Registration Data Policy for gTLDs

Category: Consensus Policy

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What We Receive Input On:

ICANN Org is seeking community input on two different pubic comment forums:

1) **Public Comment Proceeding for the implementation plan of the Registration Data for gTLDs Consensus Policy**
    a) ICANN organization worked with the community-based Implementation Review Team (IRT) to produce the proposed Registration Data Policy for gTLDs and its implementation plan for community feedback.This public comment forum is intended to gather community feedback on the the proposed Registration Data Policy for gTLDs and its implementation plan for the EPDP Phase 1 recommendations adopted on 15 May 2019, the EPDP Phase 2 Priority 2 recommendations adopted on 21 June 2021 and the EPDP Phase 1 GNSO Council Supplemental Recommendation 12 adopted on 24 February 2022.

2) **Public Comment Proceeding for the implementation plan of the EPDP Phase 1 Recommendation 27**
    a) Recommendation 27 within the EPDP Phase 1 Final Report notes that as part of implementing the EPDP Phase 1 recommendations and to ensure consistency, updates will need to be made to existing policies and procedures that touch on Registration Data. Consistent with Recommendation 27, the Board directed ICANN org to work with the IRT to examine and report on the extent to which the EPDP Team's policy recommendations require modification of existing consensus policies.

    b) ICANN org performed a detailed review and analysis of 22 existing policies and procedures. 18 of the reviewed policies and procedures were determined to have been impacted by the Registration Data Policy. Impacts included outdated provision language (e.g., references to administrative contact requirements), higher-level issues such as the relevance or inconsistency of an existing policy or procedure with the new Registration Data Policy, or implications for existing contractual provisions. Three of the reviewed policies and procedures were determined to not be impacted by the Registration Data Policy. One advisory was reissued rather than redlined as part of the Recommendation 27 review. For a complete list of the reviewed policies and procedures, please refer to

EPDP Phase 1 Recommendation 27 list of existing policies and procedures in the Supporting Information section below.

This proposed policy represents the Stage-Two following the [Interim Registration Data Policy for gTLDs](#) published on 17 May 2019.

Proposals for your Input

- Registration Data Policy Consensus Policy
- Expedited Policy Drafting errors Development Process (EPDP) Phase 1 Recommendation 27 Redlined Consensus Policies.

Background:

On 17 May 2018, the ICANN Board adopted the [Temporary Specification for gTLD Registration Data](#). The Temporary Specification modified existing requirements in the Registrar Accreditation and Registry Agreements to comply with the European Union's General Data Protection Regulation (GDPR). Following the adoption of a Temporary Specification, the procedure for Temporary Policies as outlined in the Registrar Accreditation and Registry Agreements provides the Board "shall immediately implement the Consensus Policy development process set forth in ICANN's [Bylaws](#)." Additionally, the procedure provides this Consensus Policy development process on the Temporary Specification must be carried out within a one-year period as the Temporary Specification can only remain in force for up to one year from the effective date of 25 May 2018, i.e., the Temporary Specification will expire on 20 May 2019.

On 19 July 2018, the Generic Names Supporting Organization (GNSO) Council [initiated](#) an Expedited Policy Development Process (EPDP) to be developed in two phases and [chartered](#)the EPDP on the Temporary Specification for gTLD Registration Data Team. All GNSO Stakeholder Groups, Constituencies, and ICANN Advisory Committees, that indicated interest in participating, are represented on the EPDP Team, although the charter limits the number of members per group.

During Phase 1 of its work, the EPDP Team was tasked with determining if the Temporary Specification for gTLD Registration Data should become an ICANN Consensus Policy as is, or with modifications. In addition, the charter directed that the result must comply with the GDPR and take into account other relevant privacy and data protection laws. The purpose of Phase 2 of the EPDP Team's charter was to evaluate a System for Standardized Access/Disclosure of non-public gTLD Registration Data, address issues noted in the [Annex to the Temporary Specification](#), and address other issues deferred from Phase 1.

