25 May 2016

Subject: SAC081: SSAC Response to Request for Input on Next Generation gTLD
RDS to Replace WHOIS Policy Development Process (PDP)

To: The GNSO Next Generation gTLD RDS to Replace WHOIS PDP Working
Group

On May 11 2016, the working group requested input to better inform the policy
development process. Please find the SSAC's response below.

Patrik Fältström
SSAC Chair

a. Please identify your SO/AC/GNSO Stakeholder Group / GNSO Constituency:

    The Security and Stability Advisory Committee (SSAC)

b. Please identify the member(s) of your SO/AC/GNSO Stakeholder Group / GNSO
    Constituency who is (are) participating in this working group:

    **The individuals listed below do not participate on behalf of SSAC in this
    working group.**

    Greg Aaron
    Benedict Addis (observer)
    Don Blumenthal (observer)
    James Galvin
    Rod Rasmussen

c. Please identify the members of your SO/AC/GNSO Stakeholder Group / GNSO
    Constituency who participated in developing the perspective(s) set forth below:

    **Please see the SSAC Operational Procedures for information on how the SSAC
    produces its advice.[1]**

d. Please describe the process by which SO/AC/GNSO Stakeholder Group / GNSO
    Constituency used to arrive at the perspective(s) set forth below:

Please see the SSAC Operational Procedures for information on how the SSAC produces its advice.[1]

e. Please identify a primary point of contact with an email address in case any follow-up is needed:

Please email the SSAC Admin Committee
ssac-exec-comm@icann.org

Questions

1. As part of its initial deliberations aimed at developing a work plan (https://community.icann.org/x/oIxlAw), the Working Group identified, gathered and reviewed key documents and information available in relation to charter questions that are expected to be addressed by the Working Group (see the check lists developed by the WG and also inputs identified by the Issue Report for each charter question at https://community.icann.org/x/HIxlAw). Furthermore, the Working Group identified those documents that it determined to be most relevant in relation to the topics of purpose, data elements and privacy (see https://community.icann.org/x/p4xlAw). You will find the charter questions that are expected to be addressed by the PDP Working Group in the Annex to this template.

Are there any documents missing from these input inventories and/or any additional documents or information that you consider necessary to inform the PDP WG as they begin to address the charter questions during phase 1? If so, please identify the documents / information and explain their relevance in relation to the WG's phase 1 deliberations.

Your response:

The following documents are identified in the links above:

SAC054 SSAC Report on the Domain Name Registration Data Model[2]
SAC055 WHOIS: Blind Men And An Elephant[3]
SAC058 SSAC Report on Domain Name Registration Data Validation[4]

In addition to these, the SSAC wishes to include:

SAC051 SSAC Report on Domain Name WHOIS Terminology and Structure[5]

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[1] See https://www.icann.org/en/groups/ssac/operational-procedures-08may15-en.pdf.
[2] See https://www.icann.org/en/groups/ssac/documents/sac-054-en.pdf.
[3] See https://www.icann.org/en/groups/ssac/documents/sac-055-en.pdf.
[4] See https://www.icann.org/en/groups/ssac/documents/sac-058-en.pdf.
[5] See https://www.icann.org/en/groups/ssac/documents/sac-051-en.pdf.

SAC061 SSAC Comment on ICANN's Initial Report from the Expert Working Group on gTLD Directory Services[6]

2. In addition, the WG identified key inputs received from third parties (see documents listed at https://community.icann.org/x/R4xlAw, as well as inputs enumerated in http://whois.icann.org/sites/default/files/files/final-issue-report-next-generation-rds-07oct15-en.pdf, and comments posted at https://community.icann.org/x/sYxlAw). If input from your respective SO/AC/GNSO SG/C has been identified here, please confirm whether this input is still relevant and up to date, and if not, what input the Working Group should be considering.

Your response:

The following documents are identified in the links above:

SAC051 SSAC Report on Domain Name WHOIS Terminology and Structure[7]
SAC054 SSAC Report on the Domain Name Registration Data Model[8]
SAC055 WHOIS: Blind Men And An Elephant[9]
SAC058 SSAC Report on Domain Name Registration Data Validation[10]

In addition to these, the SSAC wishes to include:

SAC061 SSAC Comment on ICANN's Initial Report from the Expert Working Group on gTLD Directory Services[11]

3. Does your SO/AC/GNSO SG/C have any guidance for the Working Group in relation to the completeness of the charter questions to be addressed by this PDP WG (see Annex A)?

Your response:

No

4. If there is any other information you think should be considered by the WG as part of its deliberations, please feel free to include that here.

Your response:

In SSAC's publications concerning registration data and WHOIS we have counseled: first the problems must be described, then the policies to address those

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[6] See https://www.icann.org/en/groups/ssac/documents/sac-061-en.pdf.
[7] See https://www.icann.org/en/groups/ssac/documents/sac-051-en.pdf
[8] See https://www.icann.org/en/groups/ssac/documents/sac-054-en.pdf.
[9] See https://www.icann.org/en/groups/ssac/documents/sac-055-en.pdf.
[10] See https://www.icann.org/en/groups/ssac/documents/sac-058-en.pdf.
[11] See https://www.icann.org/en/groups/ssac/documents/sac-061-en.pdf.

problems can be formulated, and only after that can the technical solutions to implement those policy requirements be designed.

We hope that the three Phases described in the WG plan correspond to those decision making steps. Specifically, the WG's Phase 1 must clearly define the problems the GNSO is trying to solve, and those goals must be agreed upon.

Also, the WG must always distinguish between the policy and technical aspects of their work. For example, does "WHOIS system" refer to the WHOIS protocol, or does it refer to something else?

The SSAC notes that the RDAP protocol was designed as the technical successor to the WHOIS protocol. The SSAC notes that eventually the RDS PDP WG must determine whether the RDAP protocol will accommodate the policy requirements that the GNSO establishes, otherwise the RDS PDP WG will need to describe why another technical solution is required.