

Staff Report of Public Comment Proceeding

Proposed gTLD-Registration Data Access Protocol (RDAP) Profile

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Prepared By: ICANN org

Public Comment Proceeding

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Important Information Links

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Section I: General Overview and Next Steps

The Temporary Specification for gTLD Registration Data adopted by the ICANN Board on 17 May 2018 directed the creation of a gTLD-RDAP Profile(s) as a prerequisite to launching the Registration Data Access Protocol (RDAP) service across the gTLD space. ICANN org worked with a discussion group of gTLD registries and registrars to create the proposal that was put for public comment. In the course of this joint effort, there emerged certain provisions for which all sides could not achieve consensus within the allotted timeline.

ICANN org continues to work with the group of gTLD registries and registrars to finalize the gTLD RDAP profile incorporating the input received in this public comment period.

Section II: Contributors

At the time this report was prepared, a total of eleven (11) community submissions had been posted to the forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
CentralNic Group plc	Gavin Brown	CNIC
Internet Infrastructure Coalition	Monica Sanders	I2C
Registries Stakeholder Group	Samantha Demetriou	RySG
Registrars Stakeholder Group	Zoe Bonython	RrSG
At-Large Advisory Committee	ICANN Policy Staff in support of the At-Large Community	ALAC
Business Constituency	Steve DelBianco	BC
Non-Commercial Stakeholder Group	Rafik Dammak	NCSG
MarkMonitor	Brian J. King	MM

Individuals:

Name	Affiliation (if provided)	Initials
Bernhard Reutner-Fischer		BRF
Riccardo Pecile	Convey S.r.l.	RP
Mohit Batra	RSSAC Caucus	MB

Section III: Summary of Comments

General Disclaimer: This section intends to summarize broadly and comprehensively the comments submitted to this public comment proceeding but does not address every specific position stated by each contributor. The preparer recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

The ICANN org received eleven (11) comments from the community regarding the 1) RDAP Technical Implementation Guide; 2) RDAP Response Profile; and 3) ICANN org's input to the contracted parties' proposal documents.

General comments:

RDAP Profile documents should neither create nor modify existing policy

The RySG notes that "RDAP Profile documents should neither create nor modify existing policy, but rather be limited to mapping current policy requirements to the RDAP implementation with flexibility to incorporate future policy changes with minimal engineering".

RDAP Profile documents partitioned between technical and policy requirements

The RySG support and "endorses the revised structure of the RDAP Profile documents, which essentially partitions the documentation for the RDAP Profile into elements which are policy-independent (the "RDAP Technical Implementation Guide") and policy-dependent (the "RDAP Response Profile"). The RySG encourages the RDAP Profile to both maintain and further refine this distinction".

The ALAC "appreciates the RDAP's revised structure that intends to distinguish the policy-independent elements and policy-dependent elements. Assuming the RDAP Profile appropriately defines such distinctions, this will ensure that ICANN removes the technical implementations of the RDAP from political considerations and debate, and, as a result, not bog down its adoption."

Extend the Pilot Program

The RySG "recommends an extension of the RDAP Pilot Program with the goal of conducting further testing of additional RDAP functionality such as authenticated access and the referral model, among others."

RDAP Profile documents continuous evolution

The RySG "expects further evolution and improvement of the RDAP Profile documents, and encourages updates to the RDAP Profile documents based on implementation experience..."

The RrSG explains its understanding that "this Profile is specific to the Temporary Specification adopted on 17 May 2018 and additional RDAP Profiles will need to be created in response to EPDP outcomes and/or GNSO policy development."

The NCSG suggests that the documents should mention the possibility of a successor of the Temporary Specification and its appendices.

BC notes that "several policy-related implementation changes may be pending" and expects that the "RDAP working group will be responsive with future updates to the implementation and response profiles as new policy is defined".

Global Applicability to protect domain name registrant's data

The NCSG suggests that RDAP "should globally redact personal data to safeguard privacy rights."

