

Registration Data Policy Implementation Timeline

Updated as of 1 November 2022

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. Launched a [Public Comment](#) period on Registration Data Policy implementation plan, encompassing 34 policy recommendations and the draft redlined consensus policies on 24 August 2022.




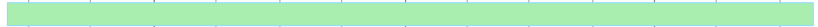




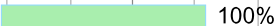

2. Some of the challenges faced during the Expedited Policy Development Process (EPDP) Team, e.g., interaction with evolving legislation and legal guidance, time pressure, have also carried over and impacted the implementation work. Some of the factors affecting the progress of the implementation work 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. Complete a public comment period (in progress) on the implementation plan and draft redlined consensus policies. Due to the number of documents and their complexity, the public comment includes an extended period for community review.
 - ii. Publish public comment report.
 - iii. Review of public comments and amend draft consensus policies as appropriate.
 - iv. 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							
			Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4				
Registration Data Policy Planning		In Progress																												
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																												
Community Input (Public Comment)		Not Started																												
Conduct Public Comment - Registration Data Policy	SM - 11 Oct PC close date extended from 31 Oct to 21 Nov per community request	In Progress																												
Consensus Policy Implementation		Not Started																												
Prepare legal notice to Contracted Parties		Not Started																												
Publish Policy & legal notice to Contracted Parties		Not Started																												
Implementation window (18 months)	This is based on estimates provided by contracted parties.	Not Started																												
Policy Effective Date - Implementation Complete		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.															98%						
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%						

