
ICANN78 | AGM – ICANN and Registrars Accreditation and Reg Data Policy Highlights
Sunday, October 22, 2023 – 3:00 to 4:00 HAM

ZOE BONYTHON: This is the Registrars and ICANN: Accreditation and Registration Data Policy Highlights session. It's an open session. Everyone's welcome. We will hope we have lots of participation. Thanks.

Okay. We're going to get started in one more minute. So thanks for your patience. Just in the meantime, I would encourage everyone to please join the Zoom Room, if possible. Okay. We're ready to get started. Can you please start recording?

TERRI AGNEW: Thank you. Hello, and welcome to the ICANN and Registrars: Accreditation and Registration Data Policy Highlight session. Please note that this session is being recorded and is governed by the ICANN Expected Standards of Behavior.

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ASHLEY HEINEMAN:

Thank you very much, Terri. Welcome to everybody. I hate this room because everybody is behind me. I do encourage you, there's lots of empty seats up here. Don't be shy, feel free to come join us at the table. Otherwise, I apologize for having my back turned to you.

So just a note—I was going to say what the title of this thing was. This has become a fairly standard meeting that we do as the Registrar Stakeholder Group, working in collaboration with ICANN. This is an opportunity to talk to folks who either are registrars, want to be registrars, resellers. Just going to talk about first, now in a much more abbreviated terms, what's this all about becoming an ICANN accredited registrar, what is this Registrar Stakeholder Group and what are its benefits. But also, we started to introduce issues of interest. So this is open to not just registrars or want to be registrars, but the broader community as well as we dive into an issue-specific. With that, I'm going to stop and I'm going to turn it over to Andee Hill, who is the director of gTLD accounts at ICANN, and she's going to talk about how to become accredited as a registrar. Andee, please go ahead.

ANDEE HILL:

Thank you, Ashley. Andee Hill for the record. Next slide, please. Go ahead and move to the next slide. As Ashley had indicated, we really want to just be able to share and use this time to share with anyone interested of how to become accredited, what it means, what are the benefits or the costs, and what the process is. As a first step, there may be many that are potentially a reseller or they're thinking about becoming accredited. We do feel that being an accredited registrar does bring you a reputational—it heightens your reputation. So it also gives you direct access to other gTLD registries. It gives you participation within this wonderful group as far as Registrar Stakeholder Group. And it also gives you direct access to ICANN. Next slide, please.

The things to consider, costs and fees are always probably the top of the list, right? In addition to what the cost and fees are, what are the compliance obligations and what are the funding obligations for this? What are the requirements? What are you going to have to do? It's nothing to be taken lightly. It's a big responsibility. We do require that you have follow the policies and procedures and that you are presenting yourself and following all of the information that it required. Sorry, next slide.

When you apply for an application, there's a few different things that we ask. There's a standard application and also, in addition to the standard application, there's an additional page on the ICANN site that gives you an idea of what are we asking in these questions. It really goes question by question and gives you an explanation of, per this question, what is ICANN asking. And you'll notice in the applications, some of them are a little bit open. We don't specifically say exactly

what we're looking for in the question because we want to make sure that you understand the contract, that you've read it, you understand the policies. It's not a yes or no question when we have the application.

We also look at the capitalization that you have as far as can you support having a registrar. There are costs involved. And we want to make sure if we go through that accreditation process, not only can you handle the technical capabilities and the operational capabilities, but you also have the funding to be able to support that. In addition to administration, we do background screenings on the applicants. Next slide, please.

So what are the fees? Application fee has not changed in quite a while. It's currently \$3500. That covers basically the background check. Then in addition to that, once we do approve accreditation, there is a \$4000 a year fee. We will not only bill you the \$3500 when we are going through the application, but then if you are approved, we will then ask you to pay that \$4000 fee in advance of the first year. Then there's also some quarterly variable fees in addition to the transaction fee, which is currently the 18 cents. Next slide, please.

Sorry, I did run through this really quick. We only have a short amount of time here. But I just want you to know, my name is Andee Hill. I have cards here. If you guys have any questions, anyone has anything that they don't understand, I'm happy to help.

