



6 June 2018

Mr. Graeme Bunton  
Chair, Registrar Stakeholder Group

Re: Effect of GDPR-Related Temporary Policy on Across-field Address Validation Working Group and the Privacy and Proxy Services Accreditation Implementation Review Team

Dear Graeme,

Thank you for your [4 May 2018 letter](#) requesting a pause in the Privacy and Proxy Services Accreditation Program Implementation Review Team (PP IRT) and the Across-field Address Validation (AFAV) working group. ICANN org acknowledges the Registrar Stakeholder Group's concerns about the potential impacts to these projects by the European Union General Data Protection Regulation (GDPR).

GDPR has raised various questions surrounding the requirements for and the treatment of personal data for ICANN org and the contracted parties. ICANN organization appreciates the hard work of the community and the complexities of dealing with the uncertainties associated with the GDPR.

On the other hand, the need for consistency of services and accuracy of registration data continues to increase. Once implemented, the Privacy and Proxy Service Provider Accreditation Program Consensus Policy and AFAV aim to reduce uncertainty by setting minimum standards for predictable, consistent and more transparent processes among providers and registrars. As you likely know, in the case of PP IRT, the work is nearly complete and the Policy document and accompanying materials are nearly ready for Public Comment. I believe that it would be more prudent to continue to drive the PP IRT's work to completion while a review of GDPR's impact is underway concurrently. We expect to complete this review by the end of June.

In regards to AFAV, I note that the need for data accuracy in registration data is a common goal for all stakeholders, including registrars, and is also a fundamental requirement of GDPR. Once ICANN org and the AFAV working group complete the requirements and issue a request for proposal to assess the technical and commercial feasibility of the available solutions, we will be in a much better position to determine the ultimate outcome of this project.

Sincerely,

Akram Atallah  
President, Global Domains Division

cc: Mr. Dean Marks and Mr. Steve Metalitz, Counsel to Coalition for Online Accountability