



## Registry Services Evaluation Policy (RSEP) Request

December 8, 2021

### Registry Operator

Public Interest Registry

### Request Details

Case Number: 00981198

This Registry Services Evaluation Policy (RSEP) request form should be submitted for review by ICANN org when a registry operator is adding, modifying, or removing a Registry Service for a TLD or group of TLDs.

The RSEP Process webpage provides additional information about the process and lists RSEP requests that have been reviewed and/or approved by ICANN org. If you are proposing a service that was previously approved, we encourage you to respond similarly to the most recently approved request(s) to facilitate ICANN org's review.

Certain known Registry Services are identified in the Naming Services portal (NSp) case type list under "RSEP Fast Track" (example: "RSEP Fast Track – BTAPPA"). If you would like to submit a request for one of these services, please exit this case and select the specific Fast Track case type. Unless the service is identified under RSEP Fast Track, all other RSEP requests should be submitted through this form.

## Helpful Tips

- Click the "Save" button to save your work. This will allow you to return to the request at a later time and will not submit the request.
- You may print or save your request as a PDF by clicking the printer icon in the upper right corner. You must click "Save" at least once in order to print the request.
- Click the "Submit" button to submit your completed request to ICANN org.
- Complete the information requested below. All fields marked with an asterisk (\*) are required. If not applicable, respond with "N/A."

## 1. PROPOSED SERVICE DESCRIPTION

### 1.1. Name of proposed service.

Unbundling .ONG/.NGO TLDs.

### 1.2. Provide a general description of the proposed service including the impact to external users and how it will be offered.

Presently, as a result of changes implemented in .ONG and .NGO after an approved 2014 RSEP, domain names are bundled between the two TLDs. The proposed service would:

- Eliminate the bundling requirement between the TLDs,
- Remove the capability to bundle from each TLD; and
- Provide a transition process for existing bundled registrations in the TLDs to the unbundled model.

After the implementation of the proposed service, domain names with identical second-level labels in the .ONG and .NGO registries would operate independently. Consequently, such formerly bundled domain names could have different registration data, DNS data, and data related to any services defined in Exhibit A of the applicable Registry Agreement for each TLD. Additionally, after the implementation of the proposed service for the .ONG and .NGO TLDs, the registry operator:

- May not necessarily offer the same services for the TLDs,
- May not necessarily apply the same registration policies for the TLDs,
- May utilize a different Data Escrow Agent for the TLDs, and
- Will be relieved of other specialized obligations undertaken in the corresponding Amendments to the respective Registry Agreements for the TLDs relative to the implementation of the approved 2014 RSEP.

The proposed service would result in simplifications for registrars and registrants, which will subsequently experience that .ONG and .NGO operate similarly to a typical gTLD under the Base Registry Agreement. Registrants will have greater choice: if they want a domain in one TLD, they will not be required to acquire and manage a domain in the other. Registrars will

have a simpler sales flow, less complexity in domain management tools/apps, and more straightforward customer service.

### 1.3. Provide a technical description of the proposed service.

The proposed change intends to remove support for the mandatory technical bundling of second level domain registrations for .NGO and .ONG that was added as a result of the previous (2014) RSEP.

As described in that RSEP, a technical bundle is a set of two domain names in different TLDs, with identical second level labels for which the following parameters are shared:

- Registrar Ownership
- Registration and Expiry Dates
- Registrant, Admin, Billing, and Technical Contacts
- Name Server Association
- Domain Status
- Applicable grace periods (Add Grace Period, Renewal Grace Period, Auto-Renewal Grace Period, Transfer Grace Period, and Redemption Grace Period)

And for which at least the following parameters are unique:

- DS records as required based on RFC 5910

After removing the requirement for technical bundling, domain names in the .ONG and .NGO TLDs with identical second level labels may have different values for the above parameters.

This solution will require no custom extensions and is based on existing core EPP RFC functionality.

This solution is compliant with the following relevant EPP RFCs:

- RFC 5730 Extensible Provisioning Protocol (EPP)
- RFC 5731 Extensible Provisioning Protocol (EPP) Domain Name Mapping
- RFC 5732 Extensible Provisioning Protocol (EPP) Host Mapping
- RFC 5733 Extensible Provisioning Protocol (EPP) Contact Mapping
- RFC 5734 Extensible Provisioning Protocol (EPP) Transport over TCP
- RFC 3735: Extensible Provisioning Protocol (EPP) Guidelines for Extending the EPP
- RFC 3915: Extensible Provisioning Protocol (EPP) Domain Registry Grace Period Mapping for the Extensible Provisioning Protocol (EPP)
- RFC 5910: Domain Name System (DNS) Security Extensions Mapping for the Extensible Provisioning Protocol (EPP)

After the implementation of the service, EPP operations for the .ONG and .NGO registries will record and deliver independent results for domain names in the different registries with the

identical second level labels, with such domain name registrations having independent registration life cycles.

