

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
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

		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

		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

		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

		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

		domain name registration data.”
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