WHOIS and Data Protection Policy (incl. Accuracy)

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ICANN | GAC
Governmental Advisory Committee

Agenda

1. **Background on WHOIS and Data Protection**

2. **Proposed gTLD Registration Data Policy (incl. Urgent Request)**

3. **Registration Data Request Service (RDRS)**

4. **Privacy/Proxy Services**

5. **Registration Data Accuracy**

6. **Considerations for Hamburg Communiqué**

WHOIS and Data Protection: Importance to the GAC

Why this is important for the GAC

Per the GAC Principles Regarding gTLD WHOIS Services (28 March 2007), recalled in the GAC Abu Dhabi Communiqué (1 Nov. 2017), the GAC noted they "*continue to reflect the important public policy issues associated with WHOIS services*" including that "*WHOIS data [...] is used for a number of legitimate activities, including:*
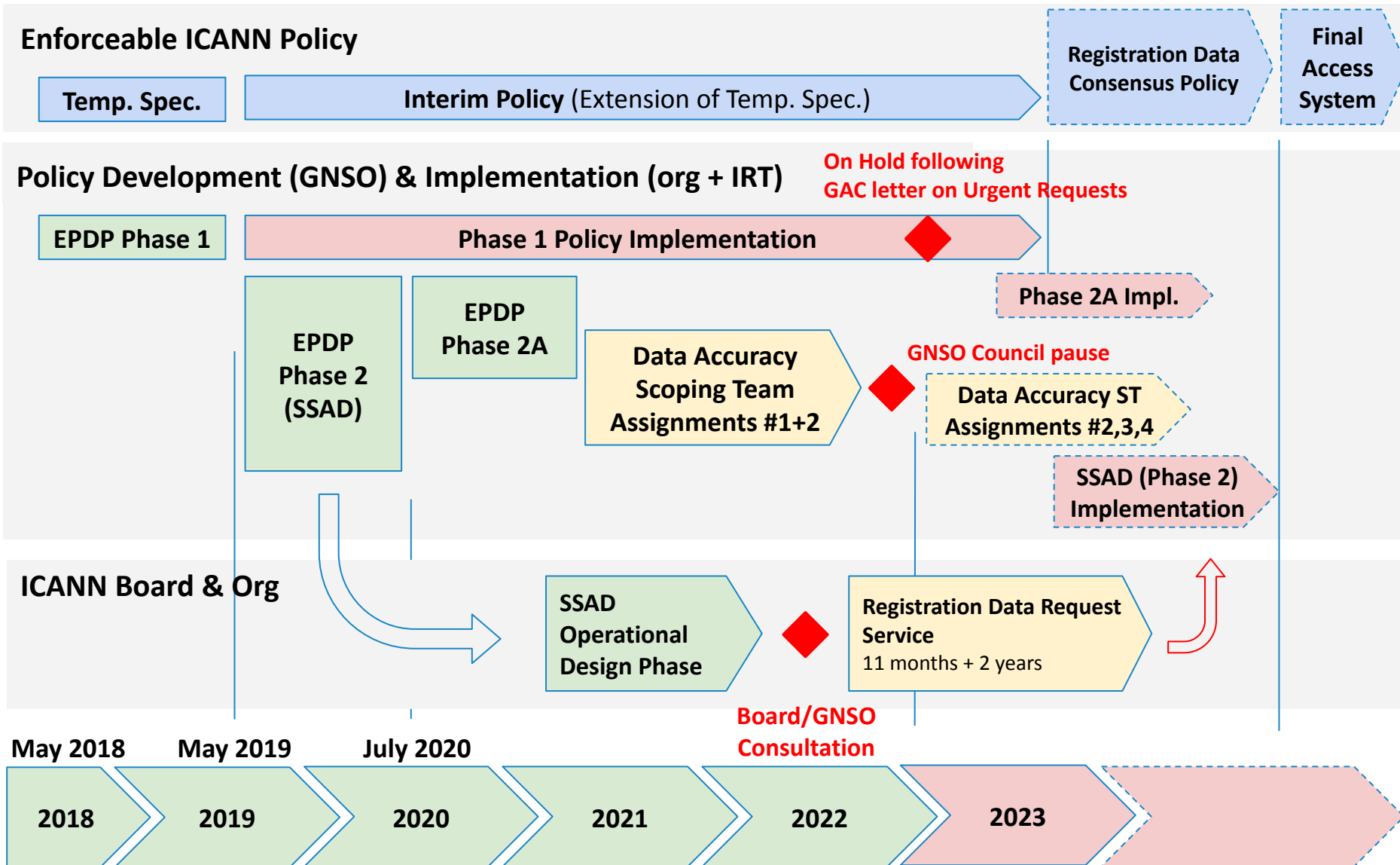
1. *Assisting law enforcement authorities in **investigations and in enforcing national and international laws**, assisting in **combating against abusive use** of internet communication technologies;*

