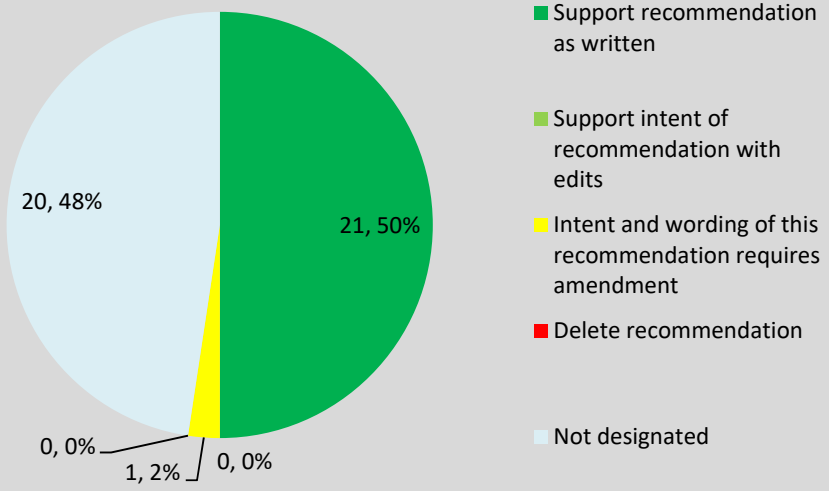
RECOMMENDATION 19

#	Comment	Contributor	EPDP Response / Action Taken

The EPDP Team recommends that for the new policy on gTLD registration data, the requirements of the Temporary Specification are maintained in relation to the Transfer Policy until such time these are superseded by recommendations that may come out of the Transfer Policy review that is being undertaken by the GNSO Council.



Support recommendation as written

#	Comment	Contributor	EPDP Response / Action Taken
1	No comments provided in support of this recommendation	• John Poole; Domain Name Registrant • Michele Neylon; Blacknight Internet Solutions Ltd • Volker Greimann; Key-Systems GmbH • Lars Steffen; eco – Association of the Internet Industry • Zoe Bonython; RrSG • Domain.com, LLC & affiliates • Wolf-Ulrich Knoben; ISPCP Constituency • Monica Sanders; i2Coalition • Wim Degezelle ; RySG • Brian King; IPC • Dean S. Marks; Coalition for Online Accountability • DR. JAIDEEP KUMAR MISHRA ; DIRECTOR MINISTRY OF ELECTRONICS AND INFORMATION TECHNOLOGY, GOVERNMENT OF INDIA • Tucows Domains Inc. • Steve DelBianco; BC • 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 – Privacy & Regulatory Affairs; Microsoft Corporation • Etienne Laurin • Evin Erdoğdu; ALAC	Support **EPDP Response:** The EPDP appreciates the support **Action Taken:** none [**COMPLETED**]
2	This recommendation handles appropriately an interdependence between the Temporary Specification and the Transfer policy appropriately.	Ayden Férdeline; NCSG	Support **EPDP Response:** The EPDP appreciates the support **Action Taken:** none [**COMPLETED**]

#	Comment	Contributor	EPDP Response / Action Taken
3	This change is probably necessary in order to reconcile EPDP recommendations with arrangements with existing UDRP providers. ICANN Org may also need to enter into data processing agreements with dispute resolution providers to limit the publication of personal and sensitive information about registrants in UDRP and URS decisions. Such data may include the names and contact information of registrants and their attorneys, and the names and contact data of complainant attorneys. Publication of identity, organization, and other data of the registrant and its attorneys -- including in dispute proceedings where the registrant won -- is a collection activity and publication of personal and sensitive data that may well be in violation of the GDPR. The UDRP and URS decision, and even the transfer of domain names, does not require such public disclosure as a necessary part of technical implementation. We further note that older UDRP and URS cases may need to be redacted for publication of personal and sensitive data of the registrant and his/her/its attorneys, email addresses, and other data.	Farzaneh Badii; Internet Governance Project This recommendation handles appropriately an interdependence between the Temporary Specification and the Transfer policy.	Support **EPDP Response:** The EPDP appreciates the support **Action Taken:** none [**COMPLETED**]
Support intent of recommendation with edits			
4	No designation or comments supplied.		**EPDP Response:** none **Action Taken:** none [**COMPLETED**]
Intent and wording of this recommendation requires amendment			
5	Under the Temp Spec, if the Gaining Registrar is unable to gain access to then-current Registration Data for a domain name subject of a transfer, the Gaining Registrar is no longer required to obtain a Form of Authorization from the Transfer Contact. This weakened protections against hijackings. Instead: any registrar with an auth_info code MUST be able to obtain the registrant contact data via EPP from the registry. That is GDPR-compliant, because the registrant has given the gaining registrar permission to access the data. The GNSO Council needs to move this along, and the GDPR is a good spur.	Greg Aaron; iThreat Cyber Group	Concerns **EPDP Response:** This concern is being addressed by the Tech Ops group. **Action Taken:** none [**COMPLETED**]
Delete recommendation			

#	Comment	Contributor	EPDP Response / Action Taken
6	No designation or comments supplied.		**EPDP Response:** none **Action Taken:** none [COMPLETED]
Not designated			
7	No selection made and no additional comments submitted	• George Kirikos; Leap of Faith Financial Services Inc. • A. Mark Massey; Domain Name Rights Coalition • Steve Gobin; Corporate domain name management • Brian Beckham; Head, Internet Dispute Resolution Section, WIPO • Sivasubramanian Muthusamy; Internet Society India Chennai • Sajda Ouachtouki; The Walt Disney Company • Tim Chen; DomainTools • Lori Schulman Senior Director, Internet Policy; International Trademark Association (INTA)Neil Fried; The Motion Picture Association of America • Neil Fried; The Motion Picture Association of America • Monique A. Goeschl; Verein für Anti-Piraterie der Film- und Videobranche (VAP) • David Martel • Ben Butler, SSAC • Ashley Heineman; NTIA • Ivett Paulovics; MFSD Srl URS Provider • Greg Mounier on behalf of Europol AGIS; Europol Advisory Group on Internet Security • Ashley Roberts; Valideus • Stephanie Perrin • Fabien Betremieux; GAC	**EPDP Response:** none **Action Taken:** none [COMPLETED]