

GNSO Council call / council vote: Approval of the Supplemental Recommendation Related to the Non-Adopted EPDP Phase 1 Recommendations (recommendation #12)

The BC recognizes and appreciates the vast amount of work undertaken by our EPDP Team experts, and trusts that we will all continue to strive in good faith towards our shared goal of defining and implementing practical solutions for the processing of, and access to, WHOIS data, that will both comply with all relevant laws and fairly address the concerns of all parts of the community. We also thank the Board for its letter of 14 October to the GNSO Council, in which it raised concerns about the deletion of the data in the Organization field. The BC shares these concerns.

Should the data in this field be deleted, we foresee scenarios where it will be impossible to verify the actual registrant, in particular where the Registered Name field cites only “domain admin”. This could unwittingly create risks of domain name hijacking. We also note that the Organization field is an indicator that a registrant is a legal – not natural – person, thus data in this field does not fall within the scope of the GDPR.

We understand that much of the data held by the Registrars in the Organization field is inaccurate for historical reasons, and very much hope that paths to ensure accurate data can be found as soon as possible. However, we strongly believe that deletion of all Organization field data would be an over-reaction to this issue. Instead, we would prefer to see this data redacted as appropriate, and in the implementation of the new policy going forward a requirement that a new registrant, or a registrant renewing their registration, verifies and/or confirms the accuracy of their data.

As stewards of the gTLD policy process, the BC firmly believes that we owe a duty to the entire community to safeguard this vital aspect of the DNS.

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