ASHLEY HEINEMAN: Thank you, Andee. Again, that was information provided with respect to how to become an ICANN accredited registrar. Any questions? I see Reg has been waiting patiently. She wants my microphone. Go ahead.

REG LEVY: Thank you. This is Reg Levy from Tucows. Andee, Tucows has been a registrar for a bit of a while and helps a lot of budding registrars with providing some of the technical back end. I was wondering what the update to the technical requirements is a result of since we've seen changes in the application recently.

ANDEE HILL: The changes in the application recently are—I don't know that we have a lot of them around technical capabilities. But we do work with our tech services team in reviewing those. We do ask about your technical capabilities. And something I didn't touch on before, we do have the application and we'll do a cursory review of it. But we almost always—in fact, we always have additional questions. What we call them is clarifying questions. We will go back and ask the applicant to really deep dive and clarify quite a bit more if something's not clear. There are quite a few backend providers. So we will see applicants that use a variety of the backend providers that we are very familiar with their technical capabilities, we will see it repeated over and over. It's a little bit of a different process because we've already verified that and we know it's not changed too much.

REG LEVY: Thanks. That's super helpful. I know that there's some sort of—they're looking into accrediting backends for registries. I'm not necessarily asking for that for registrar. But would it be appropriate for someone to put on their application, "Just look at this current registrar"?

ANDEE HILL: No, we actually ask you about your backend. Typically, if you're using a backend provider, that backend provider will usually give you, the applicant, that technical information to fill in that area. We can tell immediately if it's you or the guy next to you. It's clear who the backend provider is.

REG LEVY: It just it goes into way more depth than we think you need.

ANDEE HILL: Maybe.

REG LEVY: Thank you. I appreciate it.

ANDEE HILL: Did I hear you want to be accredited as a backend provider?

REG LEVY: No. I just said that I'm not asking for backend provider accreditation for registries. But yeah, we take some issue with the current content of the application questions.

ANDEE HILL: Let's take it offline. I'd love to hear what you have to say.

ASHLEY HEINEMAN: Thank you very much, Reg. Thank you very much, Andee. Any other questions about the ICANN registrar accreditation process that Andee will likely be able to answer for you? Anybody in the back? Nope. Okay. Let's go to the next slide, please. Thank you, Andee.

Okay. Now we're going to shift gears a little bit. We just talked about the ICANN registrar accreditation process. Now we're going to talk about this thing called the Registrar Stakeholder Group, which is not something that happens automatically once you become an ICANN accredited registrar. We have Michael Balan, who is one of our members who's going to give you all a bit of a intro to what we are. Go ahead, Michael.

MICHAEL BAULAND: Thanks. My name is Michael. This ICANN meeting is currently in Germany and we are a German registrar. I take the opportunity to do some advertisement for the Registrar Stakeholder Group.

There are several benefits. One is that it's possible to make your personal or company's opinion heard within the wider ICANN audience. For example, I'm a member of the IDN EPDP team, I'm interested in all these topics connected to IDNs and variants, and this is a great way to contribute there. But the Registrar Stakeholder Group is not just about giving, it's also about taking. You can take something

from the Registrar Stakeholder Group, in the sense that ICANN is a huge organization with so many topics going on, and it's really hard for small registrar company to follow everything. This is a good way that the Registrar Stakeholder Group provides you with all the information that is helpful and interesting for you as a company.

One thing is that you join the mailing list of the Registrar Stakeholder Group or you automatically join it if you've joined the Registrar Stakeholder Group. There's a very good summary of all things happening and you don't need to follow every single PDP or whatever is there. Talking about the mailing list, this is also a great way for you to get your questions answered. If you've got some problem or something you don't understand, just write on the mailing list and there's so many helpful and nice people that will all answer your questions.

Talking about those nice people, this last point I want to make to tell you to join the Registrar Stakeholder Group. It's a great opportunity to meet many people who are in the same or similar business. Up to now, all of the people I met are really nice, helpful, and kind. I can only encourage you all to join that group. We have just been a member for a few years, I think, 2019 or so we joined. I now hand over to Michele who's been a member for far longer time and probably has some further interesting topics or reasons why you should join. Thanks.

