

## RECOMMENDATION 3

#	Comment	Contributor	EPDP Response / Action Taken																		
	The EPDP Team recommends that requirements related to the accuracy of registration data under the current ICANN contracts and consensus policies shall not be affected by this policy.																				
	<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 recommendation as written</td> <td>15</td> <td>36%</td> </tr> <tr> <td>Support intent of recommendation with edits</td> <td>7</td> <td>17%</td> </tr> <tr> <td>Intent and wording of this recommendation requires amendment</td> <td>8</td> <td>19%</td> </tr> <tr> <td>Delete recommendation</td> <td>4</td> <td>9%</td> </tr> <tr> <td>Not designated</td> <td>8</td> <td>19%</td> </tr> </tbody> </table>			Response Category	Count	Percentage	Support recommendation as written	15	36%	Support intent of recommendation with edits	7	17%	Intent and wording of this recommendation requires amendment	8	19%	Delete recommendation	4	9%	Not designated	8	19%
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1.	No comments provided in support of this recommendation	<ul style="list-style-type: none"> <li>• Michele Neylon; Blacknight Internet Solutions Ltd</li> <li>• Sara Bockey; GoDaddy</li> <li>• Volker Greimann; Key-Systems GmbH</li> <li>• Zoe Bonython; RrSG</li> <li>• Domain.com, LLC &amp; affiliates</li> <li>• Monica Sanders; i2Coalition</li> <li>• Tim Chen; DomainTools</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 appreciates the support</p> <p><b>Action Taken:</b> none</p> <p><b>[COMPLETED]</b></p>
2.	The recommendation shall be kept as it is. No additional requirements to verify the accuracy of data given by the data subject or to validate such data shall be part of any recommendation of the EPDP team. Whilst contracted parties shall ensure that data is accurately recorded in their system as provided by the data subjects, any additional requirements are neither warranted by GDPR nor in scope of the EPDP.	<ul style="list-style-type: none"> <li>• Lars Steffen; eco – Association of the Internet Industry</li> <li>• Wolf-Ulrich Knoben; ISPCP Constituency</li> </ul>	<p><b>Support</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>
3.	Seems reasonable as written, no change required.	George Kirikos; Leap of Faith Financial Services Inc.	<p><b>Support</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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4.	<p>Accuracy, insofar as the GDPR requires, primarily relates to the requirement that the data provided to the Data Controller / Processor is recorded accurately and is kept up to date, with the data subject’s reasonable instructions. (e.g. where the data subject notifies you of an inaccuracy, the data must be changed without undue delay).</p> <p>Whereas, it is accepted that data controllers must make reasonable efforts to ensure the accuracy of the data they process; however, such reasonable efforts must be linked to practical matters such as:</p> <ul style="list-style-type: none"> <li>the likelihood of harm or damage to the DATA SUBJECT of an inaccuracy</li> <li>the use of the data by the controller (and whether the decisions made, by the controller, as a result of the data significantly affect the individual concerned, or others)</li> <li>the nature of the data processed</li> <li>the ability of the controller to verify accuracy with due regard to practical matters such as ability, technology and the cost of implementation (again all balanced against the potential impact to the rights of the data subject)</li> </ul> <p>It is submitted therefore that the current regime for accuracy, especially considering the most recent ARS report on WHOIS accuracy (Cycle 6) (June 2018) noted postal address operability is 99% and postal address syntax accuracy is 88% (up from 80% three years earlier). ICANN’s own key findings include that “nearly all WHOIS records contained information that could be used to establish immediate contact: In 98 percent of records, at least one email or phone number met all operability requirements of the 2009 RAA..</p> <p>In light of this report, it would appear that the accuracy requirements as contained in the RAA are objectively sufficient and reasonable, for the purpose to which the data is put.</p> <p>We submit, therefore, that no change to the recommendation is currently necessary.</p>	Wim Degezelle ; RySG	<p><b>Support</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>
5.	<p>The NCSG supports this recommendation as it is written.</p> <p>We do not support making changes to existing accuracy requirements, as policies regarding accuracy are not within the remit of the Temporary Specification.</p>	Ayden Férdeline; NCSG	<p><b>Support</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>Support intent of recommendation with edits</b>			

