

**Expert Working Group (EWG) on Next-Generation Registration Directory Services (RDS)  
Summary Response to Public Comments on the EWG's Initial Report**

The EWG's [Initial Report](#) (published on 24 June, 2013) generated 35 [public comment submissions](#) and over 100 [online survey](#) responses from the ICANN Community, reflecting both the continued interest and diversity of stakeholder opinions on an issue that has been controversial for over a decade. This diversity reinforces the difficulty of the task assigned to the EWG, and the need for the EWG to produce recommendations that, while not perfectly satisfying every stakeholder's needs, describes a next-generation RDS that better addresses those needs than the current WHOIS system.

The EWG thanks the ICANN Community for the meaningful comments and feedback on its Initial Report. After careful consideration of each submission, the EWG produced this Summary Response to Public Comments. In this document, each comment is represented by a one-line summary and a reference to the submission. An index at the end of this document provides links to the full text of all comment submissions.

The EWG used written public comments and Durban ICANN meeting and online inputs to pinpoint where clarifications were needed, where concerns should be investigated, and where alternatives should be considered. The EWG has updated its initial work and proposals still under development to reflect this input; many of those areas are discussed in greater detail in the EWG's [Status Update Report](#) (published on 11 November, 2013). The EWG looks forward to continuing this dialog with the ICANN Community at the ICANN-48 meeting in Buenos Aires.

#	Comment	Who / Where	WG Response
<b>Topic 1 – Working Group Mandate and Purpose.</b>			
1.	Can RDS also apply to ccTLDs	[2]SYM #11	ccTLDs are outside of ICANN's remit. However, ccTLD approaches are being considered by the EWG when formulating RDS recommendations; we hope that ccTLDs might voluntarily adopt the same next-gen approach.
2.	RDS makes WHOIS problems worse not better	[9]NCSG	The EWG started its work with a rigorous analysis of well-documented Whois problems. Our final report will include a matrix that maps Whois problems to RDS principles intended to address them, including benefits beyond that accomplished by 2013 RAA.
3.	MarkMonitor is over-represented on EWG	[12]NCSG	When forming the EWG, the ICANN board sought volunteers from all stakeholder groups. Any changes must be made by the board; this is not the EWG's role. However, no MarkMonitor employees are on the EWG.
4.	MarkMonitor does not have ANY representation	[24]Mark	See #3.
5.	Proposal violates ICANN AOC and exceeds scope	[15]LS 1.6	The ICANN board purposely and explicitly exceeded AOC scope by

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			creating two parallel efforts: one focused on implementing Whois Review Team recommendations and another (the EWG) to examine a Whois replacement. It is premature to decide whether to repair or replace Whois; after we deliver final recommendations to the ICANN board, such a decision will be made through a consultative community process.
6.	Suggestions to repair instead of replace WHOIS	[15]LS 2.x	See #5.
7.	EWG should be transparent, bottom-up effort	[21]GK pg1	The EWG has no policy-making authority; our recommendations will be delivered to the ICANN board. The EWG has and will continue to solicit community input and feedback in many ways, including draft reports, webinars, videos, briefings, and FAQs. Output is driven by community input and focused on recommending a next-gen approach that is better for all.
8.	What will proposal correct, improve, eliminate	[23]DP #2	See #2.
9.	Need greater transparency, every registrant input	[23]DP #4	See #7.
10.	Aim for unified model that could apply to ccTLDs	[27]BC #12	See #1.
11.	ARDS should not delay RAA WHOIS reforms	[33]AL #1	The EWG's efforts are not delaying implementation of the 2013 RAA. In fact, the EWG is building upon reforms already included in the new RAA.
12.	Defer solution until registration data policy agreed	[34]SS Rec#1	The EWG is indeed examining registration data purposes as the ICANN board has requested to inform registration data policy decisions.
13.	Separate security risk assessment s/b conducted	[34]SS Rec#2	The EWG agrees that risk/impact assessment should be conducted and solicited feedback on how in our initial report (page 19, section 3.6). We further detail this recommendation in our update report.
<b>Topic 2 – Methodology – Users and Permissible Purposes</b>			
14.	Determining request validity with “one size fits all”	[1]AFNIC pg2	The validity of access requests must be determined by applying applicable laws within each jurisdiction. When requester, registrant, and registrar are all in a single jurisdiction, determining validity may indeed be simpler. However, the EWG believes that

