

Q1 1. Your name (must be RDS PDP WG Member - not WG Observer - to participate in polls) If you are a WG Observer and wish to participate in polls, you must upgrade to WG Member to do so. Please do NOT participate in this poll if you are a WG Observer who has not upgraded to WG Member.

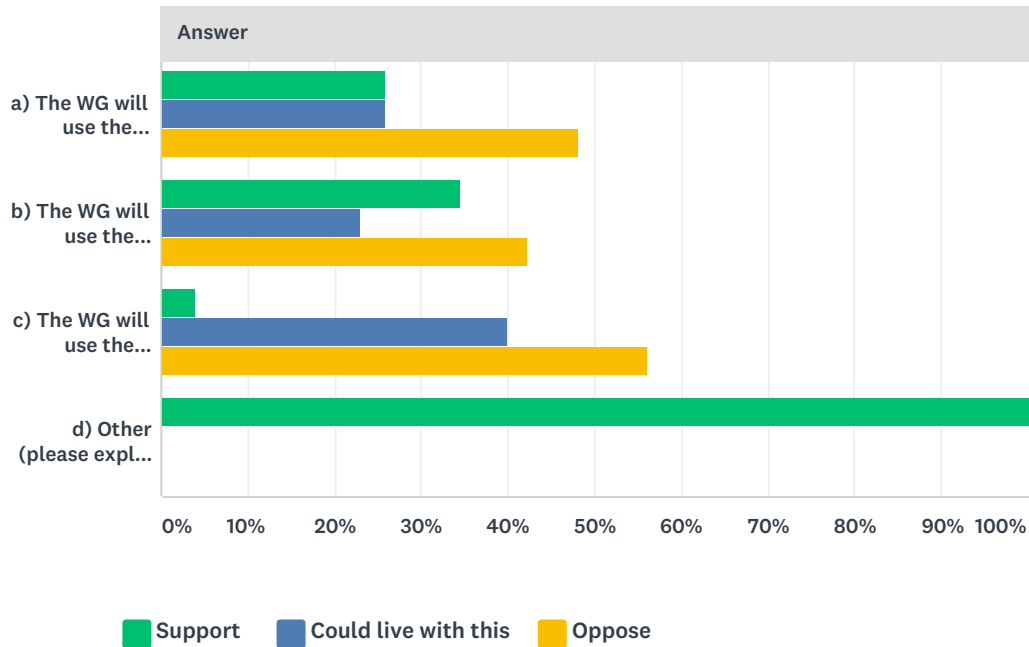
Answered: 27 Skipped: 0

#	RESPONSES	DATE
1	Farell Folly	2/3/2018 5:40 PM
2	Steve Metalitz	2/3/2018 1:23 PM
3	Daniel K. Nanghaka	2/3/2018 9:05 AM
4	Bradley Silver	2/3/2018 8:36 AM
5	Tapani Tarvainen	2/3/2018 2:55 AM
6	Benny Samuelson	2/3/2018 2:24 AM
7	Greg Shatan	2/3/2018 12:12 AM
8	Rod Rasmussen	2/3/2018 12:03 AM
9	Vicky Sheckler	2/2/2018 6:25 PM
10	Ayden Férdeline	2/2/2018 5:07 PM
11	Alex Deacon	2/2/2018 4:17 PM
12	Jeremy Malcolm	2/2/2018 3:58 PM
13	Juan Manuel Rojas	2/2/2018 3:34 PM
14	Kathy Kleiman	2/2/2018 3:21 PM
15	Sam Lanfranco	2/2/2018 2:28 PM
16	Griffin Barnett	2/2/2018 2:14 PM
17	Brian Winterfeldt	2/2/2018 2:13 PM
18	Mason Cole	2/2/2018 2:02 PM
19	Maxim Alzoba	2/2/2018 12:24 PM
20	Nathalie Coupet	2/1/2018 9:02 PM
21	Sara Bockey	2/1/2018 3:46 PM
22	andrew sullivan	2/1/2018 9:51 AM
23	Klaus Stoll	2/1/2018 9:08 AM
24	Chuck Gomes	1/31/2018 8:08 AM
25	Greg Aaron	1/31/2018 6:33 AM
26	René J. Steiner	1/31/2018 2:57 AM
27	GZ Kabir	1/31/2018 12:30 AM

