

### PURPOSE 3

#	Comment	Contributor	EPDP Response / Action Taken																		
	<p>Enable communication with and/or notification to the Registered Name Holder and/or their delegated agents of technical and/or administrative issues with a Registered Name;</p> <table border="1"> <caption>Survey Results for Purpose 3</caption> <thead> <tr> <th>Response</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Support Purpose as written</td> <td>10</td> <td>24%</td> </tr> <tr> <td>Support Purpose intent with wording change</td> <td>21</td> <td>50%</td> </tr> <tr> <td>Significant change required: changing intent and wording</td> <td>0</td> <td>0%</td> </tr> <tr> <td>Purpose should be deleted</td> <td>1</td> <td>2%</td> </tr> <tr> <td>Not designated</td> <td>10</td> <td>24%</td> </tr> </tbody> </table>	Response	Count	Percentage	Support Purpose as written	10	24%	Support Purpose intent with wording change	21	50%	Significant change required: changing intent and wording	0	0%	Purpose should be deleted	1	2%	Not designated	10	24%		
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#### Support Purpose as written

1.	No additional comments made in support.	<ul style="list-style-type: none"> <li>• Domain.com, LLC &amp; affiliates</li> <li>• Monica Sanders; i2Coalition</li> <li>• Tim Chen; DomainTools</li> <li>• Greg Aaron; iThreat Cyber Group</li> <li>• David Martel</li> <li>• Etienne Laurin</li> <li>• Evin Erdoğan; ALAC</li> </ul>	<p><b>Support</b></p> <p><b>EPDP Response:</b> The EPDP Team appreciates the support.</p> <p><b>Action Taken:</b> None <b>[COMPLETED]</b></p>
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2.	This is a legitimate purpose that is consistent with ICANN's mission. Notification and communication with the domain name registrant for purposes of technical and/or administrative issue handling is helpful and necessary for both registrants and registrars.	A. Mark Massey; Domain Name Rights Coalition	<b>Support</b> <b>EPDP Response:</b> The EPDP Team appreciates the support. <b>Action Taken:</b> None <b>[COMPLETED]</b>
3.	This is a legitimate purpose that is consistent with ICANN's mission. Notification and communication with the Registered Name Holder for purposes of technical and/or administrative issue handling is helpful and necessary for both registrants and registrars.	Ayden Férdeline; NCSG	<b>Support</b> <b>EPDP Response:</b> The EPDP Team appreciates the support. <b>Action Taken:</b> None <b>[COMPLETED]</b>
4.	Enable communication with and/or notification to the registered name holder and/or their delegated agents of technical, legal, and/or administrative issues with a registered name.  This change will clarify that legal issues involving a domain name also have a channel for communication to the registered name holder or agent.	Sajda Ouachtouki; The Walt Disney Company	
5.	This is a legitimate purpose that is consistent with ICANN's mission. Notification and communication with the Registered Name Holder for purposes of technical and/or administrative issue handling is helpful and necessary for both registrants and registrars.	Farzaneh Badii; Internet Governance Project	<b>Support</b> <b>EPDP Response:</b> The EPDP Team appreciates the support. <b>Action Taken:</b> None <b>[COMPLETED]</b>
6.	The AG IS expresses support in particular for Purposes 2, 3, and 4, which on their own and cumulatively empower the legitimate interests of the cybersecurity community in using Whois data for cybersecurity and overall data protection purposes. Moreover, it is critical to note that use of the DNS for cybercrime undermines trust in the system and the overall integrity of the DNS.	Greg Mounier on behalf of Europol AGIS; Europol Advisory Group on Internet Security	<b>Support</b> <b>EPDP Response:</b> The EPDP Team appreciates the support. <b>Action Taken:</b> None <b>[COMPLETED]</b>
<b>Support Purpose intent with wording change</b>			
7.	simplify to "issues"	Michele Neylon; Blacknight Internet Solutions Ltd	<b>Concerns</b> <b>EPDP Response:</b>  <b>Action Taken:</b>  <b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]

