**Proposed Text for De-accreditation**

At several points in its deliberations, the Working Group noted that there may be implementation challenges in applying accreditation standards to P/P service providers who are not Affiliated with an ICANN-accredited registrar.  Examples include the impact of registration transfer on P/P services; de-accreditation of proxy services; and the option to offer cancellation of a domain name registration in lieu of disclosure of customer information in response to a valid request.  While the WG believes that the accreditation policies it recommends are adequate to address these situations, it also recognizes that the implementation of these policies in the case of accredited service providers that are not Affiliated with ICANN-accredited registrars may require implementation adjustment.

*21. Regarding De-accreditation of a P/P Service Provider:*

The WG recommends that the following three general principles be adopted and followed when details regarding de-accreditation of a P/P service provider are developed during implementation by ICANN staff in consultation with a GNSO Implementation Review Team. These principles are based on the WG’s belief that customer privacy should be a paramount concern. As such, reasonable safeguards to ensure that a customer’s privacy is adequately protected in the course of de-accreditation of a customer’s P/P service provider – including when transfer of a customer’s domain name or names is involved – should be integral to the rules governing the de-accreditation process.

Principle 1: A P/P service customer should be notified in advance of de-accreditation of a P/P service provider. The WG notes that the current practice for registrar de-accreditation involves the sending of several breach notices by ICANN Compliance prior to the final step of terminating a registrar’s accreditation. While P/P service provider de-accreditation may not work identically to that for registrars, the WG recommends that ICANN explore practicable ways in which customers may be notified during the breach notice process (or its equivalent). In particular, the WG notes that, in view of the legitimate need to protect many customers’ privacy, the mere publication of a breach notice on the ICANN website (as is now done for registrar de-accreditation) may not be sufficient.

Principle 2: Each step in the de-accreditation process should be designed so as to minimize the risk that a customer’s personally identifiable information is made publicly.

Principle 3: The WG notes that the risk of inadvertent publication of a customer’s details in the course of de-accreditation may be higher when the provider in question is not Affiliated with an ICANN-accredited registrar. As such, implementation design of the de-accreditation process should take into account the different scenarios that can arise when the provider being de-accredited is, or is not, Affiliated with an ICANN-accredited registrar.

*22. Recommendation regarding the Inter-Registrar Transfer Policy*

Finally, the WG recommends that the next review of the IRTP should include an analysis of the impact on P/P service customers, to ensure that adequate safeguards are in place as regards P/P service protection when domain names are transferred pursuant to an IRTP process.