## **Registration Data Policy Implementation Timeline** Updated as of 3 April 2023

- 1. Several deliverables for the Registration Data Policy implementation are complete, including:
  - a. Published the Interim Registration Data Policy, which is in effect today;
  - b. Drafted research reports on Data Retention, Legal vs. Natural Persons, and Analyses of impacts to existing policies and procedures, which were shared with the GNSO Council, Implementation Review Team (IRT) and EPDP Phase 2 team;
  - c. Developed 22 amended policy documents to update existing consensus policy provisions impacted by the recommendations;
  - d. Drafted and reached agreement on all 16 sections of the draft Consensus Policy;
  - e. Collaborated with the GNSO Council and Board to resolve issues with Recommendations 7 and 12; and
  - f. Reviewed and incorporated EPDP Phase 2 Priority 2 recommendations.
  - g. Reviewed draft RDAP Profile draft documents from the RDAP Working Group
  - h. Completed a <u>Public Comment</u> period on Registration Data Policy implementation plan, encompassing 34 policy recommendations and the draft redlined consensus policies on 5 December 2022.
  - i. Published the <u>Public Comment Report</u> summarizing 269 comments received from 14 commenters.
- 2. Some of the challenges faced during the Expedited Policy Development Process (EPDP) Team, e.g., interaction with evolving legislation and legal guidance, time pressure, have also carried over and

impacted the implementation work. Some of the factors affecting the progress of the implementation work have included:

- a. Several recommendations were subject to varying interpretations and in some cases were escalated, using established processes, to the Board and GNSO Council to help resolve. In other cases, the IRT agreed to an interpretation that does not align with the recommendations after careful analysis and deliberation.
- b. The implementation of the Registration Data requires impact analysis of all existing consensus policies often requiring multiple reviews and further updates to related policies. The implementation work also adjusted to an expanded scope which requires analyzing and incorporating new Board adopted policy recommendations.
- 3. On 24 February 2022, the Board <u>adopted a resolution</u> on Recommendation 12 regarding the Registrant Organization Field and the Registration Data Policy Implementation team is at a point where many of the other questions facing the policy drafting have also been resolved. These achievements have enabled the construction of a comprehensive and more predictable project schedule. The summary timeline depicts the progress of work completed from the beginning of the project, including estimations, with target dates, for remaining work to be done.
- 4. To achieve publication of the Registration Data policy several milestones remain, including:
  - a. ICANN Org and IRT
    - i. Review of public comments and amend draft consensus policies as appropriate.
      - Once completed, a record of all comments and how they were taken into account will be added as an addendum to the <u>Public Comment Report</u> and made available on the <u>Registration Data Policy wiki page</u>.
    - ii. Announcement of effective date, which will take place once the Registration Data Policy is published.

- b. ICANN Org and Contracted Parties
  - i. The Data Protection Agreements between ICANN org and Contracted Parties, which require both parties to agree on the drafted data protection terms.
- 5. Given the complexities of the project, the number of stakeholders involved, the remaining dependencies, and tasks, deliverable dates as communicated here are a best estimate and subject to change with moderate risk. The Registration Data Implementation team continues to work together with the community to address challenges that affect the timeline. Potential items that we are unable to provide an estimated timeline as there are differing interpretations of the policy recommendation which may lead to an impasse are:
  - a. New Data Protection Agreements (DPA) per Phase 1 Recommendation 19: The DPA is a newly introduced agreement between the Contracted Parties and ICANN org; as such the agreement has been undergoing time-consuming negotiations.

## High-Level Timeline - RegDataPolicy Implementation

Implementation Task	Comments	Status	2019		2020			2021		2	022	202	3	2024		2025
			Q1 Q2 Q3 (	Q4 Q1	Q2 Q3	3 Q4	Q1	Q2 Q3	Q4	Q1 Q2	Q3 Q4	Q1 Q2	Q3 Q4 Q	1 Q2 Q3	Q4 Q1	Q2 Q3 Q4
Registration Data Policy Planning		In Progress											96%	)		
Interim Registration Data Policy Implementation	This interim policy was required to continue the requirement for Temp Spec.	Completed	100%													
Draft Registration Data Policy Implementation	This is dependent the CPH/ICANN org negotiation for Data Processing Agreement for Recommendation 19.	In Progress											90%	<b>)</b>		
Impact on Existing Policies & Procedures (Recommendation 27)	This task represents the work for ICANN org and IRT to review and redline all existing policies and procedures.	Completed								10	0%					
EPDP_P2, Priority 2 Consensus Recommendations and Consensus Policy Drafting	While these recommendations are not part of the EPDP Phase 1, the implementation team has accepted and included these in the project scope for efficient use of the ICANN org and community resources.	In Progress										99	%			
Consensus Policy language drafting for Public Comment		Completed									100%					
Community Input - Public Comment		Completed										92%				
Conduct Public Comment - Registration Data Policy	SM - 11 Oct PC close date extended from 31 Oct to 21 Nov per community request	Completed										100%				
Consensus Policy Implementation		Not Started									l				:	20%
Prepare legal notice to Contracted Parties		Not Started											%			
Publish Policy & legal notice to Contracted Parties	SM - Updated to 30 June per Dennis on 22 Feb 2023	Not Started											0%			
Implementation window (18 months)	This is based on estimates provided by contracted parties.	Not Started														0%
Policy Effective Date - Implementation Complete	SM - Updated to 31 December per Dennis on 22 Feb 2023	Not Started											<b>0</b> 9	%		

