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STATUS: Ratified

AT-LARGE ADVISORY COMMITTEE

Statement on the Registration Data Consensus Policy for gTLDs Public Comment Proceeding.

Ratification

On 24 August 2022, the Public Comment proceeding opened for the [Registration Data Consensus for gTLDs](#). An At-Large [workspace](#) was created for the Public Comment submission. The At-Large Consolidated Policy Working Group (CPWG), decided it would be in the interest of end users to develop and submit an At-Large Advisory Committee (ALAC) statement. Alan Greenberg and Hadia Elminiawi volunteered to draft the initial ALAC statement.

On 01 November 2022, Alan Greenberg and Hadia Elminiawi drafted the initial ALAC statement, which was posted to its workspace by ICANN Policy staff in support of the At-Large community. The recommendations and At-Large positions were discussed during weekly CPWG calls. At-Large members were invited to provide input during the CPWG calls and via email.

On 21 November 2022, the At-Large Public Comment was submitted by staff pending ratification. On 30 November 2022, additional comments were added to the statement in regards to Thick Whois. These comments were approved by the CPWG. On 30 November, Jonathan Zuck, ALAC chair, requested that the statement be sent out to ALAC for a consensus call through 5 December 2022, on the added comments.

The statement was ratified by the ALAC and submitted to the ICANN Public Comment feature. The ALAC endorsed the statement with 15 votes in favor, 0 votes against, and 0 abstentions. You may view the results [here](#).

AT-LARGE ADVISORY COMMITTEE

Executive Summary

The At-Large Advisory Committee (ALAC) has comments and concerns in regards to the following sections of this Public Comment proceeding:

- (1) Section 4: Effective Date
- (2) Section 10: Disclosure requests
- (3) Background Section of the Registration Data Consensus Policy
- (4) Thick Whois Transition Policy

Introduction

This Public Comment seeks input in relation to the implementation of the recommendations of phase one of the EPDP on gTLD registration data. The registration data consensus policy sets the requirements for processing gTLD registration data for ICANN accredited registries and registrars. The implementation report includes 12 sections.

Comments

The ALAC appreciates the opportunity to provide its comments on the gTLD registration data consensus policy. As this policy sets the necessary foundation for the processing of gTLD registration data. Namely, the purposes for the processing of the gTLD registration data and data elements required to be collected, published and redacted, it is important to accurately implement this policy in due time. However, we would like to note that according to recommendation number 18, response time to disclosure requests were meant to be finalized through the requirements set during the implementation stage. As such we do not agree with section number 10.6 as it sets responses to urgent lawful disclosure requests to up to two business days. This would mean if a request comes on a weekend, the response to an urgent lawful disclosure request could be provided after four days. We need to remember that urgent requests are requests related to circumstances that pose an imminent threat to life, serious bodily injury, critical infrastructure, or child exploitation. Therefore, the response time set in section 10 in relation to urgent requests will not satisfy the purpose of the request.

The ALAC also notes that in accordance with recommendation number 18, the ALAC does not expect that the implementation of Section 10 (Reasonable requests) will prevent or hinder the undergoing work in relation to a standardized system for access/disclosure (SSAD).

(New Form for Submission)

Registration Data Consensus Policy for gTLDs

Category: Policy
Requester: ICANN org
ICANN org Contact(s) globalsupport@icann.org

Please Read These Important Instructions Before Submission.

The goal of Part 1 of this guided submission form is to lead respondents through the sections and requirements of the Registration Data Consensus Policy for Generic Top-Level Domains (gTLDs) and identify if they accurately reflect the intent of the Expedited Policy Development Process (EPDP) on the Temporary Specification (TempSpec) for gTLD Registration Data Phase 1 and Phase 2 Priority 2 Consensus Policy recommendations. Please limit your feedback to the implementation of the policy recommendations and not the policy recommendations themselves.

The goal of Part 2 of this guided submission form is to lead respondents through the review of existing policies and procedures impacted by the Registration Data Consensus Policy for gTLDs. Please review each policy or procedure thoroughly and provide input on whether the suggested redlined changes accurately reflect the intent and scope of the Registration Data Consensus Policy for gTLDs.

