

The chart below suggests an allocation of the main components of the EWG Report into policy versus implementation issues for the purposes of conducting the PDP. It further classifies policy issues as those that should be explored as a first step (1st Pass Column), to establish the high level policy decisions from which more detailed policies can be developed through a second step (2nd Pass Column). We suggest that the second step be deferred until after the first step has been completed for all groupings. It also may be appropriate to update the description of the issues in the 2nd pass following the outcome of the work conducted during the 1st Pass. The Implementation Column would begin following the completion of the PDP.

Within each column, the issues are segregated into five groupings (color coded) that could be considered together, each in parallel, in the PDP. Per the discussions in Los Angeles, this chart assumes that **one** PDP will cover all of the issues raised by the EWG Final Report.

Following the chart are suggestions for additional research, analysis or information to support the operation of the PDP overall.

First Pass - High Level Policy Issues	Second Pass- Detailed Policy Issues	Implementation Issues
Permissible Purposes & Users	<ul style="list-style-type: none"> • Data Elements Accessible for Each Purpose/User (1st Pass) • Process for Updating Purposes/Users • Accreditation Policy for each User Community 	<ul style="list-style-type: none"> • Identify Accreditors • Confirm Link of Data Elements to Purpose & User (2nd Pass)
Gated Access	<ul style="list-style-type: none"> • Criteria for Classifying Data Elements: Public or Gated • Data Elements Authorized per Purpose, Including... <ul style="list-style-type: none"> ○ LE Access Issues 	<ul style="list-style-type: none"> • Access Protocols & Authentication methods • Credentials Administration
Data Accuracy & Validators	<ul style="list-style-type: none"> • Contact Management Policies • Validation Levels: Mandatory/Optional, Per Data Element • Remediation 	<ul style="list-style-type: none"> • Validator Accreditation • Contact Authorization • Interfaces Between Validators and Registrars & Registries
Data Elements	<ul style="list-style-type: none"> • Data Maintained by Registrars/Registries • Registrant Data Per Domain Name • Purpose Based Contacts & 	<ul style="list-style-type: none"> • Detailed List of Data Elements Requirements in Each Category • Migration of WHOIS

	<p>Data</p> <ul style="list-style-type: none"> • Process for Updating Data Elements 	<p>data</p>
<p>Privacy</p> <ul style="list-style-type: none"> • Need for Privacy/Proxy Services • Secured Protected Credentials 	<ul style="list-style-type: none"> • Overarching Data Protection Policy • Compliance With Applicable DP laws Per Jurisdiction (Rules Engine) • Determining Situs of RDS • Update Policies on Privacy/Proxy (From Existing PDP) if Needed 	<ul style="list-style-type: none"> • Developing the Overall RDS Privacy Policy Consistent With the PDP Policies • Accreditation of P/P Providers • Identification of SPC Provider • Global Legal Analysis to Build Rules Engine
<p>General Compliance Considerations</p>	<ul style="list-style-type: none"> • Auditing/ Enforcement for Each Ecosystem Player (e.g., Operator, Requestor, Validator) • Security Model to Deter Breach and Access Abuse 	<ul style="list-style-type: none"> • Amend Contracts (RAA & Registry) • Create Contracts for New Players (Validators, etc.) • Implement Security and Anti-Abuse measures
<p>RDS Model Considerations</p>	<ul style="list-style-type: none"> • RDS Models for... <ul style="list-style-type: none"> ○ Data Collection ○ Data Storage ○ Data Access & Protocols • Policy Requirements for Performance, Stability, Security, etc. 	<ul style="list-style-type: none"> • Identification of RDS operators • Implementation Design to Meet Requirements • Plan Updates to Existing Systems • Extension to Protocols (EPP/RDAP)
<p>General Cost Objectives¹</p>	<ul style="list-style-type: none"> • Detailed Cost related policies • Allocation of Cost Burdens (1st Pass) 	<ul style="list-style-type: none"> • Validate Implementation Costs & Burdens reflect policy (2nd Pass)
	<ul style="list-style-type: none"> • Policies Regarding Internationalization • Translation and Transliteration 	

¹ This contemplates high level policy guidance regarding costs (e.g.- RDS should operate on a cost recovery basis)

	<ul style="list-style-type: none"> Update any existing policies (from existing PDP) if necessary 	
Transition Objectives	General Transition policies to meet objectives	Detailed Transition Plan to implement policies

ADDITIONAL RESOURCES/SUPPORT FOR THE PDP

- Legal analysis of Current WHOIS/Proposed RDS
- Risk/Impact Assessment of Current WHOIS/Proposed RDS
- Evidence of Impact on all Participants in Ecosystem (users, registrants, registries, registrants)
- Track and Leverage Other PDPs Already Underway (Privacy/Proxy and Translation/Transliteration)

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