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			the overall processes used to determine validity must be consistent across all gTLDs and address cross-border access requests.
15.	Better definition of purpose	[3]COA I-B1	The EWG agrees that all purposes must be specified clearly; examples in our initial report were intended to be illustrative, not exhaustive. Our final report will contain further detail and examples. However, we do not expect that list of purposes to be non-overlapping or fixed. Rather, we have recommended that there be a defined process for suggesting/approving new purposes.
16.	Focus on what MUST be collected & allow opt-out	[4]CDT #1	Both technical and personal information must be collected at time of registration for the domain name system to function. The EWG has proposed purpose-driven gated access and data element collection/access criteria to minimize public exposure of sensitive data. We have considered the .uk and other ccTLD models which expose more data for commercial registrants, but have not reached consensus on such a principle.
17.	Should not differentiate use by legitimate interest	[5]MAAWG #3	The EWG has proposed that there still be some publically-accessible data to meet a wide variety of legitimate needs, commensurate with risk. However, to improve privacy, there must be some limits placed on access. Requestor statement of purpose is the foundation we have proposed for providing appropriate access to non-public data. We continue to seek the proper balance between privacy and access, guided by data protection laws.
18.	Address the needs of ALL potential users	[6]Mark #3	See #15.
19.	Identify not just uses but also abuses of WHOIS	[8]NCSG	The EWG considered many abuses of WHOIS in our initial use case development and have continued to add use cases to capture a variety of abuses. See also #15.
20.	Use cases too broad; enable technical contact only	[10]NCSG	The EWG reviewed data needs for the listed use cases; we have also provided more clarity around which data elements we propose to be gated to address related risks. See also #5.
21.	Tailor RDS for infrastructure contactability needs	[13]NCSG	The EWG considered contactability as a primary goal, as well as the

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			concerns cited here, in our initial draft. We have continued to examine and further address these concerns in our update report.
22.	Anti-abuse requires full, complete access	[15]LS 1.5	See #17.
23.	Foster innovative uses	[16]FWD #3	See #15. In our initial report, the EWG proposed that the RDS provide a platform for appropriately-controlled access to registration data, including third parties wishing to offer innovative "value-added" services. However, policies for resale of registration data by third parties are beyond our remit.
24.	Use cases are starting point, must be extensible	[27]BC #6	See #15.
25.	New uses should be subject to public comment	[27]BC #7	See #15. Public comment is one of several options to be considered.
26.	EWG should apply DCF risk/utility analysis	[31]Elchemy	The EWG recommended that an impact assessment be performed and will cite the DCF as a methodology that might be utilized.
27.	Essential that purposes are clearly identified	[32]MS pg3	See #15.
28.	ISP needs satisfied; need clear purpose definition	[35]ISP #2	See #15.
29.	Multi-stakeholder process to add new purposes	[35]ISP #5	See #15.
30.	EWG has not answered purpose question	[34]SS Rec#1	See #31.
31.	SSAC alternative proposal for identifying purpose	[34]SS Sect2.1	The EWG's initial draft made a recommendation on valid uses. Making the policy decision is up to the GNSO and the ICANN board. We agree valid uses will need to be managed by a process. See #15. Yes, parties would be subject to future change as the Internet evolves; we note that changes are more likely to involve new users and purposes that will access existing data; the RDS itself should be extensible.
<b>Topic 3 – International and Jurisdiction Principles</b>			
32.	RDS must take into account legal regimes	[1]AFNIC pg2	Jurisdiction is always taken into account. The EWG has recommended binding corporate rules for data protection to help harmonize approaches, and locating the RDS in a jurisdiction with strong data protection law to ensure effective oversight.
33.	RDS must address Article 29 WP concerns	[1]AFNIC pg2	The EWG believes that binding corporate rules and clear statement

