

From: Denise Michel

Date: March 13, 2018 at 17:21:24 AST

To: Goran Marby, Manal Ismail

Subject: [Ext] Accreditation & Access Model For Non-Public Whois Data

Dear Goran and Manal:

The undersigned respectfully request that ICANN Org immediately undertake expedited efforts to develop, finalize, and implement -- at the time ICANN's GDPR model goes into effect -- an accreditation model to enable access to non-public WHOIS data for legitimate cybersecurity and intellectual property/consumer protection purposes. We request that ICANN Org take responsibility for seeking GAC advice and working with the ICANN community to ensure this credentialing and access is ready on 25 May 2018.

To support this, attached is a draft model that can be used to jumpstart this effort. Under the threat of the existing WHOIS system "going dark" for those with legitimate and legal purposes to protect the internet from domain abuse, we have little time to act to meet the May deadline for GDPR compliance.

The draft model is presented along with a request that ICANN Org will:

1. facilitate rapid finalization and implementation of a model in a very short period time
2. contract with appropriate parties (e.g. parties who crafted TMCH) to develop detailed specifications
3. execute upon implementation of those specifications in advance of 25 May 2018

We stand ready to work with ICANN Org and the community to help achieve these objectives.

Respectfully Submitted,

AppDetex

DomainTools, LLC

Facebook, Inc.

LegitScript, LLC

MarkMonitor

Microsoft Corporation

Secure Domain Foundation

Time Warner, Inc.