

**ALAC & GAC  
Topic Leads on  
EPDP Phase 2a**

Intersessional Call

15 December 2020

# Agenda

1. Welcome and roll call - Staff
2. Opening and presentation - Alan Greenberg
3. Natural vs. Legal
4. Anonymized email
5. Next steps
6. AOB

# Insanity

Doing the same thing over  
again and expecting  
different results.

[Not: Albert Einstein]

# Difficulties

- Existing legal memos likely to be all we have
  - Unclear if there will be opportunity to ask questions (meeting agenda implies perhaps).
- Other teams largely the same
  - Will be difficult to get acceptance

# Natural vs Legal

Issues for not addressing issue as I recall them:

- No current field
  - “Organization” used for a variety of purposes.
- Would require registrant action
  - Registrars prefer not to have to contact registrants
  - What if they don’t act?
- Potential for there being personal data in a legal person’s registration data
- We need to be careful not to recommend something that will simply result in the vast majority of entries being formally class as natural persons.

# Solution

- It is up to US to come up with a proposal which we can sell.
- Registrar's preference is to:
  - Do nothing
  - Minimize (or eliminate) risk
  - Minimize effort
  - Minimize cost

# Proposal...?

- Immediately start requesting L/N category at registration
- Relatively long time frame to phase in for existing registrations
- Initial determination based on Organization field (which may have been cleared already)
- ....

# Email Addresses

“Feasibility of unique contacts to have a uniform anonymized email address”

- Never really defined, so unclear we are all talking about the same thing.
- Bird & Bird: Pseudonymization vs Anonymization
- Confusing use of word “masking”



# Issues

- We never EVEN ATTEMPTED to do a balancing test about risk vs benefits
  - Determination that the pseud/anon address might be personal information (a REAL stretch) was enough to take it off the table.
  - Never considered the benefits (including those to registrants)

# Way forward

# Next Steps

- Meeting on Thursday
- Asking (among other things) for questions in relation to legal memos.
- Hard deadline of Monday, 11 January 2021 for input, questions, and possibly proposals.
- How to do this is a coordinated way?

# AOB