DNS and RDDS services will reflect the registry data for the domain name registrations in a manner that is compliant with the relevant Registry Agreement.

The transition to unbundled .ONG and .NGO registries requires a new .ONG registry to be created so that the .ONG zone can also be published conventionally, directly from its own registry. Currently, the .ONG and .NGO DNS zones are created from a single .NGO registry. The process of creating that new .ONG registry requires metadata associated with each domain name to be created.

To implement this change, PIR will import and seed .ONG domain names with the same metadata as the .NGO domain name, with the exception of DNSSEC ("DS RDATA") data, which is unique to the domain name and not the bundle. The key metadata that will remain the same for both matching .NGO and .ONG domain names after the import include: domain registration and expiry dates, nameservers, object statuses, and contacts. Any DNSSEC ("DS RDATA") data in the registry that is unique to particular .ONG or .NGO domain names will be preserved. There will be no changes to the DNS data published in the .ONG or .NGO zones, and no DNS hosting changes will be required of .ONG or .NGO registrants.

Upon completion of the migration, the .NGO and .ONG TLDs will be managed as two independent TLDs and will no longer share metadata between the two domain names. After the migration, registrars will need to perform actions for each .NGO and .ONG name independently.

PIR will also have an OTE sandbox available for registrars to test out prior to officially transitioning to unbundled domains.

1.4. If this proposed service has already been approved by ICANN org, identify and provide a link to the RSEP request for the same service that was most recently approved.

N/A.

1.5. Describe the benefits of the proposed service and who would benefit from the proposed service.

PIR seeks to offer products and services that meet, and exceed, the customers', registrars, and community expectations. In its current form of a bundled product, PIR has observed that both registrants and registrars believe .ONG/.NGO is a confusing and complex product offering that is not fully understood and not widely implemented. Very few registrars are willing or able to sell

.ONG/.NGO domains because of the technical bundling. We expect that, unbundled, .ONG and .NGO domains will be offered by more registrars and hence will be more accessible to potential registrants. Registrants will benefit by being able to simply choose which of these TLDs they would like to register moving forward, either .NGO or .ONG, and should be able to do so from a wider selection of registrars. Currently, registrants are forced to register both and almost no registrants put use to both domain names. Currently, registrants register both names for one price; once unbundled the domains would be priced separately allowing for greater flexibility and choice for registrants in either TLD.

The original bundling proposal was innovative. Although the systems and infrastructure used to support the bundles were fully production-grade and stable, the very nature of innovation means that the bundling concept itself was experimental. Since the launch of .ONG/.NGO bundles, PIR has been able to evaluate the success of the bundle. By the quantitative measures of registrar uptake, new creates and renewals of existing bundles, the bundle has not met registrant expectations. Similarly, PIR expected that a significant number of registrants would utilize both the .NGO and .ONG domains to establish web presences in both English and Romance languages. That simply has not happened; registrants overwhelmingly utilize either the .NGO or the .ONG domains, not both. Rather than continue a practice that has not met expectations, PIR believes the best path forward is to revert to the conventional model of registry operation. Unbundling will allow registrants to choose which domain(s) they wish to use, and not force them to have an additional domain that they are not interested in using. It should also allow for greater adoption by registrars, many of which have explicitly told us that they would be more willing to carry .NGO or .ONG if they were unbundled. This too will further facilitate registrant choice as they will have a broader choice of which registrar to utilize to register their preferred .NGO or .ONG domain name.

1.6. Describe the timeline for implementation of the proposed service.

We will implement a 90-day notification with registrars and technical teams once this RSEP is approved by ICANN.

1.7. If additional information should be considered with the description of the proposed service, attach one or more file(s) below.

Attachmentpdf

1.8. If the proposed service adds or modifies Internationalized Domain Name (IDN) languages or scripts that have already been approved in another RSEP request or are considered pre-

approved by ICANN org, provide (a) a reference to the RSEP request, TLD(s), and IDN table(s) that were already approved or (b) a link to the pre-approved Reference Label Generation Rules (LGR). Otherwise, indicate “not applicable.”

N/A.

The most current IDN requirements will be used to evaluate a submitted table.