2. *Assisting businesses, other organizations, and users in **combating fraud, complying with relevant laws, and safeguarding the interests of the public**;*

3. *Combatting **infringement and misuse of intellectual property**; and*

4. ***Contributing to user confidence in the Internet** as a reliable and efficient means of information and communication by helping users identify persons or entities responsible for content and services online."*

And still relevant when considering compliance with Data Protection Law

The GAC advised the ICANN Board "*it should use its best efforts to create a system that continues to facilitate the legitimate activities recognized in the 2007 Principles, including by:*

1. ***Keeping WHOIS quickly accessible for security and stability purposes**, for consumer protection and law enforcement investigations, and for crime prevention efforts, through user-friendly and easy access to comprehensive information to facilitate timely action.*

2. ***Keeping WHOIS quickly accessible to the public** (including businesses and other organizations) for legitimate purposes, including to combat fraud and deceptive conduct, to combat infringement and misuse of intellectual property, and to engage in due diligence for online transactions and communications"*

WHOIS and Data Protection: Timeline to New Framework

Enforceable ICANN Policy

| Temp. Spec. | Interim Policy (Extension of Temp. Spec.) | Registration Data Consensus Policy | Final Access System |

Policy Development (GNSO) & Implementation (org + IRT)

On Hold following GAC letter on Urgent Requests

| EPDP Phase 1 | Phase 1 Policy Implementation |

Phase 2A Impl.

EPDP Phase 2 (SSAD)

EPDP Phase 2A

Data Accuracy Scoping Team Assignments #1+2

GNSO Council pause

Data Accuracy ST Assignments #2,3,4

SSAD (Phase 2) Implementation

ICANN Board & Org

SSAD Operational Design Phase

Registration Data Request Service
11 months + 2 years

Board/GNSO Consultation

May 2018   May 2019   July 2020

| 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |

Legend: Completed   Ongoing   Uncertain Timeline

Draft Registration Data Consensus Policy (EPDP Phase 1)

GAC Public Policy Concerns (per GAC Comments, 21 Nov. 2022)

- The GAC raised the following concerns with respect to the proposed implementation (24 Aug. 2022) of the Phase 1 recommendations, including:

    - **The definition and proposed timelines to respond to urgent requests**: while the GAC acknowledged the importance of maintaining a narrowly tailored set of circumstances warranting "urgent requests for lawful disclosure," it recommended that this include "imminent or ongoing cybersecurity incidents."

    - **The collection and publication of reseller data**: The GAC supported inclusion of the "reseller" data element, noting its view that under the 2013 RAA, the definition of "reseller" could include privacy and/or proxy services. The GAC also sought clarification as to which entities should or should not be considered resellers under the policy.

    - The **collection/publication of registration information related to legal entities**: while not strictly within the scope of Phase 1 implementation, the GAC noted that required data elements under the Consensus Policy may change as a result of pending policy recommendations (e.g. Phase 2A).

    - Qualifiers related to **"commercial feasibility" in connection with redacted data**:
    The noted concern regarding the option to redact data (including legal person data) where it is deemed not technically or commercially feasible to publish such data.

Draft Registration Data Consensus Policy (EPDP Phase 1)

GAC Public Policy Concerns, and ICANN org reponse

- The GAC also noted:
  - **A need for greater clarity**, including regarding the obligation to enter into data protection agreements;
  - **Lack of clear standards** in terms of implementation and enforcement
  - Implementation of a **Partial System Resulting in a Policy Gap**

- ICANN org response in [Report of Public Comments](#) (20 January 2023), including its Review of Public Comments (28 April 2023):
  - Publication of reseller data and data of legal persons are considered out of scope of the EPDP Phase 1 IRT
  - "The 24-hour response time to urgent requests accurately reflects the intent of the EPDP policy recommendations", but cannot extend urgent request definition

- Next steps:
  - **GAC to Follow-up with ICANN org on implementation of EPDP Phase 2A Recommendations** related to the distinction between natural and legal persons
  - ICANN announced that the **IRT will reconvene during ICANN78 to proceed with the publication of the Consensus Policy without the Urgent Requests requirements** in it for now. The GAC supports moving forward with implementation of the balance of the policy recommendations. (see GAC Aug. 23, 2023 letter re: urgent requests).

