

## MEMORANDUM

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

From: Fred Felman

Date: January 25, 2018

Re: Comment Period Extension: Proposed Interim Models to address General Data Protection Regulation

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I respectfully request that ICANN allow for an additional 14 days for the community to respond and consider both the interim GDPR models proposed by ICANN (<https://www.icann.org/en/system/files/files/interim-models-gdpr-compliance-12jan18-en.pdf>), and, the proposals made by community participants (<https://www.icann.org/resources/pages/gdpr-legal-analysis-2017-11-17-en>).

The time period allotted for comment is simply too short for meaningful understanding, consideration, analysis and feedback from the ICANN community.

While I understand that the period for implementation is short, I ask that the deadline for comments be extended until 14, February, 2018.

Extension of the comment period will give the community enough time to make implementation recommendations that meet compliance requirements, minimize resources for implementation, and, potentially enjoy broader community support.

Thank you for your consideration,

Frederick Felman