## Detailed Recommendations Timeline - RegDataPolicy

plementation Task	Status	Comments	Q1	2019 Q2 Q3	3 Q.	4 Q1		020
Recommendation 1 - Purposes	Completed	Recommendation not included in policy language and is Data Protection Specification		100			QZ	
	Completed	with ICANN Org and Contracted Parties.		100	/0			
Recommendation 2 - Phase 2 Consider additional Purposes or OCTO	Completed	Recommendation not in scope of IRT; Considered by EPDP-Phase2 and no additional Purpose created		100	%			
Recommendation 3 - Develop policy for Standardized Access	Completed	Recommendation not in scope of IRT; EPDP-Phase 2 policy development completed		100	%			
Recommendation 4 - Existing requirements on Accuracy not iffected by this policy	Completed	Recommendation not included in policy language; no change to existing contractual requirements		100	%			
Recommendation 5 - Data Elements to be Collected by Registrars	Completed	Included in Section 6 of policy language						
Recommendation 6 - Consent to Publish Additional Contact	Completed	Included in Section 9.2.4 of policy language				00%		
Recommendation 7 - Data Elements to be Transferred from Registrars to Registries	Completed	Included in Section 7 of policy language; Received guidance from the GNSO council which was incorporated.						
Recommendation 8 - DPA with Escrow Providers & Data Elements to be transferred	Completed	Included in Section 8 of policy language (DPAs w/ Escrow Providers not a dependency for public comment)						
Recommendation 8.1 - DPAs with Escrow providers	Completed	Recommendation not included in policy language; Data Protection Agreement - EPs/ICANN Org Negotiations; wont start until DPTs complete			1009	ó		
Recommendation 8.2, 8.3 - Data Transfer Requirements to Escrow Providers from Registries and Registrars	Completed	Included in Section 8 of policy language						
Recommendation 9 - Contractual Compliance	Completed	Recommendation not included in policy language; tied to Wave 2 Report						
Recommendation 10 - Published Minimum Public Data Set & Redaction	Completed	Included in Section 9.1 of policy language						
Recommendation 11 - Redaction of the City Field	Completed	Included in Section 9.2.2.4 of policy language.				100%		
Recommendation 12 - Publication and Redaction of the Drganization Field	Completed	Received guidance from the GNSO council and working with IRT to incorporate into Sections 6.6 & Implementation Notes of policy language.						
Recommendation 13 - Provision of Email Address/Web Form & Log files	Completed	Included in Section 9.2.3 & Section 11 of policy language						
Recommendation 14 - Privacy/Proxy Registrations	Completed	Included in Section 9.2.5 of policy language						
Recommendation 15 - Data Retention	Completed	Included in Section 12 of policy language						
Recommendation 16 - Geographic Basis	Completed	Included in Section 9.2.1 of policy language					100	)%
Recommendation 17 - Legal vs. Natural	Completed	Included in Section 9.2.1 of policy language						
Recommendation 18 - Requests for Lawful Disclosure	Completed	Included in Section 10 of policy language						
Recommendation 19 - DPAs with Contracted Parties	In Progress	Included in Section 5 of policy language; Included in the Data Protection Specification between ICANN org and Contracted Parties.						
Recommendation 20 - DPAs to document responsible parties	In Progress	Recommendation not included in policy language; Data Protection Specification - CPH/ICANN Org Negotiations + 3rd-Party + DRP						
Recommendation 21 - Council instruction to RPM Phase 2 VG	Completed	Recommendation out of scope for IRT; GNSO Council to launch RPM-Phase2			100%			
Recommendation 22 - DPAs with UDRP/URS Providers	Completed	Recommendation not included in policy language; Data Protection Agreement - DRP/ICANN Org Negotiations			1009	0		
Recommendation 23 - URS/UDRP Requirements	Completed	Recommendation not included in policy language; Redline of UDRP/URS policy and the GNSO Council to launch RPM-Phase2; RPM-P1 IRT					100	%
Recommendation 24 - Transfer Policy Requirements	Completed	Recommendation not included in policy language; Redline of Transfer policy + GNSO Council launched a review of this policy				10	0%	