On 21 November 2018, the EPDP Team published its Phase 1 [Initial Report](#) for [public comment](#). The Initial Report contained the EPDP Team's preliminary recommendations and a set of questions for public comment. The EPDP Team also examined and made recommendations about: (i) the validity, legitimacy

and legal basis of the purposes outlined in the Temporary Specification, (ii) the legitimacy, necessity and scope of (x) the registrar collection of registration data and (y) the transfer of data from registrars to registries, each as outlined in the Temporary Specification, and (iii) the publication of registration data by registrars and registries as outlined in the Temporary Specification.

The Phase 1 Initial Report also provided preliminary recommendations and questions for the public to consider: (i) the transfer of data from registrars and registries to escrow providers and ICANN, (ii) the transfer of data from registries to emergency back-end registry operators (EBERO), (iii) the definition and framework for reasonable access to registration data, (iv) respective roles and responsibilities under the GDPR, i.e., the responsible parties, (v) applicable updates to ICANN Consensus Policies, and (vi) future work by the GNSO to ensure relevant Consensus Policies are reassessed to become consistent with applicable law. The EPDP Team documented each of the data processing steps, and the purpose and the legal basis for each. This foundational work was necessary to develop GDPR-compliant solutions and is available in the Report's Appendix.

After the publication of the Initial Report, the EPDP Team: (i) sought guidance on legal issues, (ii) carefully reviewed public comments received in response to the publication of the Initial Report, (iii) reviewed the work-in-progress with the community groups the Team members represent, and (iv) deliberated for the production of its Final Report. Consensus calls on the recommendations contained in this Final Report, as required by the GNSO Working Group Guidelines, was carried out by the EPDP Team Chair, as described here.

The GNSO Council adopted the Final Report on 4 March 2019. ICANN org commenced a public comment period on the Final Report on 4 March 2019. The public comment proceeding sought to obtain community input prior to Board action on the final policy recommendations of the GNSO EPDP on the Temporary Specification for gTLD Registration Data. The Summary and Analysis report for the public comment was published on 23 April 2019. The Board resolved to adopt 27 of the 29 recommendations, with some exceptions, on 15 May 2019. The Board did not adopt Recommendations 1 in terms of Purpose 2 and Recommendation 12 regarding the deletion of contents in the organization field.

A Consensus Policy Implementation Team was formed to begin work on the implementation plan. An Implementation Review Team (IRT) consisting of members of the PDP Working Group and interested community members was also formed to work with the Consensus Policy Implementation Team in line with the Consensus Policy Implementation Framework (CPIF) developed by ICANN's Global Domains Division and adopted by the GNSO Council.

The IRT served as a resource to implementation staff on questions related to the adopted policy and technical implementation issues. The IRT has also served as a resource to ICANN organization on the background and rationale of the policy recommendations as well as assisting the implementation team in the planning for the technical implementation of a policy change.

Working in advance of the Board resolution, the implementation team produced the concept of three stages of the policy implementation.

- **Stage 1:** Continue to implement measures consistent with the Temporary Specification for gTLD Registration Data that expires on 25 May 2019. This is an Interim Registration Data Policy while the permanent policy is prepared and published based on the recommendations,
- **Stage 2:** This stage will begin after the ICANN organization publishes a Registration Data Policy as a Consensus Policy and formally notifies the contracted parties. During this stage, contracted parties may implement the Interim Policy, the Registration Data Policy, or elements of both as they prepare for the effective date of the Registration Data Policy. The timing of this milestone is to be determined.
- **Stage 3:** Contracted parties must comply with the Registration Data Policy as of its effective date.

On 17 May 2019, ICANN org published the [Interim Registration Data Policy for gTLDs](#) pursuant to the Board's 15 May 2019 [resolution](#). The Interim Policy effective as of 20 May 2019 requires that contracted parties to continue to implement measures consistent with the [Temporary Specification for gTLD Registration Data](#), which expired on 25 May 2019. The EPDP Team recommended that the final effective date for the Registration Data Policy for gTLDs be 29 February 2020 (see Recommendation 28 from the Phase 1 Final Report). However,given the complexity of the implementation and the possibility of additional input on the recommendations from data protection authorities or other sources there is a possibility that this date has not been be met.

