

20th April 2018

FAO: Jaime Hedlund, SVP, ICANN Contractual Compliance

**Re: Request for postponement of 2018 Spring Audit of Registrars**

Dear Mr. Hedlund,

At the Contractual Compliance Registrar Outreach session at ICANN 61 in Puerto Rico, it was brought to the attention of the Registrar Stakeholder Group (RrSG) that this year's spring Compliance Audit of registrars was scheduled to be held in May 2018.

As you are no doubt aware, this falls precisely in the middle of GDPR implementation, which will be an enormous undertaking for registrars and require most of the resources that would normally be available to respond to an Audit. The RrSG is therefore formally requesting that Contractual Compliance postpone the audit scheduled for May 2018.

A discussion has already been held with the RrSG on what is a reasonable amount of time for registrars to be relatively clear of GDPR compliance demands. The general consensus was in support of ICANN Compliance holding a single, larger Audit round in the autumn of 2018, instead of holding an Audit in both spring (May or otherwise) and autumn.

The RrSG recognises that having single large Audit round will have a potentially significant impact on ICANN Compliance resources, but hope that the importance of GDPR to both the registrar industry and the wider ICANN community will warrant serious consideration of this proposal.

GDPR is likely to also have an impact on registrar contracts and that clarity on the matter may not be reached by autumn. Consequently, the RrSG would further like to formally request that discussions be held prior to the autumn Audit to ascertain whether GDPR compliance has altered typically audited activities and what changes may therefore be required of the Audit process itself.

The RrSG remains open to discussion on all of the above and is hopeful that a way forward that is agreeable for all parties can be reached.

Yours Sincerely,

Graeme Bunton  
RrSG Chair

Cc:

Cyrus Namazi - Vice President, Domain Name Services & Industry Engagement, GDD  
Jennifer Gore - Director, Registrar Services & Engagement