MICHELE NEYLON:

Thanks, Michael. Michele from Blacknight. In fairness, I think, actually, Michael has covered most of the salient reasons why you should join. I mean, the simple one is that if you look at the way ICANN is set up, in

order to have your voice heard, you really do need to be a member of either a stakeholder group or a constituency. For registrars, the Registrar Stakeholder Group is that place. Also, specifically within the contracts, there are references to the stakeholder group and the chair of the stakeholder group, which is currently, of course, Ashley. Ultimately, ICANN policies have the ability to make or break our businesses. And they're made by those who turn up. If you turn up and you engage, you can influence the policy. If you sit at home and expect and don't engage, then you're going to have to deal with the outputs that those of us who do turn up and push for. It's that simple and not complicated. Now, the thing is from the outside, it might seem that it's dominated by some large companies like the GoDaddys or the Namecheaps and things like that. But in reality, it's not. I mean, those who turn up and engage can influence the policies and the direction of all these things no matter the size of the company they come from.

My own company is tiny. We're a pimple on the backside of the Internet compared to a lot of the companies in the room. So I just say if you are a registrar and you're not a member of the stakeholder group, you should join. It's not expensive. Zoe has been doing a fantastic team job professionalizing the organization over the last couple of years. Essentially, without Zoe, it would all fall apart. Zoe is not allowed to retire ever, ever, or take holidays. Jokes aside, I think the thing is is that it is the place that registrars need to be and it's a place where you need to show up. And if you're not a member, please talk to Zoe or anybody else, we're happy to help you.

ASHLEY HEINEMAN:

Thank you so much, Michele and Michael. It's nice to know that people think we're nice because I think we're nice. You're affirming my belief so thank you for that. That pretty much wraps up the whole how to become an ICANN accredited registrar, as well as what this Registrar Stakeholder Group is all about.

So now we're going to switch to what I promised, which is a bit of a deep dive conversation on a topical issue. This meeting, we're going to talk about Registration Data Policy. I'm going to turn it now over to Eric who is going to start off that conversation. Please, go ahead.

ERIC ROKOBAUER:

Thank you, Ashley. Hey, everyone. This is Eric Rokobauer representing the Newfold Digital wholesale and retail sides of the registrars. What I'm going to start with first is giving a high-level overview of the important dates and the events revolving to the creation of the policy. Most of you may be familiar with this. So humor me as we go through this little timeline here.

ICANN Board adopted the Temporary Specification for gTLD registration data, primarily in response to ensure compliance with the European Union's General Data Protection Regulation or GDPR. The Temp Spec modified the requirements when it came to handling the registration data within the RAA and the RA, Registration and Accreditation Agreement and the Registry Agreement, that was May 2018. The GNSO initiated an Expedited Policy Development Process or everyone knows famously, the EPDP, to confirm if requirements within the Temp Spec should become ICANN Consensus Policy through the

EPDP team, made up of members of Supporting Organizations and Advisory Groups within the community.

Fast forward to a year, it does. The 29 recommendations from the EPDP team's Phase 1 Final Report, the Interim Registration Data Policy for gTLDs was made effective May 28, 2019. The interim policy ensures contracted parties would continue to meet the requirements within the Temp Spec until the community could develop a formal consensus policy.

Following this and as part of ICANN multistakeholder model, the Registration Data Policy Implementation Review Team (or the IRT) of ICANN staff and the community was formed to develop the policy language that would eventually replace the interim policy. So now after three plus years of face-to-face and virtual meetings, the IRT has published a draft version of the Registration Data Policy that went out for Public Comment in August 2022.

Now here we are, in August 2023 to now, we're currently waiting for the ICANN Board to finish the review of letters they've received from both the GAC and the Registrar Stakeholder Group, taking to consideration specifically the timing and publication of the policy itself, along with a section specifically about the current drafted language for handling urgent requests for disclosure. A quick plug, there will be an IRT meeting scheduled taking place here at ICANN78 on Thursday, 11:00 UTC. That's open to the public, where the latest updates will likely be discussed among the IRT who, I will say, hasn't met for a couple of months so it'll be well received to get together again.

Now, here we are today, while we wait for that publication, you're going to hear from some registrar members from both the IRT and one of our subgroups, the Communications and Outreach Team over, again, a few sections of policy that we find important to talk about here with the Registrars. I now will hand it over to, I believe, Heidi, who will start us off. Thank you.