Q2 2. Criteria As the WG has deliberated on specific purposes, differing viewpoints have been caused in part by differing criteria used to determine legitimacy. To overcome this, the WG paused its deliberation on specific purposes to consider a broader question: What makes a purpose legitimate for processing registration data? When answering this question, refer to the following GDPR definition of "processing:" 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

In our 30 January call, the WG reviewed last week's poll results, revised the proposed criteria, and decided to poll on variants of the following possible WG agreement: The WG will use the following non-exhaustive criteria to determine if any proposed purpose for processing registration data may be legitimate: (i) The purpose must not be inconsistent with ICANN's mission, (ii) The purpose must be inherent to the functionality of the DNS, [AND/OR**] (iii) the purpose must satisfy at least one legal basis for processing as defined by data protection laws. "Processing" includes but is not limited to data collection. Do not assume that all criteria for processing will be sufficient for collection; this will be deliberated separately. Similarly, do not assume that "processing" implies public or non-public access to data or who will have access; this will be deliberated separately. See Question 3 below for an example of how agreed-upon criteria will be used by the WG when deliberating on specific purposes. Please indicate your level of support for each variant of the proposed WG agreement below by choosing a value from the pull-down menu: Support, Could live with, Oppose. If you wish to abstain or have no opinion, leave the pull-down blank.

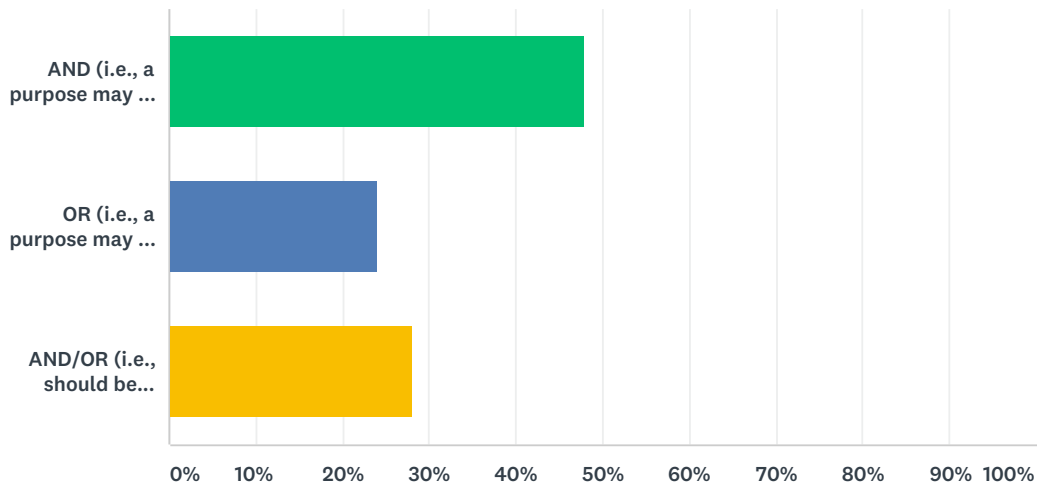
Answered: 27 Skipped: 0



Answer	SUPPORT	COULD LIVE WITH THIS	OPPOSE	TOTAL
a) The WG will use the following non-exhaustive criteria to determine if any proposed purpose for processing registration data may be legitimate: (i) The purpose must not be inconsistent with ICANN's mission, (ii) The purpose must be inherent to the functionality of the DNS, [AND/OR**] (iii) the purpose must satisfy at least one legal basis for processing as defined by data protection laws.	7	7	13	27
51% support or could live with				
b) The WG will use the following non-exhaustive criteria to determine if any proposed purpose for processing registration data may be legitimate: (i) The purpose must not be inconsistent with ICANN's mission [AND/OR**] (ii) the purpose must satisfy at least one legal basis for processing as defined by data protection laws.	9	6	11	26
56% support or could live with				
c) The WG will use the following non-exhaustive list of criteria to determine if any proposed purpose for processing registration data may be legitimate: (i) The purpose must be inherent to the functionality of the DNS [AND/OR**] (ii) the purpose must satisfy at least one legal basis for processing as defined by data protection laws.	1	10	14	25
41% support or could live with				
d) Other (please explain in the comment box below).	7	0	0	7
26% other				
(1) Farell Folly (4) Tapani Tarvainen (6) Ayden Férdeline - see 1 n/c - Juan Manuel Rojas (8) Kathy Kleiman - see 1 (9) Sara Bockey (13) GZ Kabir				

