

EPDP

Proposal for Board Advice

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GDPR Implementation Premise

ICANN Org's stated objective:

- **“to identify the appropriate balance for a path forward to ensure compliance with the GDPR while maintaining the existing WHOIS system¹ to the greatest extent possible”**

ALAC Concerns

- Potential lack of Legal/Natural Person differentiation
- Lack of Geographic differentiation
- Disappearance of Thick WHOIS

Individually and together, these will decrease capabilities with regard to DNS abuse, cybersecurity and consumer protection.

Advice

- Board should advise GNSO to reopen and/or strongly consider ensuring that these issues are addressed in line with the Board's intent to keep WHOIS to the extent compliant with GDPR.