First Name

At-Large Advisory Committee (ALAC)

Last Name

Policy staff in support of the At-Large Community

Check if you prefer to have your affiliation displayed as the author of this submission, rather than the first and last name

Affiliation

Email

staff@atlarge.icann.org

Part 1

Section 1 of the Registration Data Consensus Policy

This section pertains to the Introduction to the Registration Data Consensus Policy.

Please provide your feedback:

Section 1 accurately reflects the policy recommendations with no issues.

Section 1 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 1 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 1. (Please describe further.)

If B, C, or D, please elaborate.

Section 2 of the Registration Data Consensus Policy

This section pertains to the scope of the Registration Data Consensus Policy.

Please provide your feedback:

Section 2 accurately reflects the policy recommendations with no issues.

Section 2 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 2 does not accurately reflect the policy recommendations. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 2. (Please describe further.)

If B, C, or D, please elaborate.

Section 3 of the Registration Data Consensus Policy

This section pertains to the definitions and interpretations used within the Registration Data Consensus Policy.

Please provide your feedback:

Section 3 accurately reflects the policy recommendations with no issues.

Section 3 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 3 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 3. (Please describe further.)

If B, C, or D, please elaborate.

Section 4 of the Registration Data Consensus Policy

This section pertains to the date of when the Registration Data Consensus Policy will be required to be implemented by Contracted Parties.

Please provide your feedback:

Section 4 accurately reflects the policy recommendations with no issues.

Section 4 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 4 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 4. (Please describe further.)

If B, C, or D, please elaborate.

The EPDP Recommendations were issued in February 2019 and expected to be approved by the GNSO and Board in short order. The EPDP team (including representatives of contracted parties) understood that it would take some time to translate the recommendations into policy and then to have contracted parties implement that policy. Accordingly, Recommendation 28 extended the validity of terms within the Temporary Specification to allow for the creation and implementation of the policy. After due consideration the EPDP team set a deadline for contracted party compliance at 29 February 2020 (1 year after issuance of the Phase 1 report).

Clearly the EPDP team underestimated the amount of time needed to translate the recommendations into policy. However, the EPDP team, including registry and registrar representatives unanimously believed that the allowed period was sufficient for contracted party implementation.

Given Recommendation 28, and the fact that these recommendations are reasonably consistent with the Temporary Specification, and that the differences have been well known now for several years, the ALAC believes that allowing an additional 18 months for contracted party implementation is excessive and uncalled for.

Section 5 of the Registration Data Consensus Policy

This section pertains to the Data Protection Agreements with the ICANN organization and Contracted Parties.

Please provide your feedback:

Section 5 accurately reflects the policy recommendations with no issues.

Section 5 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 5 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 5. (Please describe further.)

If B, C, or D, please elaborate.

Section 6 of the Registration Data Consensus Policy

This section pertains to the Collection of Registration Data.

Please provide your feedback:

Section 6 accurately reflects the policy recommendations with no issues.

Section 6 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 6 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 6. (Please describe further.)

If B, C, or D, please elaborate.

Section 7 of the Registration Data Consensus Policy

This section pertains to the Transfer of Registration Data from Registrar to Registry Operator.

Please provide your feedback:

Section 7 accurately reflects the policy recommendations with no issues.

Section 7 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 7 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 7. (Please describe further.)

If B, C, or D, please elaborate.

Section 8 of the Registration Data Consensus Policy

This section pertains to the Transfer of Registration Data to Data Escrow Providers.

Please provide your feedback:

Section 8 accurately reflects the policy recommendations with no issues.

Section 8 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 8 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 8.

If B, C, or D, please elaborate.

Section 9 of the Registration Data Consensus Policy

This section pertains to the Publication of Domain Name Registration Data.

Please provide your feedback:

Section 9 accurately reflects the policy recommendations with no issues.

Section 9 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 9 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 9. (Please describe further.)

If B, C, or D, please elaborate.

Section 10 of the Registration Data Consensus Policy

This section pertains to Disclosure Requests.

Please provide your feedback:

(_) Section 10 accurately reflects the policy recommendations with no issues.

(_) Section 10 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

(x) Section 10 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

(_) Additional concern or issue identified in Section 10. (Please describe further.)