Q3 In addition, please indicate below your preference - if any - for [AND/OR**] in the above agreement:

Answered: 25 Skipped: 2



ANSWER CHOICES	RESPONSES
AND (i.e., a purpose may be considered legitimate if ALL of the criteria apply)	48.00% 12
OR (i.e., a purpose may be considered legitimate if ANY of the criteria apply)	24.00% 6
AND/OR (i.e., should be decided as WG applies criteria)	28.00% 7
TOTAL	25

#	PLEASE PROVIDE YOUR RATIONALE FOR OPPOSING THE POSSIBLE WG AGREEMENT OR PROPOSED ALTERNATIVE:	DATE
1	There was no WG agreement on phrasing, but an agreement to "think about it." Our original phrasing, in last week's poll, was: "Consistent with ICANN's Mission," and there was agreement on that in last week's poll. This is by far the clearest and most direct phrasing for ICANN's criteria as it is clearly consistent with ICANN's mission in its bylaws (ensuring "stable and secure operation of the Internet's unique identifier systems" -- Bylaws Section 1.1). But "not inconsistent with ICANN's mission," is infinitely broader and includes a range of activities, scope and criteria having nothing to do with ICANN's mission at all. Tap dancing is not "inconsistent with ICANN's Mission" nor is riding an elephant. These broad scope and infinite possibilities cannot be what we mean for "criteria to determine if any proposed purpose for processing registration data may be legitimate." I strongly recommend return to original phrasing -> "Consistent with ICANN's Mission"	2/3/2018 5:40 PM Farell Folly (same as 6,7)
2	Expressions of support could change if AND is applied. E.g., would oppose (a) if AND is used.	2/3/2018 1:23 PM Steve Metalitz
3	Strong preference for (b). Could something be inherent to the functionality of the DNS and yet also inconsistent with ICANN's mission? If so, then there may be a problem with how ICANN's mission has been defined.	2/3/2018 8:36 AM Bradley Silver
4	"not inconsistent with ICANN's mission" is so broad as to be almost meaningless, I can't think of anything inherent to DNS functionality failing that. So, with AND a) and c) are in effect logically equivalent; with OR a) would allow just about anything imaginable. (I could just live with a) with AND, but definitely not with OR.) I'd prefer this: (i) The purpose must be consistent with ICANN's mission, (ii) The purpose must be inherent to the functionality of the DNS, AND (iii) the purpose must satisfy at least one legal basis for processing as defined by data protection laws.	2/3/2018 2:55 AM Tapani Tarvainen
5	I object to this far too narrow phrase, "inherent to the functionality of the DNS" so support none of these. None of these constructions seems to work at all IMO for this reason and others. We have gone down a wrong path here.	2/3/2018 12:03 AM Rod Rasmussen

