now welcomes feedback in that regard on whether any additional recommendations can be taken into account and whether recommendations on Phase 1 is or is not necessary.

The second point is the need for GNSO Council to monitor relevant developments. So in the context of Phase 2a we notice that had there are a number of potential relevant results such as the adoption of the ni S2, as well as SSAD that Laureen referred to, so basically a preliminary recommendation currently included in the initial report that suggests that the council should monitor these developments to see whether a recommendation necessary, while at the same time others have suggested there is already the responsibility of the council so maybe it's not necessary to explicitly say so. So basically there is a point where public feedback is also needed.

The third point concerns whether a standardized data element should be available for contracted parties. Basically we had

discussed on whether we should make the technical capability of contracted parties to use standardized data elements such as flags as a requirement. So basically to have the ability to mark a registrant as a legal or natural person and their data as personal or not personal. So basically just to make a requirement the technical capability without attaching any other obligation for publication which would really have zero liability risks for the contracted parties. But again, unfortunately, we did not manage to arrive at consensus to this point is now included as part of the guidance. Basically it aims to facilitate and harmonize practices for the contracted parties which is to differentiate between legal and natural persons and, again, we look for public feedback on whether the data should be available for contracted parties and the reason why that's so.

The fourth point is whether basically the guidance that we have currently developed is sufficient. So this guidance aims at providing useful information and stops contracted parties who choose to differentiate and recommended these follow that guidance and should document all the data processes steps. So to dive into more details, to the substance of the guidance, basically according to the guidance registrants should be allowed to self-identify as natural or legal persons. There we have included guidance on the timing, so basically at the time of their registration or without undue delay after registration and in case

the registrant updates its contact information, it has again to be done without undue delay after the information updated. Then registrars should consider using the standardized data element in the RDS, the public [indiscernible] or SSAD, basically a flag indicating whether a natural or legal person there. And if a person is a legal person, whether the data they provide is personal or not personal.

Then the guidance goes on with additional safeguards that the parties can adopt such as to communicate the nature and consequences of a registrant when they identify as a legal person, to explain what the consequences are if someone identifies as a legal person, for instance, that their data may be published. And then if you have a legal person, also confirm no personal data are provided.

Basically, also the guidance stresses that it's important for the registrants, the individuals, to have easy means to correct their mistakes so basically for contracted parties to address rectification requests so public feedback guidance sought on whether provides sufficient information, if something missing, if additional elements should be taken into consideration. So really looking forward to receiving as much as public feedback as possible. I will now give the floor to my colleague Chris to take you through the unique contents.

CHRIS LEWIS-EVANS: Many thanks, Melina. Chris Lewis-Evans, for the record again. So within the Phase 2a, the EPDP team were expected to address whether unique contact could have a unified or uniform anonymous email address and whether able to display that either on a domain name basis or per registrar basis or registry basis and if it was feasible whether that should be a requirement and then also if not a requirement, what guidance could be provided for those contracted parties that may want to do this.

So on the question of feasibility, within the Phase 2 report, the proxy services had a recommendation which allowed them to publish anonymized, uniform email, so I think this showed this was feasible; however, there were a number of concerns onto the data subject depending on how that uniform approach was taken. And I think the last time was spent discussing that and how we could look at safeguards to protect the data subject while also allowing this anonymized email contact to be published.

So the fact that the contract party would be able to choose to publish either registrant or administration based email address, an anonymized one of those, and must look at providing appropriate safeguards -- or should ensure that appropriate safeguards are applied to the data subject in line with guidance

from the work that has been carried out within the EPDP and also from there relevant to that, relevant data protection authorities.

LAUREEN KAPIN:

And I think stepping back, what is important to emphasize here big picture wise, that all of the recommendations in this Phase 2a are all guidance. None of it is required. That was a big point of discussion and debate whether these should be mandatory requirements or just guidance to the affected contracted parties, so all of these recommendations in their current state are guidance which means it is at the choice of the contracted parties to do this or not.

So I just wanted to make sure that that point was very, very, very, clear.

Back to you, Chris.

CHRIS LEWIS-EVANS:

Thank you, Laureen, for that. So I will just go through some of the next steps for the Phase 2a. So as Laureen said, the report is released and released at the beginning of June and the public comment period is open until the 19th of July. Within the small GAC group -- GAC small group, sorry -- we're looking to pull together all of our work and to produce some guidance

documents to allow the GAC to make a public comment if it chooses to do so and obviously that work would be available to all the countries, and if they were wanting to submit an individual national comment in light of this work in line with their own data protection advice or their roles within their countries, that also possible.