Draft Registration Data Consensus Policy (EPDP Phase 1)

Timeline to Respond to Urgent Requests (Threats to life, critical infrastructure, child exploitation)

- Initial Proposal (22 Aug. 2022): *"without undue delay, but no more than two (2) business days from receipt"* . . . and *"up to an additional one (1) business day"* under certain circumstances.

- GAC Comment (21 Nov. 2022): *"three business days (which could stretch to seven calendar days depending on weekends and intervening holidays) is not a reasonable time period for responding to urgent requests"*

- ICANN Response (28 April 2023): *"After careful consideration and taking into account the feedback received, the [ICANN org] IPT believes there is sufficient justification to revisit the policy language and to require a 24-hour response time for urgent requests"*

- Final Proposal (24 July 2023), despite certain improvements (general expectation of a response within 24 hours) returns to up to 3-business day period to respond to Urgent Requests

- GAC Letter Requesting ICANN Board Review (23 Aug. 2023)
    - Proposed outcome does not serve its intended purpose
    - Consider next steps that would achieve an outcome that better meets the public safety considerations posed by urgent requests.
    - The balance of the implementation of the Consensus Policy should move forward.

- ICANN org confirms (14 Sep. 2023) "***the ICANN Board decided that additional time is needed to consider the appropriate next steps***", publication on hold until future notice.

- ICANN Board Comments on Washington D.C. Communiqué (18 Sep. 2023): *The Board would be interested in any data the GAC can provide as to experiences of its members in working with contracted parties on requests of an urgent nature*

Draft Registration Data Consensus Policy (EPDP Phase 1)

SSAC Draft Report on Timeline to Respond to Urgent Requests

- Draft SSAC Comment on Urgent Request in gTLD Registration Data Policy (18 October 2023) was shared for review by GAC and GNSO, and feedback by 3 November 2023
  - SSAC struck by incompatibility between the definition of Urgent Requests and response times.
  - For "imminent threat to life", the expected response time is measured in minutes, not hours or days
  - Qualifier of "*generally* within 24 hours" introduces ambiguity. The policy is not clear, therefore not enforceable.
  - The proposed procedures and policies do not include a well specified means for reaching a registrar or registry operator urgently.

- Considers applicable precedent in the 2013 RAA, reviews some Internet provider's practices in handling emergency requests for disclosure by law enforcement and governmental agencies.

- Discussed "fitness for purpose" as a requirement for policy development and implementation.

- Discussed need to clearly document the rationale for specific proposals in this consensus policy.

- SSAC is considering 3 recommendations:
  1. The policy must provide additional structure for appropriate expedited handling of Urgent Requests, including an acknowledgment of receipt within 30 minutes
  2. No legitimate Urgent Requests should be responded to in more than 24 hours
  3. ICANN Org should acquire and document data regarding Urgent Requests and make high-level information available to the community for future consideration.

Registration Data Request Service

- **EPDP Phase 2 recommended a Standardized System for Access and Disclosure (SSAD)** after several years of deliberations. **Significant concerns remained** as the GNSO Council recommended it to the ICANN Board. The GAC provided a GAC Minority Statement (24 August 2020) as did many stakeholder groups.

- ICANN's Operational Design Assessment of the SSAD recommendations (24 January 2022), requested by the ICANN Board, **concluded that a complex set of systems and processes would be required, with a wide range of costs and fees** due to uncertain demand

- **The GNSO Council** had requested a consultation with the ICANN Board, upon delivery of the SSAD recommendations, to discuss "*the financial sustainability of SSAD and some of the concerns expressed within the different minority statements*". It **requested the Board pauses consideration of the recommendations to allow work to continue on a proof of concept** given "*the ODA does not provide enough information to confidently determine the cost / benefit of the SSAD recommendations*" (GNSO Council correspondence to ICANN Board, 27 April 2022)