RP suggests that the applicability of the published ICANN proposed interim model for GDPR compliance should be limited to data processing with a European Economic Area (EEA) nexus, and "compel Registrar and Registries to disclose such registrant whois personal data whenever these data would be outside the EEA."

BC states that "since Legal persons are not subject to GDPR, the BC believes that email addresses for Legal Persons MUST be displayed in RDAP."

Technical Comments

The NCSG notes that the technical document is likely to be updated to require TLS 1.3 once it gets noticeable deployment.

MB suggests that measures such as industry best practices and guidelines (e.g. REST Security Cheat Sheet from OWASP) and Web Application Firewalls (WAF) must be considered for the secure usage and deployment of RDAP services by ICANN and its contracted parties.

MM notes that "the vCard/jCard standard for general purpose contact information is a poor fit for domain name registration data".

MM also asks whether, and for how long, contracted parties should publish both WHOIS and RDAP concurrently.

BC notes that Whois/43 and RDAP will coexist for some time, and that there is no requirement for the caches to remain coherent between the implementations.

General Suggestions

BRF's comment noted that in section 2.10 of the RDAP profile the required URL of the "RDDS Inaccuracy Complaint Form" is inconsistent with the required URL in section 2.6.3, and requests to revise the value by removing the "www." portion.

MB's comments also state a need for 1) an analysis of the impact of the proposed RDAP profile on the rollout of the ICANN org's Privacy/Proxy Services Accreditation program, and 2) A case study regarding the deployment/usage of RDAP RFC specifications for Regional and National Internet Registries (RIRs/NIRs) in benefit of the Domain Name industry's successful implementation of the RDAP profile. Additionally, MB suggests a list of topics for preparing an FAQ document on the

proposed RDAP profile, and requests that the contents of the ICANN org's URL for the RDDS Consistent Labelling and Display policy to show the latest policy version.

The ALAC expressed that the following ambiguities shall be clarified:

- "What constitutes a ""legitimate purpose"" as it is articulated in Para. 4.4, particularly as it relates to the notion of ""accurate reliable and uniform (...) based on legitimate interests not outweigh by (...) fundamental rights"";"
- "the framework to address appropriate law enforcement needs under Para. 4.4.9;"
- "handling contractual compliance monitoring requests under para. 4.4.13;"
- "provisions in Annex A para. 4 that requests operators to ""provide reasonable access to [data] to third parties on the basis of legitimate interests pursued by that party, except where such interest is overridden by the interests of fundamental rights and freedoms...pursuant to Article 6(1)(f) GDPR""; and"
- "requirements in Appendix C, particularly ones related to outlining obligations for data registrars operating in the EU."

RDAP clients

BC suggest that RDAP Profile pertaining to RDAP clients should be defined, and "it would be beneficial for a working group to develop and share working RDAP client implementation code and test cases to ensure delivery of well-made RDAP clients in a timely fashion"

BC notes that " The profiles as currently written seem to assume that complexity of certificate validation and internationalized domain names are best handled at the client side rather than the server side" and further elaborates that RDAP clients will be created by a multitude of parties contrary to a few contracted parties for the servers making risky in terms of compatibility and security."

Comments regarding ICANN org's input:

The comments related to the ICANN org's input to the RDAP profile have been categorized in the table below depending on the comment's general agreement or disagreement with each item, if applicable. Comments are further detailed below to capture situations where further clarification was requested, or additional suggestions were provided.