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6.	Wording of this recommendation should also clearly bring out both Verification and Validation aspects of WHOIS Accuracy, for example as Mentioned in 2013 RAA “WHOIS ACCURACY PROGRAM SPECIFICATION”	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><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
7.	<p>The EPDP Team recommends that the following requirements related to the accuracy of registration data under the current ICANN contracts and consensus policies shall not be affected by this policy: RAA Section 3.7.7.2, Whois Accuracy Program Specification, Whois Data Reminder Policy, Restored Names Accuracy Policy</p> <p>Specificity is important, so that there is no confusion around what ICANN requirements could be considered to be part of the requirement for accuracy.</p>	Tucows Domains 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>
8.	<p>Recommendation 3 should be edited to read:</p> <p>The EPDP Team recommends that requirements related to the accuracy of registration data under the current ICANN contracts be incorporated into this policy.</p> <p>Accuracy is both fully within scope of the EPDP and specifically addressed by the GDPR – thus, ICANN and contracted parties should proactively address how they will ensure the accuracy of data from the beginning and not only how they will rectify inaccurate data brought to their attention after collection.</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><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>

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9.	<p>According to Article 5 of the GDPR, personal data shall be "accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay." Within the GDPR, this is the second of three principles about data standards, along with data minimization and storage limitation that needs to be addressed.</p> <p>The ico. (Information Commissioner's Office in the UK) points out in its Principle (d): Accuracy that one of the new features of GDPR as compared to the principles under its predecessor is that there is now a "clearer proactive obligation to take reasonable steps to delete or correct inaccurate personal data."</p> <p>The ico. goes on to say that "The more important it is that the personal data is accurate, the greater the effort you should put into ensuring its accuracy. So if you are using the data to make decisions that may significantly affect the individual concerned or others, you need to put more effort into ensuring accuracy. This may mean you have to get independent confirmation that the data is accurate."</p> <p>Accordingly, It is the position of the BC that the accuracy requirements that currently exist under the contracts must be at a minimum maintained. These should be expanded to improve accuracy levels in light of the requirements under GDPR for accuracy, and especially in light of the unacceptably low levels of accuracy as reflected in ICANN's ARS reports. The EPDP's work to align WHOIS with GDPR will be incomplete if it fails to recommend a policy to improve accuracy. The EPDP's policy should address accuracy from the following perspectives:</p> <p>Collection: At intake, the EPDP should consider whether the current forms of validation are sufficient. In addition:</p> <ul style="list-style-type: none"> <li>• The 2013 RAA contains requirements for cross-field validation that should be implemented as one component for demonstrating compliance with the GDPR.</li> <li>• The EPDP policy should strive to improve accuracy consistent with GDPR, by revising the validation requirements specified under the RAA. For example, rather than having only one field in WHOIS validate (currently email OR phone number), the policy should consider requiring the validation of additional fields (as recommended by the EWG).</li> <li>• The EPDP team should consider requiring additional forms of validation to examine accuracy of contact information from the perspective of syntactical and operational validity -- e.g., Syntax + Operability Accuracy methods (using the methodology of SSAC 058 found in the WHOIS Accuracy Reporting System (ARS). Please note that this is NOT a request to conduct validation of the Identity of the registrant.</li> </ul> <p>Maintenance: Once data is collected, Article 5 of the GDPR says that data must be kept up to date, which seemingly requires some sort of process that to be developed, documented, and put into place. The process should be used to:</p> <ul style="list-style-type: none"> <li>• identify specific records that need to be erased or rectified without delay;</li> <li>• flag and place registrar hold on domain name registrations identified as having false or incorrect data (pending correction from the Registered Name Holder);</li> <li>• ensure a registrar doesn't fall below certain statistical thresholds in terms of accuracy; and</li> <li>• trigger an ICANN compliance inquiry where statistical thresholds for accuracy for any given registrar fall below certain levels. This should be considered for the registrars or registries that are well below the norm as reported by ICANN's ARS. ICANN compliance should have the tools to require these registrars to submit and implement a rectification plan to improve its accuracy levels.</li> </ul> <p>Rectification: Article 5 of the GDPR says that ICANN and the contracted parties must ensure that personal data that are inaccurate ... are erased or rectified without delay. Accordingly, a process should be developed, documented and put into place for a uniform method to report and rectify inaccurate data. This method should be published for the public, data subjects, and members of the community to have as a uniform method to report and rectify inaccurate data. In this regard, ICANN Compliance should be empowered to receive and act on complaints related to rectification of inaccurate WHOIS complaints, by creating a process specifically for this purpose.</p>	Steve DelBianco; BC	<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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10.	<p>The EPDP Team recommends that accuracy requirements under the current contracts must be maintained.</p> <p>We notice that the registration data set frequently contains many inaccuracies. Although even the inaccurate data is of use in cybersecurity investigations, it is much less useful for issue resolution processes such as UDRP. If the accuracy of the data can somehow be improved by changes to ICANN processes and policies, we would support such improvements.</p>	<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 &amp; Governance Policy; Cole Quinn – Domains and Registry; Joanne Charles – Privacy &amp; Regulatory Affairs; Microsoft Corporation</p>	<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>
11.	<p>The AG IS expresses general support for Recommendation 3 but notes that existing Whois accuracy efforts, whether through policy or enforcement, do not appear to achieve an outcome consistent with the requirements of GDPR Art. 5.1(d). It is critical for the EPDP to take a holistic approach to data protection requirements, and ICANN’s mandate to ensure the overall security and stability of the DNS, while respecting the rights of data subjects to have accurate records of their personal data maintained.</p>	<p>Greg Mounier on behalf of Europol AGIS; Europol Advisory Group on Internet Security</p>	<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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12.	<p>The EPDP Team recommends that the policy stresses the importance of maintaining accurate and up-to-date registration information as currently required in the registrar contracts and as a legal obligation under data protection rules. The current standard Registrar Accreditation Agreement requires Registrars to investigate claimed WHOIS inaccuracies and take reasonable steps to correct inaccuracies once it learns of them (3.7.8). The Registrar Agreement also provides that Registrars may suspend or cancel a registrant's domain name registration for willful provision of inaccurate or unreliable information or willful failure to update information provided to Registrar within designated timeframes (3.7.7.2). Those requirements need to be carefully observed.</p> <p>ICANN's contract provisions (in particular in the 2013 Registrar Accreditation Agreement, Sections 3.2.2, 3.7.7.2 and 3.7.8) obligate registrars to take steps to respond to and correct reports of inaccurate WHOIS data.</p> <p>Consistent with Article 5.1.d of the GDPR, every reasonable step must be taken to ensure the accuracy of personal data, in this case, including data provided by registrants. Article 5 of the GDPR also extends beyond the right of a data subject, "having regard to the purposes for which [the data] are processed".</p> <p>Therefore, the GAC believes that Recommendation 3 should more explicitly recognize the importance of ensuring information accuracy consistent with GDPR article 5.1(d). This recognition would underscore the data subjects (registrants) rights to the accuracy of their data while also addressing concerns of those who rely on WHOIS information for legitimate purposes (such as maintaining the security and stability of the DNS).</p> <p>The GAC also believes that ICANN's ARS is critical to supporting data accuracy and should be recognized in the policy and/or supported in a processing Purpose (see previous comments). That being said, the GAC agrees that the EPDP is not in a position to recommend new requirements on contracted parties associated with data accuracy and that such policy enhancements are to be considered separately.</p>	Fabien Betremieux; GAC	<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>
<p><b>Intent and wording of this recommendation requires amendment</b></p>			