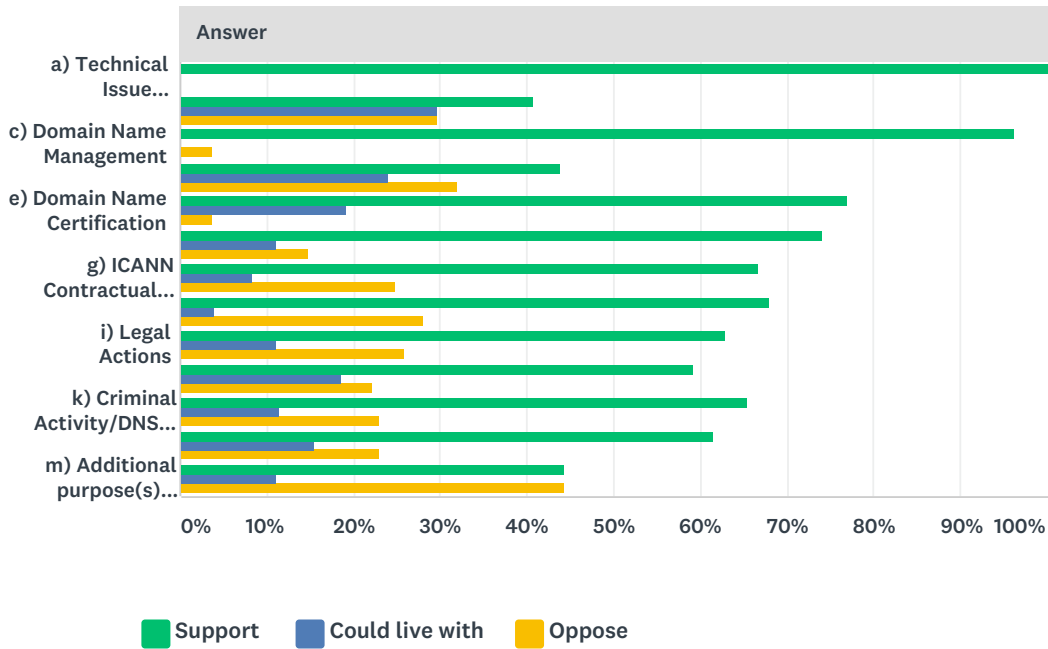
6	There was no WG agreement on phrasing, but an agreement to "think about it." Our original phrasing, in last week's poll, was: "Consistent with ICANN's Mission," and there was agreement on that in last week's poll. This is by far the clearest and most direct phrasing for ICANN's criteria as it is clearly consistent with ICANN's mission in its bylaws (ensuring "stable and secure operation of the Internet's unique identifier systems" -- Bylaws Section 1.1). But "not inconsistent with ICANN's mission," is infinitely broader and includes a range of activities, scope and criteria having nothing to do with ICANN's mission at all. Tap dancing is not "inconsistent with ICANN's Mission" nor is riding an elephant. These broad scope and infinite possibilities cannot be what we mean for "criteria to determine if any proposed purpose for processing registration data may be legitimate." I strongly recommend return to original phrasing -> "Consistent with ICANN's Mission"	2/2/2018 5:07 PM Ayden Férdeline (same as 1)
7	Change back to "must be consistent with ICANN's mission" not "not be inconsistent with".	2/2/2018 3:58 PM Jeremy Malcolm
8	There was no WG agreement on phrasing, but an agreement to "think about it." Our original phrasing, in last week's poll, was: "Consistent with ICANN's Mission," and there was agreement on that in last week's poll. This is by far the clearest and most direct phrasing for ICANN's criteria as it is clearly consistent with ICANN's mission in its bylaws (ensuring "stable and secure operation of the Internet's unique identifier systems" -- Bylaws Section 1.1). But "not inconsistent with ICANN's mission," is infinitely broader and includes a range of activities, scope and criteria having nothing to do with ICANN's mission at all. Tap dancing is not "inconsistent with ICANN's Mission" nor is riding an elephant. These broad scope and infinite possibilities cannot be what we mean for "criteria to determine if any proposed purpose for processing registration data may be legitimate." We strongly recommend return to original phrasing -> "Consistent with ICANN's Mission"	2/2/2018 3:21 PM Kathy Kleiman (same as 1)
9	I believe we need to be very specific in the criteria. The above proposals use too many words and create too many scenarios. Therefore I propose the following: (i) The purpose must within the remit of ICANN's mission, (ii) The purpose must be necessary for the functionality of the DNS, AND (iii) the purpose must be consistent with data protection law.	2/1/2018 3:46 PM Sara Bockey
10	I don't really understand how anything other than "and" is logically possible here. "Or" means "at least one", and it is easy to think of cases that would (e.g.) be ok under data protection but would not be appropriate to include.	2/1/2018 9:51 AM andrew sullivan