- Following the suggestion of an SSAD-light Concept (April 2022), the proposal of a WHOIS Disclosure System Design (Sep. 2022), **the ICANN Board approved the development of the WHOIS Disclosure System** (Board resolution, Feb. 2023),

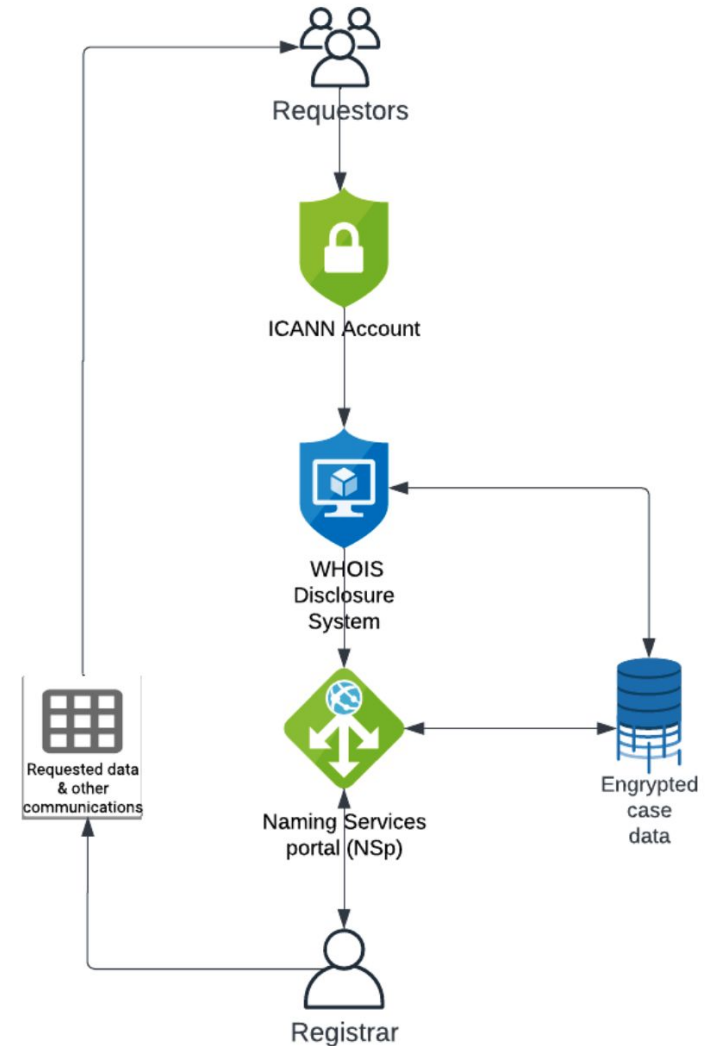- This system is **now called the Registration Data Request Service (RDRS)**

Registration Data Request Service

Timeline (per Board resolution on 27 Feb.):

- Operation for up to 2 years (once launched)

- Reporting on usage data "*at a regular cadence*"

- No later than 2 years of operation, re-initiate discussions regarding next steps on SSAD recommendations

Reminder of Key Features per ICANN org Design Document

- Central portal for intake of requests

- No cost to requestors

- No authentication / identify verification of requestors

- Only Registrars to respond to requests for disclosure of data (does not include requests directed at Registries)

- Requests are automatically routed to the appropriate registrar's Naming Services portal (existing)

- All requestor/registrar communications (including disclosure of data) to take place outside of the system

Requestors

ICANN Account

WHOIS Disclosure System

Requested data & other communications

Naming Services portal (NSp)

Engrypted case data

Registrar

GAC Kuala Lumpur Communiqué: *This system is a useful first step towards building a more comprehensive solution [...]. It should facilitate the collection of useful data [...] in a quicker and more cost-effective manner*

Registration Data Request Service

Next Steps Planned Per ICANN Board Resolution (27 February 2023):

- ICANN to work with the GNSO to **encourage comprehensive System usage by data requestors and by ICANN-accredited registrars**

- The ICANN Board urges the GNSO Council to **consider a Policy Development Process or other means to require registrars to use the System**

- The ICANN Board will engage with the GNSO Council together with the Small Team and ICANN org to **establish success criteria for this System**, which should include analysis of relevant usage data

- **Usage statistics** will inform periodic check-in discussions

Registration Data Request Service

Usage Data as recommended by the GNSO Small Team [addendum](#) (7 Nov. 2022) and as most recently [updated](#) (1 June 2023), to include:

