The Registries Stakeholder Group (RySG) offers the following comments on ICANN's planned [Request for Proposal](#) for an economic study examining pricing trends and other competition indicators in the global DNS market.

The RySG is not clear on whether all contracted parties must comply with any data requests. While new gTLD operators have to "cooperate" under Section 2.15 of their Registry Agreement, no such requirement appears in legacy TLD contracts or the Registrar Accreditation Agreement. How does ICANN propose to address this discrepancy?

The RySG recommends that the following principles – drawn from the work of the GNSO's non-PDP WG for Data & Metrics for Policy Making – be followed:

- Request for data should be non-discriminatory among registrars/registries.

- Participant lists should be treated as confidential.

- Request for data should clearly state that provision of such data is optional.

- Request for data should clearly state the purposes for which the data will be used.

- Cost of providing the data should not be borne by the registrars/registries.

- Data provided should be treated as confidential, unless otherwise agreed by the data provider.

- Data provided should be anonymized and aggregated, unless otherwise agreed by the data provider.

- There should be safeguards to protect against unauthorized access or disclosure.

- Data that has not been anonymized or aggregated should be destroyed promptly after completion of the purpose stated in the request.

- Special care should be taken when Personally Identification Information (PII) data is involved.

- Data requests should be limited to the scope necessary to address a certain issue or set of issues.

- Retail and wholesale pricing shall not be provided for use in consensus policy development (refer to Registry & Registrar agreements).

- Any requests for data should include a reasonable time frame in which to be fulfilled.

- Requests for data should be made taking into account frequency of data requests, concurrent data requests, size of data set, or other elements that may impact the ability to fulfill the request.