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13.	<p>The EPDP Team recommends that no consensus policy adopted to address registration data interfere with accuracy requirements under current ICANN contracts and consensus policies nor interfere with ICANN’s ability to enforce accuracy requirements, including by being able to access full registration data (including any data elements that are redacted from publication in any registration directory) in order to assess data accuracy and enforce accuracy contractual requirements. This includes full access to registration data to enable the operation of the ICANN WHOIS Accuracy Reporting System (“ARS”) and all validation functions under the ARS. In addition, because of the data accuracy requirements imposed by the GDPR, the EPDP Team recommends that requirements be developed to increase the accuracy of registration data.</p> <p>According to Article 5.1(d) of the GDPR, personal data shall be "accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay."</p> <p>The ico. (Information Commissioner’s Office in the UK) points out in its writings on “Principle (d): Accuracy” that one of the new features of GDPR as compared to the principles under its predecessor is that there is now a “clearer proactive obligation to take reasonable steps to delete or correct inaccurate personal data.” In addition, the European Commission’s technical input on ICANN’s proposed GDPR-compliant WHOIS models underscored the GDPR’s "Accuracy" principle and made clear that “reasonable steps should be taken to ensure the accuracy of any personal data obtained” for WHOIS databases and that ICANN should be sure to incorporate this requirement in whatever model it adopts.</p> <p>Accuracy of domain name ownership is paramount to collection of WHOIS/Registered Name Holder data in the first instance. In addition, since this data will be used by others (with a lawful interest), ensuring that it is accurate for them is also relevant. Moreover, as demonstrated by the .dk ccTLD, when accuracy and validation of registration data is taken seriously, it leads to dramatic decreases in abuse and illegal activity on the top level domain. See: <a href="https://ccnso.icann.org/sites/default/files/field-attached/presentation-difo-increase-trust-25jun18-en.pdf">https://ccnso.icann.org/sites/default/files/field-attached/presentation-difo-increase-trust-25jun18-en.pdf</a></p> <p>Prior to the adoption of the Temporary Specification, accuracy of WHOIS data was problematic. When the ARS was running, we know that almost 40% of randomly sampled registrations had a problem that warranted opening a compliance ticket on them. Therefore, even prior to ICANN seeking to modify its policies to comply with GDPR, a serious problem with accuracy existed. Now with the adoption of the Temporary Specification, the ARS is not even operational. Without improved accuracy, it is likely that the quality of WHOIS data will decline, and the important policies being discussed by the EPDP will increasingly apply to a large amount of data the accuracy of which is questionable, and would be contrary to the public interest rationale for the collection of WHOIS data.</p> <p>With the accuracy requirements that the GDPR imposes, accuracy is an issue fully within scope of the EPDP so that ICANN and contracted parties proactively address how they will ensure the accuracy of data in the first place, not just how they rectify inaccurate data brought to their attention after collection.</p>	<p>Brian King; IPC + Dean S. Marks; Coalition for Online Accountability + Brian King; MarkMonitor, Inc., a Clarivate Analytics company</p>	<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>The EPDP Team recommends that requirements related to the accuracy of registration data under the current ICANN contracts and consensus policies shall not be NEGATIVELY affected by this policy.</p> <p>There is a need for improvements related to the accuracy of registration data. The existing level of registration data accuracy is inadequate.</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><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>
15.	<p>"The GDPR has requirements for data accuracy, but there has been no adequate evaluation of whether ICANN's existing accuracy procedures comply with the GDPR."</p>	Greg Aaron; iThreat Cyber Group	<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>The accuracy requirements under the ICANN contracts and consensus policies need to be reflected in the EPDP recommendations, particularly because accuracy is itself a fundamental component of the GDPR. Greater accuracy will enhance the objectives of compliance with the GDPR while maintaining the WHOIS framework to the greatest extent possible, since accuracy is a common element of both sides of that equation. Therefore, the EPDP should consider requirements to include in its policy recommendations that will support maintaining and enhancing accuracy in the DNS, such as:</p> <ul style="list-style-type: none"> <li>• Additional validation - currently only one field is validated as operational under the RAA (email or telephone number). The EPDP should consider how to expand the validation requirements to include other fields.</li> <li>• Enhanced compliance tools - ICANN should be given broader powers to investigate the steps taken by a registrar in response to a complaint of inaccuracy, and to require registrars with unacceptably low accuracy rates to submit remediation plans.</li> <li>• Cross-field address validation - ICANN should implement this requirement under the 2013 RAA.</li> <li>• Rectification- ICANN should ensure that there is a standard, robust process for data subjects to have their data corrected.</li> <li>• Accuracy Reporting System -- ICANN should continue publishing its periodic Accuracy Reports, and the policy should allow ICANN the ability to access the full WHOIS records necessary to conduct this analysis.</li> </ul> <p>GDPR Article 5 states that personal data shall be "accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay."</p> <p>The ico. (Information Commissioner's Office in the UK) points out in its "Principle (d): Accuracy" that one of the new features of GDPR as compared to the principles under its predecessor is that there is now a "clearer proactive obligation to take reasonable steps to delete or correct inaccurate personal data." The ICO notes that "[i]n order to ensure that your records are not inaccurate or misleading in [the case of personal data someone else provides], you must:</p> <ul style="list-style-type: none"> <li>• take reasonable steps in the circumstances to ensure the accuracy of the information; and</li> <li>• carefully consider any challenges to the accuracy of the information."</li> </ul> <p>The ico. goes on to say that "The more important it is that the personal data is accurate, the greater the effort you should put into ensuring its accuracy. So if you are using the data to make decisions that may significantly affect the individual concerned or others, you need to put more effort into ensuring accuracy. This may mean you have to get independent confirmation that the data is accurate." The accuracy of WHOIS significantly affects not just the registrant but those third parties that access WHOIS for legitimate purposes such as intellectual property infringement of all types.</p> <p>The EPDP had been chartered to ensure that the new WHOIS policy complies with all of the principles of the GDPR. As a result, its work is not complete until it conducts a careful analysis of GDPR's accuracy principles, and updates the WHOIS policy to address the unacceptably low levels of accuracy that exists today.</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><b>[COMPLETED / NOT COMPLETED]</b> – [Instruction of what was done.]</p>

