

During the last plenary meeting, there was a discussion of one of the items I lead - Safeguarding Registrant Data.

Two issues were raised.

1. Given the number of data breaches that we regularly hear about, the question was raised about whether we should look into the ICANN's Escrow facilities, most likely focusing on the main provider, Iron Mountain. I think this is a valid point. I would propose that we first talk to someone from the ICANN Global Domains Division who is knowledgeable on the Escrow rules and procedures. Presumably they can also provide some documentation. Following that, we should interview someone from Iron Mountain so that we understand how data is transferred to them, how it may be retrieved in disaster-like circumstances, and how the data is protected. When Iron Mountain started, I suspect the bulk of their business was transporting and storing magnetic tapes. Now I presume it is all online and potentially vulnerable.

In addition to this, perhaps we might also want to talk to a sampling of registrars and registries (if we can find any who are willing!). Although WHOIS data is currently public, perhaps we want to ask about how well it is protected from being changed or erased.

2. Lisa (I think) raised the issue that the Terms Of Reference, as decided in Brussels identifies several parts to this overall study:

- (a) identifying the lifecycle of registrant data,
- (b) determining if/how data is safeguarded in each phase of that lifecycle,
- (c) identifying high-priority gaps (if any) in safeguarding registrant data, and
- (d) recommending specific measurable steps (if any) the team believes are important to fill gaps.

In the work statement/plan, I wrote:

Items a, c and d are being covered in both the ongoing NextGen RDS PDP and efforts to address laws related to the European GDPR. I do not believe that there is any merit in us replicating these.

b) Currently all Whois data is made available publicly. Although this will surely change with regard to natural persons, and likely other groups as a result of the ongoing efforts, currently there is no protection.

On reviewing this, I still largely stand by what I wrote, although subject to the additions in 1 above. Going in the details of the lifecycle and the various stages (other than making sure data is not lost or changed as per #1), does not sound like a productive way to spend our time in light of the other work that is ongoing.

Comments?