

## Project Change Request Form

Severity: **MEDIUM**

**Project name:**

Registration Data Accuracy Scoping Team

**Requested by:**

Michael Palage (Chair)

**Date:**

19 May 2022

**Change description:**

- The delivery of the write up for assignments #1 and #2 was originally anticipated to be delivered to the Council by the end of January 2022. This deadline was missed because the group needed several extensions of deadlines to complete assignments and deliberations were more complicated than anticipated. The Scoping Team expects to be able to deliver the write up for assignments #1 and #2 at the latest shortly after ICANN74.
- The write up for assignments #1 and #2 may include recommendations for further work to be undertaken to gather data to help inform the group's deliberations on assignments #3 and #4. This work is expected to focus on data gathering that does not involve access to registration data as further clarity on that aspect is being pursued separately (see below). If the Council supports these recommendations, this work could continue.
- Separately, the current Chair has indicated his intention to step down after delivery of the write up for assignment #1 and #2 but is willing to remain as Chair in a caretaker role until a replacement is found. Once a new Chair has been identified and further dependencies are better understood, an updated project plan and timeline will be developed.
- There are also external dependencies that may delay further work in relation to data collection that involves personal information. As communicated by the Board Liaison to the Scoping Team, the ICANN Board has requested ICANN org to prepare a number of specific scenarios for which it will consult the EDPB on whether or not ICANN org has a legitimate purpose that is proportionate, i.e., not outweighed by the privacy rights of the individual data subject(s) to request Contracted Parties to provide access to individual records as well as bulk access to registration data in order to review the accuracy of registration data.
- Depending on the progress that can be made on assignments #3 and #4 with data that is gathered that does not include personal data and the timing of responses received from the EDPB, the group's work may need to be paused at some point in time.

**Change reason:**

Although it may be possible to draw some conclusions from data that is gathered that does not include personal data, it may not be possible to draw final conclusions on the state of accuracy without being able to access and review individual records / bulk access to registration data. It is not clear at this stage what a potential timeline for responses from the EDPB would look like, nor what the responses might mean for the Scoping Team's deliberations. The Scoping Team may identify further work it can undertake while responses are pursued from the EDPB, but at some point, it may need to pause until there is a response from the EDPB that will inform if/how to proceed.

**Impact of change (complete for relevant categories):**

- **Scope:** Not applicable.

- **Budget:** Not applicable.
- **Timeline:** Not applicable until dependencies in proposed action section are resolved. The project will remain downgraded with a status of “Target will be Missed” and a health of “In Trouble”.
- **Resourcing:** This will demand continued community and staff resources from original plan.
- **Communications:** Confirmation to the GNSO Council and represented groups on the RDA\_ST.
- **Other:** Not applicable.
- **Rationale:** TBD.

**Proposed action:**

- Submit write up for assignments #1 & #2 to the GNSO Council by ICANN74 or shortly thereafter, noting that some placeholders may exist in Assignment #2 pending delivery of additional information with respect to processing personal data in bulk.
- Call for Volunteers to find a replacement Chair.
- Council to review write up for assignments #1 & #2 and proposed next steps for Scoping Team.
- Upon confirmation of new chair as well as agreement from Council to proceed with next steps as identified in write up for assignments #1 and #2, develop a revised project plan and communicate deliverable dates to the GNSO Council. Should the EDPB confirm that ICANN org has a legitimate purpose that is proportionate to request access to individual / bulk access to registration data, additional time may need to be added to the overall timeline if this would result in a restart of ARS and/or the development / implementation of a new study to assess the state of accuracy.

**Estimated Associated cost, if applicable:**

- Not applicable.

**Risks, if applicable:**

- Due to legal uncertainties, it is difficult to establish clear deliverable dates, and at the moment, there’s no clarity as to when the above dependencies will be completed as these are dependent on a response from a third party.
- Search for a replacement Chair may be challenged and lengthy.