

TSG responses to Community Comments on Draft Technical Model for Access to Non-Public Registration

In March 2019, the Technical Study Group on Access to Non-Public Registration Data (TSG) published the [Draft Technical Model](#) for Access to Non-Public Registration Data (Draft Technical Model) for review and feedback from the ICANN community.

In April 2019, the TSG reviewed all written comments received on the Draft Technical Model for Access to Non-Public Registration Data (Draft Technical Model.) The TSG's analysis of all written comments is summarized below. The TSG's consideration of the comments received from the community at ICANN64 in Kobe, Japan are memorialized in the [recording](#) from the TSG's face-to-face meeting in March 2019 in Kobe.

The TSG is grateful for the careful review and comments from members of the ICANN community; these comments led to a noticeable improvement in its [final document](#), and reflects a successful instance where the collaborative ethos of the ICANN multi-stakeholder model led to an enhanced outcome.

| COMMENTER | DRAFT TECHNICAL MODEL COMMENT SUMMARY | TSG RESPONSE |
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| DomainTools | Section 4.1, User Journey | The User Journey section has been deleted. The TSG moved the first and fourth bullets in the original User Journey section to Section 5, System Requirements and deleted the remainder of the User Journey section. |
| ID4me Association | Reusing existing identity providers | The TSG did not adjust the Technical Model as it believes the existing text adequately covers the issues raised in the comment. For specifics, refer to the day 1 and day 2 audio recording of the TSG April F2F meeting. |
| ID4me Association | Supporting multiple identity providers | The TSG revised language in the document. In Section 10.5, "Service endpoints can be discovered dynamically or exchanged statically |

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| | | as a matter of implementation policy; this information is needed to facilitate web service interactions between these actors”. |
| ID4me Association | Adopting the verifiable claims standard | The TSG added language in Section 4 to address these comments: “(this service can be operated by ICANN using, for example, OAuth claims or the W3C Verifiable Credentials Data Model.” |
| InfoNetworks | Comments included on page 1 | The TSG reviewed the comments presented on page 1 of InfoNetworks’ submissions and determined them all to fall outside the scope of its work, and counter to the requirements the group was given to develop a model in which ICANN acts as the central access point for non-public data. In addition, some of the comments focused on future policy choices that may impact a unified access model, and which were also outside the scope of the TSG’s work. |
| InfoNetworks | Comments included on page 2 | The TSG took no action on these comments as they were outside the scope of the group’s work. |
| InfoNetworks | Proposed revision to Executive Summary | The TSG did not accept the proposed revision as it would conflict with the requirement given to the TSG to design a centralized system. The TSG added additional context to this issue in its response to one of the FAQs included in Appendix 3, A3.3. |
| InfoNetworks | Proposed revision to Section 2.1 Terms | The TSG updated “ICANN RDAP Access Service” to “ICANN Access Service.” |
| InfoNetworks | Proposed revision to Section 3 Assumption 3 | The TSG did not agree with the proposed revision. For specifics, refer to the audio recording of the TSG April F2F meeting. |
| InfoNetworks | Proposed revision to Section 3, Assumption 10 | The TSG revised this assumption to remove the words “Data holders assume that...” This is now |

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| | | Assumption 11 in Section 3.2. |
| InfoNetworks | Proposed revision to Section 4.1 User Journey | The TSG removed this section in response to comments from DomainTools, IPC and BC and InfoNetworks. |
| InfoNetworks | Proposed revision to Section 5.1.c. | This section now appears as Section 5.1.d. In the Technical Model. The TSG did not agree with the proposed edit. For specifics, refer to the audio recording of the TSG April F2F meeting. |
| InfoNetworks | Proposed revisions to use of “ICANN RDAP Gateway” and “ICANN RDAP Access Service” | The TSG did not agree with the proposed edits and instead added language to the Executive Summary indicating the model is built on RDAP and its extensions. It is also addressed in Section 10.5, Prerequisites, in the last paragraph. |
| InfoNetworks | Proposed revisions to Section 9, Proposed Solution | The TSG accepted some of the edits in the second paragraph of what is now Section 10.4, RDAP Gateway Description, Proposed Solution in the Technical Model. |
| InfoNetworks | Proposed revisions to Section 9.1, Processing Steps 1, 3, 4, and Section 10.2 | The TSG did not agree with the proposed revisions. For specifics, refer to the audio recording of the TSG April F2F meeting. |
| Intellectual Property Constituency and Business Constituency Joint Comment | Section 4, Use Cases | Updated. See TSG’s response to DomainTools comments. |
| Intellectual Property Constituency and Business Constituency Joint Comment | Section 4.1, User Journey | Updated. See TSG’s response to DomainTools comments. |
| Intellectual Property Constituency and Business Constituency Joint Comment | Section 5, System Requirements, 4.e and 4.f | The TSG agrees with the comments on the requirements (which are now represented as 5.e. and 5.f. In the final Technical Model.) The TSG believes the language in these requirements makes it clear they are |

