

11 December 2018

RE: 3rd party access to data models

Graeme Bunton
Chair, Registrar Stakeholder Group

Donna Austin
Chair, gTLD Registries Stakeholder Group

Dear Mr. Bunton and Ms. Austin;

Thank you for your letter dated 22 October 2018. It has been posted to ICANN's correspondence page [here](#). I appreciate your support for ICANN's approach to exploring whether a possible unified access model may diminish the potential legal risks for contracted parties.

As you have noted, ICANN org is also exploring technical implementations wherein requests for access to non-public data could be processed by ICANN org. In such approach ICANN org would be responsible for determining whether access should be granted based on the legitimate interests of the requestor, and if yes, then facilitate access to the data. The description of ICANN's approach to designing a central hub for access is still open for discussion and we have not yet proposed a solution for how credentialing, among other issues, could be addressed.

You may have noted in my 8 November 2018 [blog](#) that I have asked Ram Mohan, the former Security and Stability Advisory Committee liaison to the ICANN Board, to coordinate a Technical Study Group on Access to Non-Public Registration Data. We will share more information about this group – to which we plan to invite representatives from gTLD registries and ICANN-accredited registrars – in the coming weeks.

In parallel, ICANN org is continuing discussions with European data protection authorities, including the European Data Protection Board (EDPB) to determine whether the approaches we are pursuing are in line with the European Union's General Data Protection Regulation. Our engagement with the EDPB aims to determine, to the extent possible, if the community's consensus policy, as well as a possible access model, are in line with the GDPR. It is important to note that this work is not intended to replace the multistakeholder policy development process, but to inform it.

I welcome your continued engagement in these important topics and encourage you to continue to follow the latest developments on our Data Protection/Privacy Issues [page](#).

Sincerely,



Göran Marby
President and Chief Executive Officer
Internet Corporation for Assigned Names and Numbers (ICANN)