WHOIS Policy Review Team Report Recommendations	PDP (ISPCP view)
1. Strategic Priority -- WHOIS, in all its aspects, should be a strategic priority, form the basis of staff incentivization (including CEO's) and organizational objectives; Board should create a committee that includes the CEO to be responsible for priority and key actions; issue public updates on progress against targets for all aspects of WHOIS.	N
2. Single WHOIS Policy -- Board should oversee creation of a single WHOIS policy document, and reference it in agreements with Contracted Parties; clearly document the current gTLD WHOIS policy as set out in the gTLD Registry & Registrar contracts & Consensus Policies and Procedure.	N
3. Outreach -- ICANN should ensure that WHOIS policy issues are accompanied by cross-community outreach, including outreach to the communities outside of ICANN with a specific interest in the issues, and an ongoing program for consumer awareness.	N
4. Compliance -- ICANN should ensure that its compliance function is managed in accordance with best practice principles, including full transparency on resourcing and structure; provide annual reports; appoint a senior executive whose sole responsibility would be to oversee and manage ICANN's compliance function (reporting to Board Committee); provide all necessary resources to manage and scale compliance team's activities.	**No. This is about reporting lines and accountability for an operational function. Therefore no PDP required**
Data Accuracy **5.** ICANN should ensure that the requirements for accurate WHOIS data are widely and pro-actively communicated, including to current and prospective Registrants, and should use all means available to progress WHOIS accuracy, including any internationalized WHOIS data, as an organizational objective. **6.** ICANN should take appropriate measures to reduce the number of WHOIS registrations that fall into the accuracy groups "Substantial Failure and Full Failure" (as defined by the NORC Data Accuracy Study, 2009/10) by 50% within 12 months and by 50% again over the following 12 months. **7.** ICANN shall produce and publish an accuracy report focused on measured reduction in WHOIS registrations that fall into the accuracy groups "Substantial Failure and Full Failure" on an annual basis. **8.** ICANN should ensure that there is a clear, unambiguous and enforceable chain of contractual agreements with registries, registrars, and registrants to require the provision and maintenance of accurate WHOIS data; agreements should ensure that clear, enforceable and graduated sanctions apply to registries, registrars and registrants that do not comply with its WHOIS policies; sanctions should include de-registration &/or de-accreditation in	**No. This is about reporting and accountability and raising the profile of a key service to stakeholders who are not currently aware of it, and who could benefit from it** **No This is about operationalizing a report's findings along with an existing contractual obligation for accurate data. It's compliance not policy.** **No. this is purely operational reporting** **Yes, but only when consensus policy elements of contracts must be changed. Proceed quickly with implementing things that can already be done without PDP with the goal of minimizing delays. A great deal**

cases of serious or serial non-compliance.	**can be achieved here without a PDP**
9 a. Board should ensure that the Compliance Team develop metrics to track the impact of the annual WHOIS Data Reminder Policy (WDRP) notices to registrants; metrics should be used to develop and publish performance targets, to improve data accuracy over time;	**No - This is about metrics not policy**
9b If this is unfeasible, Board should ensure that an alternative, effective policy is developed and implemented that achieves the objective of improving data quality, in a measurable way.	**Yes - if needed to change policy although it is hoped that current consensus policy is sufficient to support this goal**

10. Data Access – Privacy and Proxy Services -- ICANN should initiate processes to regulate and oversee privacy and proxy service providers; processes should be developed in consultation with all interested stakeholders and note relevant GNSO studies; a possible approach to achieving this would be to establish an accreditation system for all proxy/privacy service providers, and consider the merits (if any) of establishing or maintaining a distinction between privacy and proxy services; goal is to provide clear, consistent and enforceable requirements for the operation of these services consistent with national laws, and to strike an appropriate balance between stakeholders with competing but legitimate interests -- including privacy, data protection, law enforcement, the industry around law enforcement and the human rights community. A list of objectives for regulation is provided for consideration, including: labeling WHOIS entries made by a privacy or proxy service; providing full WHOIS contact details for the privacy/proxy service provider; adopting agreed standardized relay and reveal processes and timeframes; Registrars should disclose their relationship with any proxy/privacy service provider; maintaining dedicated abuse points of contact for each provider; conducting periodic due diligence checks on customer contact information; maintaining the privacy and integrity of registrations in the event that major problems arise with a privacy/proxy provider; and providing clear and unambiguous guidance on the rights and responsibilities of registered name holders, and how those should be managed in the privacy/proxy environment.	**Yes – there needs to be a policy framework within which to build these processes**
11. Data Access – Common Interface It is recommended that the Internic Service is overhauled to provide enhanced usability for consumers, including the display of full registrant data for all gTLD domain names (whether those gTLDs operate thin or thick WHOIS services); operational improvements should include enhanced promotion of the service to increase user awareness.	**No – this is an operational improvement to Internic that could be done in accordance with current policy. If other PDPs changed this policy, Internic could be required to conform with those changes. But no dedicated PDP is required for this action item**

Internationalized Domain Names **12.** ICANN should task a working group within six months of publication of this report, to determine appropriate internationalized domain name registration data requirements and evaluate available solutions; at a minimum, the data requirements should apply to all new gTLDs, and the working group should consider ways to encourage consistency of approach across the gTLD and (on a voluntary basis) ccTLD space; working group should report within a year. **13.** The final data model, including (any) requirements for the translation or transliteration of the registration data, should be incorporated in relevant Registrar & Registry agreements within 6 months of Board adoption of working group's recommendations, or put explicit placeholders in the new gTLD program agreements, & in existing agreements when they come up for renewal. **14.** Metrics should be developed to maintain and measure the accuracy of the internationalized registration data and corresponding data in ASCII, with clearly defined compliance methods and targets.	**No – unless policy changes are required in order to promulgate the rules across all gTLDs.** **Maybe. Support the Ry view that _policy-based_ (inside the picket fence) changes to Ry and Rr agreements should flow through the PDP process. However, changes outside the consensus-policy "picket fence" do not need to flow through the PDP process and care should be taken to ensure that the policy process is not inserted inappropriately into those decisions. Doesn't seem to tally with current RAA negotiations that haven't gone through a PDP** **Yes – as the compliance function needs policy underpinnings upon which to base its actions. However, developing the metrics is an operational function and can precede a narrowly scoped PDP that inserts them into the Compliance framework.**
15. Detailed and Comprehensive Plan -- ICANN should provide a detailed and comprehensive plan within 3 months after the submission of the Final WHOIS Review Team report that outlines how ICANN will move forward in implementing these recommendations.	**No, although this planning should be done in collaboration with the policy-making body so as to set realistic timing goals and expectations, this is purely operational and does not require a PDP.**
16. Annual Status Reports -- ICANN should provide at least annual written status reports on its progress towards implementing the recommendations of this WHOIS Review Team. The first of these reports should be published one year, at the latest, after ICANN publishes the implementation plan mentioned in recommendation 15, above.	**N**