ICANN org first met with the IRT to begin work on implementation of the Registration Data Policy on 29 May 2019, including a detailed review of each recommendation and rationale and identification of implementation tasks needed to support these. On 2 October 2019, the Council liaison to the IRT provided an [update](#) to the Council, noting that the recommended date "was deemed to not be feasible due to not providing adequate time for IRT to complete a full review and analysis." This communication also noted that the "IRT needs to fully understand the implications and not rush a policy that has such a wide impact."

The Governmental Advisory Committee (GAC) also provided advice to the ICANN Board in its Montreal [Communique](#) to: "take all possible steps to ensure that the ICANN org and the EPDP Phase 1 Implementation Review team generate a detailed work plan identifying an updated realistic schedule to complete its work and provide and inform the GAC on the status of its progress by 3 January 2020." ICANN org sent a [letter](#) to the GAC chair on 6 January 2020 with a status update as requested by the GAC. In that letter ICANN org cited that the CPIF is being applied, and summarized both this process and progress to date. Additionally, the letter notes that the implementation plan that will be published for public comment will include an implementation timeline.

On 10 August 2020, the EPDP Phase 2 Team published their [Final Report](#) which outlines recommendations for a System for Standardized Access/Disclosure (SSAD) to nonpublic gTLD registration data, as well as recommendations and conclusions for "Priority 2" topics, carried over from the EPDP

Phase 1 discussions. Since the Priority 2 recommendations relate to the implementation of Phase 1 recommendations, the Board considered these four recommendations separately and adopted the Priority 2 recommendations on 21 June 2021.

Following several discussions between the ICANN Board and GNSO Council, on 24 February 2022, the Board adopted the GNSO Council's Supplemental Recommendation for EPDP Recommendation 12, concerning the deletion of data in the Organization field as it addresses the Board's overarching concern of loss of essential data.

Next Steps:

ICANN organization will prepare a public comment summary report at the conclusion of the comment period. ICANN organization and the IRT will consider those comments in preparation of the implementation of the updated Registration Data Policy for gTLDs consensus policy. After the implementation plan has been finalized, ICANN's Contracted Parties will be notified of the implementation/compliance deadlines. The publication of the policy is planned for 2023Q1 with an effective date of 2024Q4.

Supporting Information:

All the final recommendations from the Final Report of the Temporary Specification for gTLD Registration Data Expedited PDP have been evaluated by the implementation team and tasks have been determined for implementation. Each recommendation and associated implementation tasks are presented below. In analyzing the recommendations, the implementation team has identified several categories that can be addressed for review by the community.

1. Recommendations for research and study
2. Recommendations that did not result in tasks for the implementation team
3. Recommendations that did not result in language in the policy document
4. Recommendations that are specifically addressed in the policy language
5. Recommendations that are considered to be a "implementation interpretation" in the Phase 1 recommendations language
6. Recommendations that resulted in varying interpretation and significant objections were noted

1. **Research and Studies**

    1.1.   **Recommendation #15.1 -** Review of ICANN Org Uses of Registration Data After the Life of the Registration

    1.2.   **Recommendation #15.4** - Review of ICANN Data Retention Waiver Process

    1.3.   **Recommendation #17** - Natural vs. Legal

1.4. **Recommendation #27** - Updates to Existing Consensus Policies/Procedures

2. **Did Not Result in Tasks for the Implementation Team**

2.1. **Recommendation #2** - (Divergence) Additional Purposes
2.2. **Recommendation #3** - System for Standardized Access to Non-Public Registration Data
2.3. **Recommendation #4** - Contractual Accuracy Requirements
2.4. **Recommendation #21** - Instructions to RPM PDP Working Group
2.5. **Recommendation #25 -** Input to Transfer Policy Review
2.6. **EPDP Phase 2 Recommendation #19 -** Display of affiliated and/or accredited privacy / proxy providers
2.7. **EPDP Phase 2 Recommendation #21 -** Data Retention
2.8. **EPDP Phase 2 Recommendation #22 -** Purpose 2