HEIDI REVELS: Thank you, Eric. Can you guys hear me okay?

ASHLEY HEINEMAN: Yes.

HEIDI REVELS: Perfect. Thank you. Apologies, I can't join you in Hamburg. Personal circumstances prevent me from doing so, but greetings from Washington D.C. Again, my name is Heidi Revels and I am with Amazon Registrar. I'm going to explain how the Registration Data Policy will update the current data collection requirements and notices that are in effect under the 2013 RAA in a Temp Spec for gTLD registration data. Next slide, please.

The 2013 RAA requires the collection of certain data, which you can see here on the slide. The registrant's name, name servers, creation and expiration date of the domain, admin and technical contacts. The RAA also requires registrars to provide notice to the registered name holder and confirm the purposes for which their data is being collected. The registered name holder must consent to the collection

of their data. Now, registrars and registry service providers can request other information, but they must always obtain the consent of the registered name holder. These are the data collection requirements under the current 2013 RAA. Next slide, please.

As Eric mentioned, earlier in our timeline of how we got here in 2018, ICANN adopted the Temp Spec for gTLD registration data, which didn't change the data fields which were required to be collected, but it expanded the notice that registrars are required to provide to registered name holders. So registrars, for example, must provide contact details for the registrar's data processing officer. Also include to the registered name holder the recipients of their personal data, include information on data retention periods, and then also provide the registered name holder with a right to request rectification or erasure of personal data. Next slide, please.

The IRT, again, released the draft Registration Data Policy and provided insight on what the new requirements for data collection will be. The policy provides clarifying language on what fields must be collected and what fields may be collected. Registrars are also provided clarification on how data is to be collected, specifically, the registrant organization data, which we'll go into more detail about later. I think most registrars will find that they have the mechanisms in place to collect most, if not all, of the required data fields under the Registration Data Policy. But as we dive deeper, you'll see that the required data collection points were lessened under the Registration Data Policy. Next slide, please.

Again, the Registration Data Policy clarifies what data must be collected. The data that must be collected is the domain name, the registrant name, the registrant address to include their city, state, country, and postal code. Now, in areas where country and postal code are not collected, that information is not required. The registrant phone and the registrant e-mail. There are other fields that registrar is required to generate, for example, the registrar's ALANA number. But in terms of registrant data, these are the required fields that must be collected. You'll notice that there's no longer a requirement for registrars to collect administrative or technical contact data, which we'll get into in the next slide. Next slide, please.

Unlike the 2013 RAA, registrars are no longer required to collect technical contact. If a registrant does provide a technical contact, the registrar must advise the registered name holder that they can designate a representative or contact that does not constitute personally identifiable information for the technical contact. An example that you see here on the slide is the tech e-mail. It's a very general e-mail, techassistance@example.org. This is now an option for registrar name holders to provide technical contact. The registrar fax is no longer required. Nor is there a requirement for the registered name holder to provide a name server. The domain can be registered without a name server listed.

Now, here's an interesting point when it comes to the administrative contact. Registrar is now allowed to delete an administrative contact entirely. However, the caveat is that the registered name holder must provide all of the mandatory fields that are required to be collected prior to a registrar deleting the administrative contact information.

The registrar must have collected the domain name, the registrant name, the registrant address, phone number and e-mail address before deleting an administrative contact. Next slide, please.

Then wrapping up this section with changes to the collection of registrant organization data. Arguably, this is one of the most significant changes to the collection of data, how the registered organization field is collected. Registrars are required to provide the registered name holder with the opportunity to present registrant organization data. Then you'll see here on the slide also name server, name server IP addresses. And if the registered name holder does provide this information, then the registrar must provide notice that the registrant organization data will be published in the registration data directory. And if published, the registered organization is considered the registered name holder.

I will now turn it over to Sarah, who's going to dive deeper into how the registrant organization data will be handled under the new Registration Data Policy. Thank you.

