

Minority Statement of the Registrar Stakeholder Group (RsSG)

The EPDP Phase 2 Final Report represents the culmination of years of collaborative work among the ICANN Community. The RrSG continues to believe that it is in all our interests to create policies and a system which balance the registrar's data protection requirements with the needs of those who rely on access to non-public registration data for legitimate and lawful purposes.

Registrars have expressed significant concerns throughout this EPDP Phase 2 process with the legality, technical feasibility, and costs associated with developing, deploying, and operating the SSAD. While registrars are more supportive of some recommendations than others, the recommendations are all highly interdependent and must be considered holistically, and we recognize that the end result is greater than the sum of its parts.

Therefore, in the spirit of ongoing compromise with the interests of other stakeholders, we support the outcome of the EPDP Phase 2 and the recommendations of this Final Report, and we will comply with the resulting Consensus Policies.

We believe that the final recommendations provide sufficient guidance on which to base a standardized and predictable system, accommodating the recommendations of EPDP Phase 1 while also permitting the necessary flexibility for each registrar to implement their SSAD operations in a manner they determine to be in accordance with their often-multi-jurisdictional legal- and privacy-related obligations.

We urge the GNSO Council and ICANN Board to adopt all recommendations in the report, so that we can transition to implementation work and an expeditious launch of the SSAD.