

RECOMMENDATION 19

The EPDP Team recommends that for the new policy on gTLD registration data, the requirements of the Temporary Specification are maintained in relation to the Transfer Policy until such time these are superseded by recommendations that may come out of the Transfer Policy review that is being undertaken by the GNSO Council.

***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?
Under the Temp Spec, if the Gaining Registrar is unable to gain access to then-current Registration Data for a domain name subject of a transfer, the Gaining Registrar is no longer required to obtain a Form of Authorization from the Transfer Contact. This weakened protections against hijackings. Instead: any registrar with an auth_info code MUST be able to obtain the registrant contact data via EPP from the registry. That is GDPR-compliant, because the registrant has given the gaining registrar permission to access the data. The GNSO Council needs to move this along, and the GDPR is a good spur.	4 (iThreat Cyber Group)	Yes/No