

MEMORANDUM

To: Goran Marby, CEO
John Jeffrey, General Counsel
Internet Corporation for Assigned Names and Numbers

From: Fred Felman

Date: January 10, 2018

Re: Proposed Interim *ICANN Redaction Model* to address General Data Protection Regulation (GDPR)

I respectfully submit the attached proposal for compliance with the European Union's General Data Protection Regulation (GDPR).

I believe this ***ICANN Redaction Model*** is a model worthy of consideration and evaluation. It is easily implementable, limits changes to the existing system while remaining compliant with GDPR, would minimize the cost and operational impact for registrars and registries, centralizes the consent and gating processes, and most importantly, can be successfully implemented prior to the compliance deadline.

This proposal was developed quickly to meet the Jan 10th deadline to contribute to the dialogue on this issue. It will likely need updating based on community feedback if there is interest in the general approach suggested.

By way of credentials, I offer more than 25 years of experience in DNS work, from building high tech businesses, brands and categories to working with global brands and enterprises within the ICANN arena. For example, in one of my previous positions I managed the Internet governance policy function at MarkMonitor, where I participated in ICANN's policy processes as a member of the Business Constituency and oversaw a team that also participated in the Intellectual Property Constituency and the Registrar Stakeholder Group.

Following 10+ years of experience working with registrars, registries, global brands, security professionals, the ICANN organization and the broader ICANN community, I believe this proposal is a model worthy of careful evaluation.

Thank you for your consideration.