

Privacy and Proxy Service Provider Accreditation Program IRT

PPAA discussion

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IRT Meeting
22 August



Agenda

- ⦿ PPAA Issue 19: LEA Framework
- ⦿ PPAA Issue 24: Record-Keeping
- ⦿ PPAA Issue 20: IP Framework
- ⦿ PPAA Issue 25: Business Dealings

PPAA Issue 19: LEA Framework

- ⦿ Edit has been suggested by PSWG.
- ⦿ Section 3.2.1 currently states: *Within two business days (in Provider’s jurisdiction) of the disclosure request been submitted, Provider will review the request, and confirm it has been received and contains the relevant information required to meet the minimum standard for acceptance. If the request does not meet the minimum standard, Provider will notify the LEA Requestor.*
- ⦿ **Background:** This provision was edited, based on IRT discussions, from initial PSWG proposal, which stated that *“Within 24 hours of the disclosure request...”* This edit was made because IRT members felt 24 hours was not enough time to evaluate whether the request meets the minimum standard for acceptance.

PPAA Issue 19: LEA Framework

- ⦿ Proposed edit from PSWG (in redline):

Within ~~two business days (in Provider's jurisdiction)~~ 24 hours of the disclosure request being submitted, the Provider will review the request to ensure it contains the relevant information required to meet the minimum standard for acceptance. ~~and confirm it has been received and contains the relevant information required to meet the minimum standard for acceptance.~~ If the request does not meet the minimum standard, Provider will notify the LEA Requestor.

PPAA Issue 19: LEA Framework

- ⦿ Selected IRT feedback on proposed edit:
 - The problem with this is that it doesn't account for weekends/holidays. Could we change to 1 business day?
 - Why would you hold PP to lower standard than Rr? This is a good compromise-only asking for review, not response.

- ⦿ Additional PSWG input:
 - Trying to follow RAA's 24-hour review period (crime occurs outside business hours)
 - PSWG has removed proposed provider obligation to respond within 24 hours
 - If provider can't take action in time, should alert LEA
 - Is there a reason to hold PP to lower standard than Rr?

PPAA Issue 24: Record-Keeping

- ⦿ **Final Report:** Providers should maintain statistics on the number of publication and disclosure requests received and the number honored, and provide these to ICANN in aggregate form to ICANN for periodic publication.

- ⦿ **PPAA Draft v1:**
 - **3.2.1:** Provider should maintain statistics on the number of Publication and Disclosure requests received from Requesters, and the number of actual Publications and Disclosure as a result of such requests.

 - **3.2.2:** Providers should provide these statistics in aggregate form to ICANN for periodic publication, in the form specified by ICANN as may be amended or modified from time to time.

PPAA Issue 20: IP Framework

- ⦿ **Final Report included detailed IP disclosure framework**
- ⦿ **PPAA Draft v1** includes framework from Final Report, with no substantive edits.
- ⦿ **IRT feedback is requested on all elements of the framework. Are any adjustments necessary?**

PPAA Issue 25: Business Dealings

- ⦿ **PPAA draft v1 Section 3.5: Business Dealings**
- ⦿ Section adapted from 2013 RAA section 3.7, incorporating specific requirements for PP providers, including:
 - Requirement to abide by all applicable laws/regulations
 - Requirement to require customers to enter into service agreements including terms required per Final Recommendations
 - Requirement to notify customers annually of obligation to provide accurate contact info
 - Requirements to notify customers re: data collection and use
 - Additional customer disclosure requirements from Final Report

IRT Action Items/Upcoming Meetings

- ⦿ IRT requested to provide any additional input on these topics by **28 August**.
- ⦿ **Please continue reviewing PPAA draft.** Send additional topics that you would like to discuss to the list.
- ⦿ **29 August:** Agenda to be distributed before meeting
- ⦿ Upcoming topics: Data escrow, labeling, data retention, Applicant Guide v2, fees, de-accreditation process, second review of draft Policy
- ⦿ **Any other topics? Please suggest on list.**

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