

ICANN | GAC

Governmental Advisory Committee

9 February 2022

Maarten Botterman, Chairman,
ICANN Board of Directors

Subject: GAC Response to ICANN Board Regarding EPDP Phase 2A Policy Recommendations

Dear Maarten,

Thank you for your [notification to the GAC](#) (9 December 2021) regarding the GNSO's majority approval of policy recommendations developed during Phase 2A of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data, pertaining to the treatment of domain name registration data from legal entities and pseudonymized email contacts.

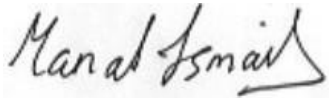
The GAC would like to draw the Board's attention to the [GAC Minority Statement on the EPDP Phase 2A Final Report](#) (10 September 2021) in which the GAC stated:

“While the GAC acknowledges the usefulness of many components of the Final Recommendations, the GAC remains concerned that almost none of the Final Recommendations create enforceable obligations. They therefore fall short of the GAC’s expectations for policies that would require the publication of domain name registration data that is not protected under the EU’s General Data Protection Regulation (GDPR) and create an appropriate framework to encourage the publication of pseudonymized email contacts with appropriate safeguards.”

The GAC also notes that other community members raised in their Minority Statements issues of interest to the GAC, including ICANN's potential role as a controller and the development of a potential Code of Conduct.

The GAC requests that the ICANN Board considers the above statement and the GAC Minority Statement in its entirety, as well as available options to address the outstanding public policy concerns expressed therein.

Best regards,

A handwritten signature in black ink that reads "Manal Ismail". The signature is written in a cursive style with a long, sweeping underline.

Manal Ismail
Chair, Governmental Advisory Committee (GAC)
ICANN