11	I support b, could live with a, and oppose c because I believe that ICANN's mission includes elements that go beyond 'inherent to the functionality of the DNS'. Here are two examples from ICANN's mission from Bylaws Annexes G-1 & G-2 that I do not believe are 'inherent to the functionality of the DNS': prohibitions on warehousing of or speculation in domain names by registries or registrars; reservation of registered names in a TLD that may not be registered initially or that may not be renewed due to reasons reasonably related to (i) avoidance of confusion among or misleading of users, (ii) intellectual property, or (iii) the technical management of the DNS or the Internet (e.g., establishment of reservations of names from registration). I think that 'AND/OR' is the best construct for the following reasons: 'AND' would apply in cases where there is a legal basis; 'OR' would apply in cases where there is no specific legal basis for some part of ICANN's mission. Another way to word the proposed agreement and avoid the 'AND/OR' is would be something like this: "A purpose for processing registration data must not be inconsistent with ICANN's mission. A purpose for processing registration data is legitimate if there is a legal basis for it as defined by data protection laws."	1/31/2018 8:08 AM Chuck Gomes
12	I don't find these statements of criteria to be workable yet. As written they allow only a cramped set of rationales for processing that do not allow the known and legitimate use cases the Working Group has already explored. . 1) "AND" by itself cannot be used. There are many acknowledged, legitimate uses that are NOT "inherent to the functionality of the DNS". For example, dealing with intellectual property rights (such as UDRP). 2) There is no common understanding of what "inherent to the functionality of the DNS" means, and it is certainly not self-evident. Does it mean 'anything having to do with resolution'? A cybersquatting domain doesn't have to ever resolve to be a problem. And registrars process data (such as billing data) that is tangential at best to domain functionality. 3) There is a problem with this sentence: "the purpose must satisfy at least one legal basis for processing as defined by data protection laws." This appears to be viewing things through the lens of GDPR, which is applicable to only some registrations. For example the United States does not have any centralized legislation at the federal level regarding data protection; nothing like GDPR. I don't know if U.S. law even spells out the right of a party to process data for the purpose of fulfilling a contract (such as a domain registration agreement). I think we're assuming too much here.	1/31/2018 6:33 AM Greg Aaron
13	I am totally in favour of "The purpose must not be inconsistent with ICANN's mission"	1/31/2018 12:30 AM GZ Kabir

