

**From:** Anthony Eden  
**Date:** Wednesday, March 14, 2018 at 10:14  
**To:** "gdpr@icann.org"  
**Subject:** [Ext] Question on latest model

Section 7.2.8.1 of the latest GDPR compliance model  
(<https://www.icann.org/en/system/files/files/gdpr-compliance-interim-model-08mar18-en.pdf>[\[icann.org\]](#)) states:

Registrars must provide registrants the opportunity to opt-in to publication of full contact details in the public WHOIS.

Is there a reason this is a MUST instead of a MAY? In the community that we service there is very little likelihood that they will want to opt-in to publishing their full data if the required data is sufficient.

Thank you.

Sincerely,  
Anthony Eden

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