

SSAC Comment on the ICANN Draft Roadmap to Implement SAC 051

1. Introduction

The SSAC thanks the ICANN for this opportunity to comment on the draft roadmap to implement SAC 051. The WHOIS (directory) service is an important concern to the SSAC, as evident by the number of SSAC advisories devoted to this issue. In particular, SAC 027, SAC 033 and SAC 051 have been calling for the replacement of the WHOIS protocol since 2008. We appreciate that ICANN has delivered a roadmap for doing so.

The SSAC agrees with the multi-pronged approach suggested by the roadmap, and would like to offer the following suggestions to further strengthen and bring clarity to the roadmap.

2. Regarding Terminology

2.1. The SSAC agrees that the terminology discussion could be handled through a lightweight administrative process.

2.2 The SSAC is aware of the concern from some community members that the terms and acronyms proposed in SAC 051 are too long. From the SSAC's perspective, the key is to separate the data, the protocol and the service, and not to mix them in a generic discussion about WHOIS.

SAC051 focuses on the domain name context for the proposed terms, as evidenced by the presence of "domain name" in each of the terms. In addition, each term was proposed presuming it would be used independently of the other terms, hence the inclusion of "registration data" in the terms "domain name registration data access protocol" and "domain name registration data directory service". When used in a known context the repeated elements in the terms could be eliminated.

SSAC offers the following shortened versions of the terms for use in a known context for your consideration:

- Registration Data (WHOIS data)
- Access Protocol (e.g. WHOIS protocol (RFC3912) and other protocols such as IRIS, whois++)
- Directory Service

2.3. The SSAC suggests that the roadmap should be revised to adopt the proposed terminology. As part of a transition strategy it would be appropriate to use both the old and new terms together, throughout.

3. Regarding replacing the WHOIS protocol:

3.1. The SSAC agrees with the multipronged approach suggested in the roadmap to implement SAC 051 recommendations 2 and 3.

3.2. Regarding the contract negotiation option, the roadmap stated that one drawback is that “it could take years to have the requirement included in all gTLD contracts.”(Section 3.1.3 of the roadmap.) The SSAC believes that this is irrelevant given how long WHOIS issues have been under discussion.

3.3. Regarding voluntary adoption through promotion and incentives, how is the recommendation to 'promote participation' and to 'promote voluntary adoption' to be operationalized and measured?

3.4. Regarding the section on economics and incentives, it would greatly add clarity to be more explicit about the connection between the alleged reasons ('it has been argued') for WHOIS stalling, and why it will be different this time. One of the fundamental questions ICANN needs to confront is past efforts have failed, and why this time the result would be different.