

ICANN | GAC

Governmental Advisory Committee

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Governmental Advisory Committee Comments on the proposed Registration Data Access Protocol (RDAP) and Bulk Registration Data Access (BRDA) Contractual Amendments

ICANN org and the Contracted Parties House Negotiating Team (CPH NT) have solicited input from the ICANN community on proposed amendments to the base contracts between ICANN and Registries (the Registry Agreement (RA)), and ICANN and Registrars (the Registration Accreditation Agreement (RAA)).¹ The proposed contractual requirements include:

1. A requirement to comply with the generic Top Level Domain (gTLD) Registration Data Access Protocol (RDAP) [Profile](#).
2. Updated definitions for Registration Data Directory Services (RDDS) related terms; this includes updating Specification 13 for .BRAND Registry Operators.
3. Reporting requirements for registries that include changes to address the advice from the ICANN Security and Stability Advisory Committee (SSAC) in [SAC097](#) related to inconsistent reporting of RDDS queries.
4. Service Level Requirements for RDAP availability, round-trip time, and update time.
5. The plan to sunset certain requirements to provide RDDS via the WHOIS protocols over a period of 18 months from the contract effective date.
6. The requirement for registrars to provide RDAP for all gTLD Domains Under Management (DUMs) eliminating the option for registrars supporting registries that provide complete contact information to relay the registration data from the registry.
7. A change to the language of Specification 4, Section 3.1 that will enable ICANN org to use the existing Bulk Registration Data Access (BRDA) for research purposes. The BRDA change enables ICANN to use this data to conduct important research for projects such as [extending the Domain Abuse Activity Reporting \(DAAR\) system to registrars](#). DAAR is a system for studying and reporting on domain name registration and security threats. The overarching purpose of DAAR is to develop a robust, reliable, and reproducible methodology for analyzing security threat activity ([domain abuse](#)), which the ICANN community may use to make informed policy decisions.
8. Updates made to clean-up Uniform Resource Locator (URL) web addresses and miscellaneous editorial changes (e.g., URLs updated to “https” from “http”) to address outdated links and clarifications to current requirements.

¹ [Proposed Amendments to the Base gTLD RA and RAA to Add RDAP Contract Obligations](#). Comment closing 24 October 2022; Report Due 07 November 2022

GAC Comment regarding the requirement to comply with the gTLD RDAP Profile.

As described by ICANN², the [gTLD RDAP Profile](#) consists of two documents:

- the [RDAP Technical Implementation Guide](#) “that aims to provide technical instructions to gTLD registries and registrars on how to implement the RDAP service”
- the [RDAP Response Profile](#) “that intends to map current policy requirements to the RDAP implementation with flexibility to incorporate future policy changes with minimal reengineering.”

The GAC views this requirement as a worthwhile endeavor.

The GAC observes that the domain name industry has evolved considerably since ICANN’s inception, and today includes roles/entities which may not have existed in previous RDDS systems. In the same vein, new entities/roles may be created tomorrow which have yet to be conceived of today. Accordingly, the GAC supports efforts to build, to the extent possible, flexibility into the contracts to accommodate future policy changes pertaining to RDDS, such as new RDAP data elements and/or changes to which RDAP data elements might be viewed as necessary to include in an RDAP response.

Section 2.5 of the RDAP Response Profile provides that “the returned domain object in the RDAP response MAY contain an entity with the reseller role, if the domain name was registered through a reseller.” In recognition of the purposes of the RDDS system and the evolving domain name industry, the GAC supports the inclusion of all entities inherent to the registrar’s domain name registration data distribution channel. Such entities should be included in an RDAP query response, when they exist.

Recognizing that the reseller may be listed in the Registrant data element, regarding the optional Reseller data element (in Section 2.5 of the Response Profile), the GAC seeks clarity as to whether commercial proxy services would be considered “Reseller” entities? Some might consider commercial proxy services to be a subcategory of resellers who exist to anonymize the identifying information of the primary registrant. Others might argue that commercial proxy services have historically been treated differently by ICANN policy making, having been the subject of a potential accreditation program,³ and thus should not be considered general “resellers”. If the latter viewpoint prevails, it may be that commercial proxy services are in need of their own data element or entity role.

Similarly, in light of ICANN’s 2019 Registration Directory Service (RDS)-WHOIS2 Review, which noted that 71% of responding WHOIS users⁴ made use of WHOIS “reverse lookup” functionality⁵, the GAC appreciates efforts by ICANN to ensure that such capabilities are not precluded from adoption pursuant to potential future policy development activities.

Lastly, in recognition of ICANN’s proposal for the development of a WHOIS Disclosure System (WDS), and the need for public awareness outreach to make end users aware of such a system, the GAC would call attention to the potential value of an RDAP data element designed for the sole purpose of directing requesters to the appropriate means of requesting unredacted RDDS data (such as the WDS, once implemented). An inclusion of this data element within the RAA (3.3.1) RDAP Directory Service might be considered, as only the RDDS communication channel is certain to reach 100% of the potential WDS user-base.

² [ICANN gTLD RDAP Profile](#), version February-2019

³ [ICANN Privacy and Proxy Accreditation](#)

⁴ See Section 5.2 of the [Registration Directory Service \(RDS\)-WHOIS2 Review Final Report](#).

⁵ A “reverse lookup” of WHOIS data fields allows requestors to submit an identifier other than the domain name, and receive as a response other domains that were registered using the same information.

GAC Comment regarding change to the language of Specification 4, Section 3.1 that will enable ICANN org to use the existing Bulk Registration Data Access (BRDA) for research purposes (such as extending Domain Abuse Activity Reporting to registrars)

The GAC appreciates and supports this step taken by ICANN and the CPH NT to enable the use of BRDA for research purposes. The GAC notes that DNS Abuse is an ongoing issue of importance to the GAC, and reiterates its view that a common understanding of facts only benefits discussion of the issue within the ICANN community. DAAR reporting has always been appreciated, but the continued improvement of such reporting to enable the linkage between abusive domains and their corresponding registrars is a welcome development.