

Privacy and Proxy Service Provider Accreditation IRT

Subteam 3 (Third Party Providers)

Amy Bivins

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Agenda

- ⦿ Status of subteam's work
- ⦿ Discussion: potential solutions for data escrow challenges related to third-party providers
- ⦿ Next steps

Status of Subteam's Work

- ⊙ First meeting held 16 June
 - Discussed logistics, high-level issues
- ⊙ Next task: identify proposed solutions
 - Data escrow
 - De-accreditation
 - Other issues?

Topic 1: Data Escrow Issues

- ⦿ Issues raised:
 - What happens if an unaffiliated provider is de-accredited and its data escrow deposits are bad or nonexistent?
 - What are the impacts on data escrow if the provider registers names through >1 registrar?
 - Do these issues differ based on TPP's business model?
 - Reseller;
 - Affiliated with one Registrar, provides services through other registrars;
 - Completely free-standing provider.
- ⦿ Any other issues that should be considered?

Topic 1: Potential Data Escrow Solutions

- ⦿ Proposed solutions raised to date:
 - Could unaffiliated providers be required to escrow additional data?
 - Should there be additional or more frequent audits of third party providers' data escrow deposits?
 - Should providers be required to track which registrars their customers' names are registered through, in the event the customer transfers to another registrar without the provider's knowledge?

- ⦿ Should 1 or more of these proposed solutions be pursued?

- ⦿ Other potential solutions?

Next Steps

- ⦿ Subteam requested to continue discussing potential solutions on-list, with goal of finalizing list of proposed solution(s) for data escrow-related challenges by 14 July
- ⦿ Next step—discuss de-accreditation challenges and potential solutions; can begin discussion on-list prior to next meeting
- ⦿ Next meeting—21 July
- ⦿ Goal—complete subteam work by 28 July so that proposed solutions can be discussed with full IRT 1 August

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