If B, C, or D, please elaborate.

The Final Report said "A separate timeline of [less than X business days] will be considered for the response to 'Urgent' Reasonable Disclosure Requests, those Requests for which evidence is supplied to show an immediate need for disclosure [time frame to be finalized and criteria set for Urgent requests during implementation]."

It is important to note the definition of "URGENT" requests. ***"Urgent Requests for Lawful Disclosure" are limited to circumstances that pose an imminent threat to life, serious bodily injury, critical infrastructure, or child exploitation in cases where disclosure of the data is necessary in combatting or addressing this threat. Critical infrastructure means the physical and cyber systems that are vital in that their incapacity or destruction would have a debilitating impact on economic security or public safety.***

It is unfortunate that the report specified "business days" as the basis for the policy. That being said, to set it at TWO days in light of the definition of Urgent requests is totally unreasonable! It is not uncommon to have three consecutive non-business days resulting in a potential of 5 calendar days for responses to URGENT requests.

The ALAC notes that the RAA already includes provision 3.18.2: ***Well-founded reports of Illegal Activity submitted to these contacts must be reviewed within 24 hours by an individual who is empowered by Registrar to take necessary and appropriate actions in response to the report.***

As such, registrars must already have staff who are able and authorized to respond to critical situation within 24 hours. There is no reason not to use these same capabilities for situations where there is imminent threat to life, serious bodily injury, critical infrastructure, or child exploitation.

The ALAC also notes that the recently approved EU NIS 2 Directive allows an absolute maximum of 72 hours for response to ALL requests for access (not just critical requests).

Section 11 of the Registration Data Consensus Policy

This section pertains to maintaining Log Files.

Please provide your feedback:

Section 11 accurately reflects the policy recommendations with no issues.

Section 11 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 11 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 11. (Please describe further.)

If B, C, or D, please elaborate.

Section 12 of the Registration Data Consensus Policy

This section pertains to the Retention of Registration Data.

Please provide your feedback:

Section 12 accurately reflects the policy recommendations with no issues.

Section 12 accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 12 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 12. (Please describe further.)

If B, C, or D, please elaborate.

Addendum I of the Registration Data Consensus Policy

This section pertains to the implementation of Whois (available via port 43) and web-based Whois directory services.

Please provide your feedback:

Addendum I accurately reflects the policy recommendations with no issues.

Addendum I accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Section 13 does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 13. (Please describe further.)

If B, C, or D, please elaborate.

Addendum II of the Registration Data Consensus Policy

This section pertains to the Registrant Organization Field.

Please provide your feedback:

Addendum II accurately reflects the policy recommendations with no issues.

Addendum II accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Addendum II does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 14. (Please describe further.)

If B, C, or D, please elaborate.

Implementation Notes of Registration Data Consensus Policy

Implementation notes are not considered policy requirements but are included to provide guidance on how to best implement the requirements described in sections 5 -12.

Please provide your feedback:

Implementation Notes accurately reflect the policy recommendations with no issues.

Implementation Notes accurately reflect the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

Implementation Notes do not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

Additional concern or issue identified in Section 15. (Please describe further.)

If B, C, or D, please elaborate.

Background Section of the Registration Data Consensus Policy

This section pertains to the general background of the Registration Data Consensus Policy.

Please provide your feedback:

() Background Section accurately reflects the policy recommendations with no issues.

() Background Section accurately reflects the policy recommendations; however, the following clarification(s) are suggested. (Please provide the suggested language change.)

() Background Section does not accurately reflect the intent of the Registration Data Consensus Policy. (Please provide an explanation including Recommendations from the EPDP-TempSpec Phase 1 or Phase 2 Final Report where there are inconsistencies and the suggested change to make this section consistent.)

() Additional concern or issue identified in Section 16. (Please describe further.)

If B, C, or D, please elaborate.

[The document gives the date the EPDP Team issued its Initial report and the date the GNSO Council adopted the Final Report, but should also give the date of the Final Report \(20 February 2019\).](#)

Part 2

Additional Whois Information Policy (AWIP)

Please review the Redlined AWIP.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the AWIP correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Expired Registration Recovery Policy (ERRP).

