



Public Comment on Priority 2 Policy Recommendations for ICANN Board Consideration from EPDP Phase 2

The Internet Infrastructure Coalition (i2Coalition) appreciates the opportunity to comment on Priority 2 Policy Recommendations for ICANN Board Consideration from EPDP Phase 2.

The i2Coalition's diverse membership represents both large and small Internet infrastructure providers such as web hosting companies, software services providers, data centers, registrars and registries. The i2Coalition has several key goals within ICANN, but chief among them is continuing to build a voice for underrepresented parts of the Internet ecosystem – in particular web hosts, data centers and cloud infrastructure providers – and ensuring that accountability and transparency are paramount. The i2Coalition brings unique representation to ICANN as it is made up of companies representing the broad ecosystem of Internet infrastructure companies.

Comments on Recommendations

Specifically, the i2Coalition would like to submit comments on two of the four recommendations, number 20 and number 21.

On recommendation #20, while unlikely to have any practical effect, given that the status quo for contracted parties is to redact the field, the i2Coalition supports the change from MUST to MAY in the city field, as each registrar and registry can make a choice.

The i2Coalition generally supports recommendation #21. The recommendation sets up a minimum retention time for specific data required for the TDRP, and makes it clear that each contracted party can make their own determination to extend retention requirements beyond the data needed for the TDRP. However, i2Coalition would like to

ask for clarification on ICANN Compliance being deemed merely a Requestor, wherein many can and have concluded ICANN to be a controller or a joint controller. We believe that determination from ICANN on this aspect would be beneficial to the community.

Concluding Comments

Thank you for the opportunity to comment. We look forward to continuing to work with the group as it moves toward finalizing its work.