		20	21			20	22			20	23	
Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
						100%	ó					
					1	00%						
							100%	•				
							100%					
							100 /d	1				
							100%					
							1(	00%				
							100%	)				
				4000/								
				100%								
			-	100%								
						100	%					
	1(	00%										
				100%								
											79%	

Implementation Task	Status	Comments		201	9		20	)20			202	1		202	22			2023
			Q1	Q2	Q3 C	4 Q1	Q2	Q3	Q4	Q1	Q2	Q3 C	24 Q1	Q2	Q3	Q4 (	Q1 Q2	2 Q3 (
Recommendation 25 - Review of Transfer Policy	Completed	Recommendation out of scope for IRT; GNSO Council launched a review of this policy			100	%												
Recommendation 26 - DPAs with non-contracted parties (3rd Party Vendors)	Completed	Recommendation not included in policy language; This recommendation is not needed for public comment and will not begin until Data Protection Agreement with contracted parties is completed.			100	%												
Recommendation 27 - Analyze and update the impacts on existing consensus policies	In Progress	Recommendation requires redlines to existing policies and procedures and isn't included in the policy language.																97%
Recommendation 28 - Policy Effective Date	Completed	Included in Section 4 of the policy language; ICANN org and IRT agreed that 29 Feb 2020 can't be met and will rely on Interim Registration Data Policy until policy effective date.													10	0%		
Recommendation 29 - Admin Contact Transition	Completed	Included in Section Section 6.8 of the policy language			10	0%												
EPDP_P2, Priority 2 Consensus Recommendations and Consensus Policy Drafting	In Progress	While these recommendations are not part of the EPDP Phase 1, the implementation team has accepted and included these in the project scope for efficient use of the ICANN org and community resources.																99%
P2-P2 Recommendation 19 - Privacy/Proxy Providers	Completed	Included in Section 9.2.5 of policy language.										10	0%					
P2-P2 Recommendation 20 - City Field	Completed	Included in Section 9.2.2.4 of policy language.										10	0%					
P2-P2 Recommendation 21 - Data Retention	Completed	Included in Section 12 of policy language.												1009	6			
P2-P2 Recommendation 22 - Purpose 2	In Progress	Recommendation not included in policy language and included Data Protection Specification between ICANN org and CPH.																99%

