



AL-ALAC-ST-0414-03-01-EN

ORIGINAL: English

DATE: 02 May 2014

STATUS: Final

AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the Policy Development Process (PDP) on Privacy & Proxy Services Accreditation Issues

Introduction

Alan Greenberg, ALAC member from the North American Regional At-Large Organization (NARALO) and the ALAC Liaison to the GNSO, composed an initial draft of this Statement after discussion of the topic within At-Large and on the Mailing Lists.

On 17 April 2014, this Statement was posted on the [At-Large Policy Development Process \(PDP\) on Privacy & Proxy Services Accreditation Issues Workspace](#).

On that same day, Olivier Crépin-Leblond, Chair of the ALAC, requested ICANN Policy Staff in support of the ALAC to send a Call for Comments on the Recommendations to all At-Large members via the [ALAC-Announce Mailing List](#).

On 23 April 2014, a version incorporating the comments received was posted on the aforementioned workspace and the Chair requested that Staff open an ALAC ratification vote on the proposed Statement.

On that same day, the Chair requested that the Statement, referenced AL-ALAC-ST-0414-03-00-EN, be transmitted to the Public Comment process, copying the ICANN Staff member responsible for this Public Comment topic, with a note that the Statement was pending ALAC ratification.

On 02 March 2014, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 12 votes in favor, 0 votes against, and 0 abstentions. You may review the result independently under: <https://www.bigpulse.com/pollresults?code=3860sfdJENmQzqnUAnPkQ3dV>.

Summary

1. The ALAC strongly supports amending the Privacy Proxy Specification such that: 1) It is applicable to all Privacy and Proxy providers; 2) the personal details of the beneficial user are verified in accordance with verification requirements in the 2013 RAA; and 3) limits on access to the personal information of the beneficial user must be clear and balanced.
2. In the case where a beneficial user is revealed during the process of a UDRP, and that UDRP proceeding finds in favor of the registrant, the identity and contact information of the beneficial user must NOT be revealed in any public document resulting from the UDRP.

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The ALAC strongly supports amending the Privacy Proxy Specification such that:

- It is applicable to all Privacy and Proxy providers.
- The personal details of the beneficial user are verified in accordance with verification requirements in the 2013 RAA. The process should ensure that, at least when the information is collected, that the proposed beneficial user is a real person/organization and that the contact details are those of the proposed beneficial user.
- Limits on access to the personal information of the beneficial user must be clear and balance the legitimate privacy requirements of the beneficial user as against the legitimate needs of law enforcement agencies and UDRP providers.

The ALAC further advises that in the case where a beneficial user is revealed during the process of a UDRP, and that UDRP proceeding finds in favor of the registrant and not the entity filing the UDRP, the identity and contact information of the beneficial user must NOT be revealed in any public document resulting from the UDRP.