Q4 3. Legitimate Purposes for Processing Registration Data Given the criteria listed in Question 2 above, please re-consider the following list of purposes defined by drafting teams and indicate your level of support for the following possible WG agreement: The WG will treat the following non-exhaustive list of purposes for processing registration data as possibly legitimate, and will work to further flesh out data and user needs associated with these purposes:

- Technical Issue Resolution;
- Academic or Public Interest Research;
- Domain Name Management;
- Individual Internet Use;
- Domain Name Certification;
- Domain Name Purchase/Sale;
- ICANN Contractual Enforcement;
- Regulatory Enforcement;
- Legal Actions;
- Criminal Activity/DNS Abuse Investigation;
- Criminal Activity/DNS Abuse Notification; and
- Criminal Activity/DNS Abuse Reputation

See Question 2 above for criteria and definition of "processing." "Processing" includes but is not limited to data collection. Do not assume that all criteria for processing will be sufficient for collection; this will be deliberated separately. Similarly, do not assume that "processing" implies public or non-public access to data or who will have access; this will be deliberated separately. Please indicate below your level of support for including in this agreement each purpose for processing registration data: Support, Could live with, Oppose. If you wish to abstain, simply skip this entire question or any specific purpose.

Answered: 27 Skipped: 0



Answer	SUPPORT	COULD LIVE WITH	OPPOSE	TOTAL
a) Technical Issue Resolution	26	0	0	26
b) Academic or Public Interest Research	11	8	8	27
c) Domain Name Management	26	0	1	27
d) Individual Internet Use	11	6	8	25
e) Domain Name Certification	20	5	1	26
f) Domain Name Purchase/Sale	20	3	4	27
g) ICANN Contractual Enforcement	16	2	6	24
h) Regulatory Enforcement	17	1	7	25
i) Legal Actions	17	3	7	27
j) Criminal Activity/DNS Abuse Investigation	16	5	6	27
k) Criminal Activity/DNS Abuse Notification	17	3	6	26
l) Criminal Activity/DNS Abuse Reputation	16	4	6	26
m) Additional purpose(s) (explain below)	4	1	4	9

Support (m):
 (2) Steve Metalitz
 (4) Greg Shatan
 n/c - Vicky Sheckler
 n/c - Greg Aaron

Oppose (m)
 (5) Ayden Férdeline
 (7) JM Rojas -see 5
 n/c - Sam Lanfranco
 n/c- Sara Bockey

1	<p>As we know, data can only be processed consistent with the “predefined and specific purposes” set out in an organization's clear purpose statement. Very few items on this list satisfy legitimate purposes for processing the data under the predefined and specific purposes that ICANN must adopt under the GDPR. Accordingly, the purposes for processing registrant's domain name registration data must be consistent with ICANN's role as a technical organization and our narrowly-defined mission of ensuring the stable and secure operation of the Internet's unique identifier systems. Thus, the “purposes for processing registration data” are limited and, from this list, would be: “Technical Issue Resolution,” “Domain Name Management,” “Domain Name Certification,” and Domain Name Purchase/Sale. This does not mean that exceptions cannot be allowed. In the GDPR as well as every international and national legislation in the field, exceptions are foreseen where the rights to privacy and data protection can be limited. These exceptions are usually related to cases where personal data are processed for national security, defense, public safety, law enforcement and fundamental freedoms of others, notably freedom of expression. In these specific cases, and when these rules apply, the data controller can apply different rules to the processing of the data for those purposes. But these are the exceptions, and not the general rule, and not part of the clear purpose statement that ICANN must develop for its own specific data processing needs pursuant to its own bylaws, its specific and technical mission and concrete operations. Clearly, ICANN is not a law enforcement agency (criminal or civil). ICANN is not a regulator, and ICANN is not an organization of lawyers. ICANN is not a university. Accordingly, what must be **deleted from this list** is: Academic or Public Interest Research, Individual Internet Use, ICANN Contractual Enforcement; Regulatory Enforcement; Legal Actions; Criminal Activity with DNS Abuse Investigation, DNS Abuse Notification and DNS Abuse Reputation. These may fall under the exceptions in law listed above. But for ICANN's purpose to support ICANN's mission, the proposed purposes that are legitimate for processing a registrant's domain name registration data would be directly related to the maintenance and functioning of that domain name in the DNS</p>	2/3/2018 5:40 PM	<p>Farell Folly (same as 5,6,7,8)</p>
2	<p>Aggregation of registration data, under appropriate terms and conditions, for use in achieving another legitimate purpose.</p>	2/3/2018 1:23 PM	Steve Metalitz
3	<p>b,h,i) not ICANN's business d) nothing under this really relevant g) Not sure what contractual enforcement would mean here (what kind of contract would justify processing not otherwise covered?) j,k,l) could mean content regulation and outside ICANN's mission anyway</p>	2/3/2018 2:55 AM	Tapani Tarvainen
4	<p>Even though the list is non-exhaustive, I will propose some additional (non-exhaustive) purposes and questions. First, I presume that Domain Transfer is included in Domain Name Management and/or Domain Name Purchase/Sale; if this unclear, it should be separately stated. Second, it would be clearer if "Criminal Activity" and "DNS Abuse" were not collapsed together; it might lead some to think this refers only to Criminal DNS Abuse. Third, I'm not sure what "Reputation" refers to in "I" -- it doesn't seem analogous to investigation and notification. Fourth, I assume but would like to clarify that an audit of a domain name portfolio by or on behalf of the owner is included in "Domain Name Management"; if not clear, that should be separately stated. Fifth, I assume that Due Diligence in a corporate transaction for the purpose of confirming information about the seller's portfolio is included in Domain Name Purchase/Sale (even if the deal is not consummated); if not, this should be separately stated. Sixth, I assume that "Legal Actions" includes investigations prior to instituting legal actions and/or confirmation of ownership prior to sending pre-litigation correspondence, such as a "demand letter" or "cease and desist letter"; if this is not clear, it should be separately stated. Seventh, I assume that investigation prior to or as a part of Regulatory Enforcement is included in that category (noting that Investigation is separately broken out in (j) but only as regards criminal activity and DNS abuse). Eighth, I note that governments can bring criminal or civil cases, as well as engaging in regulatory enforcement other than through litigation; I assume that government civil litigation (including pre-litigation activity) is included in legal actions; if this is unclear, this should be separately stated. Ninth, I assume that private civil cases (including pre-litigation activity) is also covered in "Legal Actions"; if this is not clear, it should be separately stated. (For example, if I represent or advocates for people with disabilities, and I determine that a website is not accessible to the disabled (which may violate disability laws, human rights laws, and/or anti-discrimination laws) and I wish to use RDS to confirm or get further information about the owner of the website, that would be a legitimate purpose, whether my next step is to contact the website operator in a cordial fashion, an adversarial fashion or to bring suit. There's more than this, but these are some ambiguities that arise from this non-exhaustive list..</p>	2/3/2018 12:12 AM	Greg Shatan

