

Göran Marby
Chief Executive Officer
Internet Corporation for Assigned Names and Numbers
12025 E Waterfront Dr., Suite 300
Los Angeles, CA 90094

Dear Göran:

This letter follows ICANN's intention to create a "Temporary Specification" for registry and registrar compliance with the European Union's General Data Protection Regulation ("GDPR"). Contracted party registrars have been working on our own technical implementations for many months, as there was no guidance from ICANN regarding proposed or actual new policies. Any temporary specification adopted now that significantly deviates from previously held expectations and models will be far too late for us to accommodate for a May 25, 2018 implementation date.

For this reason, we ask that any temporary specification include a formal ICANN compliance moratorium, not shorter than six (6) months, providing us an opportunity to conform, to the extent possible, our GDPR implementation with the GDPR-compliant aspects of any ICANN temporary specification. We note that the six month timeline for implementation is a minimum and an estimate. Depending upon the scope and scale of changes, many registrars will need a longer period to implement any temporary specification imposed by the Board upon the community, and there should be an option for registrars to apply for an extension.

Very truly yours,
Graeme Bunton, on behalf of the following Registrars:

Endurance,
GoDaddy,
Tucows,
Blacknight,
1&1,
United Domains,
NetEarth One,
Cloudflare

Cc: Cherine Chalaby, Chair, ICANN Board of Directors,
Jamie Hedlund, SVP, Contractual Compliance & Consumer Safeguard