ICANN org's input	Agree	Disagree	Believes issue is out of scope for the profile
1. Require the use of a TLS certificate issued by a Certificate Authority (CA) that follows the latest CA/Browser Forum Baseline Requirements, which is also trusted by major browsers and operating systems.	BC CNIC MM	RrSG I2C	
2. Require support for RDAP domain and nameserver lookup queries in U-label format.	BC CNIC RrSG MM	NCSG	
3. Require support for mixture of A-labels and U-labels in domain and nameserver lookup queries.	CNIC RrSG MM	NCSG BC	
4. Require support for JavaScript web clients.	CNIC RrSG MM BC		

5. Require showing data for most optional elements where data exists.	CNIC MM BC	RrSG I2C NCSG	
6. Require only one registrant, administrative, and technical contact per domain name.	CNIC	RrSG I2C MM	
7. Require a signaling mechanism for the profile version.	BC CNIC RrSG MM		
8. Make RDAP extensions and additional fields' requirements consistent with CL&D policy and the Temporary Specification for gTLD Registration Data.	MM CNIC BC		RrSG
9. Allow contacts the possibility to opt-in to publication of full data (including email).	CNIC RrSG I2C CNIC MM		
10. Require the event "last update of RDAP database" in entity lookup responses.	MM CNIC BC RrSG		
11. Make field mappings consistent with CL&D policy.	MM CNIC BC		RrSG
12. Add type to remarks element in redacted objects.	CNIC RrSG MM BC		
13. Clarify requirement for registries to support registrar object lookups by name.	CNIC RrSG MM BC		
14. Clarify requirement for registries to support nameserver object lookup by IP address.	CNIC RrSG MM BC		
15. Use RDAP features for contact email redaction requirements.	CNIC MM	RrSG	
16. Add RDAP support for host objects sharing name where that is allowed in the registry system.	CNIC	MM	
17. Add optional support to include links to variant domain names.	CNIC RrSG MM		
18. Clarify requirement for mapping of additional roles.	CNIC MM BC RrSG		
19. Require use of ISO-3166 two-letter codes instead of full country names.	CNIC RrSG MM		
20. Add requirements to support LDH names in queries and responses.	CNIC MM		

	RrSG BC		
21. Clarify that registrar and nameserver object queries only apply to registries.	CNIC MM BC RrSG		
22. Clarify RFC compliance requirements.	BC CNIC MM	RrSG	
23. Do not require registrars to include link to their RDAP service for a queried domain.	CNIC RrSG MM BC		
24. Omit unicodeName member in non-IDN responses.	CNIC BC	RrSG MM	
25. Require registrars to not redact contact data where a privacy/proxy service is used.	CNIC MM BC		RrSG
26. Permit registries and registrars to optionally use RDAP to provide reasonable access to data per the Temporary Specification for gTLD Registration Data.	CNIC MM BC		RrSG
27. Require implementation of searchability in RDAP once an RFC provides such functionality.		RrSG NCSG CNIC I2C	
28. Specify what to use as handle for entity objects in thin registries.	CNIC	RrSG	

Comments regarding input #1:

BC and CNIC agree with ICANN org's suggestion of a MUST.

MM's comment acknowledges that RDAP servers should use a TLS server certificate from a well-known Certificate Authority.

The RrSG express its disagreement with ICANN org's suggestion of a MUST. The RrSG "would encourage the use of SHOULD or MAY, not MUST". The RrSG highlights a need for "better definitions (e.g. "well-known")".

The I2C agrees with the working group's position, stating and the use of the mandatory language creates an unfeasible requirement due to the ambiguity of the words "well-known".

Comments regarding input #2:

BC and CNIC agree with ICANN org's suggestion.

The RrSG, express "no issue with ICANN org's input".

MM agrees that RDAP servers should support queries in U-Label format "in the interest of promoting the use of IDNs".

The NCSG believes "that [the] decision to support RDAP lookup queries and responses using both A-label and U-label should be left to policy discussion, i.e. considered through a GNSO Policy Development Process."

Comments regarding input #3:

CNIC agrees with ICANN org's suggestion.

The RrSG, express "no issue with ICANN org's input".

MM's notes that RDAP servers should not reject queries that mix a- and u-labels.

The NCSG disagrees with the ICANN org's input.

