

21 June 2019

Mr. Keith Drazek
Chair, GNSO Council

Re: Request for Clarification on Data Accuracy and Phase-2 of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data

Dear Keith,

I would like to reaffirm ICANN org's commitment to supporting the GNSO Council's policy development work related to gTLD Registration Data. We are aware of the significant progress to date, and the work that remains to be completed, both in the context of the implementation of Phase 1 recommendations (as approved by the Board on [15 May 2019](#)) as well as in Phase 2.

Given the anticipated changes in gTLD registration data requirements based on the EPDP Phase 1 policy recommendations, ICANN org is specifically interested in further understanding the EPDP Team's plans to consider the subject of "data accuracy" as it relates to gTLD registration data and related services, such as the [WHOIS Accuracy Reporting System \(ARS\)](#).

As reference, the WHOIS ARS project was initially developed as a result of the first WHOIS Review Team [recommendations](#). The Board received subsequent advice on the topic from both the Security and Stability Advisory Committee (SSAC) via [SAC058](#), and the Governmental Advisory Committee (GAC) via the [Beijing Communique](#).

As a result, ICANN org began collecting samples of public gTLD registration data to identify, assess, and [report](#) on gTLD registration data accuracy beginning in August 2015. Accuracy was [defined](#) through the validation of data elements as specified in the 2013 Registrar Accreditation Agreement.

ICANN org has issued a new report every six months as per Board direction. The last report was issued in [June 2018](#) using data collected in January 2018, prior to adoption of the Temporary Specification; however, since the adoption of the Temporary Specification in May 2018, ICANN org has not published further ARS reports. ICANN org recognizes that there have been changes in gTLD registration data requirements, and the public availability of such data has affected not only the potential viability of the ARS, but other registration data services that rely on publicly available registration data.

ICANN org notes that footnote #6 on page 7 of the EPDP Phase 1 Final Report states: "The topic of accuracy as related to GDPR compliance is expected to be considered further as well as the WHOIS Accuracy Reporting System." However, it is not clear who would consider this topic and when. Therefore, ICANN org seeks the GNSO Council's clarification on whether the Phase 2 EPDP Team will be

considering the subject of data accuracy, including projects that utilize gTLD registration data, such as WHOIS ARS.

It is important to ICANN org that we utilize resources efficiently and appropriately to meet the needs of the community. Having more clarity into the consideration of the above will assist us in determining how to further progress with affected projects.

I look forward to the GNSO Council's input and to engaging further on this topic with the GNSO Council at ICANN65.

Sincerely,



Göran Marby
President and Chief Executive Officer
Internet Corporation for Assigned Names and Numbers (ICANN)