

January 28, 2018

Dear Goran:

The Business Constituency (BC) and Intellectual Property Constituency (IPC) respectfully request that ICANN Org extend the community input period on the ICANN-Proposed GDPR Compliance Models, which is currently set to close on January 29, 2018. We request an additional two weeks, with a new comment deadline of February 12, 2018, to provide additional opportunity for the community to provide input and to bring the public comment period into conformity with the standard 40-day comment period that ICANN generally employs.

This complex issue requires careful, dutiful consideration by all affected community members and stakeholders, including global business owners that expect to see significant impact from the adoption of an interim GDPR compliance model in terms of the accessibility of WHOIS data. In addition, we received confirmation on January 24, 2018 from you and John Jeffrey that we could use this comment period to provide input relating to the five community-proposed models, in addition to the three ICANN-proposed models, which was not made clear in the original call for community input issued on January 12, 2018. As a result, we believe additional time is warranted and necessary to integrate our thoughts about all eight models and ensure our input is as comprehensive and useful as possible.

We note from your blog published on January 25, 2018 that you acknowledge the need to provide for further opportunities to solicit community understanding and feedback, and we welcome the opportunity to participate in the webinar scheduled for February 2, 2018 to solicit additional community views on this topic. (<https://www.icann.org/news/blog/data-protection-privacy-update-status-of-model-selection-and-webinar>) We would respectfully point out that the public comment opportunity should extend past the date of the scheduled webinar for community input, and that ICANN should further extend their consideration period to late February.

Thank you for your quick acknowledgement and consideration of this request.

Sincerely,

Business Constituency
Intellectual Property Constituency