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17.	<p>Current ICANN contracts and consensus policies may need to be revised—and registration data may need to be collected, processed and shared with third parties—to ensure the accuracy of registration data.</p> <p>The WHOIS system can only be as successful in meeting its purposes as it is accurate. Entities providing data, as well as those entities relying on such data for legitimate purposes, have legitimate expectations that such data will be kept up to date and accurate. If that were not enough, the GDPR creates obligations to ensure data that is collected, processed, and shared is accurate. See GDPR art. 5(1)(d), <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1528874672298&amp;uri=CELEX%3A32016R0679">https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1528874672298&amp;uri=CELEX%3A32016R0679</a>. For both reasons, and in light of the fact that substantial data inaccuracies continue to persist within the WHOIS system, it stands to reason that current policies may be insufficient and require revision, and that data may need to be shared with third parties for purposes of verification, updating, and correction.</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>
18.	<p>GDPR principle 1(d) requires that “Personal Data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’).”</p> <p>It is not logical to examine if only some ICANN policies comply with GDPR but to not examine others. Here the EPDP WP makes a recommendation about data accuracy, but so far the EPDP team has not fully explored the data accuracy requirements of the GDPR, and whether the procedures in the 2013 Registrar Accreditation Agreement (RAA) and the Temp Spec are GDPR-compliant. That needs to be done.</p> <p>SSAC believes that data accuracy in RDS is vital, and has commented many times on the importance of accuracy in RDS data.</p> <p>A balanced situation is needed. An accredited RDS access program will allow examination of the data and challenges by parties who are pre-qualified and responsible actors, and some better requirements around reasonable access would assist non-accredited parties and would also be part of a balanced solution. Please see our notes regarding Preliminary Rec #12 / Question #8 for community input below.</p> <p>This situation also makes it more important for ICANN Compliance—which can request the data for examination--to perform accuracy checks going forward.</p> <p>See SAC104 for additional comments and information.</p>	Ben Butler; SSAC	<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>

