RDS PDP Outreach #1 Input from the gTLD Registries Stakeholder Group

To: The Next-Generation RDS PDP WG via gnso-secs@icann.org

Submitting Organization Information

a. Please identify your SO/AC/GNSO Stakeholder Group / GNSO Constituency:

gTLD Registries Stakeholder Group (RySG)

b. Please identify the member(s) of your SO/AC/GNSO Stakeholder Group / GNSO Constituency

who is (are) participating in this working group:

Marc Anderson, Donna Austin, Edmon Chung, Kal Feher, Chuck Gomes, Scott Hollenbeck, Elaine Pruis, Norm Ritchie

c. Please identify the members of your SO/AC/GNSO Stakeholder Group / GNSO Constituency

who participated in developing the perspective(s) set forth below:

(Insert names to include Chuck Gomes, etc.)

d. Please describe the process by which SO/AC/GNSO Stakeholder Group / GNSO Constituency

used to arrive at the perspective(s) set forth below:

1. *Initial possible responses were drafted by Chuck Gomes and sent to the RySG email list for review, comments and additional input from all RySG participants.*
2. *Discussion was encouraged on the RySG email list and in an RySG teleconference meeting.*
3. *Suggested edits were incorporated into the proposed responses.*
4. *RySG participants were requested to communicate objections to any of the responses; there were no objections.*

e. Please identify a primary point of contact with an email address in case any follow-up is

needed:

Maxim Alzoba, m.alzoba@gmail.com (Maxim will join the WG; in the interim Chuck Gomes will serve this role.)

Questions

1. As part of its initial deliberations aimed at developing a work plan (https://community.icann.org/x/oIxlAw), the Working Group identified, gathered and reviewed key documents and information available in relation to charter questions that are expected to be addressed by the Working Group (see the check lists developed by the WG and also inputs identified by the Issue Report for each charter question at https://community.icann.org/x/HIxlAw). Furthermore, the Working Group identified those documents that it determined to be most relevant in relation to the topics of purpose, data elements and privacy (see https://community.icann.org/x/p4xlAw). You will find the charter questions that are expected to be addressed by the PDP Working Group in the Annex to this template.

   Are there any documents missing from these input inventories and/or any additional documents or information that you consider necessary to inform the PDP WG as they begin to address the charter questions during phase 1? If so, please identify the documents / information and explain their relevance in relation to the WG's phase 1 deliberations.

   Your response:

   No additional documents were identified.

2. In addition, the WG identified key inputs received from third parties (see documents listed at https://community.icann.org/x/R4xlAw, as well as inputs enumerated in http://whois.icann.org/sites/default/files/files/final-issue-report-next-generation-rds-07oct15-en.pdf, and comments posted at https://community.icann.org/x/sYxlAw). If input from your respective SO/AC/GNSO SG/C has been identified here, please confirm whether this input is still relevant and up to date, and if not, what input the Working Group should be considering.

   Your response:

   The RySG re-emphasizes the comments it submitted on July 13, 2015 with some added comments in brackets in a few cases:

- *"Cost must be analyzed during each step of the PDP."*
  - *"What is the cost to develop and who will pay for it?"*
  - *" What is the cost to deploy and who will pay for it?"*

  [The RySG understands that the ability to accurately estimate costs will become more feasible as the PDP progresses through its three phases, but suggests that cost considerations still be considered in all three phases.]

- *Consideration of and coordination with other RDS related initiatives must occur.*
- *"Phase I must be prioritized as certain questions must be resolved before other questions can be answered."*
- *"Individuals should have reasonable expectations of privacy; any incursions into an individual's privacy should be necessary and proportionate."*
- *"Questions regarding technical feasibility and industry impact must be answered. . . . we must understand completely how this transition will be managed prior to completion of Phase I. With around 160 million gTLD registrations, and all of our systems designed to interact with the WHOIS configuration, how a Next Gen RDS will be deployed must be thoroughly examined and stress tested to ensure the transition will have favorable outcome."*

  [The RySG understands that ability to determine technical feasibility and industry impact will not be completely feasible until policies are developed and implementation plans are prepared in Phases 2 & 3 but still believes that these two factors be considered as much as possible in Phase 1.]

- *". . jurisdictional issues must be addressed."*

3. Does your SO/AC/GNSO SG/C have any guidance for the Working Group in relation to the completeness of the charter questions to be addressed by this PDP WG (see Annex A)?

Your response:

   None at this time.

4. If there is any other information you think should be considered by the WG as part of its deliberations, please feel free to include that here.

   Your response:
   None at this time.

ANNEX A – Charter Questions

From https://community.icann.org/x/E4xlAw

The following text is **excerpted verbatim from the WG Charter** in order to **provide a list of key inputs for each question**.

During Phase 1, the PDP WG should, at a minimum, attempt to reach consensus recommendations regarding the following questions:

- **What are the fundamental requirements for gTLD registration data?**
  When addressing this question, the PDP WG should consider, at a minimum, users and purposes and associated access, accuracy, data element, and privacy requirements.

- **Is a new policy framework and next-generation RDS needed to address these requirements?**
  If yes, what cross-cutting requirements must a next-generation RDS address, including coexistence, compliance, system model, and cost, benefit, and risk analysis requirements? If no, does the current WHOIS policy framework sufficiently address these requirements? If not, what revisions are recommended to the current WHOIS policy framework to do so?

As part of its Phase 1 deliberations, the PDP WG should work to reach consensus recommendations by considering, *at a minimum*, the following complex and inter-related questions:

- **Users/Purposes:** Who should have access to gTLD registration data and why?

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- **Gated Access:** What steps should be taken to control data access for each user/purpose?

- **Data Accuracy:** What steps should be taken to improve data accuracy?

- **Data Elements:** What data should be collected, stored, and disclosed?

- **Privacy:** What steps are needed to protect data and privacy?

- **Coexistence:** What steps should be taken to enable next-generation RDS coexistence with and replacement of the legacy WHOIS system?

- **Compliance:** What steps are needed to enforce these policies?

- **System Model:** What system requirements must be satisfied by any next-generation RDS implementation?

- **Cost:** What costs will be incurred and how must they be covered?

- **Benefits:** What benefits will be achieved and how will they be measured?

- **Risks:** What risks do stakeholders face and how will they be reconciled?

Refer to the Phase 1 Documents page (https://community.icann.org/x/p4xlAw) for initial WG efforts to identify and create summaries of key input documents to inform the WG's work plan, prior to WG deliberation on Phase 1 questions.