

The BC would like to thank all participants in the EPDP for the many hours of work to date, and the Council, in particular Keith, for granting our request for deferral which has allowed us to have substantive internal consultations.

Although we have explored at length various potential options to address our concerns, unfortunately we are not able to vote in favour of this motion.

The EPDP's work is incomplete – this is just Phase 1 – and the Report is a step backwards for BC members' interests compared to the Temp Spec, especially as the legitimate purposes for collecting and processing data in the Report are insufficiently precise and don't include consumer protection, cybercrime, DNS abuse and IP protection. Further, there are no firm assurances or commitments as to timeliness of dealing with requests or data accuracy. Overall, we note that there has been little attempt to address the risks to consumers and the DNS system as a whole of not disclosing data for legitimate purposes. As firm supporters of the multistakeholder model, we also note that many of the BC's concerns with the Phase 1 Report are shared by the IPC, ALAC, SSAC, and GAC.

The BC trusts that Phase 2 will move forward expeditiously to put in place an accredited RDS access programme, with specific deliverables and ambitious deadlines. Please be assured that the BC remains committed to this process.

Scott & Marie