**Delete recommendation**

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19.	<p>This recommendation is premature since changes in the WHOIS registration data (deletion of Admin contact info, etc.) could "affect" one or more of ICANN's "requirements related to the accuracy of registration data."</p> <p>The EPDP working group needs to do its work, then review ALL of ICANN's "requirements related to the accuracy of registration data" before making a such a broad and vague recommendation.</p>	John Poole; Domain Name Registrant	<p><b>Divergence</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
20.	<p>full deletion</p> <p>This recommendation is unnecessary; Policies regarding accuracy are not within the remit of the nothing in the temporary specification, and should not be a part of or the current set of recommendations affects policies regarding accuracy in any way. While DNRC understands that accuracy is important to specific stakeholder groups, and to the registrants, unreasonable fears about impact on existing accuracy policies should not be legitimized by a recommendation such as this one.</p>	A. Mark Massey; Domain Name Rights Coalition	<p><b>Divergence</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
21.	<p>Accuracy is an integral element to a sustainable domain name system. In our experience, registration information of domains established for illegitimate purposes regularly contain fake names and addresses. In fact, if there is a legitimate complaint regarding inaccurate registration data, there should be an independent verification procedure.</p>	Monique A. Goeschl; Verein für Anti-Piraterie der Film- und Videobranche (VAP)	<p><b>Divergence</b></p> <p><b>EPDP Response:</b></p> <p><b>Action Taken:</b></p> <p>[COMPLETED / NOT COMPLETED] – [Instruction of what was done.]</p>
22.	<p>This recommendation is unnecessary; nothing in the temp spec or the current set of recommendations affects policies regarding accuracy in any way. While we understand that accuracy is important to specific stakeholder groups, and to the registrant, unreasonable fears about impact on existing accuracy policies should not be legitimized by a recommendation such as this.</p>	Farzaneh Badii; Internet Governance Project	<p><b>Divergence</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>Not designated</b>			

#	Comment	Contributor	EPDP Response / Action Taken
23.	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, WIPO</li> <li>• Ashley Heineman; NTIA</li> <li>• Theo Geurts</li> <li>• Ivett Paulovics; MFSD Srl URS Provider</li> <li>• Ashley Roberts; Valideus</li> <li>• Renee Fossen; Forum - URS and UDRP Provider</li> <li>• Stephanie Perrin</li> </ul>	<p><b>EPDP Response:</b> none</p> <p><b>Action Taken:</b> none</p> <p><b>[COMPLETED]</b></p>