- Number of registrars participating (total) and new participating registrars (current period)
- Number of requestors (total) and new requestors (current reporting period)
- Number of disclosure requests
- Number of times the data request form for non-participating registrars has been used
- Number of disclosure requests by priority
- Number of disclosure requests by requestor type (LEA, IP, Cybersecurity, etc)
- Number of disclosure requests by requestor (x% of users generate xx% of requests)
- Number of disclosure requests broken out by participating and non-participating registrars
- Number of open disclosure requests
- Number of closed disclosure requests
- Number of closed disclosure requests by type (approved, partial approval, rejected, etc)
- Average disclosure request response time (approved, partial approved and denied responses)
- Response time distribution (mean, median, histogram by timeframe), including time from the request until the request is addressed, differentiating between approved and denied responses.

Registration Data Request Service

The GNSO Small Team delivered [RDRS Proposed Success Criteria](#) (15 May 2023) which were sent by the GNSO Council for [ICANN Board consideration](#) (1 June 2023):

- The main and overarching success criteria of the RDRS is:

  Has the experience with the RDRS sufficiently informed the GNSO Council and ICANN Board to make a decision with regards to the SSAD recommendations?

- At a minimum the following criteria would need to be met in order to be able to provide the relevant information to the GNSO Council and ICANN Board:

  1. The RDRS should be available to all possible requestors to submit their data requests

  2. The RDRS should be available to all interested ICANN-accredited registrars to participate in

  3. The RDRS should track all relevant data points as identified by the Small Team

  4. Sufficient number of registrars participate reflecting a sufficient number of domain name registrations under management so that statistically significant data can be obtained;

  5. Sufficient number of requests are made by requestors so that statistically significant data can be obtained

  6. Registrar and requestor user satisfaction with the service should be measured (this should not focus on the outcome of requests but on experience with the service itself)

Registration Data Request Service

Reminder: Risks and related concerns (discussed by the GAC since ICANN75)

- Uncertainty as to adoption by Registrars (participation is voluntary)

- Lack of awareness, misconceptions about guaranteed data disclosure may lower/deter usage

- May not produce actionable data for consideration of SSAD (due to lack of use)

Relevant GAC Statements in the Kuala Lumpur Communiqué (26 Sept. 2022), Cancún Communiqué (20 March 2023) and Washington D.C. Communiqué (20 June 2023):

- *The GAC highlights the **importance of engaging in education and outreach** with potential requesters so that these requesters learn of the WHOIS Disclosure System's availability.*

- *The GAC stresses the importance of providing users of the RDRS with **easy to access step-by-step training**, and guidance in the form of **Frequently Asked Questions (FAQs) and answers***

- *The GAC notes the importance of **maximizing voluntary participation in the system**, including through effective outreach and potential incentive structures*

- *The GAC finds it very important to **log [approvals or denials of requests, timing of the response, and reasons for denial] in a proper manner** as this will help to ensure the system is generating robust and useful data to inform future work*

Registration Data Request Service

Latest Updates (since ICANN77)

