

# Privacy and Proxy Service Provider Accreditation IRT

Subteam 3 (Third Party Providers)

Amy Bivins

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# Agenda

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

# Status of Subteam's Work

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

# Over-Arching Considerations

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- ⦿ Final Report contemplated that third-party providers would exist
- ⦿ Goal of this accreditation program is to get providers to become accredited and comply with accreditation requirements
- ⦿ We should not create undue roadblocks to accreditation (or providers may not seek accreditation)
- ⦿ We should not unfairly restrict any category of providers

# Topic 1: Data Escrow Issues

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- ⦿ 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

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- ⦿ 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?
  
- ⦿ Updated escrow specifications (in RA) have added requirements re: formatting, reporting
  
- ⦿ Other potential solutions?

# Next Steps

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- ⦿ Full IRT will discuss data escrow next week, 25 July
- ⦿ How would subteam like to proceed?
- ⦿ Next step—discuss de-accreditation challenges and potential solutions; can begin discussion on-list prior to next meeting

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