5	<p>As we know, data can only be processed consistent with the “predefined and specific purposes” set out in an organization's clear purpose statement. Very few items on this list satisfy legitimate purposes for processing the data under the predefined and specific purposes that ICANN must adopt under the GDPR. Accordingly, the purposes for processing registrant's domain name registration data must be consistent with ICANN's role as a technical organization and our narrowly-defined mission of ensuring the stable and secure operation of the Internet's unique identifier systems. Thus, the “purposes for processing registration data” are limited and, from this list, would be: “Technical Issue Resolution,” “Domain Name Management,” “Domain Name Certification,” and Domain Name Purchase/Sale. This does not mean that exceptions cannot be allowed. In the GDPR as well as every international and national legislation in the field, exceptions are foreseen where the rights to privacy and data protection can be limited. These exceptions are usually related to cases where personal data are processed for national security, defense, public safety, law enforcement and fundamental freedoms of others, notably freedom of expression. In these specific cases, and when these rules apply, the data controller can apply different rules to the processing of the data for those purposes. But these are the exceptions, and not the general rule, and not part of the clear purpose statement that ICANN must develop for its own specific data processing needs pursuant to its own bylaws, its specific and technical mission and concrete operations. Clearly, ICANN is not a law enforcement agency (criminal or civil). ICANN is not a regulator, and ICANN is not an organization of lawyers. ICANN is not a university. Accordingly, what must be **deleted from this list** is: Academic or Public Interest Research, Individual Internet Use, ICANN Contractual Enforcement; Regulatory Enforcement; Legal Actions; Criminal Activity with DNS Abuse Investigation, DNS Abuse Notification and DNS Abuse Reputation. These may fall under the exceptions in law listed above. But for ICANN's purpose to support ICANN's mission, the proposed purposes that are legitimate for processing a registrant's domain name registration data would be directly related to the maintenance and functioning of that domain name in the DNS.</p>	2/2/2018 5:07 PM	<p>Ayden Férdeline (same as 1)</p>
6	Please refer to my response to the previous poll.	2/2/2018 3:58 PM	J Malcolm
7	<p>Very few items on this list satisfy legitimate purposes for processing the data under the predefined and specific purposes that ICANN must adopt under the GDPR. Accordingly, the purposes for processing registrant's domain name registration data must be consistent with ICANN's role as a technical organization and our narrowly-defined mission of ensuring the stable and secure operation of the Internet's unique identifier systems. Thus, the “purposes for processing registration data” are limited and, from this list, would be: “Technical Issue Resolution,” “Domain Name Management,” “Domain Name Certification,” and Domain Name Purchase/Sale. This does not mean that exceptions cannot be allowed. In the GDPR as well as every international and national legislation in the field, exceptions are foreseen where the rights to privacy and data protection can be limited. These exceptions are usually related to cases where personal data are processed for national security, defense, public safety, law enforcement and fundamental freedoms of others, notably freedom of expression. In these specific cases, and when these rules apply, the data controller can apply different rules to the processing of the data for those purposes. But these are the exceptions, and not the general rule, and not part of the clear purpose statement that ICANN must develop for its own specific data processing needs pursuant to its own bylaws, its specific and technical mission and concrete operations. Clearly, ICANN is not a law enforcement agency (criminal or civil). ICANN is not a regulator, and ICANN is not an organization of lawyers. ICANN is not a university. Accordingly, what must be **deleted from this list** is: Academic or Public Interest Research, Individual Internet Use, ICANN Contractual Enforcement; Regulatory Enforcement; Legal Actions; Criminal Activity with DNS Abuse Investigation, DNS Abuse Notification and DNS Abuse Reputation. These may fall under the exceptions in law listed above. But for ICANN's purpose to support ICANN's mission, the proposed purposes that are legitimate for processing a registrant's domain name registration data would be directly related to the maintenance and functioning of that domain name in the DNS.</p>	2/2/2018 3:34 PM	<p>(same as 7) Juan Manuel Rojas (largely same as 1)</p>

