Dear Akram:

(cc: Cyrus, Karla, Russ)

The Thick WHOIS Consensus Policy establishes a deadline of May 1, 2018 for Registrars to complete submission of all new domain name registrations as Thick WHOIS data to Verisign for .com and .net domain name registrations, as well as February 1st, 2019 for the complete migration to Thick.

Verisign determined that certain changes to the .com and .net registry-registrar agreements ("RRAs") were needed for the acceptance of Thick WHOIS data from the Registrars. The Registrar Stakeholder Group raised concerns with the proposed changes. Both parties have attempted to address these concerns in multiple telephone and live discussions.

As the RRA changes remain under discussion and have not been approved, Verisign was granted an 120-days extension of the August 1, 2017 Thick WHOIS data acceptance deadline. Because of the 120-days extension of the August 1, 2017 deadline, the corresponding submission deadline of all new domain name registrations as Thick WHOIS data to Verisign under the Consensus Policy should be extended, as well as the February 1, 2019 deadline for migration completion.

Accordingly, the Registrar Stakeholder Group would like to request that ICANN provide an extension of no less than 120 days to both deadlines. Given that the amount of work required for the transition to thick has not changed, and is unlikely to change, we would ask that an equivalent extension be granted if the Thick WHOIS data acceptance date is extended again in the future.

During this extension period, the Registrar Stakeholder Group will continue to engage with ICANN and Verisign regarding the RRA changes, ICANN's role under the GDPR, and steps needed to implement the Thick WHOIS transition.

Thank you for your consideration of this important matter.

Graeme Bunton, Chair, Registrar Stakeholder Group