

4 September 2018

Elliot Noss
CEO, Tucows

Re: 7 June 2018 Letter

Dear Mr. Noss:

Thank you for your letter dated 7 June 2018. It has been posted to ICANN's correspondence page [here](#). You raise many important points in your note on a topic that has dominated our community's discussions for the last year.

As you are aware, the [Temporary Specification for gTLD Registration Data](#) took effect on 25 May 2018. The issues you raise as they relate to the implementation of the Temporary Specification would be important points to note with the Expedited Policy Development Process Team that is examining whether the Temporary Specification should be adopted as consensus policy. I encourage you to engage in these important community discussions, as together we determine the future shape of registration data directory services.

Since you sent your letter, ICANN has published with the Temporary Specification, under Additional Resources, the [Model Registry Registrar Agreement Amendment Terms](#). This document provides a template for a Data Processing Addendum between registries and registrars. We hope that Tucows finds this to be a useful document.

To the extent that some of the points in your letter concern matters that are being addressed separately as part of injunction proceedings ICANN initiated against EPAG in Germany, I refer you to ICANN's papers filed in that proceeding for ICANN's views. Those papers can be found on ICANN's litigation webpage [here](#).

Once again, I am grateful for Tucows' engagement on this important topic. I encourage you to continue to share your thoughts at gdpr@icann.org as well as to engage with the EPDP Team.

Best wishes,



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