3. **Did Not Result in Language in the Policy Document**

3.1. **Recommendation #1** - Purposes for Processing gTLD Registration Data
3.2. **Recommendation #8.1** - Data Protection Agreements with Escrow Providers
3.3. **Recommendation #9** – Transmission of Data from Registries/Registrars to ICANN Compliance
3.4. **Recommendation #19** - Data Processing Agreements with Contracted Parties
3.5. **Recommendation #20** - Data Processing Activities and Responsible Parties
3.6. **Recommendation #22** - Data Processing Agreements with Dispute Resolution Providers
3.7. **Recommendation #26** - Joint Controller and Data Processing Agreements with Non-Contracted Party Entities

4. **Resulted in Language addressed in the Policy Document**

4.1. **Recommendation #5** - Data Elements to be Collected by Registrars
4.2. **Recommendation #6** - Consent to Publish Additional Contact Information
4.3. **Recommendation #7** - Data Elements to be Transferred from Registrars to Registries
4.4. **Recommendation #8.2** - Data Transfer Requirements to Escrow Providers
4.5. **Recommendation #8.3** - Data Elements to be Transferred from Registries/Registrars to Escrow Providers
4.6. **Recommendation #10** - Data Redaction
4.7. **Recommendation #11** - Redaction of the City Field
4.8. **Recommendation #12** - Publication and Redaction of the Organization Field
4.9. **Recommendation #13** – Provision of Email Address/Web Form
4.10. **Recommendation #14** - Privacy/Proxy Registrations
4.11. **Recommendation #15.2** - Data Retention Requirements
4.12. **Recommendation #15.3** - Registrars should not be prohibited from setting their own retention periods, if required by law, legal proceedings, or other appropriate legal basis

4.13. **Recommendation #16** - (Divergence) Geographic Basis

4.14. **Recommendation #18** - Requests for Lawful Disclosure

4.15. **Recommendation #23** - URS/UDRP Requirements

4.16. **Recommendation #24** - Transfer Policy Requirements

4.17. **Recommendation #28** - Policy Effective Date

4.18. **Recommendation #29** - Admin Contact Transition

4.19. **EPDP Phase2 Recommendation #20** - City Field

5. <u>**Implementation Interpretations Identified**</u> <u>in the Phase 1 Recommendations</u>

5.1. Registrar Registration Expiration Date - Registrar to Collect or Generate

5.2. Name Server IP Address(es) collected by Registrar

5.3. DNSSEC Element transfer from Registrar to Registry Operator

5.4. Registrar Registration Expiration Date - Registrar Transfer to Data Escrow Providers

5.5. Registrar IANA ID Data Element transfer from Registrar to Data Escrow providers

5.6. Registry Registrant ID transfer to Data Escrow Provider by Registry Operators

5.7. Registry Expiry Date - Registrar MAY Publish

5.8. Registrar Registration Expiration Date - Registrar to publish

5.9. Nameserver IP address - Registrar and Registry Operator to Publish

5.10. Tech Emails - Registrar MAY maintain Log Files

5.11. Data Elements Matrix version reference

5.12. 2nd Email Address

6. <u>**Implementation approaches**</u> <u>taken for 19 recommendations in the final report that</u> **DO NOT** <u>have language:</u> <u>Rec 1</u>, <u>Rec 2</u>, <u>Rec 3</u>, <u>Rec 4</u>, <u>Rec 9</u>, <u>Rec 20</u>, <u>Rec 21</u>, <u>Rec 22</u>, <u>Rec 25</u>, <u>Rec 26</u>, <u>Rec 27</u>**,** <u>P2P2 Rec 19</u>, <u>P2P2 Rec 21</u>, <u>P2P2 Rec 22</u>

6.1. **Recommendation #1 - Purposes for Processing gTLD Registration Data**

6.1.1. This recommendation will be addressed in the terms of the data processing agreements with contracted parties, which will include language regarding the ICANN Purposes for processing gTLD Registration Data.

