

5 September 2018

RE: 24 July letter regarding ICANN's GDPR Compliance Model Comparison Chart

Dear members of the ICANN Business Constituency:

Thank you for your [letter](#), dated 24 July 2018, regarding corrections required to the previously published [chart](#) comparing ICANN's Unified Access Model discussion paper, the Accreditation and Access Model (v 1.5) and the Philly Special (v 2.0). We appreciate your input and have noted the changes requested in your letter.

We encourage you to review the second iteration of the [Draft Framework for a Possible Unified Access Model for Continued Access to Full WHOIS Data – For Discussion](#), which was published 20 August 2018. Your feedback on this possible model will be important as we continue our dialogue with the European Data Protection Board (EDPB) in order to seek legal clarity for any such access mechanism. Lowering the legal risks for data controllers/contracted parties is necessary to develop a workable unified access model. It will also aid the community's discussion of the [Temporary Specification for gTLD Registration Data](#) in the [Expedited Policy Development Process](#).

The ICANN org will continue to work with the community and keep it apprised with regular updates to ICANN's [data protection/privacy webpage](#).

Best wishes,



Göran Marby
President and Chief Executive Officer
Internet Corporation for Assigned Names and Numbers (ICANN)