

PURPOSE 4

| # | Comment | Contributor | EPDP Response / Action Taken | | | | | | | | | | | | | | | | | | |
|--|--|-------------------|------------------------------|------------|----------------------------|----|-----|--|---|-----|----------------|----|-----|---------------------------|---|----|--|---|----|--|--|
| | <p>Provide mechanisms for safeguarding Registered Name Holders' Registration Data in the event of a business or technical failure, or other unavailability of a Registrar or Registry Operator;</p> <table border="1"> <caption>Pie Chart Data</caption> <thead> <tr> <th>Response Category</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Support Purpose as written</td> <td>23</td> <td>55%</td> </tr> <tr> <td>Support Purpose intent with wording change</td> <td>7</td> <td>17%</td> </tr> <tr> <td>Not designated</td> <td>11</td> <td>26%</td> </tr> <tr> <td>Purpose should be deleted</td> <td>1</td> <td>2%</td> </tr> <tr> <td>Significant change required: changing intent and wording</td> <td>0</td> <td>0%</td> </tr> </tbody> </table> | Response Category | Count | Percentage | Support Purpose as written | 23 | 55% | Support Purpose intent with wording change | 7 | 17% | Not designated | 11 | 26% | Purpose should be deleted | 1 | 2% | Significant change required: changing intent and wording | 0 | 0% | | |
| Response Category | Count | Percentage | | | | | | | | | | | | | | | | | | | |
| Support Purpose as written | 23 | 55% | | | | | | | | | | | | | | | | | | | |
| Support Purpose intent with wording change | 7 | 17% | | | | | | | | | | | | | | | | | | | |
| Not designated | 11 | 26% | | | | | | | | | | | | | | | | | | | |
| Purpose should be deleted | 1 | 2% | | | | | | | | | | | | | | | | | | | |
| Significant change required: changing intent and wording | 0 | 0% | | | | | | | | | | | | | | | | | | | |
| <p>Support Purpose as written</p> | | | | | | | | | | | | | | | | | | | | | |

| | | | |
|-----------|---|---|---|
| <p>1.</p> | <p>No additional comments included.</p> | <ul style="list-style-type: none"> • Brian King; IPC • Dean S. Marks; Coalition for Online Accountability • Sivasubramanian Muthusamy; Internet Society India Chennai • DR. JAIDEEP KUMAR MISHRA ; DIRECTOR MINISTRY OF ELECTRONICS AND INFORMATION TECHNOLOGY, GOVERNMENT OF INDIA • Sajda Ouachtouki; The Walt Disney Company • Tim Chen; DomainTools • Greg Aaron; iThreat Cyber Group • Lori Schulman Senior Director, Internet Policy; International Trademark Association (INTA) • Brian King; MarkMonitor, Inc., a Clarivate Analytics company • 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 – | <p>Support</p> <p>EPDP Response: The EPDP Team appreciates the support.</p> <p>Action Taken: None [COMPLETED]</p> |
|-----------|---|---|---|

| # | Comment | Contributor | EPDP Response / Action Taken |
|----|---|--|--|
| | | Privacy & Regulatory Affairs; Microsoft Corporation <ul style="list-style-type: none"> • David Martel • Etienne Laurin • Ben Butler; SSAC • Evin Erdoğan; ALAC • Farzaneh Badii; Internet Governance Project • Greg Mounier on behalf of Europol AGIS; Europol Advisory Group on Internet Security | |
| 2. | We support the purpose as written. The legal basis for the processing shall, however, be determined as being Art. 6 I f GDPR as it is not related to performing the contract with the registered name holder. | <ul style="list-style-type: none"> • Lars Steffen; eco – Association of the Internet Industry • Wolf-Ulrich Knoben; ISPCP Constituency | Support EPDP Response: The EPDP Team appreciates the support. Action Taken: None [COMPLETED] |
| 3. | <p>The RySG supports this purpose as written. Provided that the requisite data protection mechanisms and agreements are in place between contracted parties and escrow agents, mechanisms for safeguarding registered name holder registration data is in the registrants' best interest in allowing contracted parties to provide a stable and secure service with reasonable expectations of continuity.</p> <p>The RySG, noting the discussions of the ePDP team surrounding legal basis for such processing, would also like to emphasise that any processing of data for such a purpose is based on a balanced application of Article 6(1)f and NOT article 6(1)b, "</p> | Wim Degezelle; RySG | Support EPDP Response: The EPDP Team appreciates the support. Action Taken: None [COMPLETED] |
| 4. | It is legitimate to collect and process data for this purpose, as it supports the rights and interests of the registrant. | A. Mark Massey; Domain Name Rights Coalition | Support EPDP Response: The EPDP Team appreciates the support. Action Taken: None [COMPLETED] |
| 5. | | • | |
| 6. | This purpose must be limited to data security and recovery mechanisms and not to additional data sharing, which is suggested in the purpose rationale. | Tu cows Domains Inc. | Support EPDP Response: The EPDP Team appreciates the support. Action Taken: None [COMPLETED] |