6.2. **Recommendation #2 - (Divergence) Additional Purposes**

6.2.1. This recommendation is a commitment statement by the EPDP team and will be considered as part of Phase 2 of its work.

6.3. **Recommendation #3 - System for Standardized Access to Non-Public Registration Data**

6.3.1. This recommendation is a statement by the EPDP team to make a new recommendation regarding "Standardized Access" as part of its Phase 2 efforts. The EPDP team addressed this topic as part of its Phase 2 work.

6.4. **Recommendation #4 - Contractual Accuracy Requirements**

6.4.1. This recommendation is a statement by the EPDP team to clarify that there is no intention to change the requirements related to accuracy. Therefore, the

implementation team has addressed this recommendation by taking note to ensure that accuracy requirements are not changed. Additional language or implementation notes in the Registration Data Policy are not required to address this point.

6.5. **Recommendation #9 – Transmission of Data from Registries/Registrars to ICANN Compliance**

    6.5.1. The recommendation is aimed at contracted parties to make contract changes if necessary thus, no additional policy language is needed to address this recommendation.

6.6. **Recommendation #8.1 - Data Protection Agreements with Escrow Providers**

    6.6.1. This recommendation is addressed in the data processing agreements between ICANN org and data escrow providers. As such, no additional policy language is needed to address this recommendation.

6.7. **Recommendation #15.1 - Review of ICANN Org Uses of Registration Data After the Life of the Registration**

    6.7.1. This recommendation has been addressed in the Data Retention: Review of ICANN Org Processes report, which provides an analysis of ICANN org's active processes and procedures to identify and document the instances in which it would request personal data from a registrar beyond the period of the life of the registration

6.8. **Recommendation #15.4 - Review of ICANN Data Retention Waiver Process**

    6.8.1. This recommendation has been addressed in the Review of ICANN Process for Handling Registrar Data Retention Waiver Requests report, which provides an analysis of the data retention waiver process based on available quantitative data and case experience, and aims to identify potential areas in which the process could be adjusted.

6.9. **Recommendation #17 - Natural vs. Legal**

    6.9.1. This recommendation has been addressed in the Differentiation between Legal and Natural Persons in Domain Name Registration Data Directory Services (RDDS) report prepared per Recommendation 17.2, which provides an analysis on the costs and benefits of differentiating between legal and natural persons in RDDS.

6.10. **Recommendation #19 - Data Processing Agreements with Contracted Parties**

    6.10.1. This recommendation is addressed in the data processing agreements between ICANN org and contracted parties. The data processing terms are intended to define the principles and procedures that the parties shall adhere to and the responsibilities the parties owe to each other.

6.11. **Recommendation #20 - Data Processing Activities and Responsible Parties**

    6.11.1. This recommendation is covered in the requirements defined for EPDP Recommendation 19 concerning data protection agreements between ICANN and Contracted Parties. As such, no additional policy language is needed to address this recommendation.

6.12. **Recommendation #21 - Instructions to RPM PDP Working Group**
  6.12.1.   This recommendation has been addressed in the URS recommendations of the RPM PDP Working Group report.

6.13. **Recommendation #22 - Data Processing Agreements with Dispute Resolution Providers**
  6.13.1.   This recommendation is covered in the requirements defined for EPDP Recommendation 19 concerning data protection agreements. As such, no additional policy language is needed to address this recommendation.

6.14. **Recommendation #25 - Input to Transfer Policy Review**
  6.14.1.   This recommendation requests that the GNSO, as part of its review of the Transfer Policy, review the implications, as well as adjustments, that may be needed to the Transfer Policy as a result of GDPR.

6.15. **Recommendation #26 - Joint Controller and Data Processing Agreements with Non-Contracted Party Entities**
  6.15.1.   This recommendation is covered in the requirements defined for EPDP Recommendation 19 concerning data protection agreements. As such, no additional policy language is needed to address this recommendation.

