RECOMMENDATION 10

In relation to facilitating email communication between third parties and the registrant, the EPDP Team recommends that current requirements in the Temporary Specification that specify that a Registrar MUST provide an email address or a web form to facilitate email communication with the relevant contact, but MUST NOT identify the contact email address or the contact itself, remain in place.

Disclaimer: *This overview has been developed to facilitate the EPDP Team's consideration of the concerns expressed and possible updates to the recommendations. However, this does not replace the EPDP Team's obligation to review all input received in full and to indicate if any concerns in this overview have inadvertently been mischaracterized.*

Noted Concerns

Concern	Corresponding PCRT Comment #	Further Discussion Required?
Email communication should be deleted from this recommendation as registrars could implement web contact forms or alternate communication methods rather than "relay" email addresses, as the later will become compromised rapidly following their publication.	6, 7, 9, 11, 12, 13 (GoDaddy, RrSG, Volker Greimann, ECO, ISPCP, Michele Neylon, Domain Name Rights Coalition, RySG)	Yes/No
Strongly resist any suggestion as to the necessity of the Registrar in 'confirming' delivery. Such a 'service level' approach is unrealistic, and this recommendation, at its highest must be only taken as a 'pass on' requirement and should not give rise to any unreasonable expectations on the registrars to 'verify' receipt of such a communication.	13 (RySG)	Yes/No
GDPR is for the protection of data privacy of individuals, not commercial operations. Where a domain is obviously being used for commercial purposes, there should be full transparency on contact email address.	14 (VAP)	Yes/No

It exceeds ICANN's purview to require that registrars operate an email service, be it forwarding or a web form that transmits to the RNH via email. The Security, Stability, and Resilience of the Domain Name System can be maintained without giving all Internet users the ability to contact all gTLD domain owners. This functionality should be optional for registrars to provide, if not entirely removed from ICANN's contractual requirements.	15 (Tucows)	Yes/No
No one knows if the messages are getting sent on to the registrants. So while there's a requirements no one knows if its working or if its enforceable (or if compliance work is being executed). As a result contactability (for UDRP, abuse, etc.) is possibly crippled. [Registrars should be required to ensure that the anonymized email address or web form contact, in fact, reaches the Registrant. Third parties looking to reach a Registrant often do not know if an anonymized email or web form reached the Registrant, or if the Registrant is simply ignoring the communication.]	16, 26 (iThreat, INTA)	Yes/No
Oppose redaction of the Email field without a suitable replacement. It is important to ensure that another universal, cross-TLD identifier, whether generated through anonymization or tokenization, exist in its place. An email form is not suitable for cybersecurity purposes.	17 (Europol AGIS)	Yes/No
Registrants need to be able to opt-out of this, and be able to show their own identity and email address. A registrant that wishes to display their contact information should be allowed to do so.	18, 21, 25 (George Kirikos, ALAC, Tim Chen)	Yes/No
A registrar's systems may be less reliable than that of a registrant, and a registrant shouldn't be forced to have their inbound communications be intercepted by the registrar's systems.	18 (George Kirikos)	Yes/No
At minimum, the community must implement an effective and standardized method for replacing the email address with a pseudonymized email. Such a pseudonymized email would redact personally identifiable information by providing a unique, registrant-	19, 22 (BC, IPC)	Yes/No

specific replacement address. \This policy, in the context of the balancing exercise under 6(1)(f) GDPR, would grant reasonable latitude to legitimate third party interests and provide a reliable method of contact that would further allow for indexing such a contact to multiple domain names registered to the same person or entity.		
Creating an anonymized DNS-wide identifier has not yet been reduced to practice, and may not be available in the desired timeframe. As a result, the original email addresses remain the best mechanism for contacting and identifying bad actors who operate across several registrars. Web forms do not function as a unique identifier as an email address does, and do not provide the same delivery notices or read notices. When web forms are offered, they must not impose unreasonable and unrealistic character limits	20, 22, 23 (Microsoft, IPC, MarkMonitor)	Yes/No
The Registrant's e-mail address should not be redacted and that it be validated by the registrar and made publicly available	24 (Coalition for Online Accountability)	Yes/No