| # | Comment | Contributor | EPDP Response / Action Taken |
|---|--|---|---|
| 7. | It is legitimate to collect and process data for this purpose, as it supports the rights and interests of the registrant. | Ayden Férdeline; NCSG | Support EPDP Response: The EPDP Team appreciates the support. Action Taken: None [COMPLETED] |
| 8. | <p>The BC supports this purpose and we believe that registrars should be required to allow registered name holders to provide technical contact information, as some would so elect, to facilitate communication regarding technical issues.</p> <p>The BC does not believe that collection of Technical Contact information should be mandatory. However, the OPTION to provide this information should be required since some registrants, particularly large corporate registrants, elect to provide this information in order to route appropriate communications within their organization.</p> <p>The EPDP team has pursued policy recommendations that, in many areas, guarantee registrant rights. The BC therefore advocates for the same in this instance: to preserve this registrant right, registrars should be required to offer the non-mandatory option.</p> | Steve DelBianco; BC | Support EPDP Response: The EPDP Team appreciates the support. Action Taken: None [COMPLETED] |
| Support Purpose intent with wording change | | | |
| 9. | <p>Delete the bit about "other unavailability"</p> <p>The suggested wording is too broad. Escrow is meant to be for failure. Suggested wording would encompass too much.</p> | Michele Neylon; Blacknight Internet Solutions Ltd | Concerns EPDP Response: Action Taken: [COMPLETED / NOT COMPLETED] – [Instruction of what was done.] |
| 10. | PROVIDE MECHANISMS FOR SAFEGUARDING REGISTERED NAME HOLDERS' REGISTRATION DATA IN THE EVENT NECESSITATED BY A BUSINESS OR TECHNICAL FAILURE OF A REGISTRY OPERATOR OR REGISTRAR. | Sara Bockey; GoDaddy | Concerns EPDP Response: Action Taken: [COMPLETED / NOT COMPLETED] – [Instruction of what was done.] |

| # | Comment | Contributor | EPDP Response / Action Taken |
|---|---|---|---|
| 11. | Delete "OR OTHER UNAVAILABILITY OF A REGISTRAR OR REGISTRY OPERATOR" Additional language is too broad and not necessary to frame the purpose. Additional language is overbroad. | <ul style="list-style-type: none"> Volker Greimann; Key-Systems GmbH Zoe Bonython; RrSG | Concerns EPDP Response: Action Taken: [COMPLETED / NOT COMPLETED] – [Instruction of what was done.] |
| 12. | No additional comments included. | Domain.com, LLC & affiliates | Concerns EPDP Response: Action Taken: [COMPLETED / NOT COMPLETED] – [Instruction of what was done.] |
| 13. | “Or other unavailability” is unclear and should be removed. We cannot allow this purpose to be overbroadly applied because it appears to encompass things it should not. | Monica Sanders; i2Coalition | Concerns EPDP Response: Action Taken: [COMPLETED / NOT COMPLETED] – [Instruction of what was done.] |
| 14. | PROVIDE MECHANISMS FOR SAFEGUARDING **PAST AND PRESENT** REGISTERED NAME HOLDERS' **PAST AND PRESENT** REGISTRATION DATA IN THE EVENT OF A BUSINESS OR TECHNICAL FAILURE, OR OTHER UNAVAILABILITY OF A REGISTRAR OR REGISTRY OPERATOR Adding "past and present" before "registered name holders'" and also before "registration data" is important, to ensure that it's not just a current snapshot of current data that is being retained, but an entire history of both current and past registrants' data, in escrow. If only a current snapshot is maintained, critical data would be lost in the event of a business or technical failure, etc. | George Kirikos; Leap of Faith Financial Services Inc. | Concerns EPDP Response: Action Taken: [COMPLETED / NOT COMPLETED] – [Instruction of what was done.] |
| Significant change required: changing intent and wording | | | |

| # | Comment | Contributor | EPDP Response / Action Taken |
|----------------------------------|--|------------------------------------|---|
| 15. | | | <p>Concerns</p> <p>EPDP Response:</p> <p>Action Taken:</p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p> |
| Purpose should be deleted | | | |
| 16. | <p>DELETE</p> <p>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 "PROVIDE MECHANISMS FOR SAFEGUARDING REGISTERED NAME HOLDERS' REGISTRATION DATA IN THE EVENT OF A BUSINESS OR TECHNICAL FAILURE, OR OTHER UNAVAILABILITY OF A REGISTRAR OR REGISTRY OPERATOR."</p> | John Poole; Domain Name Registrant | <p>Divergence</p> <p>EPDP Response:</p> <p>Action Taken:</p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p> |
| Not designated | | | |

| # | Comment | Contributor | EPDP Response / Action Taken |
|-----|--|--|---|
| 17. | No selection made and no additional comments submitted | <ul style="list-style-type: none"> • Steve Gobin; Corporate domain name management • Brian Beckham; Head, Internet Dispute Resolution Section, World Intellectual Property Organization • Neil Fried; The Motion Picture Association of America • Monique A. Goeschl; Verein für Anti-Piraterie der Film- und Videobranche (VAP) • Ashley Heineman; NTIA • Ivett Paulovics; MFSD Srl URS Provider • Ashley Roberts; Valideus • Renee Fossen; Forum - URS and UDRP Provider • Stephanie Perrin • Fabien Betremieux; GAC | <p>EPDP Response: none</p> <p>Action Taken: none COMPLETED</p> |