BC disagrees with ICANN org's suggestion and further elaborates "... even if the RDAP server persisted the mixed-format query format, there is no way to return that format during the response. Accepting one string as a query and then returning a response for a different (albeit equivalent) string could make for a bad user experience".

Comments regarding input #4:

CNIC agrees with ICANN org's suggestion.

The RrSG, express "no issue with ICANN org's input".

MM further notes that "if we can securely enable a web base javascript RDAP client, then we should."

BC agrees with ICANN org's input and further elaborates: "... the profiles treat client development as an afterthought. This could be improved by adding a method to facilitate creation of JavaScript clients".

Comments regarding input #5:

CNIC agrees with ICANN org's suggestion.

MM's comment agrees that RDAP servers should be required to return optional fields that contain data to "protect registrants that have opted in to having data published."

BC agrees with ICANN org's input, and further explains that "this protects legal person registrants who benefit from data being published".

The RrSG and the I2C express their disagreement with ICANN org's input. The RrSG further elaborate "If the field is optional it should not have to be displayed, regardless if it is blank or not".

The NCSG disagrees with ICANN org's suggestion. The NCSG express that "making optional fields if filled in available is a matter of access and a policy question which must be answered before deciding whether the current contracts clauses related to this issue is valid and not against the law."

Comments regarding input #6:

CNIC agrees with ICANN org's suggestion.

The RrSG and the I2C note that the "RDAP Profile shouldn't be defining how many contacts should be allowed/required".

MM comments that "if the policy does not prohibit multiple contacts, registrants should be allowed to provide them."

Comments regarding input #7:

BC and CNIC agree with ICANN org's input.

The RrSG, express "no issue with ICANN org's input".

MM supports the ICANN org's input to include the version of the RDAP profile in the response.

Comments regarding input #8:

MM, CNIC, and BC agree with the ICANN org's input.

The RrSG, express that "Policies should not be stated/named out here", and does not disagree with the input but considers that listing it in the RDAP profile is unnecessary.

Comments regarding input #9:

The RrSG, the I2C, CNIC, and MM agree with the ICANN org's input.

Comments regarding input #10:

MM, CNIC and BC agree with the ICANN org's input.

The RrSG, suggests that the event shall be named "last update of the registrar/registry database."

Comments regarding input #11:

MM, CNIC, and BC agree with the ICANN org's input.

The RrSG, express that "Policies should not be stated/named out here", and does not disagree with the input but considers that listing it in the RDAP profile is unnecessary.

Comments regarding input #12:

CNIC agrees with ICANN org's suggestion.

The RrSG notes that "there should be a list of reasons: Redacted for Privacy, Truncated due to load, etc."

MM's comment supports using the remarks element, the use of a specific value for the remark type to convey redaction of data as distinct from truncation.

BC supports "the addition of a new value that could represent redaction distinct from truncation, could contain anonymized contact details such as a registrar-provided email alias or a link to a registrant's registrar-provided contact form".

Comments regarding input #13:

CNIC, the RrSG, MM, and BC agree with ICANN org's input.

Comments regarding input #14:

CNIC, the RrSG, MM and BC agree with ICANN org's input. MM further requests to ensure both IPv4 and IPv6 addresses can be specified for a nameserver lookup.

Comments regarding input #15:

CNIC agrees with ICANN org's suggestion.

MM suggests the use of a remark element to include a link to the contact form, which would not require changing vCard elements.

The RrSG expresses that "this doesn't fit with the current profile" and "it could be integrated into future profiles once other technical hurdles have been resolved"

Comments regarding input #16:

CNIC agrees with ICANN org's suggestion.

The RrSG highlights that "is unclear how this is supposed to work or how this is possible. Further clarity is needed."

MM expressed that they do not wish to support querying host objects in non-sponsoring TLDs.

Comments regarding input #17:

CNIC agrees with ICANN org's suggestion.

The RrSG express "no problem if this is a MAY".

MM's commented that a "MAY" should be included to establish a placeholder for future policy.

