

8 March 2018

Dr. Dražen Lučić  
President of the Council, HAKOM

RE: Statement from Contractual Compliance regarding WHOIS contractual requirement  
Dear Dr. Lučić,

Thank you for your letter of 2 January 2018. It has been published to our correspondence page [here](#). Since you sent your letter, we have published a document outlining [three proposed interim models](#) for compliance with the European Union's General Data Protection Regulation, as well as [comments](#) received on those models, and a [webinar](#) on 2 February 2018 discussing both ICANN- and community-proposed models. These proposed models would allow for temporary changes to the collection, retention and display of registration data in the WHOIS services.

Your letter raised concerns regarding the scope of the interim solutions we have proposed, including the [Statement from Contractual Compliance](#), published on 2 November 2017. The ability to apply for a temporary deferral of contractual compliance enforcement is meant to address the approaching 25 May 2018 deadline for the GDPR's enforcement. Given that numerous contracted parties and ICANN may be affected by this legislation, we are moving swiftly to provide a single interim solution that will allow compliance with both the law and ICANN's contracts and policies on a temporary basis until the ongoing Next Generation gTLD Registration Directory Services Policy Development Process Working Group puts forth its comprehensive recommendations.

On 28 February 2018, we posted a [proposed interim compliance model](#) for community input. We welcome your feedback on this model, as we work toward settling on the final interim model. In the interim, contracted parties may continue to use existing procedures if they have additional conflicts with local laws.

You may find more information, including our latest announcements, correspondence, proposed models and community feedback on those models on ICANN's [Data Protection/Privacy Issues](#) page. Community feedback on the proposed interim models can be seen on this [subpage](#).

Thank you again for your engagement on this important topic. We look forward to continuing these discussions with you and other community members over the coming weeks, including at the ICANN61 meeting in San Juan.

Thank you.



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