



DGI/JM/AS/SK/NW/SS

Strasbourg, 8 October 2012

Mr Robin GROSS  
NCUC

**Subject: RAA's review and privacy compliance**

Dear Mr Gross,

At its last meeting on 27 to 28 September 2012, the Bureau of the Consultative Committee (T-PD) of the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data took note with interest of your email dated 22 July 2012 sent on behalf of the Non-Commercial Users Constituency (NCUC) of ICANN. In this letter, you raised some privacy concerns relating to the amendments proposed to the Registrar Accreditation Agreement concerning the processing of personal data provided by customers in connection with registrations of domain names.

The Bureau of the T-PD took note of the position of the Article 29 Data Protection Working Party in its comments of 26 September 2012 on the data protection impact of the revision of these arrangements concerning accuracy and data retention of the WHOIS data and fully shares the concern raised.

The Bureau of the T-PD is convinced of the importance of ensuring that appropriate consideration be given in the ICANN context to the relevant European and International privacy standards, such as the Convention for the protection of individuals with regard to automatic processing of personal data ("Convention 108") and remains fully available to provide expertise in the future.

Yours sincerely,



Jean-Philippe Walter,  
Chair of the Consultative Committee