

**From:** "Ducos, Sebastien"

**Date:** Wednesday, January 10, 2018 at 18:04

**To:** "gdpr@icann.org"

**Subject:** [Ext] Comment on the "Layered Access Approach"

Dear ICANN Team,

Please receive the comment from the geoTLD.group on the "Layered Access Approach" described in Part 3 of the Hamilton legal analysis.

The geoTLD.group thinks that a Layered Access Approach or Tiered Access, which will allow protecting private data from public view while making it available to Authorised Parties, is a relevant solution to GDPR in our industry.

We view the definition of Authorised Parties as an issue to be resolved and welcome community input on the matter.

Kindly,

**Sebastien Ducos**  
**GeoTLD Group - Chair**