ASHLEY HEINEMAN:

Thank you so much, Heidi. I'm going to pretend I'm Sarah for a moment. Well, not really. We just wanted to pause for a second because that was a lot of information for folks, whether you've been following this process or not. It's a refresher at this point. So I just wanted to see if anybody had any questions. This is going to show stupid I am. All right. I'm going to ask a question that I posed to my colleagues, because I'm not a lawyer and I'm not the one responsible for making these changes internally. I asked what happens during this

consent—it was noted by Heidi that to collect this information, we have to get the consent of the registrant. My question was what happens if they don't give consent? Who wants to answer my question? I know what it is but... Go on, Catherine.

CATHERINE MERDINGER: Sure. This is Catherine Merdinger from Name.com. The interesting thing about consent is that it really only is valid consent if you can actually say no. This is one of those tricky things that's not super in line with how we think of privacy these days post GDPR. But the fact is if you don't consent to giving your name to register a domain name, you can't register a domain name. But generally, registries, registrars are not relying on consent for a lawful basis for processing because that would be not valid, the consent would not be valid. Thanks. And it looks like we have another question.

ASHLEY HEINEMAN: Thank you very much. Mr. James Bladel, please go ahead.

JAMES BLADEL: Hi. Thanks, Ashley. James Bladel from GoDaddy. I was a member of the PDP but I haven't been following the IRT very closely. I have a question regarding the registrant organization field because I think Heidi mentioned that—yes?

SARAH WYLD: I'm so sorry, James. I didn't mean to interrupt you. But the next section in this is specifically on the org field, so we might answer it.

JAMES BLADEL: Because that was a very spicy topic. Okay. I'll hold my question until the next time.

SARAH WYLD: Thank you so much.

ASHLEY HEINEMAN: With that, I don't see any other hands. So we'll eagerly jump into the next section so we can get James back up here. Go ahead, Sarah.

SARAH WYLD: Hello, friends. I am Sarah Wyld. I work with Tucows and I have the pleasure of leading our Communications and Outreach team within the Registrar Stakeholder Group. And today, I will speak about updates to the organization field. Next slide, please.

Okay. Right now, requirements for how registrars handle the org field are spread out through the RAA, Registry Agreements and Consensus Policies. The IRT for this policy went through about 20 impacted consensus policies to identify what change is needed to happen so it's a little bit messy. To recap, registrars collect organization data depending on registry TLD requirements. Then if the organization data is collected, it's part of what gets validated and verified, transferred to the registry and the escrow provider, and retained for some time after the domain expires or transfers away. In the public WHOIS or RDAP response, the WHOIS specification section of the RAA includes a

footnote that says the output must include either the name or organization, or both if available.

We've also looked at the reality of how the org field has been used and we found that domain owners tend to populate the org field with all sorts of data. So it could be the domain name itself, it could be the registrant's full name, sometimes it's N/A for not applicable. The purpose of the field was not well understood and the quality of the data is overall hard to quantify. Next slide, please.

Now, the new Registration Data Policy has requirements for how they handle the org field for both already existing domains and for new domains registered after the policy is effective. The Registrar Communications Team has an explainer doc that we will distribute that shows a lot of this also. Hopefully, someone can drop that in the chat. And it's the second one down on the guidance and info page.

As you can see, we have a couple of new obligations. There's disclosure at the time of collection, there is potential redaction in the Registration Data Directory Service. And there's work with pre-existing domains. There are also some changes to collection, as we heard, and transfer and retention requirements. What does this actually mean? What work do we have to do? Next slide, please.

For domains that exist already before the new policy comes in, registrars need to ask domain owners to review their domain data and give them the option to consent to publish that registrant organization information. If the registrant consents to the publication, then the registrar must explain that the organization will be treated as non-personal data and will be published and actually do that publication. If

the registrant does not answer or declines, the registrar may either redact the organization data from the public RDDS or delete that registered org data entirely. If the registrar deletes the organization information, they first need to make sure that the registrant's name has been collected because we cannot have domain names without owners. Next one, please.

Moving on to new registrations. Once this policy is effective, registrars must offer the chance for the registrant to provide organization data. The registrant can choose if they want to provide this data or not. If they do provide the organization data, then at the time of collection, the registrant must be informed of certain things. You'll notice that this mirrors what was provided to pre-existing domain owners also. First, the organization will be considered the domain owner with the person listed as the point of contact at that organization. Second, if the registrant agrees, then the org field data will be published and if they do not agree, it's not published. And instead, the registrar may redact that data. Next slide, please.

