**PURPOSE 3 –** (Small Team B output – 8 January 2019)

Enable communication with and/or notification to the Registered Name Holder and/or their delegated agents of technical and/or administrative issues with a Registered Name

***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 #** | **Proposed EPDP Team Response to concerns** | **Proposed modification / rewording for EPDP Team Consideration** |
| Excessive wording – purpose should be simplified | 7, 8, 9  (Blacknight, GoDaddy, Key-Systems, RrSG) | The EPDP considered like comments such as “issues” use in general and specificity of said issues. Also the use of “designated agent” is less clear under GDPR and the same purpose would apply to delegated agents if the RNH is legally allowed to do so. | "Enable communication with the Registered Name Holder on matters relating to the Registered Name. " |
| Delegated agents should be removed from this purpose | 10, 11, 13  (Association of the Internet Industry, ISPCP, RySG) |
| Legal issues should be added to this purpose (note: one in favor of adding legal issues advocates for the deletion of administrative issues as this term is vague) | 12, 14, 15, 19, 20, 21, 22, 24, 25  (Leap of Faith Financial Services Inc, IPC, Coalition for Online Accountability, INTA, MarkMonitor, MPAA, Microsoft, The Walt Disney Company, BC) |
| Registries/Registrars should endeavor to reach the RNH directly as the process of delegating an agent is sometimes done carelessly | 16  (Internet Society India Chennai) |
| Purpose should be modified since there may not be a tech/admin contact (and rec. 4 would essentially do away with collection of tech/admin contacts) | 18, 23  (Tucows, SSAC) |
| Billing issues should be added to this purpose | 17  (GOVERNMENT OF INDIA) | Billing is not a purpose that of ICANN but more of a Registrar’s purpose. Thus, not a part of the EPDP’s scope. | None |
| This purpose should be deleted as a refinement of Purpose 1 would encompass communication to the RNH | 27  (John Poole; Domain Name Registrant) | The EPDP disagreed in that this purpose is needed to allow for communications with the RNH which is separate and distinct from the RNH establishing his/her right in use of the domain name. | None |