- Possibility for Law Enforcement to request **confidentiality** now included

Registration Data Request Service

Home » Make New Request

Request for Non-Public Registrant Data

Requestor
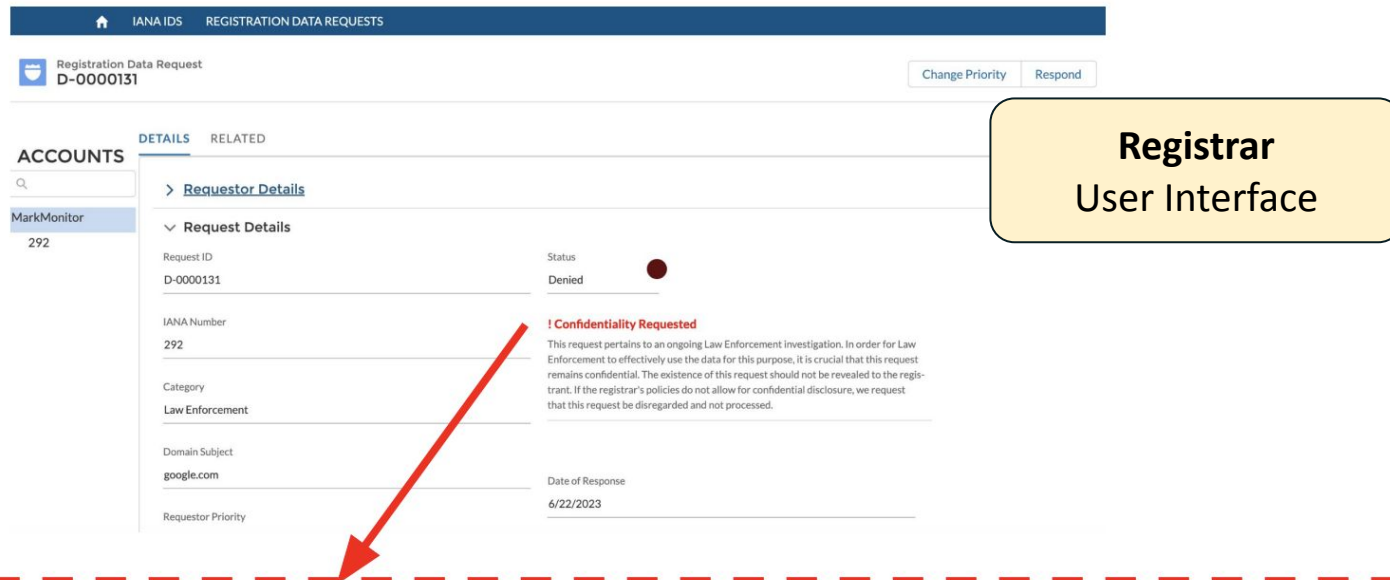User Interface

All fields required unless marked as optional

Request Category

Law Enforcement

☐ **Requesting confidentiality (optional):** By checking this box, the Registrar will be notified of your request for confidentiality. Please note that this is a voluntary system, and best effort will be made to honor your request. This may involve taking appropriate measures to comply with your request, providing you with information on the steps that can be taken, or rejecting your request without notifying the registered name holder.

Registration Data Request Service

Latest Updates (since ICANN77)

- Possibility for Law Enforcement to request **confidentiality** now included

Registration Data Request Service

Latest Updates (since ICANN77)

- **Urgent Requests changed to "Expedited Review Request"**

Request for Non-Public Registrant Data

① —— ② —— ③

All fields required unless marked as optional

Request Category

[   ] × ▾

Identify your request priority level.

Priority Setting Disclaimer: *Please note that the registrar has the ability to change the priority level if they determine your request does not meet the priority level you have selected.*

◯ **Urgent Request**
    The criteria to determine urgent requests is limited to circumstances that pose an imminent threat to life, serious bodily injury, critical infrastructure (online and offline) or child exploitation. For the avoidance of doubt, Priority 1 is not limited to requests from law enforcement agencies.

◯ **Standard Request**

Source: https://www.icann.org/en/system/files/files/presentation-rdrs-system-development-update-27jul23-en.pdf

Registration Data Request Service

Latest Updates (since ICANN77)

- **Urgent Requests changed to "Expedited Review Request"**

ICANN|GAC

Registration Data Request Service

Latest Updates (since ICANN77)

- **Urgent Requests changed to "Expedited Review Request"**

Disclaimer Language to Requestors:

Disclaimer: Expedited Review Request Clarification

Please be advised that selecting the "Expedited" option for your request does not obligate the Registrar to provide an expedited response. The "Expedited" designation primarily signifies your view that the nature of your request warrants a faster processing time, but it does not guarantee an accelerated resolution.

Do not rely on this Expedited Review Request functionality in emergency situations such as but not limited to an imminent threat to life, serious bodily injury, critical infrastructure (online and offline), or child exploitation. In these circumstances you should contact the Registrar directly for immediate assistance. For the Registrar's contact information, please refer to this page.

Please exercise caution and discretion when selecting the "Expedited" option, as it is not a substitute for direct communication in emergency situations, and it is not necessary for all requests. If you select "Expedited Review Request", provide an explanation in the box below.