## 2. SECURITY AND STABILITY

2.1. What effect, if any, will the proposed service have on the life cycle of domain names?

Once unbundled, domain names in the .NGO and .ONG TLDs with identical second-level labels will be able to be registered, renewed, transferred or deleted independently of each other. Thus, the lifecycle of .ONG and .NGO domain names will become more consistent with the vast majority of other gTLDs.

2.2. Does the proposed service alter the storage and input of Registry Data?

No.

2.3. Explain how the proposed service will affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems.

No change to the publication of zone data in the DNS or in the way that authoritative DNS servers for .ONG and .NGO are provisioned or operated are anticipated. Consequently, we do not anticipate any change to the throughput, response time, consistency or coherence of responses to Internet servers or end systems.

2.4. Have technical concerns been raised about the proposed service? If so, identify the concerns and describe how you intend to address those concerns.

The initial request to bundle .NGO and .ONG domain names was subject to an RSTEP. That RSTEP identified some concerns but determined that the concerns were not serious enough to object to the proposal to bundle. The unbundling of these gTLDs would eliminate those concerns entirely.

2.5. Describe the quality assurance plan and/or testing of the proposed service prior to deployment.

All system changes in PIR's back-end registry services will be subject to their normal software development lifecycle and quality assurance processes. Full testing will be conducted with existing .ONG/.NGO bundle registrars prior to any changes being implemented. Registrars will also be able to test .ONG and .NGO in the OTE sandbox prior to officially launching unbundled domains.

2.6. Identify and list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.

"Report on Internet Security and Stability Implications of the Public Interest Registry (PIR) Technical Bundling Proposal", ICANN Registry Services Technical Evaluation Panel, July 2014.

This document describes the special handling required of .ONG and .NGO domains while they are managed as a bundle. The concerns described in this document relating to the bundling will be eliminated entirely by this proposed change.

### 3. COMPETITION

3.1. Do you believe the proposed service would have any positive or negative effects on competition? If so, please explain.

Unbundling would undoubtedly have a positive effect. Most registrars are unable or unwilling to offer .ONG and .NGO domains today because the bundles require special handling as compared to any other TLD. We expect additional registrars to offer .ONG and .NGO domains once they can be registered in a conventional, unbundled fashion. Availability of .ONG and .NGO as separate domains from an increased number of registrars gives registrants more choice in the marketplace. Indeed, this unbundling would give the registrants a more direct choice between .NGO and .ONG as well.

3.2. How would you define the markets in which the proposed service would compete?

These domains would compete in the existing global marketplace.

3.3. What companies/entities provide services or products that are similar in substance or effect to the proposed service?

Existing registrars provide other TLDs for registrants to choose.

3.4. In view of your status as a Registry Operator, would the introduction of the proposed service potentially affect the ability of other companies/entities that provide similar products or services to compete?

No.

3.5. Do you propose to work with a vendor or contractor to provide the proposed service? If so, what is the name of the vendor/contractor and describe the nature of the services the vendor/contractor would provide.

PIR's back-end registry services provider will provide the technical capability. PIR's current back-end registry services provider is Afilias.

3.6. Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed service? If so, please describe the communications.

No, PIR has not provided specific communications of the unbundling of the domains listed in this RSEP. As noted earlier, PIR will send communication at least 90 days prior to launch to registrars. PIR also will communicate with impacted registrants.

3.7. If you have any documents that address the possible effects on competition of the proposed service, attach them below. ICANN will keep the documents confidential.

## 4. CONTRACTUAL PROVISIONS

4.1. List the relevant contractual provisions impacted by the proposed service. This includes, but is not limited to, Consensus Policies, previously approved amendments or services, Reserved Names, and Rights Protection Mechanisms.

.ONG: PIR's .ONG Registry Agreement, Exhibit A, Section 5 "TLD Bundling Service" (as set forth in Amendment No. 1 (9 December 2014)); and

.NGO: PIR's .NGO Registry Agreement, Exhibit A, Section 5 "TLD Bundling Service" (as set forth in Amendment No. 1 (9 December 2014)).

4.2. What effect, if any, will the proposed service have on the reporting of data to ICANN?

There will be no effect on the reporting of data to ICANN if this proposed service is approved.

4.3. What effect, if any, will the proposed service have on Registration Data Directory Service (RDDS)?\*

None.

4.4. What effect, if any, will the proposed service have on the price of a domain name registration?

This unbundling should have significant positive effects for registrants. Since we know most registrants have been registering bundles for the use of only one domain name, this will result in more flexibility and choice for registrants. It should also allow for wider registrar adoption of either gTLD and would, therefore, allow registrants greater choice in which registrar they register domains with.

