

23 October 2021

Re: EPDP Phase 1 Recommendation 12

Philippe Fouquart, Chair  
Generic Names Supporting Organization (GNSO) Council

Dear Philippe,

Thank you for your [letter](#) on 04 March 2021, which provides clarification to the Board's specific concern regarding the deletion of data in the Registrant Organization Field.

The original EPDP Phase 1 Recommendation 12 noted that "The Organization field will be published if that publication is acknowledged or confirmed by the registrant via a process that can be determined by each registrar. If the registered name holder does not confirm the publication, the Organization field can be redacted or the field contents can be deleted at the option of the registrar."

Following the Board's review of the [Supplemental Recommendation](#), the previous dialogue, and the clarifications in your letter, the Board is inclined to accept the GNSO Supplemental Recommendation on the Expedited Policy Development Process on the Temporary Specification for gTLD Registration Data (EPDP) Phase 1, Recommendation 12, concerning the Organization field.

However, in light of its previously expressed [concerns](#), the Board would like to share the following understanding of the intent and impact of Recommendation 12 once the Registration Data Policy is implemented:

1. The Board [understands](#) from the GNSO council letter that "*there is a significant legacy of mixed uses and purposes for this field. There is no standardization across the registrar landscape in how this field is utilized.*" Thus, it is our understanding that the **intent of Recommendation 12 is to provide requirements to standardize** how the Registrant Organization Field is utilized.
2. Standardizing the field will require a **transition process for existing registrations**. As part of that, Registrars will be required to ask Registrants to confirm the accuracy of the data in that field, determine whether the data should be deleted, and "If necessary, the registration will be re-assigned to the Registered Name Holder."
3. For **new registrations**, Registrars will be required to **treat the Registrant Organization Field as having priority** over the Registrant Name Field by considering the data in the Registrant Organization field as the Registered Name Holder. This means that the entity listed in the

Organization Field will have **the rights and responsibilities of Registered Name Holders** ([section 3.7.7 of the RAA](#)) such as transferring, renewing and claiming a domain name.

4. Given the above, and the requirement in [section 3.6 of the RAA](#) to escrow the Registered Name Holder data, the implementation of Recommendation 12 with the supplemental guidance will result in a **new requirement for the registrar to include the Organization field in its escrow deposits**. Ensuring the requirement to escrow the Registrant Organization Field will maintain compliance with principles of security stability and resilience *“especially in the rare instance of a registrar failure and transition of registrations from a de-accredited, losing Registrar to a gaining Registrar”* as noted in the Council’s 04 March 2021 [letter](#).
5. The Board acknowledges the GNSO Council [statement](#) that *“the data published in Whois or RDAP is not the only data stored, nor is it the data on which the registrar primarily relies to maintain contact with the registrant”* and understands that for existing registrations, **deleted values will continue to be required to be maintained in the registrar record** of changes to WHOIS information for the for the duration of the registrar’s sponsorship of the domain name and for an additional 2 years per section 1.1 of the Data Retention Specification in the [2013 RAA](#).
6. The **requirement for new registrations is for Registrars to seek consent to publish** the value in the Registrant Organization Field. If the Registrant declines publication of the value, the value will remain redacted, but the data will not be deleted.
7. If the Registrant agrees to the publication of the value, Registrars will publish the value. The Board understands that the language in the Final Report noting that the Registrant Organization field *“will be listed as the Registered Name holder”* **means that the data in the Registrant Name field will be treated as a point of contact at the organization**, but the labels in the RDDS will not change.

The ICANN Board would like to confirm whether this aligns with the Council’s understanding of the Supplemental Recommendation and the foreseen implementation of Recommendation 12. We appreciate this opportunity to continue to engage with the GNSO Council on these topics and we remain available should there be any further questions.

Sincerely,



Maarten Botterman  
Chair, ICANN Board of Directors