Registration Data Request Service

Latest Updates (since ICANN77)

- **Confidentiality Request from LEA added**
- **"Expedited" category replaces "Urgent"** (----> further discussion needed on how to collect data for urgent requests)

- **Registrar Onboarding** into the RDRS has started. ICANN reports (18 October) that:
    - 19 registrars have onboarded RDRS, representing 10% of total gTLD domains
    - Registrars having pledged to onboard represent 45% of total gTLD domains

Q1		**Q2**			**Q3**			**Q4**		
Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

Project Kickoff
Webinar #1
Webinar #2
Registrar Early Access
Webinar #3 (Registrar Onboarding)
ICANN78
Public Launch
Webinar #4

Registration Data Request Service

Latest Updates (since ICANN77)

- For domains which registration data includes **Privacy/Proxy Services** information, it is **unclear whether underlying registrant data would be returned** in response to a RDRS disclosure request. Per ICANN org's recent clarification (12 October):

  - The RDRS does not currently take into an account the way to disclose the underlying registrant's data if the domain is behind Privacy or Proxy service

  - The RDRS disclaimer [...] warns the requestor that some domains may be utilizing the privacy or proxy service, in which case, the RDRS may or may not be the right tool to request the nonpublic registration data and in some cases, they may wish to contact the registrar directly.

Privacy/Proxy Services

Definitions on paper may no longer apply to real world circumstances

- Definition (per https://www.icann.org/en/icann-acronyms-and-terms)
  - **Proxy services** shield the identity of a customer by becoming the domain name's holder of record. When the domain name is queried in WHOIS, the identity and contact information for the proxy service is shown.
  - **Privacy services** prevents certain contact information for a registrant from appearing in Registration Directory Services such as WHOIS. A privacy service allows a registrant to appear as the domain name holder of record, but may provide alternate contact information for that registrant.

But… in the real world, services marketed as "Privacy" services often operate as "Proxy" services

Domain Privacy   Off

Your personal contact info is currently showing in our public WHOIS directory. Turn Domain Privacy on to replace your info with details from our partner,*Brand Redacted Proxy®*.

Privacy/Proxy Services

ICANN | LOOKUP

Registration data lookup tool

Try it yourself!
(lookup.icann.org)

Enter a domain name or an Internet number resource (IP Network or ASN)   Frequently Asked Questions (FAQ)

cnn.com

Lookup

By submitting any personal data, I acknowledge and agree that the personal data submitted by me will be processed in accordance with the ICANN Privacy Policy, and agree to abide by the website Terms of Service and the registration data lookup tool Terms of Use.

Registrant:

Name: Domain Name Manager

Organization: Turner Broadcasting System, Inc.

Email: tmgroup@turner.com

Phone: tel:+1.4048275000

Fax: tel:+1.4048271995

Mailing Address: One CNN Center, 13N, Atlanta, GA, 30303, US

This is what Registrant information looks like *without* P/P services

Privacy/Proxy Services

ICANN|LOOKUP

Registration data lookup tool

(lookup.icann.org)

Enter a domain name or an Internet number resource (IP Network or ASN)   Frequently Asked Questions (FAQ)

exampleproxy.com   Lookup

By submitting any personal data, I acknowledge and agree that the personal data submitted by me will be processed in accordance with the ICANN Privacy Policy, and agree to abide by the website Terms of Service and the registration data lookup tool Terms of Use.

Registrant:

Handle: 1

Name: Registration Private

Organization: Domains By Proxy, LLC

Kind: individual

Mailing Address: DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

Contact Uri: https://www.godaddy.com/whois/results.aspx?domain=exampleproxy.com

When Proxy services are used, the Proxy information is displayed *instead.*

Privacy/Proxy Services

Will have significant impact on Registration Data Access & RDRS

- RDRS provides a framework that allows registration data to be processed in a manner that ensures appropriate security of the personal data, compliant to relevant data protection laws

- During the [Board/GAC ICANN76 Communiqué Clarification Call](#) (11 April 2023) the ICANN Board discussed:
    - the increasing use of privacy/proxy services in gTLD Registration Data services
    - the need to consider privacy/proxy services as part of ensuring meaningful access to registration data
    - considerations to leverage RDRS to reinvigorate the implementation of the 2015 GNSO policy recommendations regarding accreditation of Privacy/Proxy services

Status of interplay between Privacy/Proxy and RDRS, as of ICANN 78

1. **If a registrant used a Proxy service, Registrars are generally expecting to disclose only Proxy information, in the place of information about the registrant.**

2. **Leading registrars have turned on free proxy services by default (Opt-out).**

Privacy/Proxy Services

Latest Developments on Privacy/Proxy Policy

- ICANN org reported (22 October 2023) to the GNSO Council that:

