Registration Data Policy for All gTLDs - EPDP Phase 1 Implementation

Policy Stages

Prepare → Plan → **Analyze and Design** → Implement → Support and Review

Latest Update:

The EPDP Phase 1 Implementation Project Team (IPT) has finalized the policy language for the Registration Data Policy for publication. However, the publication has been placed on hold due to the letters to the ICANN Board from the GAC and Registrars Stakeholder Group concerning the Urgent Request response timelines outlined in the policy.

Description and Scope:

On 4 March 2019, the GNSO Council adopted the Expedited Policy Development Process (EPDP) on gTLD Registration Data Team's Phase 1 Final Report. Following a Public Comment period, the ICANN Board passed a resolution on 15 May 2019 to authorize the implementation of 27 of the 29 recommendations contained within the Report. Of the two recommendations not adopted in full, the Board identified portions of the recommendations that require further consultation with the GNSO (see the ICANN Board's scorecard for the EPDP's Phase 1 recommendations here).

ICANN org implemented the Interim Registration Data Policy for gTLDs pursuant to the Board's 15 May 2019 resolution. The interim policy maintains requirements from the Temporary Specification for gTLD Registration Data, which detailed how registries and registrars must handle gTLD registration data as a result of privacy legislation, and which expired on 20 May 2019. The implementation is currently engaged in analysis of the recommendations to produce an implementation plan to be published for public comment.

The EPDP Team completed the Phase 2 of their work and published the final report consisting of 22 recommendations. A subset of the recommendations termed "Priority 2" are related to the EPDP Team's Phase 1 work on the Temporary Specification for gTLD Registration Data. On 21 June 2021, the Board adopted the Recommendations 19-22 and the implementation of these recommendations were added to Registration Data Policy Implementation scope of work. On 24 February 2022, the Board adopted the GNSO Council's Supplemental Guidance on EPDP Recommendation 12, concerning the deletion of registrant data in the Organization field as it addresses the Board's overarching concern of loss of essential data.

The Registration data Policy implementation plan encompasses 34 policy recommendations from the following three ICANN Board Resolutions:

- EPDP Phase 1: Board Resolution in May 2019 (29 recommendations)
- EPDP Phase 2: Board Resolution in June 2021 (4 recommendations)
- Supplemental Recommendation 12: Board Resolution in February 2022 (1 recommendation)

The implementation plan includes:

- Draft policy language for Registration Data Policy
- Revisions to 20 impacted policies and procedures
- A new policy advisory to replace the existing advisory
- Revised Registration Data Access Protocol (RDAP) Technical Implementation Guide
- Registration Data Access Protocol (RDAP) Response Profile

ICANN org worked on the implementation plan with support from an Implementation Review Team (IRT) consisting of members of the PDP Working Group and interested community members, in line with the Consensus Policy Implementation.

A Public Comment period for the Registration Data Policy implementation plan opened on 24 August 2022, and closed on 5 December 2022. The EPDP Phase 1 Implementation team published a Public Comment Report summarizing 269 comments received from 14 commenters on 20 January 2023.

On 28 April 2023, ICANN org published a report titled ICANN org Review of Public Comments on the Registration Data Policy Implementation wiki. In addition to publishing on the Registration Data Policy Implementation wiki, ICANN org published *ICANN org Review of Public Comments* as an addendum to the Public Comment Report on 1 May 2023.

The report was a result of the EPDP Phase 1 Implementation project team's (IPT) review of all Public Comment input received and organized comments into the following sections:

- Major themes of comments received.
- Specific comments considered that did not result in changes to the draft Registration Data Policy and/or Redlined Policies and Procedures.
- Specific comments that resulted in changes to the draft Registration Data Policy and/or Redlined Policies and Procedures.

Along with the Public Comment Report Addendum, the IPT published an updated redline of the Registration Data Policy reflecting the changes resulting from Public Comment, along with the revised redline for the Uniform Rapid Suspension System (URS) Procedure policy, and Additional WHOIS Information Policy (AWIP), which were updated based on the input received during the Public Comment period.

