		Issue Summary
Appendix D: U	Please consider Appendix D: Uniform Rapid Suspension: This Appendix contains supplemental requirements for the 17 October 2013 URS High Level Technical Requirements for Registries and Registrars and URS Rules effective 28 June 2013.1. URS High Level Technical Requirements for Registry Operator and Registrar1.1. Registry Operator Requirement: The Registry Operator (or appointed BERO) MUST provide the URS provider with the full Registration Data for each of the specified domain names, upon the URSprovider notifying the Registry Operator (or appointed BERO) of the existence of a complaint, or participate in another mechanism to provide the full Registration Data to the Provider as specified by ICANN. If the gTLD operates as a "thin" registry, the Registry Operator MUST provide the available Registration Data to the URS Provider.1.2. Registrar Requirement: If the domain name(s) subject to the complaint reside on a "thin" registry, the Registrar MUST provide the full Registration Data to the URS Provider upon notification of a complaint.2. URS RulesComplainant's complaint will not be deemed defective for failure to provide the name of the Respondent (Registered Name Holder) and all other relevant contact information required by	The majority of groups support the text of Appendix D as written or deferred to registrars. Otherwise, the following questions/issues were raised: 1. Should the language "participate in another mechanism" in Section 1.1 be clarified or eliminated? 2. Does the langauge in section 1.2 (for thin registries) create possible incompatibilies with existing URS procedures? 3. There is currently no processing agreement withan Asian URS providers in place. Is this an issue for the EPDP Team? 4. Does the term "contact details" in Section 2 of Annex D need to be further defined? 5. Should language allowing the Complainant to file an amended URS Complaint following receipt of registration data be included in Section 2 ? 6. Is the review of Appendix D more appropriately addressed by the RPM PDP, and timing, i.e., should the review of Appendix D be deferred until after the EPDP Team deliberates on the access model/framework? 7. Does Section 2 of Appendix D need additional or [illegible]
Appendix E: U	Please consider Appendix E: Uniform Domain	

	Name Dispute Resolution PolicyThis Appendix contains supplemental requirements for the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules").Uniform Domain Name Dispute Resolution Policy1.1. Registrar Requirement: The Registrar MUST provide the UDRP provider with the full Registration Data for each of the specified domain names, upon the UDRP provider notifying the Registrar of the existence of a complaint, or participate in another mechanism to provide the full Registration Data to the Provider as specified by ICANN.1.2. Complainant's complaint will not be deemed defective for failure to provide the name of the Respondent (Registered Name Holder) and all other relevant contact information required by Section 3 o the UDRP Rules if such contact information of the Respondent is not available in registration data publicly available in RDDS or not otherwise known to Complainant. In such an event, Complainant may file a "Doe" complaint and the Provider shall provide the relevant contact details of the Registered Name Holder after being presented with a "Doe" complaint.Having reviewed this section I support this section as is:	The majority of groups support the text of Appendix E as written. Otherwise, the following questions/issues were raised: 1. Should the language "participate in another mechanism" in Section 1.1 be clarified or eliminated? 2. Does the langauge in section 1.2 create possible incompatibilies with existing UDRP procedures? 3. Does Section 2 of Appendix E require additional safeguards to ensure against abuse, i.e., a complainant filing "doe complaints" in an attempt to get registration data? 4. Should language allowing the Complainant to file an amended UDRP Complaint following receipt of registration data be included in Section 2 of Appendix E? 5. Is the EPDP Team's review of Appendix E more appropriately addressed by the RPM PDP, and timing, i.e., should the review of Appendix E be deferred until after the EPDP Team deliberates on the access model/framework?
Appendix G:	Please consider Appendix G: Supplemental	

	Procedures to the Transfer PolicyThis Appendix provides supplemental procedures for the Transfer Policy applicable to all ICANN-accredited Registrars.1. Until such time when the RDAP service (or other secure methods for transferring data) is required by ICANN to be offered, if the Gaining Registrar is unable to gain access to then-current Registration Data for a domain name subject of a transfer, the related requirements in the Transfer Policy will be superseded by the below provisions:1.1. The Gaining Registrar is not REQUIRED to obtain a Form of Authorization from the Transfer Contact.1.2. The Registrant MUST independently re-enter Registration Data with the Gaining Registrar. In such instance, the Gaining Registrar is not REQUIRED to follow the Change of Registrant Process as provided in Section II.C. of the Transfer Policy.Having reviewed this section I support this section as is:	The following concerns/issues were flagged by groups not in support of the language as written: 1. Does the revised transfer process create new security risks and vulnerabilities such as domain name theft and hijacking, and if so, should the EPDP Team address this as part of the work of this EPDP? 2. Should this Team's consideration be affected by existing efforts to replace/modify the Transfer Policy? 3. Does Section 1.2 of Appendix G, imposing redundant processes on the registrant, overly denigrate the user experience? Is there an alternative? 4. Should the language "to be offered" be removed from Section 1 to avoid confusion?
Appendix G:	Please consider Appendix G: Supplemental	

