**Recommendation 10 – Email Communication**

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, ***unless as per Recommendation X, the Registered Name Holder has provided consent for the publication of its email address***.

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. ***Such records will be available to ICANN for compliance purposes, upon request. Nothing in this recommendation should be construed to prevent the registrar from taking reasonable and appropriate action to prevent the abuse of the registrar contact process.***[[1]](#footnote-1)

Note: in relation to 1), this matches the requirements in Section 2.5.1 of Appendix A to the Temporary Specification

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. ***The EPDP notes that the GNSO Council may choose to consider further work on a potential method for*** ***safely and reliably*** contacting registrants in cases where their email cannot be displayed.

***Note: In response to the SSAC’s feedback regarding verification of bounced email notifications, Recommendation 3 of the EPDP Team’s Final Report specifically provides that the EPDP Team’s work shall not affect the accuracy of registration data under the current ICANN contracts and consensus policies.***

***Accordingly, registrars are still required to reverify a registered name holder’s email address if the registrar receives information suggesting that the contact information is incorrect. This would include a bounced email notification or non-delivery notification message in response to a registrar-initiated communication. This requirement can be found in paragraph 4 of the Whois Accuracy Program Specification in the Registrar Accreditation Agreement.***

1. Examples of abuse could include, but are not limited to, requestors purposely flooding the registrar’s system with voluminous and invalid contact requests. This recommendation is not intended to prevent legitimate requests. [↑](#footnote-ref-1)