But on that, if any country that isn't part of the small GAC has any points that they think are interesting that have been maybe missed by the EPDP's work and that would be relevant to putting into public comment, the GAC small group would be welcome to collect the information to inform the GAC. So hoping to get that pulled together by the 7th of July to give GAC members a couple of weeks before the deadline for submission, and obviously we will try our best to get that out earlier but as you can imagine, it's a large part of work along with everything else along with preparation for ICANN71. And there is a community update and consultation which is tomorrow at 14:30 UTC, but I think Manal would like you to come to this room because that is also the time of the communique drafting, but obviously the recording would be available if you want to listen to that later. Next slide, please. Back to Melina and Laureen.

MELINA STROUGNI:

Yes, thank you, Chris. So on the accuracy, as you may recall during ICANN70 we had discussed the ICANN org briefing of February on accuracy so in this slide I'm going to describe the developments that we have had since then. On 23 of April, the GNSO leadership circulated the set of proposed next steps for the accuracy scoping exercise. These next steps focused on the scope, study, timing and the scoping team composition.

Just to clarify that contrary to what may have been implied, the accuracy issue [indiscernible] predated EPDP, and has been raised for many years so even before the GDPR. Also to remind that the accuracy issue was meant to be addressed in Phase 1 of the E but has been repeatedly pushed back. A lot of constituencies have expressed concerns that if the issue is not addressed within the E, this could be left in the hands of the legislators which could create more fragmentation. So it was clear that the scoping team should be formed and allowed to start work as soon as possible.

So in light of that context there was a call by some constituencies for setting a draft for proposal. Also the [indistinct] had stressed how important it was to allow to start work as soon as possible. So a small GNSO group was formed. Work on accuracy still to be defined, for instance the scope of work including the discussion

for support of such work -- and whether GAC should be a part of the team. [reading] the GAC confirmed its interest and recommendation on December 2020, and since then we understand there have been discussions on what is the right way for forming the scoping team, for example suggestion to have two members from each stakeholder group, wondering whether this would be sufficient and really believe the composition of the Working Group should be more carefully considered and definitely merits additional discussion.

In terms of the timing, we understand that the GNSO accuracy team was concerned about lack of resources which were mainly stemming from the fact that the whole phase would overlap with the EPDP Phase 2a process. So there was discussion on whether the scoping exercise should be launched before the finalization of the Phase 2a. This of course we understand this is a very valid concern. However, now that the EPDP Phase 2a calendar is well known, some further clarity on the timeline of the accuracy work would be very helpful. So indeed, as I see in the comments, things are unclear yet and nothing has been decided.

To give you a brief overview of the key messages that GAC has conveyed so far on this topic, as stressed and also included in our Phase 2 minority statement, the accuracy of domain name registration data is fundamental for maintaining a secure and

resilient domain name system. So potential study on accuracy should really consider this point and take a much broader approach. It is very important for GAC to ensure the accuracy of domain name information. This point has been made in the GNSO GAC leadership discussions. What matters for GAC is really to ensure that the information provided by a registrant allows that registrant to be actually identified and contacted. This could be both compliant with respective agreements in place and would also serve a lot of legitimate purposes. For instance, it would be able to provide with accurate data to access requests by law enforcement authorities or other legitimate questioners.

Last but not least, the scoping exercise is essential for scoping the work and asking the right questions. We believe the GAC would be an added value for the scoping work and needs to be part of the scoping team. So we are looking forward to some progress on this very important issue and hopefully get more clarity on all these outstanding issues, so the scoping work process, team composition, and the timing.

So I will now give the floor to Chris to give you an overview of the timeline. Thank you.

CHRIS LEWIS-EVANS: Thank you, Melina. I am Chris Lewis-Evans, for the record again.

So this last slide is just a graphical representation of the different aspects going on within the EPDP process, and I think the main thing to draw from this is the lack of any concrete timeline going forward. So within this very important issue for the GAC, we have an interim policy that has been in place since early 2019, so two years now, and we really don't have a clear guide on when we will get a concrete policy based off of the community's work. So I think that's really the key aspect from that, and I think we look forward to working with the rest of the community to try and move these forward.

But I think it would be really helpful for us at the GAC to get an understanding of when the different aspects will come into place and also help with some of the issues around resources being available to do some of the work as well. So I don't want to spend too much time on that, getting close to the hour mark and wanting to ensure we get onto the communicate stuff, but I think with that, we have a little bit of time for any questions from the GAC. Thank you.