6.16. **Recommendation #27 - Updates to Existing Consensus Policies/Procedures**
  6.16.1.   This recommendation specifies the need to identify and address all policies and procedures that might be affected by the EPDP Phase 1 policy recommendations and the new Registration Data Policy. The relevant analysis of impacted areas as part of Recommendation 27 work is being completed in multiple "waves". Wave 1 Report covered existing consensus policies in effect, Wave 1.5 Report covered policy recommendations approved but not yet implemented, and Wave 2 will cover (non-policy) procedures. Proposed updates to the different policies are being addressed with the oversight of the IRT.

6.17.   EPDP Phase 2 Recommendation #19
  6.17.1.   This recommendation will be applicable when a new policy is implemented that defines the display of affiliated or Accredited Privacy/Proxy service.

6.18.   **EPDP Phase 2 Recommendation #21 Data Retention**
  6.18.1.   This recommendation provides further clarity to the EPDP Phase 1 Recommendation 15 concerning data retention. As such, no additional policy language is needed to address this recommendation.

6.19.   EPDP Phase 2 Recommendation #22 - Purpose 2
  6.19.1.   This recommendation adds an additional purpose to the EPDP Team Phase 1 purposes. As such, no additional policy language is needed to address this recommendation.

7.   Implementation approaches taken for 19 recommendations that **DO** have language : Rec 5, Rec 6, Rec 7, Rec 8.2, Rec 8.3, Rec 10, Rec 11, Rec 12, Rec 13, Rec 14, Rec 15.2 & 15.3, Rec 18, Rec 23, Rec 24, Rec, 28, Rec 29, P2P2 Rec 20

7.1. **Recommendation #5 - Data Elements to be Collected by Registrars**
    7.1.1. This recommendation is incorporated into Section 7 as well as "Implementation Notes" Section A of the draft Registration Data Policy.

7.2. **Recommendation #6** - **Consent to Publish Additional Contact Information**
    7.2.1. This recommendation is incorporated into Section 10.3.2 of the draft Registration Data Policy.

7.3. **Recommendation #7** - **Data Elements to be Transferred from Registrars to Registries**
    7.3.1. This recommendation is incorporated into Section 8 as well as "Implementation Notes" Section B of the draft Registration Data Policy.

7.4. **Recommendation #8.2 - Data Transfer Requirements to Escrow Providers**
    7.4.1. This recommendation is incorporated into Section 9 of the draft Registration Data Policy.

7.5. **Recommendation #8.3** - **Data Elements to be Transferred from Registries/Registrars to Escrow Providers**
    7.5.1. This recommendation is incorporated into Section 9 as well as "Implementation Notes" Section B of the draft Registration Data Policy.

7.6. **Recommendation #10 - Data Redaction**
    7.6.1. This recommendation is incorporated into Section 10 of the draft Registration Data Policy.

7.7. **Recommendation #11 - Redaction of the City Field**
    7.7.1. This recommendation is incorporated into Section 10.3.1.5 of the draft Registration Data Policy.

7.8. **Recommendation #12 - Publication and Redaction of the Organization Field**
    7.8.1. This recommendation is incorporated into Section 10.3.5 as well as "Implementation Notes" Section C of the draft Registration Data Policy.

7.9. **Recommendation #13 – Provision of Email Address/Web Form**
    7.9.1. This recommendation is incorporated into Sections 12.1 of the draft Registration Data Policy.

7.10. **Recommendation #14 - Privacy/Proxy Registrations**
    7.10.1. This recommendation is incorporated into Section 10.3.4 of the draft Registration Data Policy.

7.11. **Recommendation #15.2 - Data Retention Requirements**
    7.11.1. This recommendation is incorporated into Section 13 of the draft Registration Data Policy.

7.12. **Recommendation #15.3 - Registrars should not be prohibited from setting their own retention periods, if required by law, legal proceedings, or other appropriate legal basis**

7.12.1. This recommendation is incorporated into the "Implementation Notes" Section D of the draft Registration Data Policy.

7.13. **Recommendation #16 - (Divergence) Geographic Basis**
7.13.1. This recommendation is incorporated into Section 10.3 of the draft Registration Data Policy.

