**Public Comment Review Status 18 January 2019**

| **Purpose / Recommendation #** | **Cat** | **To be reviewed** | **Completed** | **Notes** |
| --- | --- | --- | --- | --- |
| Purpose 1 - Establish the rights of a Registered Name Holder | 1 | **√** |  | Awaiting final language and workbooks from RySG; determine if ‘rights/obligations’ is required |
| Purpose 2 - Maintaining SSR through enabling of lawful access | 3 |  | **√** |  |
| Purpose 3 - Enable communication with RNH | 1 |  | **√** |  |
| Purpose 4 - Safeguarding RNH's Registration Data | 1 |  | **√** |  |
| Purpose 5 - Handling Contractual Compliance | 2 |  | **√** |  |
| Purpose 6 - Resolution of DRPs | 2 |  | **√** |  |
| Purpose 7 - gTLD registration policy eligibility criteria | 3 |  | **√** |  |
| Recommendation #1 –Purposes for collecting |  | **√** |  | Recommendation to be drafted to refer moving Purpose O and ARS to phase 2 with required legal research (I.e., can Purpose O and ARS be included in Purpose 2?); in addition, does disclosure of personal data based on Consent required an additional purpose? |
| Recommendation #2 - Commitment to consider a system for Standardized Access to non-public Registration Data | 3 |  | **√** |  |
| Recommendation #3 - Requirements related to accuracy | 3 | **√** |  | Review input provided during public comment; complete prior discussion that did not reach conclusion |
| Recommendation #4 - Data elements to be collected by Registrars (incl. Question #2) | 4 | **√** |  | Review input provided during public comment and recommend changes, if any, to original recommendation; in addition (1) settle issue of whether regitrars should be required to offer the ‘optional’ Techical Contact fields; (2) Alan G recognized that elimination of the Admin Contacts can affect older registrations that included no name for the RNH. James ladel to address this issue. |
| Recommendation #5 - Data elements to be transferred from Registrars to Registries | 3 | **√** |  | Review input provided during public comment; amend, if necessary, the recommendation and inform the small data elements review team of pertinent public comment or plenary conclusions |
| Recommendation #6 - Escrow Providers | 2 | **√** |  | Public comment review completed, small team to review data elements workbooks |
| Recommendation #7 – Contractual Compliance | 3 | **√** |  | Clarifications have been suggested and to be drafted by Support team; EPDP Team to review the updated language and determine if ICANN input is required. |
| Recommendation #8 – Redaction | 3 | **√** |  | “City” data element to be considered – consider (a) ICANN Org response to our question; (2) email from Milton citing authority. (3) consider asking Legal Counsel. |
| Recommendation #9 – Organization field | 3 | **√** |  | Agreement in principle: final language to be developed and reviewed by EPDP Team |
| Recommendation #10 – Email communication | 2 | **√** |  | Agreement in principle: final language to be developed and reviewed by EPDP Team |
| Recommendation #11 - Data retention | 2 | **√** |  | Use Email thread to determine justification in ICANN policy on data retention period |
| Recommendation #12 - Reasonable access | 2 | **√** |  | Small team working on possible language to address concerns. Confirm outcome via email thread? |
| Recommendation #13 - Controller Agreement | 2 | **√** |  | Use email thread to aim to close on small group language |
| Recommendation #14 - Responsible parties | 2 | **√** |  | Public comments to be reviewed, to review in conjunction with data elements workbooks; resolve the legal basis 6(1)b vs 6(1)f discussion; consider the ‘no-third party beneficiary’ proposed statement in relation to this Recommendation |
| Recommendation #15 - URS / UDRP | 1 |  | **√** |  |
| Recommendation #16 - Instructions for RPM PDP WG | 1 |  | **√** |  |
| Recommendation #17 - Input from RPM PDP WG to inform subsequent access discussion | 1 |  | **√** | Eliminate Recommendation, turn into action item |
| Recommendation #18 - Data processing agreements with dispute resolution providers (incl. Question #4) | 1 |  | **√** |  |
| Recommendation #19 - Transfer Policy | 1 |  | **√** |  |
| Recommendation #20 - Input to Transfer Policy review (incl. Question #5) | 1 |  | **√** |  |
| Recommendation #21 - Data processing agreements with non-Contracted Party entities involved in registration data processing | 1 |  | **√** |  |
| Recommendation #22 - Impact on other policies | 1 |  | **√** | To be revisited at the end of the process – add TDRP |
| General Comments |  | **√** |  | To review input provided during public comment |
| Implementation Transition Period |  | **√** |  | Principle agreement. Language to be reviewed by EPDP Team and confirmed by CPH. |

**Proposed Categorization**:

1. **Purposes / Recommendations that appear to enjoy broad support, with minor edits suggested**

* Purpose 1 - Establish the rights of a Registered Name Holder
* Purpose 3 - Enable communication with RNH
* Purpose 4 - Safeguarding RNH's Registration Data
* Recommendation #15 - URS / UDRP
* Recommendation #16 - Instructions for RPM PDP WG
* Recommendation #17 - Input from RPM PDP WG to inform subsequent access discussion
* Recommendation #18 - Data processing agreements with dispute resolution providers (incl. Question #4)
* Recommendation #19 - Transfer Policy
* Recommendation #20 - Input to Transfer Policy review (incl. Question #5)
* Recommendation #21 - Data processing agreements with non-Contracted Party entities involved in registration data processing
* Recommendation #22 - Impact on other policies

1. **Purposes / Recommendations that have support, but where some edits are suggested that may result in broad support**

* Purpose 5 - Handling Contractual Compliance
* Purpose 6 - Resolution of DRPs
* Recommendation #6 - Escrow Providers
* Recommendation #10 - Email communication
* Recommendation #11 - Data retention
* Recommendation #12 - Reasonable access
* Recommendation #13 - Controller Agreement
* Recommendation #14 - Responsible parties

1. **Purposes / Recommendations were significant concerns and/or opposition has been expressed**

* Purpose 2 - Maintaining SSR through enabling of lawful access
* Purpose 7 - gTLD registration policy eligibility criteria
* Recommendation #2 - Commitment to consider a system for Standardized Access to non-public Registration Data
* Recommendation #3 - Requirements related to accuracy
* Recommendation #5 - Data elements to be transferred from Registrars to Registries
* Recommendation #7 - Contractual Compliance
* Recommendation #8 - Redaction
* Recommendation #9 - Organization field

1. **More detailed examination needed as it includes several layers of responses**

* Recommendation #4 - Data elements to be collected by Registrars (incl. Question #2)