8	<p>As we know, data can only be processed consistent with the “predefined and specific purposes” set out in an organization's clear purpose statement. Very few items on this list satisfy legitimate purposes for processing the data under the predefined and specific purposes that ICANN must adopt under the GDPR. Accordingly, the purposes for processing registrant's domain name registration data must be consistent with ICANN's role as a technical organization and our narrowly-defined mission of ensuring the stable and secure operation of the Internet's unique identifier systems. Thus, the “purposes for processing registration data” are limited and, from this list, would be: “Technical Issue Resolution,” “Domain Name Management,” “Domain Name Certification,” and Domain Name Purchase/Sale. This does not mean that exceptions cannot be allowed. In the GDPR as well as every international and national legislation in the field, exceptions are foreseen where the rights to privacy and data protection can be limited. These exceptions are usually related to cases where personal data are processed for national security, defense, public safety, law enforcement and fundamental freedoms of others, notably freedom of expression. In these specific cases, and when these rules apply, the data controller can apply different rules to the processing of the data for those purposes. But these are the exceptions, and not the general rule, and not part of the clear purpose statement that ICANN must develop for its own specific data processing needs pursuant to its own bylaws, its specific and technical mission and concrete operations. Clearly, ICANN is not a law enforcement agency (criminal or civil). ICANN is not a regulator, and ICANN is not an organization of lawyers. ICANN is not a university. Accordingly, what must be **deleted from this list** is: Academic or Public Interest Research, Individual Internet Use, ICANN Contractual Enforcement; Regulatory Enforcement; Legal Actions; Criminal Activity with DNS Abuse Investigation, DNS Abuse Notification and DNS Abuse Reputation. These may fall under the exceptions in law listed above. But for ICANN's purpose to support ICANN's mission, the proposed purposes that are legitimate for processing a registrant's domain name registration data would be directly related to the maintenance and functioning of that domain name in the DNS.</p>	2/2/2018 3:21 PM	<p>Kathy Kleiman (same as 1)</p>
9	<p>please add some clarity and start j/k/l with "prevention of" so we have "prevention of criminal activity" to avoid situation when one of the reasons is Criminal Activity/DNS Abuse Investigation which looks like the support of the Criminal Activity OR DNS Abuse Investigation</p>	2/2/2018 12:24 PM	<p>Maxim Alzoba</p>
10	<p>I would like to exclude purposes for processing that are not derived from the registrant's duty of care, of proper use and obligation to do no harm.</p>	2/1/2018 9:02 PM	<p>Nathalie Coupet</p>
11	<p>Some of these I skipped because I didn't know how they weren't "domain name management" (an opinion I had at the time we discussed that topic too). Some of them I said I could live with because I didn't know how they were different from one another (I think we have a tendency to try to draw too many fine distinctions). I don't see how the research case is in any way a use that can compel the disclosure of information: even the census is controversial in some countries for this.</p>	2/1/2018 9:51 AM	<p>andrew sullivan</p>