	Procedures to the Transfer Policy2. As used in the Transfer Policy:2.1. The term "Whois data" SHALL have the same meaning as "Registration Data".2.2. The term "Whois details" SHALL have the same meaning as "Registration Data".2.3. The term "Publicly accessible Whois" SHALL have the same meaning as "RDDS".2.4. The term "Whois" SHALL have the same meaning as "RDDS".3. Registrar and Registry Operator SHALL follow best practices in generating and updating the "AuthInfo" code to facilitate a secure transfer process.4. Registry Operator MUST verify that the "AuthInfo" code provided by the Gaining Registrar is valid in order to accept an inter-registrar transfer request. Having reviewed this section I support this section as is:	The following concerns/issues were flagged by groups not in support of the language as written: 1. Is additional language necessary to ensure registry operators are able to process authcode changes in bulk? 2. Does the language "best practices" in Section 3 require additional clarity?
Other	If there is any further input you want to provide on the sections referenced above that will help inform further deliberations, please use this comment box.	

Alan Woods	James Bladel
RySG	RrSG
Yes	**No strong opinion**
Generally the RySG does not currently have any concerns with the wording of Appendix D NOTE: As Section 1.2 refers to Registrar requirements, we shall defer to the RrSG input on this matter. It should be noted that although the RySG does not have issue with the wording in the Appendix per se, s.2 does create possible incompatibilities with the existing URS procedures, and thus this should be considered during substantive review.	No significant issues, however a processing agreement with the dispute providers is still lacking, For example the dispute providers in Asia
Yes	**No strong opinion**

Rationale: Generally the RySG does not have any concerns with the Appendix E wording; however as it relates more so to Registrars efforts we shall defer to the RrSG input on this matter. NOTE: It should be noted that although the RySG does not have issue with the wording in the Appendix per se, similar to that as noted in Appendix D, s 1.2 does create a possible incompatibility with the existing UDRP procedures, and thus this should be considered during substantive review. The RySG also notes that there is a comprehensive review of URS and UDRP underway in the RPM PDP.	
No	**No**

Sections 1.1 – 1.2 are intended as temporary, stop–gap measures. In addition, the community is already engaged in efforts to replace/modify the transfer policy and therefore these sections would not likely be considered an appropriate inclusion for the Consensus Policy	The Revised Transfer Process is working, but creates new vulnerabilities for domain theft/hijack, and leaves little recourse for disputes. The Temporary Specification has exacerbated the ineffectiveness of transfer disputes; transfer dispute have never worked well, at this point the process is basically non-existant. The RrSG recommends that after the ePDP is completed, work should be done to revise & streamline the Transfer Policy, including some provisions to support transfer disputes.
No	**No strong opinion**

As with Sections 1.1 – 1.2, Sections 2-4 are intended as temporary, stop–gap measures. In addition, as previously noted the community is already engaged in efforts to replace/modify the transfer policy and therefore these sections would not be considered an appropriate inclusion for the Consensus Policy	Registry operators need to make sure their limits are able to process authcode changes in bulk
These survey responses attempt to reflect the views of the RySG but we note that it has not gone to the full group for review / approval. Responses may need to be updated.	

Mark Svancarek	Farzaneh Badii
BC	NCSG
Yes	**No**
	Access to Registered Name Holder contact data in a URS proceeding involves access to this data by: Trademark owners in the event that one URS complaint is filed on behalf of one or multiple related companies against one Registered Name Holder, or one complaint is filed against multiple Registered Name Holders that are somehow shown to be related URS Provider in order to contact the Registered Name Holder(s) using postal address, email and fax The NCSG does not believe that a rewrite of the URS process should take place on this EPDP Team, as it is currently being done elsewhere (GNSO Review of all RPMs for all gTLDs PDP). Moreover, it is not clear what information constitutes "contact details" in Section 2, or the specific purposes for processing such data. The NCSG believes that all questions of data access, even by Trademark owners and/or URS Providers, should be deferred until the EPDP Team deliberates on an access model/framework for Registered Name Holder data. Additionally, the EPDP Team should remain informed of progress on the review of the URS, in order to align its own future access deliberations to the outcome of the URS review.
Yes	**No**

	Same as response to the question on Appendix D. The question of access to Registered Name Holder data by Trademark owners and UDRP providers should be deferred.
No	**No strong opinion**

Executing a transfer request at the request of the registrant is consistent with GDPR because it is processing for the performance of the contract. We are concerned about changes which might result in the transfer process becoming less secure. 1.2 also seems to impose redundant process on the Registrant, which is a weaker user experience.	NCSG defers on answering this question for the time being and might develop opinions about this section that will be relayed to the group.
Yes	**No strong opinion**

	NCSG might have comments on this section in the future which might lead to changing its answer.

