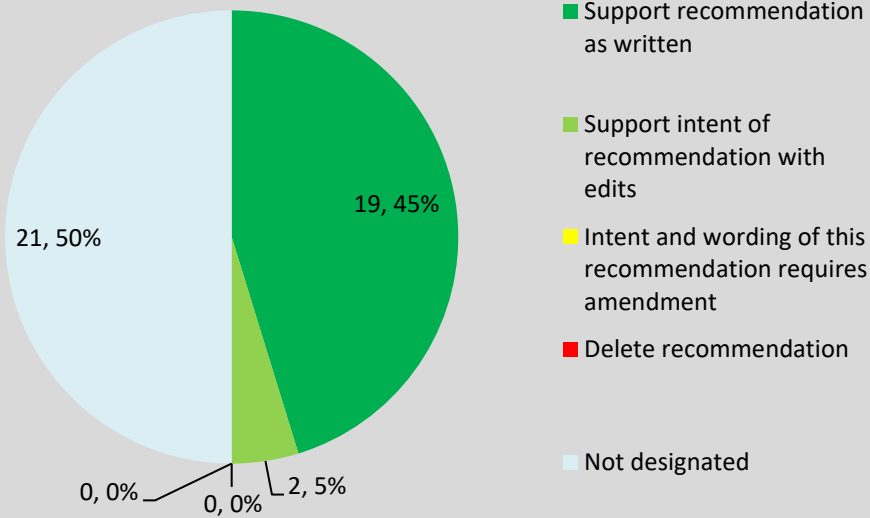


RECOMMENDATION 20

#	Comment	Contributor	EPDP Response / Action Taken
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The EPDP Team recommends that the GNSO Council, as part of its review of the Transfer Policy, specifically requests the review of the implications, as well as adjustments, that may be needed to the Transfer Policy as a result of GDPR.



Support recommendation as written

#	Comment	Contributor	EPDP Response / Action Taken
1.	No comments provided in support of this recommendation	<ul style="list-style-type: none"> • Evin Erdoğan; ALAC • Brian King; IPC • Dean S. Marks; Coalition for Online Accountability • Steve DelBianco; BC • 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 • John Poole; Domain Name Registrant • Tucows Domains Inc. • Michele Neylon; Blacknight Internet Solutions Ltd • Sara Bockey; GoDaddy • Volker Greimann; Key-Systems GmbH • Zoe Bonython; RrSG • Domain.com, LLC & affiliates • Wim Degezelle ; RySG • Ayden Férdeline; NCSG • Brian King; MarkMonitor, Inc., a Clarivate Analytics company • Lars Steffen; eco – Association of the Internet Industry • Wolf-Ulrich Knoben; ISPCP Constituency • Monica Sanders; i2Coalition • Etienne Laurin 	
Support intent of recommendation with edits			

#	Comment	Contributor	EPDP Response / Action Taken
2.	<p>The EPDP Team recommends that the GNSO Council, as part of its review of the Transfer Policy, specifically requests the review of the implications, as well as adjustments that may be needed to the Transfer Policy as a result of GDPR and other prevailing and future global data privacy/protection legislations.</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>Concerns</p> <p>EPDP Response:</p> <p>Action Taken:</p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
3.	<p>Distinguish between ownership changes (internal within a domain name registrar) and changes of registrar (with or without changes of ownership).</p> <p>"Transfers" can be ambiguous, so consider the needs of various scenarios (i.e. change of ownership/registrar while not changing the registrar, vs. change of registrar (with or without changes of ownership/registrar).</p> <p>GDRP needs might differ amongst those scenarios.</p>	George Kirikos; Leap of Faith Financial Services Inc.	<p>Concerns</p> <p>EPDP Response:</p> <p>Action Taken:</p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
Intent and wording of this recommendation requires amendment			
4.			<p>Concerns</p> <p>EPDP Response:</p> <p>Action Taken:</p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
Delete recommendation			
Not designated			

#	Comment	Contributor	EPDP Response / Action Taken
5.		<ul style="list-style-type: none"> • Sivasubramanian Muthusamy; Internet Society India Chennai • Tim Chen; DomainTools • Mark Massey; Domain Name Rights Coalition • Farzaneh Badii; Internet Governance Project • David Martel • Steve Gobin; Corporate domain name management • Ben Butler; SSAC • Ashley Heineman; NTIA • Neil Fried; The Motion Picture Association of America • Sajda Ouachtouki; The Walt Disney Company • Greg Mounier on behalf of Europol AGIS; Europol Advisory Group on Internet Security • Monique A. Goeschl; Verein für Anti-Piraterie der Film- und Videobranche (VAP) • Fabien Betremieux; GAC • Brian Beckham; Head, Internet Dispute Resolution Section at WIPO • Theo Geurts • Ivett Paulovics; MFSD Srl URS Provider • Ashley Roberts; Valideus • Renee Fossen; Forum - URS and UDRP Provider • Stephanie Perrin 	<p>EPDP Response: none</p> <p>Action Taken: none</p> <p>[COMPLETED]</p>
Are there any changes that the EPDP Team should consider in relation to the Transfer Policy that have not already been identified?			
6.	<p>The GNSO should consider if policy changes are needed to guard against unauthorised transfers. Additionally, the TechOps group is currently investigating the technical feasibility of alternative transfer processes, that, once finalized, could be used as a basis for future policy work. This considers possible transfer processes that are simple, guard against unauthorized transfers, and do not rely on WHOIS data to initiate a transfer. The EPDP team should recommend that the TechOps group continues their valuable work and that the GNSO should seriously consider their findings.</p>	<p>Zoe Bonython; RrSG</p>	<p>Concerns</p> <p>EPDP Response:</p> <p>Action Taken:</p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>

#	Comment	Contributor	EPDP Response / Action Taken
7.	The RySG suggests that when reviewing the Transfer Policy, the GNSO Council should also consider whether changes to the Policy are needed to guard against unauthorized transfers.	Wim Degezelle ; RySG	<p>Concerns</p> <p>EPDP Response:</p> <p>Action Taken:</p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
8.	NO	DR. JAIDEEP KUMAR MISHRA ; DIRECTOR MINISTRY OF ELECTRONICS AND INFORMATION TECHNOLOGY, GOVERNMENT OF INDIA	<p>Concerns</p> <p>EPDP Response:</p> <p>Action Taken:</p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>