Composition

Project Sponsor: Karen Lentz

Project Manager: Dennis Chang

Council Liaison: Sebastien Ducos

 # Participants: 37 Participants (link)

 # Observers: 36

Tools: Mailing List / Meeting Schedule / Wiki

Deliverables Progress*

- Complete
- In Progress

11%

89%
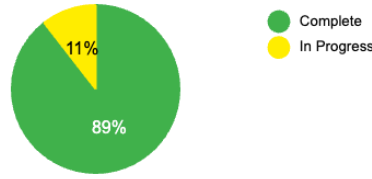
The deliverables for this project include all items needed to announce the Registration Data Policy effective date. Please note the deliverables reflected in this chart are not weighted.

Resources

- EPDP Team Charter
- 2013 RAA
- GNSO EPDP on the Temporary Specification for gTLD Registration Data
- EPDP Phase 1 Final Report
- EPDP Phase 2 Final Report
- Implementation Phase 1 Wiki
- EPDP Wiki
- Interim Registration Data Policy for gTLDs

Breakdown of Work

Implementation Status

Start Date: 20-May-2019

End Date: 11-February-2025

Review Duration to Date: 52 Months

**Total Expected Duration:** View Timeline

Total Progress

88%

| 0% | 20% | 40% | 60% | 80% | 100% |

Phase Progress

Prepare*	Plan	Analyze and Design	Implement	Support and Review*

Complete   **In Progress**   **Not Started**

Prepare*

100% Complete GDS monitors policy development progress and engages with Working Group

100% Complete GDS provides input on GNSO PDP Initial Report.

100% Complete GDS prepares materials for Board consideration

The Prepare phase reflects work done in the Policy Development Process (PDP)

Plan

100% Complete Policy and GDS staff arrange for the recruitment of the IRT

100% Complete GDS staff are handed off the Consensus Policy recommendations for implementation

100% Complete GDS organize activities to implement Policy recommendations.

100% Complete GDS draft and post implementation project plan.

Analyze and Design

95% Complete Reports & Studies

100% Complete Review Consensus Policy impact on existing policies and procedures

100% Complete Finalize Draft Registration Data Policy Language for Public Comment

85% Complete Data Processing Terms with Contracted Parties

50% Complete Data Processing Terms with Third Parties

Implement

100% Complete Announce Policy Effective Date

40% Complete Develop education and outreach materials

0% Complete Conduct outreach to Contracted Parties

0% Complete Consensus Policy becomes effective

Support and Review*

Continuous improvement and measure of policy effectiveness

Formal review

Post-Implementation Policy Status Report

The Support and Review stage includes ongoing activities that continue after implementation of the policy is complete

Member Participation and Composition

IRT Member Affiliations
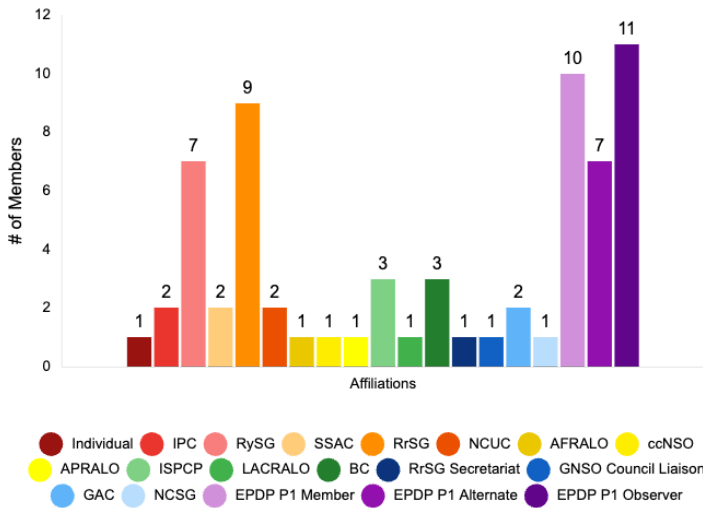
Volunteer Participation Rate*
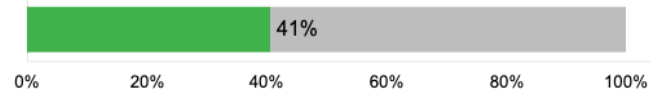
*Volunteer Participation Rate is calculated based on the total number of invitations for IRT members to participate in meetings divided by the number of times meetings were attended by individual IRT members.

Hours Worked*

Face to Face Meetings:	7 Meetings
Calls:	77 Calls
Volunteer Meeting & Call Time:	120 Hours
Personnel Support Time:	749 Hours

*Hours worked is calculated based on time spent in project meetings