

R10.1 (Draft Report Version)

Recommendation R10:1 The Board should monitor the implementation of the PPSAI. In the event that the PPSAI policy does not become operational by 31 December 2019, the ICANN Board should propose an amendment to the RAA that Privacy/Proxy providers affiliated with registrars shall verify and validate underlying customer information provided to them in the same way as registrars are required to verify and validate other registration data.

Findings: The PPSAI PDP recommendations are expected to ensure the verification and validation requirements are expanded to also encompass the underlying registration details of privacy and proxy service providers. It is understood from review by the RDS-WHOIS2 Review Team of existing registrar practices that registrars often already include such processes even though there is no such requirement but this is not known to be a standard practice employed by all accredited registrars.

Rationale: In case the IRT does not result in policy, the policy loophole to the verification and validation of registration data would remain for registrations through such registrars that do not act in this manner and while ICANN would have no ability to enforce any such ability against nonaffiliated, non-accredited providers, the addition of such a requirement to the RAA could eliminate this issue for a large number of services.

R10.1 (Draft Report Version)

Impact of Recommendation: Ensure better data quality and contactability of the underlying contact owner for registrations using privacy services. Would require amending the RAA.

Feasibility of Recommendation: Amendment process of RAA is envisioned in the RAA itself. It would merely expand already existing practices to all registrations using registrar-affiliated privacy services.

Implementation: Use of the RAA amendment process by mutual agreement between ICANN and accredited registrars.

Priority: Low.

Level of Consensus: No objections.

R10.1 (FtoF4) – Redlined Version

Recommendation R10:1 The Board should monitor the implementation of the PPSAI. In the event that the PPSAI policy does not become operational by 31 December 2019, the ICANN Board **should ensure** ~~propose~~ an amendment to the **2013 RAA (or successor documents) is proposed** that **ensures that the underlying registration data of domain name registrations using Privacy/Proxy providers affiliated with registrars shall be verified and validated in application of the verification and validation requirements under the RAA unless such verification or validation has already occurred at the registrar level for such domain name registrations.** ~~underlying customer information provided to them in the same way as registrars are required to verify and validate other registration data.~~

Findings: The PPSAI PDP recommendations are expected to ensure the verification and validation requirements are expanded to also encompass the underlying registration details of privacy and proxy service providers. It is understood from review by the RDS-WHOIS2 Review Team of existing registrar practices that registrars often already include such processes even though there is no such requirement but this is not known to be a standard practice employed by all accredited registrars.

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R10.1 (FtoF4) – Clean Version

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