

From: Goran Marby
Sent: Friday, October 25, 2019
To: Andrea Jelinek, David Stevens
Subject: Strawberry Paper

Dear Chairperson Jelinek,

Dear Mr. Stevens,

Allow me to express our appreciation for your guidance and willingness to engage on the unique matter of the application of the European Union's General Data Protection Regulation (GDPR) to gTLD registration data (WHOIS).

We hereby submit a paper, "Exploring a Unified Access Model for gTLD Registration Data," which outlines a model for access to/disclosure of non-public gTLD registration data. We submit this paper for the purpose of seeking guidance from the European Data Protection Board (EDPB) about whether this model would be compliant with the GDPR. We believe that this model would create a secure, transparent, and predictable system for data subjects and parties requesting access to this data. For reference, we also attach the Technical Study Group's technical model, which forms the technical basis for the proposed model.

We would like to acknowledge the European Commission's invaluable advice in the process of drafting this paper. We also note that, according to ICANN's practices, this paper will be shared with the ICANN community and published on the ICANN website.

ICANN org appreciates your willingness to consider the questions included in the paper to ensure the ICANN policy development delivers a solution for registration data access that meets the relevant GDPR requirements, as prompted by the Article 29 Working Party and the EDPB. We would also appreciate the opportunity to meet with you to discuss the model proposed in this paper and the questions posed.

Best Regards,

Göran Marby
President & CEO ICANN