## Detailed Recommendations Timeline - RegDataPolicy

plementation Task	Status	Comments	Q1	2019 Q2 Q3	3 Q.	L Q1		020
Recommendation 1 - Purposes	Completed	Recommendation not included in policy language and is Data Protection Specification		100			QZ	
	Completed	with ICANN Org and Contracted Parties.		100	/0			
Recommendation 2 - Phase 2 Consider additional Purposes or OCTO	Completed	Recommendation not in scope of IRT; Considered by EPDP-Phase2 and no additional Purpose created		100	%			
Recommendation 3 - Develop policy for Standardized Access	Completed	Recommendation not in scope of IRT; EPDP-Phase 2 policy development completed		100	%			
Recommendation 4 - Existing requirements on Accuracy not iffected by this policy	Completed	Recommendation not included in policy language; no change to existing contractual requirements		100	%			
Recommendation 5 - Data Elements to be Collected by Registrars	Completed	Included in Section 6 of policy language						
Recommendation 6 - Consent to Publish Additional Contact	Completed	Included in Section 9.2.4 of policy language				00%		
Recommendation 7 - Data Elements to be Transferred from Registrars to Registries	Completed	Included in Section 7 of policy language; Received guidance from the GNSO council which was incorporated.						
Recommendation 8 - DPA with Escrow Providers & Data Elements to be transferred	Completed	Included in Section 8 of policy language (DPAs w/ Escrow Providers not a dependency for public comment)						
Recommendation 8.1 - DPAs with Escrow providers	Completed	Recommendation not included in policy language; Data Protection Agreement - EPs/ICANN Org Negotiations; wont start until DPTs complete			1009	ó		
Recommendation 8.2, 8.3 - Data Transfer Requirements to Escrow Providers from Registries and Registrars	Completed	Included in Section 8 of policy language						
Recommendation 9 - Contractual Compliance	Completed	Recommendation not included in policy language; tied to Wave 2 Report						
Recommendation 10 - Published Minimum Public Data Set & Redaction	Completed	Included in Section 9.1 of policy language						
Recommendation 11 - Redaction of the City Field	Completed	Included in Section 9.2.2.4 of policy language.				100%		
Recommendation 12 - Publication and Redaction of the Drganization Field	Completed	Received guidance from the GNSO council and working with IRT to incorporate into Sections 6.6 & Implementation Notes of policy language.						
Recommendation 13 - Provision of Email Address/Web Form & Log files	Completed	Included in Section 9.2.3 & Section 11 of policy language						
Recommendation 14 - Privacy/Proxy Registrations	Completed	Included in Section 9.2.5 of policy language						
Recommendation 15 - Data Retention	Completed	Included in Section 12 of policy language						
Recommendation 16 - Geographic Basis	Completed	Included in Section 9.2.1 of policy language					100	)%
Recommendation 17 - Legal vs. Natural	Completed	Included in Section 9.2.1 of policy language						
Recommendation 18 - Requests for Lawful Disclosure	Completed	Included in Section 10 of policy language						
Recommendation 19 - DPAs with Contracted Parties	In Progress	Included in Section 5 of policy language; Included in the Data Protection Specification between ICANN org and Contracted Parties.						
Recommendation 20 - DPAs to document responsible parties	In Progress	Recommendation not included in policy language; Data Protection Specification - CPH/ICANN Org Negotiations + 3rd-Party + DRP						
Recommendation 21 - Council instruction to RPM Phase 2 VG	Completed	Recommendation out of scope for IRT; GNSO Council to launch RPM-Phase2			100%			
Recommendation 22 - DPAs with UDRP/URS Providers	Completed	Recommendation not included in policy language; Data Protection Agreement - DRP/ICANN Org Negotiations			1009	0		
Recommendation 23 - URS/UDRP Requirements	Completed	Recommendation not included in policy language; Redline of UDRP/URS policy and the GNSO Council to launch RPM-Phase2; RPM-P1 IRT					100	%
Recommendation 24 - Transfer Policy Requirements	Completed	Recommendation not included in policy language; Redline of Transfer policy + GNSO Council launched a review of this policy				10	0%	

		20	21			20	22			20	23	
Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
						100%	ó					
					1	00%						
							100%	•				
							100%					
							100 /d	1				
							100%					
							1(	00%				
							100%	)				
				4000/								
				100%								
			-	100%								
						100	%					
	1(	00%										
				100%								
											79%	

Implementation Task	Status	Comments		201	9		20	)20			202	1		202	22			2023
			Q1	Q2	Q3 C	4 Q1	Q2	Q3	Q4	Q1	Q2	Q3 C	24 Q1	Q2	Q3	Q4 (	Q1 Q2	2 Q3 (
Recommendation 25 - Review of Transfer Policy	Completed	Recommendation out of scope for IRT; GNSO Council launched a review of this policy			100	%												
Recommendation 26 - DPAs with non-contracted parties (3rd Party Vendors)	Completed	Recommendation not included in policy language; This recommendation is not needed for public comment and will not begin until Data Protection Agreement with contracted parties is completed.			100	%												
Recommendation 27 - Analyze and update the impacts on existing consensus policies	In Progress	Recommendation requires redlines to existing policies and procedures and isn't included in the policy language.																97%
Recommendation 28 - Policy Effective Date	Completed	Included in Section 4 of the policy language; ICANN org and IRT agreed that 29 Feb 2020 can't be met and will rely on Interim Registration Data Policy until policy effective date.													10	0%		
Recommendation 29 - Admin Contact Transition	Completed	Included in Section Section 6.8 of the policy language			10	0%												
EPDP_P2, Priority 2 Consensus Recommendations and Consensus Policy Drafting	In Progress	While these recommendations are not part of the EPDP Phase 1, the implementation team has accepted and included these in the project scope for efficient use of the ICANN org and community resources.																99%
P2-P2 Recommendation 19 - Privacy/Proxy Providers	Completed	Included in Section 9.2.5 of policy language.										10	0%					
P2-P2 Recommendation 20 - City Field	Completed	Included in Section 9.2.2.4 of policy language.										10	0%					
P2-P2 Recommendation 21 - Data Retention	Completed	Included in Section 12 of policy language.												1009	6			
P2-P2 Recommendation 22 - Purpose 2	In Progress	Recommendation not included in policy language and included Data Protection Specification between ICANN org and CPH.																99%