

8 March 2018

Roberto Viola, Director General, Directorate-General for Communications Networks, Content and Technology, European Commission

Re: Technical Input on Proposed WHOIS Models on behalf of the European Union

Dear Mr. Viola,

Thank you for your letter 7 February 2018. It has been published to our correspondence page [here](#). We also appreciated the [letter](#) sent from your European Commission colleagues sent on 29 January 2018. These communications have served as vital contributions to the discussion surrounding the public interest value of WHOIS, as well as the importance of ensuring compliance with the European Union's General Data Protection Regulation (GDPR).

The issues you raise in both your letter and that of your European Commission colleagues are critical to the discussions ICANN is undergoing with its other community members, including our contracted parties (domain name registries and registrars), as well as other interested stakeholders. It is also helpful as we engage with the relevant data protection authorities to find clarification on the points that you have raised.

As you know, because of ICANN's unique relationship with contracted parties, we need to address uncertainties related to the publication of registration data in the WHOIS services. As we work to ensure the organization's and its contracted parties' compliance with the law in time for the 25 May 2018 deadline, it is helpful to discuss the outstanding issues you outlined.

On 28 February 2018, we [published](#) new materials for discussion by the community. These included a [proposed interim model](#) for compliance with both the law and ICANN's contracts, as well as a [chart](#) comparing this interim model against other proposed models. We welcome your input on these documents, as well.

Again, your guidance on these matters has been very helpful. Thank you for your engagement on this important topic. We look forward to continuing these discussions with you over the coming weeks.

Thank you.



Göran Marby  
President and Chief Executive Officer  
Internet Corporation for Assigned Names and Numbers (ICANN)