Finally, there are updated requirements that are applicable to the org field for all registered gTLDs which, again, align nicely with the obligations for new and pre-existing registrations. Registrants must be given the opportunity to consent to publish their organization data. If they do consent, it must be published. If they do not, the registrar may redact. Then if the registrar collects organization information and the registry requires that this data be transferred to them, and an appropriate legal basis exists and a data processing agreement is in place, then the organization information must be transferred from registrar to registry. Similarly, but with fewer if then statements, if the

register I collect the organization, it must be included in the data escrow. Once again, I will just mention to check out our policy explainer. And that's it for me for the moment. Thank you. Any questions?

ASHLEY HEINEMAN: Thank you, Sarah. Any questions? Reg again. Reg, go ahead.

REG LEVY: Thank you. I have two questions. One is are we allowed to delete the registrant org field from new registrations like we could have with old ones?

SARAH WYLD: Thank you for asking that, Reg. No. For the new domains being registered after the policy is effective, because it was optional for the registrant to decide if they're providing org field data or not, if they do want to provide it, then we must collect it. The option is to publish it or to redact it. But deletion of org field data is for domains that were registered before the new policy to clean up the old data. Thank you.

REG LEVY: Thank you. My second question is I thought I heard you say that if a registrant agrees to put org field information in there, that their personal information will also be published as they are the point of contact for that organization?

SARAH WYLD: Thank you, Reg. I don't think I had intended to mean that and no. If the org field is consented for publication, then the org field is published. But it doesn't bring along with it the name. What they said is that the person listed as the first name and last name will be understood to be the point of contact at that organization. But that's separate from the publication aspect of it.

REG LEVY: So what do you mean by point of contact?

SARAH WYLD: I think if a registrar is trying to contact a registrant and we see that the registrant is sarahwyld@tu cows, then we know that Tucows owns that domain, but Sarah Wyld is the contact person there.

REG LEVY: So in the future, it will be assumed that the registrant is in fact the registrant.

SARAH WYLD: Yes.

REG LEVY: Okay. Just making sure. Thank you.

SARAH WYLD: Thank you.

ASHLEY HEINEMAN: That was fun. Okay, next we have Andee. Please go ahead.

ANDEE HILL: Thank you. I just wanted to thank you guys. I think this is confusing to a lot of people that aren't in the weeds. And this is really, really helpful for you to spell it out in a really clean and easy way to understand. Thank you.

ASHLEY HEINEMAN: All right. We got another one. Michele, please go ahead.

MICHELE NEYLON: Thanks. Sarah, you said you have an explainer on this. Microphone.

ASHLEY HEINEMAN: She did this in chat. There's a link in chat.

MICHELE NEYLON: Okay. Maybe just put it on the list afterwards if you could, please. Just for those of us who are slow to read things in chat.

SARAH WYLD: Thank you so much, Michele. The explainers were sent to the stakeholder group list earlier this week, and I will forward you that e-mail.

MICHELE NEYLON: Ooh. Burn.

ASHLEY HEINEMAN: I'm so glad you said it like that.

MICHELE NEYLON: I think I'm on fire.

MICHAEL BAULAND: Maybe I take that that the people were nice.

ASHLEY HEINEMAN: She said it in a nice way. Any other questions? We have more content, but I just want to make sure we got the questions, if anybody has them. Okay. Next slide, please.

All right. We're going to shift gears again a little bit and we're going to talk about data publication and redaction. We have Catherine Merdinger from Name.com who's going to talk to this. So go ahead, Catherine.

CATHERINE MERDINGER: Thanks. I'd like to establish for the record that Sarah is the nicest of all of the Registrar Stakeholder Group representatives. She's the best of us.

Anyway, moving on, let's go to the next slide. I'm going to be talking about publication and redaction. I wanted to start by defining what it means to publish and what it means to redact. You can see I've included those definitions that are exactly from the policy, but also included examples on this slide so you can see what publishing means.