4.5. Will the proposed service result in a change to a Material Subcontracting Arrangement (MSA) as defined by the Registry Agreement? If so, identify and describe the change. Please note that a change to an MSA requires consent from ICANN org through the MSA change request process. The RSEP request must be approved prior to submitting the MSA change request.

No.

## 5. AUTHORIZATION LANGUAGE

5.1. A Registry Agreement (RA) amendment is required when the proposed service: (i) contradicts existing provisions in the RA or (ii) is not contemplated in the RA and, therefore, needs to be added to Exhibit A of the RA and/or as an appropriate addendum/appendix. If applicable, provide draft language (or a link to previously approved RA amendment language) describing the service to be used in an RA amendment if the proposed service is approved. If an RA amendment is not applicable, respond with “N/A” and provide a complete response to

question 5.2.\*

For examples or for IDN services, you may refer to the webpage for standard RA template amendments for commonly requested Registry Services.

Exhibit A , Section 5. "TLD Bundling Service" will need to be removed in both the .ONG and the .NGO Registry Agreements:

<https://www.icann.org/sites/default/files/tlds/ong/ong-amend-1-pdf-09dec14-en.pdf>

<https://www.icann.org/sites/default/files/tlds/ngo/ngo-amend-1-pdf-09dec14-en.pdf>

No other changes to either Registry Agreement will be needed.

5.2. If the proposed service is permissible under an existing provision in the Registry Agreement, identify the provision and provide rationale. If not applicable, respond with "N/A" and provide a complete response to question 5.1.

N/A.

## 6. CONSULTATION

6.1. ICANN org encourages you to set up a consultation call through your Engagement Manager prior to submitting this RSEP request. This is to help ensure that necessary information is assembled ahead of time.

Identify if and when you had a consultation call with ICANN org. If you did not request a consultation call, provide rationale.

PIR had several discussions and communications with ICANN org prior to the submission of this RSEP.

6.2. Describe your consultations with the community, experts, and/or others. This can include, but is not limited to, the relevant community for a sponsored or community TLD, registrars or the registrar constituency, end users and/or registrants, or other constituency groups. What were the quantity, nature, and results of the consultations? How will the proposed service impact these groups? Which groups support or oppose this proposed service?

This proposal seeks to remove the special bundle management required for .ONG and .NGO domains, following which they will be handled in a fashion that is substantially identical to most other gTLDs.

PIR has observed minimal usage of its bundling products and confusion among its existing registrants. Most .ONG/.NGO registrants do not utilize both of their .ONG and .NGO domains. Most all .ONG/.NGO bundles are broken by configuration, have only one of the domains in use, or are parked by PIR (premium names) or by a registrar acting as registrant. The way that .ONG/.NGO bundles are structured is that both .ONG and .NGO domain names within a single bundle have the same DNS nameservers (although the DNSSEC information associated with each domain name may be different). For an .ONG/.NGO bundle to be correctly configured, the single set of nameservers must respond correctly to queries for either domain. PIR conducted research to determine whether bundle registrants were making use of both ONG and .NGO names, or just one. The results of that research, conducted in 2019, revealed that the overwhelming majority of deployed bundles were not correctly configured; that is, for most registered bundles, the registrant nameservers did not respond correctly to one or both names in the bundle. While this data is from 2019, the frequency at which changes are made in the current bundle registry is very low and we do not anticipate that the 2019 results would be markedly different to a similar experiment run today. PIR has consulted with a number of registrars about their reluctance to carry these TLDs and received feedback that the bundling requires too many system/purchase flow changes for them to implement. Removal of the bundling requirement should allow for more registrants to carry .NGO or .ONG and allow for greater choice and flexibility for registrants. During a recent series of engagement webinars with registrars, PIR informed its registrars of the plan to move forward with unbundling .NGO/.ONG and did not receive any objections.

## 7. OTHER

7.1. Would there be any intellectual property impact or considerations raised by the proposed service?

No.

7.2. Does the proposed service contain intellectual property exclusive to your gTLD registry?

No.

7.3. Provide any other relevant information to include with the request. If none, respond with "N/A."

N/A.

7.4. If additional information should be considered, attach one or more file(s) below.

**Affected TLDs**

<b>Current Registry Operator</b>	<b>Top Level Domain</b>	<b>Registry Agreement Date</b>
Public Interest Registry	ngo	2014-03-06
Public Interest Registry	ong	2014-03-06