

EPDP Phase 2 Final Report

GAC/SSAC/IPC/BC Statements

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ALAC Position

- SSAD must be able to increase automated use cases that meet the recommended policy **WITHOUT** further policy development.
- Phase 1 Issues must be addressed in a timely manner.
 - Legal vs Natural
 - Accuracy and ARS
 - Anonymized e-mail addresses
- Financial model and affordability/accessibility
- Consumer protection priority

SSAC

No formal statement (yet)

- Reiterates SAC101v2 and SAC111
- Rec 6: Priority Levels (Security Invest. ≠ Prio 3)
- Rec 10: Response SLAs (5-10 days for Prio 3)
- Rec 12: Reveal disclosure of Requestor
- Rec 14: Financial sustainability

“Thank you to all for the diligent efforts thus far, and we look forward in good faith to continuing to support and improve the SSAD.”

GAC

No formal statement (yet)

- **Rec 5: Response requirements** – “The failure to deal with data accuracy requirements under the GDPR calls into question whether this recommendation achieves its intended purpose.”
- **Rec 6: Consumer protection**
- **Rec 8: CP Authorization** - “The failure to deal with data...”, lack of flexibility to adjust to changing conditions.
- **Rec 12: Disclosure Requirements** - “The failure to deal with data...”
- **Rec 14: Financial Sustainability**
- **Rec 18: Evolution**

BC/IPC

“The IPC and BC support privacy protection for personal data, and privacy law seeks to strike a balance between the individual right to privacy and other legitimate interests. Unfortunately, the Phase 2 Final Report fails to strike this balance.”

- Lack of Centralized Disclosure and Insufficient Mechanisms for Evolution
- Failure to Distinguish Between Natural and Legal Persons
- Failure to Address Accuracy of Data
- Inadequate Enforcement Policies
- Unpredictability (if and when...)

- Lack of reverse lookup

Registrars/Registries

- It's not perfect but we all tried hard...
- Top Priorities
 - Protecting customer 's personal data
 - Minimizing risk
 - Priority 2 items WERE addressed

(with apologies for glib characterization)

Possible ALAC Actions

- Revise Statement
- Add additional comment
- Do nothing more

Recommendation

- Submit an addendum to statement noting that although the each of our groups took a somewhat different approach to addressing out positions in respect to the report, the ALAC is in general agreement with all of the statements made in the SSAC, GAC and BC/IPC statements and consensus positions.

Recommendation considerations

- Submit an addendum to statement noting that although the each of our groups took a somewhat different approach to addressing out positions in respect to the report, the ALAC is in *general*? agreement with *all*? of the statements made in the SSAC, GAC and BC/IPC statements and consensus positions.

Discussion & Questions?