

## 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 [Public Comment](#) period on Registration Data Policy implementation plan, encompassing 34 policy recommendations and the draft redlined consensus policies on 5 December 2022.
  - i. Published the [Public Comment Report](#) 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 [adopted a resolution](#) 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.
      1. Once completed, a record of all comments and how they were taken into account will be added as an addendum to the [Public Comment Report](#) and made available on the [Registration Data Policy wiki page](#).
    - 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.




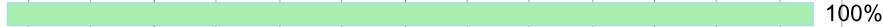




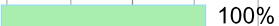

5. Given the complexities of the project, the number of stakeholders involved, the remaining dependencies, and tasks, deliverable dates as communicated here are a best estimate and subject to change with moderate risk. The Registration Data Implementation team continues to work together with the community 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.




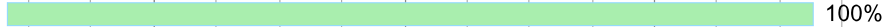




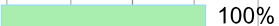

# High-Level Timeline - RegDataPolicy Implementation

| Implementation Task   | Comments   | Status             | 2019 |    | 2020 |    |    |    | 2021 |    |    |    | 2022 |    |    |    | 2023 |    |    |    | 2024 |    |    |    | 2025 |    |    |    |    |    |
|---|--|--------------------|------|----|------|----|----|----|------|----|----|----|------|----|----|----|------|----|----|----|------|----|----|----|------|----|----|----|----|----|
|   |  |                    | Q1   | Q2 | Q3   | Q4 | Q1 | Q2 | Q3   | Q4 | Q1 | Q2 | Q3   | Q4 | Q1 | Q2 | Q3   | Q4 | Q1 | Q2 | Q3   | Q4 | Q1 | Q2 | Q3   | Q4 | Q1 | Q2 | Q3 | Q4 |
| <b>Registration Data Policy Planning</b>                                    |  | <b>In Progress</b> |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| Interim Registration Data Policy Implementation                             | This interim policy was required to continue the requirement for Temp Spec.  | Completed          |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| Draft Registration Data Policy Implementation                               | This is dependent the CPH/ICANN org negotiation for Data Processing Agreement for Recommendation 19.   | In Progress        |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| 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          |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| 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        |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| Consensus Policy language drafting for Public Comment                       |  | Completed          |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| <b>Community Input - Public Comment</b>                                     |  | <b>Completed</b>   |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| Conduct Public Comment - Registration Data Policy                           | SM - 11 Oct PC close date extended from 31 Oct to 21 Nov per community request   | Completed          |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| <b>Consensus Policy Implementation</b>                                      |  | <b>Not Started</b> |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| 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        |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| Implementation window (18 months)   | This is based on estimates provided by contracted parties.   | Not Started        |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |
| Policy Effective Date - Implementation Complete                             | SM - Updated to 31 December per Dennis on 22 Feb 2023  | Not Started        |      |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |      |    |    |    |    |    |



| Implementation Task   | Status      | Comments   | 2019 |   |      |    | 2020 |    |    |    | 2021 |    |   |   | 2022 |    |      |     | 2023 |    |    |    |      |
|---|-------------|--|------|---|------|----|------|----|----|----|------|----|---|---|------|----|------|-----|------|----|----|----|------|
|   |             |  | Q1   | Q2  | Q3   | Q4 | Q1   | Q2 | Q3 | Q4 | Q1   | Q2 | Q3  | Q4  | Q1   | Q2 | Q3   | Q4  | Q1   | Q2 | Q3 | Q4 |      |
| 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.                    |      |  |      |    |      |    |    |    |      |    |   |   |      |    |      |     |      |    |    |    | 100% |
| Recommendation 29 - Admin Contact Transition                                      | Completed   | Included in Section Section 6.8 of the policy language   |      |  | 100% |    |      |    |    |    |      |    |   |   |      |    |      |     |      |    |    |    |      |
| 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.  |      |   |      |    |      |    |    |    |      |    |  | 100%  |      |    |      |     |      |    |    |    |      |
| P2-P2 Recommendation 20 - City Field  | Completed   | Included in Section 9.2.2.4 of policy language.  |      |   |      |    |      |    |    |    |      |    |  | 100%  |      |    |      |     |      |    |    |    |      |
| P2-P2 Recommendation 21 - Data Retention  | Completed   | Included in Section 12 of policy language.   |      |   |      |    |      |    |    |    |      |    |  |   |      |    | 100% |     |      |    |    |    |      |
| 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%  |     |      |    |    |    |      |



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|   |             |  | Q1   | Q2  | Q3   | Q4 | Q1   | Q2 | Q3 | Q4 | Q1   | Q2 | Q3 | Q4  | Q1   | Q2   | Q3 | Q4  | Q1   | Q2 | Q3 | Q4 |      |
| 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.                    |      |  |      |    |      |    |    |    |      |    |    |   |      |      |    |     |      |    |    |    | 100% |
| Recommendation 29 - Admin Contact Transition                                      | Completed   | Included in Section Section 6.8 of the policy language   |      |  | 100% |    |      |    |    |    |      |    |    |   |      |      |    |     |      |    |    |    |      |
| 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.  |      |   |      |    |      |    |    |    |      |    |    |  | 100% |      |    |     |      |    |    |    |      |
| P2-P2 Recommendation 20 - City Field  | Completed   | Included in Section 9.2.2.4 of policy language.  |      |   |      |    |      |    |    |    |      |    |    |  | 100% |      |    |     |      |    |    |    |      |
| P2-P2 Recommendation 21 - Data Retention  | Completed   | Included in Section 12 of policy language.   |      |   |      |    |      |    |    |    |      |    |    |  |      | 100% |    |     |      |    |    |    |      |
| 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% |      |    |    |    |      |