In this case, you must publish the domain name in RDDS output. You have domain.example. And publishing the registrant's name, it might be Sophia Exemplar. But then, if you have to redact it, you have to list redacted for privacy. Publish means include an output and then redaction overrides that publication. Let's go to the next slide and talk about specific data elements that we always have to publish.

You'll see here, this is not limited to the personal data elements that we're talking about. This is what registrars must always publish in their RDDS output. You can see the ones marked by the little asterisk as fields that are subject to redaction. We'll get to the rules for applying redaction a bit later. I don't feel that I need to read these all to you. But there you go. You got them all. You'll notice that tech contact and admin contact are not listed. Let's go to the next slide.

Now, this is similarly must be published if registrars, collect this data or if it's generated automatically at the registrar. So the registrar WHOIS server, you have to publish it if you generate it. That's kind of a no-brainer. But then, as Heidi talked about, when we're talking about collection, we've got the tech name, phone, and e-mail that we might not be collecting. But if we have it, we have to publish it. And again, I don't feel the need to read these out to you. You can see them. Why don't we go to the next slide?

Then we have a list of what may registrars published. So we don't have to have the registrant phone extension. But we're allowed to publish it if we have it maybe. Similarly, the reseller field does not have to be published by registrars, but you can. Let's go to the next slide and talk about redaction.

So, the rules for applying redaction under the Registration Data Policy are kind of interesting. So you have to redact data where required by applicable law. This is kind of a no-brainer. In our Registrar Accreditation Agreements, we already have to comply with applicable law. So even if this weren't in the policy, you would still be obligated to do it if the law required you. But then it also gives you the opportunity to redact if there's a commercially reasonable purpose for doing so, or where it's not technically feasible to limit the application of the redaction to just where, say, it's required under applicable law. And then I've included as a reminder the definition of redaction with my own italics and underlines. Let's go the next slide.

These are the elements that the registrars must redact. Now, I have a bunch of different star symbols up there. So it's a lot, there's a lot going on with this slide. But we'll decode it. So we're going to assume that you are applying redaction under that first slide. So some registrars might not be applying redaction for all of their registrations. But assuming, let's say that you're required to redact under applicable law, you are required to redact the things marked with the dark little star, which I've realized now is not on any of these. Oh no, sorry, it's up at the top, my bad. My bad. So we're assuming we're requiring redaction, then the little triangle star thing, notes for the registrant e-mail and the tech e-mail, much like today, registrars need to provide a link to a web form or an anonymized e-mail address in that for that value, so that the registrant or the tech contact can be contacted but that their personal data is not disclosed. That is not a change from what we currently have.

Then, all the things marked with the little snowflake. Sorry, guys. I realized it's clear on my screen, it's maybe not super clear on yours. That is registrant phone extension, fax, fax extension. I think that's it. That's only if you're publishing those that they would need to be redacted.

Then the ones marked with the more circular thing with a hole in the middle is that the registrant has the opportunity to consent to publishing. They are little donuts, not donuts anymore. Okay. Let's go into the next slide.

So registrars may redact the registrant city and the registrant organization. Again, this is applying assuming we're applying redaction and this is subject to all of the things Sarah had talked about earlier. Finally, the next slide.

This is again listing what the registrar must allow the registered name holder to consent to publish. Again, we have our little star guy saying we're assuming we're applying redaction, and your little triangle guys, again, noting that it has to be linked to a web form or that's, I guess, only when redacting. But then the snowflake is only if you're publishing. So there's a lot of just hard kind of data thrown at you, facts thrown at you. So please let me know if you have any questions? Yeah. Thanks.

ASHLEY HEINEMAN:

Thank you, Catherine. Once again, a lot of information. Do we have any questions for Catherine? Eric, please go ahead.

ERIC ROKOBAUER: Thank you, Catherine, for walking us through that. This is definitely some of the most challenging things to read through, and so I appreciate including all of your little icons legend. My question is, is there possibly a resource for this that maybe registrars can refer to?

CATHERINE MERDINGER: It's crazy that you say that.

ERIC ROKOBAUER: Wait for Sarah, wait for Sarah.

CATHERINE MERDINGER: Because in one of the footers on one of these slides, somebody who was not me had already dropped the link to this, our explainer, in the Doc, and so I definitely have it.

