

RrSG response to Priority 2 Policy Recommendations for ICANN Board Consideration from EPDP Phase 2

<https://www.icann.org/public-comments/policy-recommendations-epdp-phase-2-2020-12-03-en>

Public comment period closes: 22 January 2021

The Registrar Stakeholder Group (RrSG) is pleased to comment on the priority 2 policy recommendations for ICANN Board consideration from EPDP Phase 2. The RrSG supported the Phase 2 Final Report as a complete package, both within the EPDP and at Council level, which was the result of a lot of work and compromises on all sides. As such the RrSG is still generally supportive of all priority 2 recommendations and has no further comment on recommendations 19, 20 and 22.

With regards to recommendation 21, however, we would like to take this opportunity to provide some additional clarifying comments. The language of the recommendation 21 makes it clear that only data required for the purposes of the Transfer Dispute Resolution Policy (TDRP) must be retained and it is essential that any policy implementation keeps the data element retention requirement specific to TDRP-required data. The RrSG does have some concern that the language states it be done 'when deemed necessary' for TDRP, which may inadvertently lead to a broader interpretation than was intended, but we believe the intent is still very clear and should be understood as such. The RrSG would like to further note that the retention period does not restrict the ability of registries and registrars to retain data elements for longer periods.

Ashley Heineman
RrSG Chair