7.14. **Recommendation #18 - Requests for Lawful Disclosure**
7.14.1. This recommendation is incorporated into Sections 12.2 of the draft Registration Data Policy.

7.15. **Recommendation #23 - URS/UDRP Requirements**
7.15.1. This recommendation is incorporated into the URS and UDRP Rules and Procedures.

7.16. **Recommendation #24 - Transfer Policy Requirements**
7.16.1. This recommendation is incorporated into the TransferPolicy.

7.17. **Recommendation #28 - Policy Effective Date**
7.17.1. This recommendation is incorporated into Section 4 of the draft Registration Data Policy.

7.18. **Recommendation #29** - **Admin Contact Transition**
7.18.1. This recommendation is incorporated into Section 7.8 of the draft Registration Data Policy.

7.19. **EPDP Phase 2 Recommendation #20 - City Field**
7.19.1. This recommendation is incorporated in Section 10.3.7 of the draft Registration Data Policy

Documents and Resource Links:
- Draft Registration Data Policy for gTLDs (OneDoc converted to PDF)
- Interim Registration Data Policy for gTLDs published on 17 May 2019
- Data Elements Matrix analysis
- Summary of IRT inputs
- Frequently Asked Questions (on IRT wiki)
- Data Elements Publication Example (could be renamed)
- Data Processing Agreements with Contracted Parties
- Drafting Errors and Implementation Explanations

Additional Information:
- **ICANN Board and GNSO Council Correspondence:**
  - Board and Council EPDP Phase 1 Consultation Process
  - Board Response to EPDP Phase 1 Consultation Re: Rec 1 Purpose 2; Rec 12
  - Board Response receipt of GNSO Supplemental Recommendation for Rec 12

- - Board Letter to the GNSO Council Potential Impasse Concerning Implementation of EPDP Phase 1 – Recommendation 7
    - GNSO Council Response to Board Letter Re: Next Steps on EPDP Phase 1 Recommendation 7 Implementation and Thick WHOIS Transition Policy
    - Board Response to Supplemental Recommendation on EPDP Phase 1, Recommendation 12
    - GNSO Council to ICANN Board Correspondence regarding Input Concerning Implementation of EPDP Phase 1, Recommendation 7 Motion
    - GNSO Council Clarification on Supplemental Recommendation on EPDP Phase 1, Recommendation 12
    - Board Clarification letter to GNSO Council on implementing Supplemental Recommendation, Recommendation 12
    - Response from GNSO Council regarding EPDP Phase 1 Recommendation 12 to confirm and/or clarify the Board's assumptions
    - Board Confirmation letter to GNSO Council on Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Phase 1, Recommendation 12

- **ICANN org Baseline Rationale Documents:**
    - Baseline Rationale Documents - Privacy
    - Baseline Rationale Documents - 24 Hour Disclosure
    - Baseline Rationale Documents - Retention
    - Baseline Rationale Documents - Tech Contact

- **Additional Resource Links:**
    - Board Resolution on 15 May 2020 for GNSO EPEP Recommendations on the Temporary Specifications for gTLD Registration
    - The Final Recommendations Report of the GNSO Expedited Policy Development Process (EPDP) Team on the Temporary Specification for gTLD Registration Data for submission to the GNSO Council
    - Version 1.8 of the Data Elements Matrix 20 Feb
    - Registration Data Policy IRT wiki space
    - Legal Memos and Inputs to EPDP

EPDP Phase 1 Recommendation 27 list of existing policies and procedures reviewed for impacts by the Registration Data Policy

1. **Policies and Procedures impacted by the Registration Data Policy:**
    1.1. Registry Registration Data Directory Services Consistent Labeling and Display Policy (CL&D)
    1.2. Thick WHOIS Transition Policy for .COM, .NET and .JOBS
    1.3. Restored Names Accuracy Policy (RNAP)

2.   Policies and Procedures not impacted by the Registration Data Policy:

3.   Advisory reissued rather than redlined: