

From: "Brian J. Winterfeldt"

Date: Tuesday, February 27, 2018 at 9:01 AM

Subject: RE: [Ext] Update re IPC/BC Representative Discussions with Contracted Party Representatives and Forthcoming Input to ICANN

Dear Göran, Akram, and John,

Attached please find a joint IPC/BC document that provides input on key issues and concerns with the proposed ICANN interim compliance model based on our prior discussions of this model.

To briefly summarize, this document highlights the following model elements / issues where we believe the IPC and BC views diverge from what is currently presented (or omitted) in the ICANN model:

1. Territorial scope
2. Scope of application to natural vs. legal persons
3. Non-publication of Registrant email address
4. Self-certification/accreditation issues
5. Data accuracy
6. Bulk / aggregated data access

Each section provides our specific comments as well as citations and links to prior input which we believe ICANN should note in connection with our stated views. As you will recall, we had offered to provide this kind of input when we spoke on Friday February 16, 2018.

We note that the IPC and BC membership raised no objections to the content of the document. However, we note that the section on self-certification/accreditation was added pursuant to IPC members' suggestions, and there was not sufficient time to obtain formal BC endorsement of that specific section after re-circulating the updated draft last night. Therefore, that section specifically should be attributed only to the IPC. Otherwise, the document should be considered joint input of both the IPC and BC.

As previously mentioned, we understand that ICANN anticipates formally publishing its draft interim compliance model shortly. We hope ICANN will review and consider the attached input prior to publication. Of course, this document should serve as input in further refining the model in any case, and we will anticipate providing any further input once the draft model is formally published.

Best regards,

Brian