

6 November 2018

RE: GDPR and Across-field Address Validation Working Group (AFAV)

Mr. Graeme Bunton,
Registrar Stakeholder Group Chair

Dear Mr. Bunton,

Thank you for your 5 September 2018 letter, in which you expressed concern that proceeding forward with across-field address validation (AFAV) at this time will generate additional risk for both registrars and the ICANN organization under the General Data Protection Regulation.

As you know, the Registrar Accreditation Agreement requires registrars to “[v]alidate that all postal address fields are consistent across fields (for example: street exists in city, city exists in state/province, city matches postal code) where such information is technically and commercially feasible for the applicable country or territory.” To that end, ICANN org has been working with a group of registrars (the AFAV working group) to determine the feasibility of implementing this requirement.

ICANN org acknowledges your concerns about the potential impact of GDPR on ICANN org’s implementation of AFAV. ICANN org will review the project again in light of the concerns you have raised.

Once this analysis is complete, ICANN org will follow up with the AFAV working group to discuss next steps.

Sincerely,



Cyrus Namazi
Vice President, Global Domains Division