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| | | conditional on future policy requirements. |
| Intellectual Property Constituency and Business Constituency Joint Comment | Section 5, System Requirements, 4.h. | The TSG revised 5.h. (previously 4.h. in the Draft Technical Model) to: “The system MUST NOT prohibit the ability of non-interactive clients to issue requests (i.e. there MUST be no requirement requiring user interaction such as might be necessary with a browser-based RDAP client).” |
| Intellectual Property Constituency and Business Constituency Joint Comment | Section 7, Actor Models | Actor Models now appear in Section 8 of the Technical Model. The TSG considered the IPC/BC comments on this section but decided to leave the section as-is. For specifics, refer to the audio recording of the TSG April F2F meeting. |
| Intellectual Property Constituency and Business Constituency Joint Comment | Section 9, Proposed Solution | Proposed Solution now appears as Section 10 in the Technical Model. The TSG considered the IPC/BC comments on this section but decided to leave the section as-is. For specifics, refer to the audio recording of the TSG April F2F meeting. |
| Intellectual Property Constituency and Business Constituency Joint Comment | Section 9.1, Prerequisites | Prerequisites now appear as Section 10.5 in the Technical Model. The TSG modified the text to read: “Identity Providers, third party authorizers, and ICANN exchange or publish configuration information to identify service endpoints. Service endpoints can be discovered dynamically or exchanged statically as a matter of implementation policy; this information is needed to facilitate web service interactions between these actors.” |
| iThreat Cyber Group | Actor Models | The TSG included a sentence in Section 10, Proposed Solution to clarify its intent: “This proposed solution will accommodate any one of the four actor models in section 8. In this section each component is |

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| | | described separately.” |
| iThreat Cyber Group | Policy, Section 5, System Requirements, 8.b and 8.d | The referenced requirements now appear in Section 5 as 9.b and 9.d. The TSG did not alter the text as it believes these represent good protocol. |
| iThreat Cyber Group | Policy, Section 5, System Requirements, 6.c | The TSG adjusted the text in what now appears in Section 5, System Requirements, 7.c and 7.d. |
| iThreat Cyber Group | Policy, Section 5, System Requirements, 8.b. | The TSG adjusted the text in what now appears in Section 5, System Requirements, 9.c and 9.d to MUST. |
| iThreat Cyber Group | User Needs, Section 5, System Requirements, 7.a | The TSG added an example in what is now 8.a to clarify this requirement, “...(e.g., ICANN RDAP Gateway, CP RDAP servers, Identity Providers, Authorizers)...” The TSG also added additional text in 8.a in response to the comment regarding SSAC101v2: “Speed, reliability and responsiveness are important for usability of the system, and any SLA commitments should take these factors into consideration. Rate limiting should be applied to safeguard against abuse, denial of service attacks or to preserve stability, rather than to justify underprovisioning of systems.” |
| iThreat Cyber Group | User Needs, Bulk queries discussion | The TSG added a definition for bulk queries in Section 7.3. |
| iThreat Cyber Group | User Needs, Unified Technical Requirements | The TSG added a sentence in Section 5, Requirement 6.c in response to the comment: “CP RDAP Servers MUST receive and respond to queries from unauthenticated requestors with all available public domain name registration data.” |
| iThreat Cyber Group | User Needs, Section 9.2, Processing Steps | The TSG added a new requirement under Section 5, System Requirements, 6.c: “CP RDAP Servers MUST receive and respond to queries from unauthenticated requestors with all available public |

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| | | domain name registration data.” |
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