Comments regarding input #18:

CNIC, MM and BC agree with the ICANN org's input.

The RrSG, express "no issue with ICANN org's input".

The NCSG notes that "is unclear to the NCSG as to what roles are being referred" in section 3.5, "because there is no other explanation in the appendix."

Comments regarding input #19:

CNIC agrees with ICANN org's suggestion.

The RrSG, agrees with ICANN org's input, but not until a vCard property supports this.

MM "strongly supports the use of ISO-3166 country codes using the addition of the 'cc' property to the vCard/jCard address object."

Comments regarding input #20:

CNIC and MM agree with the ICANN org's input.

The RrSG, express "no issue with ICANN org's input".

BC express that they support adding explicit language to clarify the distinction of LDH compared to A-Labels and requirement to support both.

Comments regarding input #21:

CNIC, MM, and BC agree with the ICANN org's input.

The RrSG express "no issue with ICANN org's input".

Comments regarding input #22:

BC and CNIC agree with ICANN org's input.

MM commented that they "agree in principle" with the ICANN org's input, and "note that time-boxing could be problematic for RFC implementation requirements that prove more onerous than others."

The RrSG express its disagreement with the ICANN org's input.

Comments regarding input #23:

CNIC, the RrSG, MM, and BC agree with ICANN org's suggestion.

Comments regarding input #24:

BC and CNIC agree with ICANN org's suggestion.

The RrSG express "this should be optional. You MAY omit."

MM's comment expressed that "RDAP clients could be simplified if a Unicode field and an ACE field were both always represented in the JSON output." and includes a suggested behavior for RDAP clients for parsing and displaying this information to "promote general acceptance of IDNs."

Comments regarding input #25:

BC and CNIC agree with ICANN org's suggestion.

MM agrees with the ICANN org's input and supports adding "an RDAP element indicating whether P/P is in use or not."

The RrSG, express that "Policies should not be stated/named out here", and does not disagree with the input but considers that listing it in the RDAP profile is unnecessary.

Comments regarding input #26:

CNIC, MM, and BC agree with the ICANN org's suggestion.

The RrSG, express that "Policies should not be stated/named out here", and does not disagree with the input but considers that listing it in the RDAP profile is unnecessary.

Comments regarding input #27:

The RrSG emphatically express its disagreement with ICANN org's input. The RrSG highlights that "is not technically (or legally) feasible due to the level of burden and risk placed on the registrar" and "is not clear how ICANN, as a data controller, would be able to demonstrate compliance with Art 25 and Art 35 of the GDPR"

The NCSG express its disagreement with ICANN org's input. The NCSG further elaborates that ".. searchability of the personal data of domain name registrants is being sought without first a Data Protection Impact Assessment being undertaken, which may reveal significant data protection concerns within ICANN's agreements and policies that may contradict with data protection principles."

CNIC stated that "It is not appropriate to force registries to offer an RDAP search service. Instead, they should merely be permitted to do so, in the same way they are permitted (but not obliged) to offer a searchable whois service."

The I2C shared their concerns on permitting reverse search capabilities in RDAP, regarding them as "highly problematic and ... considerable risk".

MM's comment states that "search queries must have different SLAs than exact match queries."

Comments regarding input #28:

CNIC agrees with ICANN org's suggestion.

The RrSG express its disagreement with ICANN org's suggestion.

MM shared follow up questions to the ICANN org's input stating that the RDAP pilot group has not yet discussed this topic.

Section IV: Analysis of Comments

General Disclaimer: This section intends to provide an analysis and evaluation of the comments submitted along with explanations regarding the basis for any recommendations provided within the analysis.

ICANN org wishes to thank all the commenters for their thoughtful input on the proposal for gTLD RDAP profile. The proposal is the product of a discussion group of gTLD registries and registrars. ICANN org has been and will continue to work with the group of gTLD registries and registrars to finalize the gTLD RDAP profile incorporating the input received in this public comment period.