

Data Element	Redacted B-PA5	Commented [MK1]: Per current requirements in the Temporary Specification
Domain Name	No	<b>EPDP Team Charter Questions</b> f1) Should there be any changes made to registrant data that is required to be redacted? If so, what data should be published in a freely accessible directory? f2) Should standardized requirements on registrant contact mechanism be developed? f3) Under what circumstances should third parties be permitted to contact the registrant, and how should contact be facilitated in those circumstances?
Registry Domain ID	-	
Registrar Whois Server	No	
Registrar URL	No	
Updated Date	No	
Creation Date	No	
Registry Expiry Date	No	
Registrar Registration Expiration Date	No	
Registrar	No	
Registrar IANA ID	No	
Registrar Abuse Contact Email	No	
Registrar Abuse Contact Phone	No	
Reseller	No	
Domain Status	No	
Registry Registrant ID	-	
Registrant Fields		
• Name	Yes	
• Organization (opt.)	No	
• Street	Yes	
• City	Yes	
• State/province	No	
• Postal code	Yes	
• Country	No	
• Phone	Yes	
• Phone ext (opt.)	-	
• Fax (opt.)	-	
• Fax ext (opt.)	-	
• Email <sup>1</sup>	No	
2nd E-Mail address	-	
Admin ID	-	
Admin Fields		
• Name	-	
• Organization (opt.)	-	
• Street	-	
• City	-	
• State/province	-	
• Postal code	-	

<sup>1</sup> Per the current temp spec requirement: 2.5.1. Registrar MUST provide an email address or a web form to facilitate email communication with the relevant contact, but MUST NOT identify the contact email address or the contact itself.

Data Element	Redacted B-PA5	Commented [MK1]: Per current requirements in the Temporary Specification
• Country	-	
• Phone	-	
• Phone ext (opt.)	-	
• Fax (opt.)	-	
• Fax ext (opt.)	-	
• Email	-	
Tech ID	-	
Tech Fields		
• Name	Yes	
• Organization (opt.)	-	
• Street	-	
• City	-	
• State/province	-	
• Postal code	-	
• Country	-	
• Phone	Yes	
• Phone ext (opt.)	-	
• Fax (opt.)	-	
• Fax ext (opt.)	-	
• Email <sup>2</sup>	No	
NameServer(s)	No	
DNSSEC	No	
Name Server IP Address	No	
Last Update of Whois Database	No	
Other Data:		
• Field 1	-	
• Field 2	-	

<sup>2</sup> Idem

#### **Input from Triage on redaction:**

RrSG: Registrant Organization should optionally be redacted, if it can be determined that the Organization contains Personal Information. However, given that there is currently no field in the WHOIS data set to distinguish a legal from a natural person, the application to all registrants is the only solution that offers legal cover to contracted parties, which would otherwise be drawn into making judgment calls on whether start ups, home-based businesses, personally identifying emails and other contacts are caught by GDPR.

BC: BC has the following concerns with this section:

- We should not require redaction of data for legal persons or for cases outside of GDPR jurisdiction.
- Registrant City and Postal Code should be removed as they are not personally identifiable and are applicable to selection of venue when required for legal action.
- Final policy must accommodate circumstances beyond those supported by an unmonitored web form. Examples include providing a registrant's unique, verified email address (anonymized or other) and registrar being accountable to ensure that mail sent from a web form is received by the registrant and responded to within a defined time interval

NCSG: The NCSG is in general agreement with the approach to publication and redaction of registrant data outlined in Appendix A, sections 2.1 – 2.5. We believe that this approach strikes the right balance between registrant privacy rights and open public access to the data needed to fulfill ICANN's mission.

GAC: Section 2.2: "For fields that section 2.3 and 2.4 of this Appendix requires to be "redacted", Registrar and Registry Operator MUST provide in the value section of the redacted field text substantially similar to the following "REDACTED FOR PRIVACY". Prior to the required date of implementation of RDAP, Registrar and Registry Operator MAY: (i) provide no information in the value section of the redacted field; or (ii) not publish the redacted field." Should read as: "For fields that section 2.3 and 2.4 of this Appendix requires to be "redacted", Registrar and Registry Operator MUST provide in the value section of the redacted field text stating "REDACTED FOR DATA PROTECTION". Rationale: for the sake of greater consistency, the Registrar and Registry Operator should provide the same text in the value fields. Also, "REDACTED FOR DATA PROTECTION" more accurately reflects the reason for redacting (vs "privacy"). Additionally, the GAC would like section 2.2 to include new text that directs WHOIS users to details on how/where to request the non-public (redacted) information.

SSAC: 3) Regarding 2.2, operators should be required to always publish the redacted field name itself. Not publishing the redacted field names gives inconsistent output across providers.

ISPCP: The "Organization" field must also be redacted as a standard since the same issues apply as for registrants. Organization data can be PII and the publication should require consent.