

RECOMMENDATION 15

The EPDP Team recommends that for the new policy on gTLD registration data, the requirements of the Temporary Specification are maintained in relation to URS and UDRP until such time as these are superseded by recommendations from the RPMs PDP WG (if any).

***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?
Support purpose, but do not support the idea of disclosure of RNH data prior to the filing of a UDRP dispute.	2 (Tucows)	Yes/No
Support purpose, but the URS/UDRP has become more onerous. It would be exceedingly useful if, as part of a UDRP or URS filing, registries or registrars could somehow provide a list of all domains registered to that same respondent as part of the registrant information disclosure process, to solve the reverse WHOIS problem. This would not disclose any more personal data than has already been disclosed about the registrant, but could present other challenges – we suggest this approach be further considered within the EPDP and/or the RPM Review PDP.	3, 5, 8, 11 (IPC, MarkMonitor, INTA, Microsoft, BC)	Yes/No
Rather than trying to modify additional policies via the EPDP, we should leave the temporary specification in place and allow the GNSO’s Rights Protection Mechanism PDP to take up the other issues. The extent to which these policies are addressed here should be limited to the extent to which gTLD Registration Data is processed within the context of DRP proceedings.	4, 6 (NCSG, Internet Governance Project)	Yes/No

Necessary data processing agreements must be in place before data is transferred to the dispute resolution providers.	7 (RySG)	Yes/No
The URS Rules require amendment, e.g., “examiner” should be “provider”.	9 (MFSD)	Yes/No