

**From:** Brian Winterfeldt  
**Date:** January 13, 2018  
**To:** [Goran.marby@icann.org](mailto:Goran.marby@icann.org)

**Subject: IPC Submission to ICANN CEO re: Models for GDPR Compliance**

Dear Goran,

On behalf of the Intellectual Property Constituency, I am writing today with regard to the proposed models for possible GDPR Compliance that ICANN is scheduled to release for community input today.

We respectfully ask that ICANN fully explain how the proposed models presented by ICANN for community input relate to, take into account, and/or track the five community-developed models for GDPR compliance, particularly the Coalition for Online Accountability (COA) model, EWG-based model as submitted by AppDetex, the ICANN Redaction Model, and the model submitted by iThreat. (Available here: [https://www.icann.org/resources/pages/gdpr-legal-analysis-2017-11-17-en\[icann.org\]](https://www.icann.org/resources/pages/gdpr-legal-analysis-2017-11-17-en[icann.org]))

We also respectfully ask that ICANN include for official consideration, the community-developed models for GDPR compliance alongside its own three models.

We look forward to continuing communication on this critical issue as we all work toward finding the appropriate balance of community concerns.

Best,

Brian