MANAL ISMAIL, GAC CHAIR: Thank you very much, Chris, Laureen, and Melina. I'm just looking to see if there are any requests for the floor.

I see none. I think we need to also to check the Q&A pods?

LAUREEN KAPIN: And I am looking at Alan's comment which contains a useful clarification. Alan Woods is one of the participants in the Phase 2a proceedings and indeed is a legacy member having participated in the prior EPDP proceedings, and he is pointing out, and I'm glad he has, that this creation of a standard flag, that would be identifying whether a registrant is either a legal entity, a natural entity, or unspecified, that that actually is not a guidance, that that is considered consensus policy. Because everyone agreed on that, which was a good thing. So it's not merely guidance. And Alan notes, although it's not merely guidance, it is still being discussed whether this is going to be a must or a may use the flag. So it's a nuanced point here, but I appreciate Alan making that point.

MANAL ISMAIL, GAC CHAIR: Thank you, Laureen, and thanks Alan. Just checking for any other comments, questions. I see Olivier's hand up. European Commission, please go ahead.

EUROPEAN COMMISSION: Thank you, Manal. I had difficulties finding the raise hand button but found it. Just to first of all thank the colleagues of the small group who have been involved in this EPDP Phase 2a but in the whole EPDP process and also thank the group as the whole, the EPDP 2a group. We were not always in agreement but a lot of [indiscernible] participation in this exercise, and I think the Chair has been doing a very good work.

I would like to come back on a few points that were mentioned in the presentation and which appear now in the timeline. I agree very much with Chris that it is important to have a clearer timeline on when the Phase 1 recommendations are going to be implemented. I mean, it's a question of implementing a new WHOIS policy, and we have been always pushing the commission for accelerating the implementation and moving from the temporary specifications which have some weaknesses, so a new more complete policy.

On the accuracy question -- sorry, first on the EPDP 2a question, I think it's very good, I remember there were two questions when we met in ICANN70 when the group would be able to continue its work and conclude, I think there are good elements in the guidance that has been agreed in terms of substantive elements, but we are disappointed in the commission by the fact that the

result is essentially voluntary, and we would have expected a more ambitious result with elements of mandatory obligations, in particular the two questions discussed in the group [indiscernible] and anonymized email.

Accuracy is an issue that goes beyond the question of GDPR implementation. This is a discussion that that was taking place whether the ICANN community started the EPDP process, it's a very important question. We have feedback from many access seekers that they need accurate data to be able to do their work, and there are issues with the accuracy of the data currently. Also a question which is not only linked to personal data but also a question of accuracy of non-personal data contained in the registration databases, so we think it's really important to work on this aspect, really important to start this scoping exercise and to have the GAC involved in the scoping exercise to bring our specific perspective in the discussion. So I hope the GNSO will be able to decide quickly on -- relatively quickly on this exercise.

These were the three points I wanted to make. Thank you very much.

MANAL ISMAIL, GAC CHAIR: Thank you very much, Olivier. And to other colleagues, if you are facing difficulty in the Zoom webinar to raise your hand, please

even type it in the chat, hand raised, and we will certainly give you the floor. In lack of other requests for the floor, I wonder whether Chris, Melina, Laureen, any final comments?

LAUREEN KAPIN:

I would encourage GAC members to look at the report, it's on the short side comparatively, shorter than many of the other reports and on important issues. And the public comment period really is the time for individual countries as well as the GAC collectively to weigh in, and we're really encouraging individual countries to do so. Because these are important issues and really focused on two main topics, so we're hoping that countries that feel strongly about these issues take the opportunity to weigh in.

And also procedurally, ICANN made it more user friendly to file public comments in certain regards because they have now provided a form for you to do so, and also the GAC itself through your small team will be helping draft a proposed public comment. So that could be a resource for you if you choose to fill your own public comment as well. Not that you have to be consistent with that; you of course are free to express your own views, but we would offer that as a resource. So I just wanted to emphasize that opportunity coming up.

MANAL ISMAIL, GAC CHAIR: Thank you very much, Laureen, Chris, and Melina. Thank you very much, appreciate the effort you have been putting on this topic. I know the workload is significant and the time needed and the dedication, so I cannot thank you enough.

With this, I thank you all for your attention as well. This concludes the discussion on RDS/WHOIS, Data Protection.

Please stay connected and allow us a minute to get ready for the following session on the communique.

[END OF TRANSCRIPT]