**Recommendation #10 – Email Communication**

This update to Recommendation 10 seeks to retain the agreed upon language developed during the meeting in Toronto and also addresses comments on the email list. In some cases, the “Toronto language” was edited out or added to in the email list without rationale. In those cases, we attempted to strike a balance by retaining most of the suggested language but by separating the Recommendations from the informational “notes” that accompanied those recommendations. In that way, the Recommendations are clear and the implementation team can take the notes into account as it sees fit.

In addition, we took on board the comments in the recent EPDP Team meeting and avoided incorporating Temporary Specification sections by reference but rather used the specific language in the Temporary Specification that we chose to include in our recommendation.

We also noted the recent SSAC intervention on this topic in the email list and suggest that we retain the language below (that was written in days prior to receipt of the SSAC email). The group should consider whether the SSAC points are addressed by Purpose 5 (Compliance), Recommendation 3 (Whois Accuracy) and the current RAA, which remains in force unless amended as a result of the policy recommendations of this EPDP. In addition, the Recommendation below describes the issues with web forms or pseudonymized email addresses that are also raised in the SSAC email and suggests the issue should be investigated.

**Originally proposed language**

1) In relation to facilitating email communication between third parties and the Registered Name Holder, 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.

2) The EPDP Team recommends Registry Operators and Registrars MUST maintain Log Files associated with the transmission of email communications between the Registry Operator/Registrar and the Registered Name Holder.

3) The EPDP notes operational difficulties having to do with contacting registered name holders through webforms (where there is no confirmation that the message sent was received) and pseudonymized email addresses (that often can be readily "hacked" to discover the identity of the addressee), and recommends the GNSO Council initiates work to develop a reliable, safe ways of contacting registrants in cases where their email cannot be displayed.

**Newly proposed language (redline)**

1) The EPDP Team recommends that the 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.

Note: This matches the requirements inSection 2.5.1 of Appendix A tothe Temporary Specification

2) The EPDP Team recommends Registrars MUST maintain Log Files, which shall not contain any Personal Information, and which shall contain confirmation that a relay of the communication between the requestor and the Registered Name Holder has occurred, not including the origin, recipient, or content of the message.

Note: The EPDP notes operational difficulties having to do with contacting registered name holders through webforms (where there is no confirmation that the message sent was received) and pseudonymized email addresses. **Therefore, the registrar cannot be reasonably expected to confirm, or attempt to confirm by any means, the receipt of any such relayed communication.** It is recommended the GNSO Council initiates work to develop a reliable, safe ways of contacting registrants in cases where their email cannot be displayed.

**Newly proposed language (clean)**

1) The EPDP Team recommends that the 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.

Note: This matches the requirements inSection 2.5.1 of Appendix A tothe Temporary Specification

2) The EPDP Team recommends Registrars MUST maintain Log Files, which shall not contain any Personal Information, and which shall contain confirmation that a relay of the communication between the requestor and the Registered Name Holder has occurred, not including the origin, recipient, or content of the message.

Note: The EPDP notes operational difficulties having to do with contacting registered name holders through webforms (where there is no confirmation that the message sent was received) and pseudonymized email addresses. Therefore, the registrar cannot be reasonably expected to confirm, or attempt to confirm by any means, the receipt of any such relayed communication. It is recommended the GNSO Council initiates work to develop a reliable, safe ways of contacting registrants in cases where their email cannot be displayed.