

Statement for the record:

The Business Constituency thanks all of our GNSO colleagues, in particular those active in the relevant small team, for their good faith engagement in trying to reach a solution to allow both Consensus Policies agreed by the multistakeholder community, Thick WHOIS and the EPDP Phase One Report, to co-exist. We note with regret that the Thick WHOIS policy is to be repealed without specific community consultation, especially as we now have clear guidance from the European Commission in the form of the draft cybersecurity Directive that maintaining an accurate WHOIS database does not in itself contravene the provisions of the GDPR. The EPDP Report was clear that Thick WHOIS data must be transferred from registrar to registry provided an appropriate legal basis exists and a data processing agreement is in place and we note with concern that this is not to be put into effect. As such, we are regrettably obliged to vote against this motion.

Thanks again,
Marie

Marie Pattullo
Senior Trade Marks and Brand Protection Manager