

8 March 2018

Dimitris Avramopoulos, Commissioner for Migration, Home Affairs and Citizenship, European Commission  
Věra Jourova, Commissioner for Justice, Consumers and Gender Equality, European Commission  
Sir Julian King, Commissioner for the Security Union, European Commission

RE: Technical input on Proposed WHOIS Models on behalf of the European Union

Dear Mr. Avramopoulos, Ms. Jourova and Sir Julian,  
Thank you for your letter of 29 January 2018. It has been published to our correspondence page [here](#). We also appreciated the subsequent [letter](#) from your colleague Roberto Viola, received 7 February 2018. Your communication and that of your colleague have proved to be vital contributions to the discussion surrounding the public interest value of WHOIS, as well as the importance of ensuring compliance with the European Union's General Data Protection Regulation (GDPR).

The issues the Commission raises in its letter and that of Mr. Viola are critical to the discussions ICANN is undergoing with its other community members, including our contracted parties (domain name registries and registrars), as well as other interested stakeholders. It is also helpful as we engage with the relevant data protection authorities to find clarification on the points that you have raised.

As you know, because of ICANN's unique relationship with contracted parties, we need to address uncertainties related to the publication of registration data in the WHOIS services. As we work to ensure the organization's and its contracted parties' compliance with the law in time for the 25 May 2018 deadline, it is helpful to discuss the outstanding issues you outlined.

On 28 February 2018, we [published](#) new materials for discussion by the community. These included a [proposed interim model](#) for compliance with both the law and ICANN's contracts, as well as a [chart](#) comparing this interim model against other proposed models. We welcome your input on these documents, as well.

Again, your guidance on these matters has been very helpful. Thank you for your engagement on this important topic. We look forward to continuing these discussions with you over the coming weeks.

Thank you.



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