

27 August 2019

RE: Deferred enforcement of Thick WHOIS Transition Policy

Mr. Keith Drazek, Chair
Generic Names Supporting Organization (GNSO) Council

Dear Keith,

On 29 July 2019, Verisign [wrote](#) to ICANN org again requesting an extension to the current implementation plan for the [Thick WHOIS Transition Policy](#) by one year.

The ICANN Board wishes to understand the GNSO Council's views as to whether or not it should grant an additional deferral of compliance enforcement for the Thick WHOIS Transition Policy.

On 14 March 2019, the ICANN Board passed a [Resolution](#) to defer contractual compliance enforcement of this policy. Accordingly, ICANN Contractual Compliance will defer enforcing the following milestones until the dates listed below:

- By 30 November 2019: The registry operator must begin accepting Thick WHOIS data from registrars for existing registrations in .COM, .NET and .JOBS.
- By 31 May 2020: All registrars must send Thick WHOIS data to the registry operator for all new registrations in .COM, .NET and .JOBS.
- By 30 November 2020: All registrars are required to complete the transition

The resolution cited above is the fourth such deferral of enforcement approved by the ICANN Board since the original Consensus Policy dates were communicated in February 2017. The rationale for the deferrals has been related to challenges in defining agreeable data processing terms for the .com and .net Registry-Registrar Agreements (RRA) and the uncertainty created by the European Union's General Data Protection Regulation (GDPR) and the subsequent work of the [Expedited Policy Development Process \(EPDP\) Team to assess the Temporary Specification for gTLD Registration Data](#).

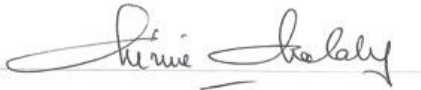
As you may know, the ICANN org and an Implementation Review Team (IRT) of community volunteers are actively working to define and implement the gTLD Registration Data Policy based on the Expedited Policy Development Process (EPDP) Team's [recommendations](#) as [adopted](#) by the ICANN Board on 15 May 2019. Through the implementation of the gTLD Registration Data Policy, ICANN org and the IRT will also consider the new policy's potential impact on other, relevant ICANN Consensus Policies, including the Thick WHOIS Transition Policy. ICANN org and

IRT are working toward the completion of the gTLD Registration Data Policy with a target effective date of 29 February 2020 in accordance with the recommendation from the EPDP Team.

Additionally, as part of the implementation of the gTLD Registration Data Policy, ICANN org and the contracted parties are expected to define the appropriate roles and responsibilities in the processing of gTLD registration data and create the necessary data protection arrangements. It is anticipated that this effort will be foundational for reaching agreeable terms in the respective RRAs for .com and .net.

Given the limited amount of time before the first milestone for the Thick WHOIS Transition Policy the ICANN Board respectfully requests a response from the GNSO Council during or immediately following your next GNSO Council meeting currently scheduled for the week of 19 September 2019.

Sincerely,



Cherine Chalaby
Chair, ICANN Board of Directors