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8.	<p>Enable the provisioning of domain name registrations, including, to the extent necessary, communication with the RNH, or their designated agent, of any technical or administrative issues that would impact such registration.</p> <p>Recommendation is poorly written and contains excess wording to no benefit.</p>	Sara Bockey; GoDaddy	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
9.	<p>Change to: Enable Communications with and/or notification to the RNH, or their designated agent, for issues regarding a Registered Name</p> <p>Recommendation is poorly written and contains excess wording to no benefit.</p>	<ul style="list-style-type: none"> <li>• Volker Greimann; Key-Systems GmbH</li> <li>• Zoe Bonython; RrSG</li> </ul>	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
10.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER FOR MATTERS RELATING TO THE DOMAIN NAME AND / OR ITS FUNCTIONALITY.</p> <p>Where the registered name holder is permitted to designate agents, any correspondence with such agents is in fact communication with the registered name holder. Thus, the additional language is at best redundant, if not misleading as it might be construed as a justification to install or maintain the roles of the technical or administrative contact although the current practice of collecting and otherwise processing the respective data for these contacts is not part of the preliminary recommendations of the EPDP team.</p> <p>The additional clarification on the type of communication shall further specify the purpose to ensure that contactability shall not need to be facilitated by contracted parties to e.g. serve as a communications channel with customers of the registered name holder on support queries.</p>	Lars Steffen; eco – Association of the Internet Industry	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>

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11.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER FOR MATTERS RELATING TO THE DOMAIN NAME AND / OR ITS FUNCTIONALITY.</p> <p>Where the registered name holder is permitted to designate agents, any correspondence with such agents is in fact communication with the registered name holder. Thus, the additional language is at best redundant, if not misleading as it might be construed as a justification to install or maintain the roles of the technical or administrative contact although the current practice of collecting and otherwise processing the respective data for these contacts is not part of the preliminary recommendations of the EPDP team.</p> <p>The additional clarification on the type of communication shall further specify the purpose to ensure that contactability shall not need to be facilitated by contracted parties to e.g. serve as a communications channel with customers of the registered name holder on support queries.</p>	Wolf-Ulrich Knoblen; ISPCP Constituency	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
12.	<p>add "and/or legal issues"</p> <p>"Administrative issues" is ambiguous. Adding "legal issues" explicitly ensures that registrants will receive communications relating to those disputes. Given that purpose 6 (below) currently limits things to ICANN-related policies, as opposed to broader disputes outside of ICANN's remit (e.g. disputes in the courts), I think it's important to add the language into Purpose #3.</p>	George Kirikos; Leap of Faith Financial Services Inc.	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
13.	<p>The RySG supports the principle of this comment, but recommends the following wording: "ENABLE LAWFUL COMMUNICATION WITH AND/OR NOTIFICATION, OF RELEVANT DOMAIN-RELATED MATTERS, TO THE REGISTERED NAME HOLDER."</p> <p>It remains unclear as to whether or not Registered Name Holders can designate third party contact information in the Tech and Admin field, or indeed whether or not the Admin or Tech fields should be retained as part of the minimum data set. The RySG submits that the proposed wording change is closer to the true purpose, and provides more clarity than the current draft wording.</p> <p>Furthermore the RySG submits, regardless of whether or not the wording change is accepted, that the question of the Registered Name Holder being able to designate third parties as contacts requires further deliberation in both this and other contexts.</p>	Wim Degezelle; RySG	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>

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14.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER AND/OR THEIR DELEGATED AGENTS OF TECHNICAL, LEGAL, AND/OR ADMINISTRATIVE ISSUES WITH A REGISTERED NAME</p> <p>The proposed wording change is intended as a mere clarification that communication should be enabled for legal issues involving a domain name, to the extent legal issues are not specifically within the “administrative” issues category. Enabling communication for legal issues is aimed at ensuring proper notice and due process where a domain name might implicate certain legal matters. Alternatively, “administrative issues” should be defined to include resolving claims that a domain name is being used to facilitate unlawful conduct, or to infringe on the legitimate rights of others. Under pre-GDPR Whois, third parties often addressed complaints regarding these issues to the administrative contact (a label that ICANN has never defined). Additionally, these uses are already forbidden under the RAA and/or registry agreements. In cases when third parties address their complaints of violations of the RAA to the registrar (or of RA to the registry), these contracted parties need to know who is the “delegated agent for administrative issues” such as these.</p>	Brian King; IPC	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
15.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO AND/OR INVESTIGATION OF THE REGISTERED NAME HOLDER AND/OR THEIR DELEGATED AGENTS OF TECHNICAL AND/OR ADMINISTRATIVE AND/OR LEGAL ISSUES WITH A REGISTERED NAME (BOTH WITH RESPECT TO THE REGISTERED NAME ITSELF AND/OR THE USE OF THE REGISTERED NAME).</p> <p>Adding the words “legal issues” bring greater clarity and specificity to the purpose and understanding by the registered name holder that the personal data collected may be used to contact or notify the registered name holder of legal issues with respect to the registered name. The same holds true for adding the word “investigation,” as the personal data collected from the domain name registrant may be used in connection with investigations of technical issues (e.g., domain name “hijacking”) as well as legal issues, including those pursued by law enforcement. The parenthetical language “(both with respect to the registered name itself and/or the use of the registered name)” provides clarity and information to the registered name holder that their personal data may be processed for the purpose of resolving claims that the registered name is being used to facilitate unlawful conduct, including by giving the registered name holder appropriate notice of such claims.</p> <p>All of the suggested edits to Purpose #3 seek to bring it into greater compliance with the GDPR, particularly Article 13 and its information requirements.</p>	Dean S. Marks; Coalition for Online Accountability	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>

