

From: "Taylor, David"
Date: Friday, January 26, 2018 at 10:45
To: "gdpr@icann.org"
Subject: [Ext] Hogan Lovells question re GDPR

To: Goran Marby, CEO
John Jeffrey, General Counsel
ICANN

Dear Goran dear John

We have provided comments on the 3rd Hamilton memo as requested by 10 January 2018. We note the publication of the three interim GDPR models proposed by ICANN on 12 January with a request for comments by 29 January (effectively 10 working days). We were surprised by the short period between the close of comments and the publication of the three interim models namely 2 days.

We are considering these three models and preparing comments and have also partaken in the recent discussions including the ICANN IPC and ICANN BC Whois/GDPR event of 24 January. These are, as you know, very complex issues, and the potential consequences and ramifications of getting things wrong on cyber security, abuse, consumer protection and intellectual property investigations are considerable.

10 working days to digest and meaningfully comment on these 3 ICANN interim models as well as the 5 Community models is simply too short to do it properly and thus it inherently leads to rushed judgments and conclusions and is counterproductive to finding consensus and broad community support. We would thus ask for the deadline to be extended by a further 10 working days at the very least, thus until 12 February 2018. This would also allow 5 working days to enable feedback to be given after the newly announced webinar on 2 February 2018.

Yours sincerely

David Taylor
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