

**From:** "Chen, Tim"  
**Date:** Wednesday, April 10, 2019 at 10:42  
**To:** "[gdpr@icann.org](mailto:gdpr@icann.org)" <[gdpr@icann.org](mailto:gdpr@icann.org)>  
**Subject:** [Ext] comment on the TSG draft

Hi Ram/TSG Team,

I briefly reviewed the TSG document and had only this one comment if useful: It regards Section 4.1 "User Journey".

This section does not really seem to represent a typical user journey. I would go so far as to say Section 4 doesn't seem to have the same thoroughness as the rest of the document.

The typical User Journey to me might be something like this:

- User needs access to non-public Whois data on one or more domains for legitimate purpose
- User discovers ICANN service
- User applies for credentials, and is able to understand what evidence is needed and how to apply and how long that process takes.
- User applies.
- User receives credentials or a rejection or redirect in a reasonable amount of time (I'd prefer to be specific here)
- User is made aware of what materials he/she needs to submit for a properly formatted request for non-public registration data
- User uses credentials in concert with specific investigation materials to request non-public Whois data on one or more domains
- User receives non-public Whois data or a rejection or redirect in a reasonable amount of time (I'd prefer to be specific here)

The TSG should consider either re-writing the User Journey to be consistent with the level of detail and quality in other parts of this 22 page document, or delete it. What exists there now is actually damaging bc it seems to be an incomplete and somewhat random list of a very small number of actions that *may* be part of this service. For example:

- correlation is not more than a possible future concept at this point, yet it is one of four bullets here.
- "was the name just registered" ? Create Date is still in public Whois I believe. Therefore this is not a likely query for this service or at a minimum can be accomplished outside of this service.
- the term 'abusive registrant' is not a defined term and lacks any context or specificity. Certainly it is something a user might pursue but there are many such concepts that would fall in this category, most of which are not listed in 4.1.

If 4.1 is supposed to be just a few examples of certain query types or 'user journeys' that may be supported, fine. But make that clear. What is there right now certainly does not seem to be a "User Journey" nor the most common use case.

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