  - Work on Privacy/Proxy Services Accreditation Issues (PPSAI) policy implementation is still paused

  - The assumption is that there are approximately 500 affiliated P/P service providers affiliated with ICANN-accredited registrars currently in existence (The 2017 estimation during the first IRT was 250 providers)

  - ICANN org has done planning for some directions that could be taken in implementation, in anticipation of being able to move resources onto PPSAI once EPDP Phase 1 is completed

  - This Wednesday: an informal discussion with members of the previous IRT to share current thinking and to incorporate feedback into our planning

- During ICANN78, ICANN org has signaled (21 October 2023) a potential opportunity/need to address the matter of Urgent Request in two processes at once:

  - Privacy Proxy Implementation and

  - EPDP Phase 1 Implementation

Registration Data Accuracy

GAC Positions on Accuracy and work of the GNSO Scoping Team

- In the ICANN73 GAC Communiqué, the GAC "*emphasized the importance of holding contracted parties accountable for their compliance with the existing accuracy requirements, as well as the importance of increasing transparency about compliance, in order to inform an evidence-based analysis of these issues*" while noting that "*maintaining accuracy must be considered along with any policy's impact on the privacy needs of all registrants, including those registrants with enhanced privacy needs*."

- In the ICANN74 GAC Communiqué, the GAC called for the Scoping Team to move toward resolution of Assignment 1, stressing that "*contractual requirements are not limited to accurate but also reliable data*," while welcoming continued work on the development of a Registrar Survey and "*additional and complementary work items, such as testing of accuracy controls in a manner that is not dependent on access to personally identifiable data*."

Registration Data Accuracy

Interim Report of the Scoping Team to the GNSO Council

- On 6 September 2022, the Scoping Team's [Interim Report](#) was delivered to the GNSO covering:
  - assignment #1: a "Current Description" of Accuracy
  - assignment #2: Possible ways to measure the current state of accuracy that require or do not require access to registration data.

- The report includes three recommendations in total:

  1. **A Registrar Survey be conducted** on the status of accuracy of their domains under management.

  2. **A Registrar Audit be considered** regarding procedures for determining the accuracy of registration data.

  3. **A pause of the Scoping Team's work on _only_ those proposals that require access to registration data** until such time when it is sufficiently clear whether proposals that require access to registration data are a viable path to assess the current state of accuracy.

Registration Data Accuracy

Update during ICANN76:

- ICANN org provided an [update to the GNSO Council](#) (14 March 2023) noting the completion of a Data Protection Impact Assessment (DPIA) for an audit focusing on compliance with accuracy requirements under the Registrar Accreditation Agreement (RAA), adding that this audit *would* comply with the GDPR.

ICANN77 GAC Washington D.C. Communiqué

- Accuracy of registration data is an important element in law enforcement and cybersecurity investigations, domain name registration management, and other legitimate third-party interests. At the same time, the GAC reiterates that maintaining accuracy must be considered along with any policy's impact on the privacy needs of all registrants, including those with enhanced privacy needs… it would be helpful to receive quarterly updates on the status of the DPAs and to give further consideration to activities that may be resumed by the Accuracy Scoping Team in the interim.

- In response, the ICANN Board indicated that "***ICANN is preparing a comprehensive assessment of what activities it may undertake to study accuracy […]***".

Registration Data Accuracy

ICANN org [Report to the GNSO Council](link) (19 October 2023)

- **Several deficiencies and challenges** in pursuing the 4 scenarios envisioned to study accuracy:
  - Scenario 1 - Analyze publicly available registration data
  - Scenario 2 - Proactive Contractual Compliance audit
  - Scenario 3 - Analyze a (representative) sample of full registration data provided by registrars to ICANN
  - Scenario 4 - Registrar registration data accuracy survey (voluntary)

- **ICANN has identified alternatives to study accuracy:**
  - Inter alia, Historical data on compliance with current contractual validation and verification requirements

Considerations for Hamburg Communiqué

- The GAC may want to consider input in the Hamburg Communiqué on the following themes:

  - Implementation of policy recommendations stemming from EPDP Phase 1 and EPDP Phase 2A (legal vs. natural)

  - Urgent Requests, in EPDP Phase 1 and RDRS

  - Privacy/Proxy Services

  - Registration Data Accuracy