ccNSO/ALAC Liaison Report February 18th 2016
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1) January 31st 2016 - ALAC Statement on the Proposed Implementation of GNSO Thick Whois Consensus Policy Requiring Consistent Labeling and Display of RDDS (Whois) Output for All gTLDs Follow Updates

Summary:

The timeline for the "Thick Whois" PDP was:

- **The GNSO requested the Issue Report in September 2011;**
- **The PDP was initiated by the GNSO in March 2012;**
- **The Final Report was issued in October 2013;**
- **The Board approved the PDP Recommendations in February 2014.**

The Implementation Plan published on 25 November 2015 and the subject of this Public Comment outlines a three-phase process to implement the PDP recommendations, *"each with a specific scope and a dedicated timeline".* These are:

- **Phase 1 - Effective Date: 1 August 2016**
- **Phase 2 - Effective Date: [Dependent on completion of IETF work, but effective 6 months after such publication]**
- **Phase 3 - Effective Date: [To be determined]**

The PDP Report explicitly stated, and the Implementation Plan acknowledged that the implementation of one part of the recommendation should not unnecessarily delay other parts, and the example given was that conversion to a Thick Whois for those registries that do not currently use it should not delay consistent labeling and display of data.

The ALAC would like to register its extreme dismay and dissatisfaction with the current state of this project. Specifically:

1. **The prime rational for the PDP and prime recommendation of the PDP was the move to a Thick Whois (now RDDS);**
2. **The Implementation Review Team acknowledges that this, now identified as "Phase 3", has an independent timeline from the other phases.**
3. **The current proposal includes no plan and no target date for this prime requirement, but rather has focused on ancillary PDP recommendations.**

However, soon after August 2016, the effective date of Phase 1 implementation and the only one with a firm target, we will be entering the SIXTH year of this work. Surely ICANN should be able to do better than that.

Link to full document and recommendations {LINK}

2) January 23rd 2016 - ALAC Statement on the Registration Data Access Protocol (RDAP) Operational Profile for gTLD Registries and Registrars

The ALAC welcomes the opportunity to comment on the Registration Data Access Protocol (RDAP) Operational Profile for gTLD Registries and Registrars.

While the new RDAP Operational Profile includes many new enhanced features from the previous Whois protocol, it does not include a list of mandatory features and provisions that will support an authentication and authorization access control framework.

The SSAC in its 2011 report on Domain Name Whois Terminology and Structure (SAC 051) recommended the development of replacement protocol that would provide a uniform and standard framework for accessing Domain Name Registration Data (DNRD). That framework would 'define and implement verification methods, credential services and access control capabilities'. The Board accepted SSAC recommendations and established the Expert Working Group on gTLD Directory Services (EWG) to begin implementation of the recommendations. In its Final Report, the EWG recommended a paradigm shift whereby gTLD registration data is collected, validated and disclosed for permissible purposes only, with some data elements being accessible only to authenticated requestors that are then held accountable for appropriate use.

Therefore, while existing ICANN policies do not now require differentiated access to DNRD, it is clear from Board decisions and EWG recommendations that future ICANN policies will likely have that requirement.

The Operational Profile of RDAP, therefore, should include an obligation on all gTLD registries and registrars that the basic functionality will support an authentication and authorization framework.

Specifically, the features to allow differentiated access must be required now, as part of this protocol – even if at this stage all access seekers will be in one class - the public. In that way, when differentiated access requirements are imposed, protocol features will already be deployed to provide such access.

Link to original document {LINK}

Respectfully submitted
By Ron Sherwood (ccNSO/ALAC Liaison)