



30 November 2021

Addendum to SAC118v2: Additional Rationale for Recommendation 3C

In SAC118v2, recommendation 3C states:

“To achieve policy objective (A2), additional research is needed on the methods, their efficacy, and their tradeoffs. We recommend the EPDP Phase 2A not specify a method for correlating registrations with a common contact at this time.”

Upon further review, it appears that the rationale for such a recommendation was not clear enough. The SSAC would like to add the following rationale to complement the recommendation:

With respect to policy objective (A2), there is no clear way to use publicly accessible pseudonymized email addresses to achieve correlation across registrations. Proposed approaches appear to be unlikely to work across registrars. Further, they may also expose personally identifiable information and thus violate the intent of using pseudonymized email addresses. We recommend the EPDP Phase 2A not specify a method for correlating registrations with a common contact at this time. Instead, we suggest a much stronger approach for matching registrations to the same registrant is to develop a service that uses trusted access to the entire corpus of registration data to achieve this level of correlation.