**PURPOSE 2**

Maintaining the security, stability, and resiliency of the Domain Name System in accordance with ICANN’s mission through the enabling of lawful access for legitimate third-party interests to data elements collected for the other purposes identified herein

***Disclaimer:*** *This overview has been developed to facilitate the EPDP Team’s consideration of the concerns expressed and possible updates to the recommendations. However, this does not replace the EPDP Team’s obligation to review all input received in full and to indicate if any concerns in this overview have inadvertently been mischaracterized.*

**Noted Concerns**

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| **Concern** | **Corresponding PCRT Comment #** | **Further Discussion Required?** |
| Purpose needs minor tweaking for clarity | 5  (GOVERNMENT OF INDIA) | Yes/No |
| Language should be tweaked to ensure ICANN’s mandate is not inadvertently expanded by the language of this purpose. | 6  (Tucows Domains Inc.) | Yes/No |
| Third party legitimate interests should be spelled out more specifically, i.e., law enforcement, intellectual property, consumer protection, et. al. (Proposed edits vary by comment.) | 4, 7, 8, 9, 10, 11, 12, 15  (Coalition for Online Accountability, The Walt Disney Company, BC, INTA, MarkMonitor, MPAA, Microsoft, IPC) | Yes/No |
| Maintain should be changed to ensure, as ensure is used within ICANN’s stated mission. | 4, 9, 10, 11, 12, 15  (Coalition for Online Accountability, INTA, MarkMonitor, MPAA, Microsoft, IPC) | Yes/No |
| ICANN’s mission and core values should be referenced within this purpose. | 13, 14  (NTIA, GAC) | Yes/No |
| This purpose is unnecessary b/c legitimate third-party access is not prohibited by GDPR. | 16, 20, 25  (John Poole, Association of the Internet Industry, ISPCP) | Yes/No |
| Third-party access to data is not part of ICANN’s mission, so this purpose should be deleted.  [ICANN's mission does not explicitly include enabling third-party access to registration data. Third-party access may be found to be a legitimate secondary purpose. Additionally, the EDPB has already cautioned ICANN against conflating its purposes with that of third-party interests.] | 17, 18, 19, 21, 22, 23, 28  (Blacknight, GoDaddy, Key-Systems, RrSG, Domain.com LLC & affiliates, i2Coalition, Internet Governance Project) | Yes/No |
| Contracted parties do not collect data for the purpose of disclosure – as such, this purpose should be deleted. | 24  (RySG) | Yes/No |
| Purpose should be further clarified to emphasize the preservation of Registrant Data by the earlier WHOIS process, which made data elements largely available to all users. | 26  (Internet Society India Chennai) | Yes/No |
| Language of purpose is too vague and does not specify what is involved in “[m]aintaining the security, stability, and resiliency of the Domain Name System in accordance with ICANN’s mission”. | 27  (NCSG) | Yes/No |