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The Registries Stakeholder Group (RySG) requests that ICANN initiate and participate in a voluntary pilot program for RDAP implementation. The goal of this pilot program is for registry operators and ICANN to work together to develop a profile (or profiles) to guide implementation, as well as a timeline and transition plan for the migration from the current WHOIS-based registration directory service (RDS) to an RDAP-based solution.

Proceeding with a pilot program provides an opportunity for RDS operators to gain operational experience and for producers and consumers of RDS data to participate and provide valuable feedback. We urge ICANN to move forward with a pilot program as soon as practicable utilizing the following guidelines:

- Registries participating in the pilot would be expected to comply with the technical requirements established in the RDAP RFCs, but could experiment with different policy requirements and RDAP extensions.
- ICANN would waive the requirement for participating registries to go through a Registry Service Evaluation Process to deploy RDAP.
- The RySG and ICANN staff agree to collaborate on a mutually agreeable RDAP profile or profiles. Representatives of the RySG and ICANN staff agree to schedule regular calls and to have face-to-face-checkpoints at ICANN 60 and 61 meetings to ensure progress is made.
- Registries participating in the pilot program would be expected to notify ICANN of their timeline for deploying RDAP, provide a description of their proposed implementation and the location where it can be accessed. Registries MAY also register their pilot RDAP service with the IANA RDAP bootstrap service provided they make it clear this is a pilot implementation.
- Participating registries would be required to publish their then-current RDAP implementation features, including any limitations, privacy guidelines, available services, extensions and terms of use, as applicable.
- ICANN would maintain a web-based resource describing the pilot program, with appropriate resources including links to the RDAP service of each of the participating registries.
- Registries participating in the pilot would be expected to reasonably cooperate in sharing their operational experiences with members of the RDS policy development process (PDP) (e.g., through briefings during calls or at ICANN meetings).
- For the duration of the pilot, registries would not be expected to include RDAP queries in Monthly Reporting. However, ICANN may participate in the pilot and work with participating registries to develop or enhance existing reporting systems to accommodate RDAP reporting and to help guide the work of the RDS PDP.
- Registries participating in the pilot program would be required to continue to run WHOIS-based services in accordance to all the applicable requirements set forth in their Registry Agreements in parallel to RDAP until the finalization of a profile or profiles for RDAP and establishment of a formal date for RDAP deployment.

- If inconsistent with policies resulting from the RDS PDP, registries would be expected to redeploy RDAP in a manner consistent with the policy and implementation outcomes of that working group.
- Registries may retire their experimental RDAP deployments provided they notify ICANN.
- ICANN may participate in the pilot and work with participating registries to develop or enhance existing monitoring to accommodate RDAP services.

The availability of RDAP and the work currently underway in the RDS PDP represents a real opportunity for improvement. The RySG looks forward to continuing to work with ICANN on the development and implementation of RDAP, related RDS policies, and ultimately sun-setting WHOIS-based services.

Thank you