Please review the Redlined ERRP.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the ERRP correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Protection of International Governmental Organization (IGO) and International Non-Governmental Organization (INGO) Identifiers in all gTLDs Policy.

Please review the Redlined Protection of IGO and INGO Identifiers in all gTLDs Policy.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the Protection of IGO and INGO Identifiers in all gTLDs Policy correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Registry Registration Data Directory Services Consistent Labeling and Display (CL&D) Policy

Please review the Redlined CL&D Policy.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the CL&D Policy correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Restored Names Accuracy Policy (RNAP)

Please review the Redlined RNAP.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the RNAP correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Revised ICANN Procedure for Handling Whois Conflicts with Privacy Law

Please review the Redlined Revised ICANN Procedure for Handling Whois Conflicts with Privacy Law.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the Revised ICANN Procedure for Handling Whois Conflicts with Privacy Law correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Thick Whois Transition Policy for .COM, .NET, and. JOBS

Please review the Redlined Thick Whois Transition Policy.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the Thick Whois Transition Policy correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes. [EPDP recommendation on the transfer of data from registrars to registries makes the implementation of the Thick Whois policy difficult, but it does not make it impossible. This is particularly true for registrations that contain no personal information.](#)

Transfer Form of Authorization (FOA) Confirmation of Registrar Transfer Request

Please review the Redlined Transfer FOA Confirmation.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the Transfer FOA Confirmation correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Transfer FOA Initial Authorization for Registrar Transfer

Please review the Redlined Transfer FOA Initial Authorization.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the Transfer FOA Initial Authorization correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Transfer Dispute Resolution Policy (TDRP)

Please review the Redlined TDRP.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the TDRP correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Transfer Policy

Please review the Redlined Transfer Policy.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the Transfer Policy correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Uniform Domain Name Dispute Resolution Policy (UDRP).

Please review the Redlined UDRP Policy.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the UDRP correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

UDRP Rules

Please review the Redlined UDRP Rules.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the UDRP Rules correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Uniform Rapid Suspension System (URS) Procedure

Please review the Redlined URS Procedure.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the URS Procedure correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

URS Rules

Please review the Redlined URS Rules.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the URS Rules correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

URS High Level Technical Requirements for Registries and Registrars

Please review the Redlined URS High Level Technical Requirements.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the URS Requirements correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Whois Data Reminder Policy (WDRP)

Please review the Redlined WDRP.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the WDRP correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Whois Marketing Restriction Policy

Please review the Redlined Whois Marketing Restriction Policy.

Based on the requirements outlined in the Registration Data Consensus Policy, are the proposed redlined changes identified in the Whois Marketing Restriction Policy correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

New Advisory: Clarifications to the Registry and Registrar Requirements for Whois Data Directory Services

Please review the New Advisory: Clarifications to the Registry and Registrar Requirements for Whois Data Directory Services.

Based on the requirements outlined in the Registration Data Consensus Policy, is the proposed Advisory Clarifications to the Registry and Registrar Requirements for Whois Data Directory Services correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Registration Data Access Protocol (RDAP) Technical Implementation Guide

Please review the Redlined and Clean RDAP Technical Implementation Guide.

Based on the requirements outlined in the Registration Data Consensus Policy, is the proposed the RDAP Technical Implementation Guide correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

RDAP Response Profile

Please review the Redlined and Clean RDAP Response Profile.

Based on the requirements outlined in the Registration Data Consensus Policy, is the proposed RDAP Response Profile correct?

Yes

No

If no, please explain why the suggested changes are incorrect and provide any suggested changes.

Attachment

File Name	Size
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Summary of Attachment

Please provide a summary of your attachment. This summary should include whether your attachment is in addition to completing the Public Comment Proceeding form or if your attachment is in lieu of completing this form (max. of 2,000 characters).

Summary of Submission

Please provide a summary of your Public Comment Submission. This summary should include a statement that reflects the overall position of your Submission and other high-level observations or recommendations. This summary is public and published on the Public Comment Submission page along with a link to your Submission (max. of 2,000 characters).

[x] By submitting your personal data, you agree that your personal data will be processed in accordance with ICANN Privacy Policy, and agree to abide by the website Terms of Service

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