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16.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER directly as far as possible AND/OR through THEIR DELEGATED AGENTS OF TECHNICAL AND/OR ADMINISTRATIVE or other important ISSUES WITH A REGISTERED NAME</p> <p>This is in consideration of the possibility that in the case of some individual users, some small businesses and even some large businesses, the process of designating an agent is sometimes careless, and it is not always that the communication to the designated agent reaches the actual Registrant; The proposed modification to the text is to emphasise that Registries and Registrars have a purpose in reaching the Registrant, directly as far as possible, and "through" the designated Agent where direct communication is not possible.</p>	Sivasubramanian Muthusamy; Internet Society India Chennai	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
17.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER AND/OR THEIR DELEGATED AGENTS OF BILLING, TECHNICAL AND/OR ADMINISTRATIVE ISSUES WITH A REGISTERED NAME</p> <p>Minor language tweaks for sake of clarity and being more explicit.</p>	DR. JAIDEEP KUMAR MISHRA; DIRECTOR MINISTRY OF ELECTRONICS AND INFORMATION TECHNOLOGY, GOVERNMENT OF INDIA	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
18.	<p>Enable communication with and/or notification to the Registered Name Holder and/or their delegated agents of technical and/or administrative issues (if applicable) with a Registered Name;</p> <p>Including “and/or” with regard to the TECH and ADMIN contacts implies that there must always be these alternate contacts in addition to the RNH; as these should be optional, if they are used at all, we recommend the text provided above (adding “if applicable”).</p>	Tucows Domains Inc.	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
19.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER AND/OR THEIR DELEGATED AGENTS OF TECHNICAL, LEGAL, AND/OR ADMINISTRATIVE ISSUES WITH A REGISTERED NAME</p> <p>The existing wording is unduly narrow and fails to acknowledge that the relationship between the registrant and the registrar is a legal one, which includes obligations not only in relation to the act of registering and technically maintaining the domain name, but other obligations pertaining to the terms of use which are included as part of the framework of agreements and obligations between ICANN, Registry Operators, Registrars and Registrants. These obligations are in accordance with ICANN’s Mission, as set forth in its Bylaws. Communication with the registrant when such terms are breached is a logical and proportionate purpose for data processing.</p>	Lori Schulman Senior Director, Internet Policy; International Trademark Association (INTA)	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>

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20.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER AND/OR THEIR DELEGATED AGENTS OF TECHNICAL, LEGAL, AND/OR ADMINISTRATIVE ISSUES WITH A REGISTERED NAME.</p> <p>MarkMonitor believes that adding “legal” clarifies that communication should be enabled for legal issues involving a domain name, to the extent legal issues are not specifically within the “administrative” issues category. Enabling communication for legal issues ensures proper notice and due process where a domain name might implicate certain legal matters. Alternatively, “administrative issues” should be defined to include resolving claims that a domain name is being used to facilitate unlawful conduct, to infringe on the legitimate rights of others, and other legal matters involving a domain name.</p> <p>MarkMonitor also recommends that the EPDP team further define “administrative” (a term that never has been fully defined in this context) as inclusive of matters such as rights infringement or resolution of claims of unlawful conduct. These clarifications will further assist third parties reporting contractual violations, who will be able to discern a “delegated agent” for administrative issues.”</p>	Brian King; MarkMonitor, Inc., a Clarivate Analytics company	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
21.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER AND/OR THEIR DELEGATED AGENTS OF TECHNICAL, LEGAL, AND/OR ADMINISTRATIVE ISSUES WITH A REGISTERED NAME, or for other purposes identified herein.</p> <p>Communication with a registrant may be necessary to fulfill purposes identified herein that go beyond technical and administrative issues, and such communication will require the collection and processing of data as part of the WHOIS system, including sharing with third parties.</p>	Neil Fried; The Motion Picture Association of America	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
22.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER AND/OR THEIR DELEGATED AGENTS OF TECHNICAL, LEGAL, AND/OR ADMINISTRATIVE ISSUES WITH A REGISTERED NAME.</p> <p>In addition to administrative issues, communication should be enabled for legal issues involving a domain name. Enabling communication for legal issues ensures proper notice and due process where a domain name might implicate certain legal matters.</p>	Jeremy Dallman, David Ladd – Microsoft Threat Intelligence Center; Amy Hogan-Burney, Richard Boscovich – Digital Crimes Unit; Makalika Naholowaa, Teresa Rodewald, Cam Gatta – Trademark; Mark Svancarek, Ben Wallace, Paul Mitchell – Internet Technology & Governance Policy; Cole Quinn – Domains and Registry; Joanne Charles – Privacy & Regulatory Affairs; Microsoft Corporation	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>

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23.	<p>This wording conflicts with Recommendation 4, which would do away with Administrative and Technical Contacts.</p> <p>The wording on this recommendation could be fine as long as the role-specific contacts such as Technical remain intact. See responses to items 44, 45 below for more detail</p>	Ben Butler; SSAC	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
24.	<p>Enable communication with and/or notification to the registered name holder and/or their delegated agents of technical, legal, and/or administrative issues with a registered name.</p> <p>This change will clarify that legal issues involving a domain name also have a channel for communication to the registered name holder or agent.</p>	Sajda Ouachtouki; The Walt Disney Company	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
25.	<p>ENABLE COMMUNICATION WITH AND/OR NOTIFICATION TO THE REGISTERED NAME HOLDER AND/OR THEIR DELEGATED AGENTS OF TECHNICAL, LEGAL, AND/OR ADMINISTRATIVE ISSUES WITH A REGISTERED NAME</p> <p>Legal issues involving a domain name deserve a channel for communication to the registered name holder or agent; this is not enumerated in the current wording of the purpose, and particularly is not/should not be part of the “administrative” issues category. Legal communication can enable proper notice and/or due process in matters involving domain names, and those submitting such matters would benefit from specificity. The BC also recommends that the EPDP team further define “administrative” (a term that never has been fully defined in this context) as inclusive of matters such as rights infringement or resolution of claims of unlawful conduct. These clarifications will further assist third parties reporting contractual violations, who will be able to discern a “delegated agent” for administrative issues.</p>	Steve DelBianco; BC	<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
<b>Significant change required: changing intent and wording</b>			
26.			<p><b>Concerns</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>



#	Comment	Contributor	EPDP Response / Action Taken
<b>Purpose should be deleted</b>			
27.	This is not needed--see my response to Purpose 1 above, the primary purpose is "AS SUBJECT TO REGISTRY AND REGISTRAR TERMS, CONDITIONS AND POLICIES, AND ICANN CONSENSUS POLICIES: TO RECORD AND MAINTAIN RECORDS OF THE NAMES AND CONTACT INFORMATION OF DOMAIN NAME REGISTRANTS" which encompasses communication and notification.	John Poole; Domain Name Registrant	<p><b>Divergence</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
<b>Not designated</b>			
28.	No selection made and no additional comments submitted	<ul style="list-style-type: none"> <li>• Steve Gobin; Corporate domain name management</li> <li>• Brian Beckham; Head, Internet Dispute Resolution Section, World Intellectual Property Organization</li> <li>• Monique A. Goeschl; Verein für Anti-Piraterie der Film- und Videobranche (VAP)</li> <li>• Ashley Heineman; NTIA</li> <li>• Ashley Roberts; Valideus</li> <li>• Renee Fossen; Forum - URS and UDRP Provider</li> <li>• Stephanie Perrin</li> <li>• Fabien Betremieux; GAC</li> </ul>	<p><b>EPDP Response:</b> none</p> <p><b>Action Taken:</b> none <b>COMPLETED</b></p>