Alan Greenberg	Thomas Rickert
ALAC	ISPCP
Yes	**Yes**
Clarity on the phrase "participate in another mechanism" would be appreciated. Is this just to attempt to get P/P details revealed or is it something else?	
Yes	**Yes**

Clarity on the phrase "participate in another mechanism" would be appreciated. Is this just to attempt to get P/P details revealed or is it something else?	
No	**Yes**

1. In section 1, it is not obvious that the simple existence of RDAP will also imply that the Gaining Registrar will have full access to the necessary data. 2. In the absence of RDAP, there does not appear to be adequate protection from domain hijacking (ie the transfer without the approval of the current registrant).	
Yes	**Yes**

	The relationship between RDAP and the Transfer Policy needs to be reflected in the updated document.

Kavouss Arasteh, Ashley Heineman, Laureen Kapin	Alex Deacon and Diane Plaut
GAC	IPC
Yes	**Yes**
Despite support in principle, these sections need the following clarifications: Section 1.1: It is not clear what "participate in another mechanism to provide the full Registration Data to the Provider as specified by ICANN" mean. Section 2: what are the safeguards built in to ensure that this provision of "Doe" complaint is not be abused to get the contact details of the Registered Name Holder.	The IPC is supportive of this section, subject to the following clarifications. 1.1 - Clarification is needed on "another mechanism to provide the full Registration Data to the Provider as specified by ICANN". Any other mechanism must make full Registration Data available to Complaint so that Complainant has an opportunity to amend complaint upon obtaining full RDDS data post-filing. "[A]vailable Registration Data should be "full Registration Data". 2 - Complainant must only be required to insert whatever publicly-available RDDS data exists for the domain name(s) at issue, and must be given the opportunity to file an amended complaint upon obtaining the full RDDS data post-filling.
Yes	**Yes**

Despite support in principle, these sections need the following clarifications: Section 1.1: It is not clear what "participate in another mechanism to provide the full Registration Data to the Provider as specified by ICANN" mean. Section 1.2: what are the safeguards built in to ensure that this provision of "Doe" complaint is not be abused to get the contact details of the Registered Name Holder.	The IPC is supportive of this section, subject to the following clarifications. 1.1 - As above, clarification is needed on "another mechanism to provide the full Registration Data to the Provider as specified by ICANN". Any other mechanism must make full Registration Data available to Complaint so that Complainant has an opportunity to amend complaint upon obtaining full RDDS data post-filing. 1.2 - As above, Complainant must only be required to insert whatever publicly-available RDDS data exists for the domain name(s) at issue, and must be given the opportunity to file an amended complaint upon obtaining the full RDDS data post-filling.
Yes	**Yes**

	The IPC is supportive of this section, subject to the following clarifications. 1 - We note that RDAP will be in effect and implemented by the time Consensus Policy is adopted. We believe the phrase “to be offered” in Section 1 above should be removed for clarity.
Yes	**Yes**

	The IPC is supportive of this section, subject to further clarification on “best practices”. Will there by agreed-upon mandatory practices?

Benedict Addis
SSAC
Yes
Yes

Sum of Yes	Sum of NSO	Sum of No	% No Agreement
7	1	1	11.11%
7	1	1	11.11%

1.2 (Access to Respondent contact) may be a use case for a future differentiated access system. ICANN staff are advised to keep a list of collection purposes that we identify during this PDP, if they're not already doing so. Additionally, the current lack of access may make it harder to consolidate multiple cases involving the same registrant. As a result, dispute resolution caseload may increase. Consolidation is explicitly permitted under UDRP paragraph 4(f), and implicitly in URS.				
No	3	1	5	55.56%

The security of the Transfer Policy is weakened by Appendix G. Specifically, the Gaining Registrar is excused the obligation to obtain authorisation from the registrant. This seems reasonable in light of GDPR redaction. But without this step, authorisation depends purely on the AuthInfo code, which is not its purpose and is explicitly prohibited in section A.5 of the Transfer Policy. We understand that some registries have unilaterally implemented an optional section of RFC5731, permitting a domain command to be authenticated using the AuthInfo code. This may be a mechanism by which contact info could be provided to the Gaining Registrar, in order to obtain FOA.				
Yes	6	2	1	11.11%

Agree in general, with some caution on 2.3: 'The term "Publicly accessible Whois" SHALL have the same meaning as "RDDS".' These two terms are not equivalent, because access to RDDS is envisaged as being context dependent. As a result, the availability of a particular dataset (like the contact data referenced in the Transfer Policy) can no longer be taken for granted in a given context.	