ERIC ROKOBAUER: When I see it, I will be so excited. That'll be very helpful for me.

CATHERINE MERDINGER: Oh, jinx, Sarah. Oh, she got all of the explainers. This is the redaction explainer. Also, I realized, could we go to the next slide? That was the last one I was talking about. Yes, I did. I'm speedy quick. There should be one after it. I'm looking at the—yes. No, sorry, the one before that. Thank you. That was the other one I was talking. But, Reg, you have your hand up.

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- REG LEVY: Thank you. You said that a registrar may redact something if it is commercially reasonable to do so. And I wasn't sure if that was sort of a blanket exemption to redact everything, because perhaps a registrar would like to be known as a privacy forward registrar and therefore redact all of the things for commercially reasonable reasons.
- CATHERINE MERDINGER: I'm not ICANN Compliance so I can't tell you how they might read that. But I think that is a very commercially reasonable reason to redact.
- ASHLEY HEINEMAN: Okay, expect a lot of questions later on this week from other parties. Thank you very much. Catherine, please go ahead.
- CATHERINE MERDINGER: I just also wanted to flag that I did not put in this explainer, but it just dawned on me that if a registration is subject to a privacy or proxy service, that is not supposed to be redacted and that output needs to appear in the WHOIS service or the RDDS. I've been saying RDRS too much this week. So yes, thank you.
- ASHLEY HEINEMAN: Real fast, we got a queue.
- UNIDENTIFIED MALE: But that's the case where it's known to be a privacy or proxy. Like if it's a third party lawyer who's doing that, we wouldn't know, right?

CATHERINE MERDINGER: That's correct. You can't necessarily know if it's a privacy or proxy unless it's administered, I guess, by the registrar. Thanks. Owen?

OWEN SMIGELSKI: Just a clarification. So for privacy and proxy services, the proxy service always has to get published. A privacy service would show the registrant's name in the field in there, but because you have to redact it, then you can redact that part. So there is a little bit of redaction available with privacy services. I know that only because that's what Namecheap does. Thank you.

CATHERINE MERDINGER: Thank you, Owen. That's a good call out.

ASHLEY HEINEMAN: Any other questions? Because I think this is the end of our content. So feel free to come to the mic either in the room, raise your hand the Zoom. Happy to answer any questions about this. Oh, Michele. Go ahead, Michele.

MICHELE NEYLON: Tell me how you really feel. I suppose a very practical question from my perspective is what's the timeline on this?

SARAH WYLD: Thanks, Michele. The IRT is almost ready to publish the policy. And I think we're going to talk about this on Tuesday at Stakeholder Day. Once it's published, we will have 18 months to come into compliance

with the new policy. The first six months of that is what we're calling a quiet period, during which time we should all look within ourselves and do work on ourselves. So we will update our own internal systems, then we will prepare and we will coordinate with our registry friends to do a smooth transition. Then once that six months has passed, we will have a 12-month production, like public update process. During that time, you can update at the time you feel is best for yourself. But at the end of that total 18 months, we all need to comply with the new policy.

MICHELE NEYLON: Okay. Thanks. So basically, for now, the clock hasn't started ticking on this. And that's my takeaway.

SARAH WYLD: That is correct. We will make sure that it's sent by e-mail.

ASHLEY HEINEMAN: Okay. Any other questions about these presentations on the Registration Data Policy or about the Registrar Stakeholder Group? Anything, whatever, what we talked about, or about ICANN accreditation? If not, I want to leave you all with an invitation. If you're not already an RrSG member and you're interested, we are meeting pretty much all day Tuesday. And it is an open meeting, whether you're a member or not. We'll be talking about a lot of issues, including this to a certain extent. So if you want to hear about a bunch of other issues, please feel free to come. I don't remember the room. But I don't know that I need to know. You'll find it in the schedule. But

yes, most of the day Tuesday, the Registrar Stakeholder Group will be meeting from 9:00 until the end of time. 9:00 to 4:00.

So with that, not seeing any other hands, I want to thank everybody for joining us here today, either physically or remotely. And we can go ahead I guess end the recording.

SARAH WYLD: Thank you, everyone.

[END OF TRANSCRIPTION]