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			of all purposes would address Article 29 WP concerns, providing that all legal requirements are also met. See also #32.
34.	Could RDS provide IDN, script labels	[2]SYM #14	Internationalized domain names (IDNs) are stored in an ASCII-encoded form that identifies the domain name as an IDN. The RDS would use RDAP to provide capabilities for domain name lookups and searches using both ASCII-encoded and Unicode representations for domain name labels. However, RDAP cannot return metadata describing Unicode label makeup.
35.	National laws may prohibit upload to ARDS	[28]JPNIC #2	The EWG believes that binding corporate rules and strong data protection provisions will address most reasons for TBDF blockages, providing that all legal requirements are also met. See also #32.
36.	Must consider national legislation, warrants	[30]LAC #3	Implications of all national legislation must be considered on a case by case basis, particularly insofar as LEA requests are concerned. However, see #32 for our recommendations on binding corporate rules and RDS location.
37.	What jurisdiction(s) will ARDS be subject to	[32]MS pg4	This decision is beyond the EWG's remit. However, see #32 for our recommendation on location.
38.	LEA accreditation should reflect national DP laws	[35]ISP #4	See #36.
39.	Gating should take into account national DP laws	[35]ISP #7	See #36.
40.	Jurisdictions may prohibit contact data export	[34]SS Rec#3C	See #35.
<b>Topic 4 – Accountability and Compliance Principles</b>			
41.	Would CAs that are RRs have insider access	[2]SYM #13	Registrars would continue to have access to their own customer's data, but would be subject to the same gated access to the entire RDS.
42.	Prohibition against redistribution is poor policy	[15]LS 1.4	The EWG agrees that innovative third-party value-added services are useful; we continue to discuss precise definitions for permissible purposes and how third-parties could deliver such services while complying with those purposes.
43.	Third-party ARDS operator weakens compliance	[19]USG #6	The EWG expects that ICANN will continue to be directly responsible for RAA and RA contractual compliance enforcement,

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			even if RDS services are operated by a third party. New contractual relationships added by the RDS, such as accreditation of requestors, have yet to be defined. However, we expect that those new contracts would also include strong compliance enforcement.
44.	Need to identify miscreant problems and fixes	[23]DP #3	The EWG examined some miscreant use cases during our initial analysis and drafted principles to counter these impermissible uses of RDS data. We have also recommended a risk assessment to more fully explore this concern.
45.	Annual reminder is not sufficient for compliance	[29]INTA IV	We agree. The EWG has recommended on-going randomized data audits, frequent revalidation of collected data, and reusable contact IDs to improve maintainability. We expect these measures will substantively improve the quality of registration data far more than an annual reminder.
46.	Consistency of participation improves compliance	[32]MS pg4	The EWG agrees that broad participation in a system like the RDS will facilitate more uniform policy compliance across all gTLDs.
47.	What are abusive requests and repercussions	[32]MS pg4	The EWG agrees that abusive requests and repercussions must be clearly defined; further work is needed to derive recommendations in these areas.
48.	How will the compliance function be enforced	[33]AL #4	See #47.
<b>Topic 5 – Privacy Principles, Privacy/Proxy Requirements and Secure Protected Credentials</b>			
49.	Proxy service issues must be addressed	[3]COA II-A	The EWG has been working to develop more detailed recommendations regarding privacy problems to be addressed and how the RDS might do so through accredited service providers; see our status update report for further details.
50.	Maximum protected registration must be detailed	[3]COA II-B	See #49.
51.	Protect registrant privacy by default	[4]CDT #2	The EWG's recommended gated access and default data disclosure principles significantly reduce the amount of personal data presented by the RDS.
52.	Commercial registrants don't need privacy protect	[5]MAAWG #1	This distinction is still under discussion by the EWG.
53.	Differentiate between commercial and non-comm	[6]Mark #1	See #53.

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54.	Registrant notification would be damaging to LEA	[19]USG #5	Registrant notification is still under discussion by the EWG.
55.	Privacy option already available, change unneeded	[22]AIFA #3	Many known deficiencies in today's privacy and proxy services are described in the EWG's update report.
56.	Privacy and notification are rights, esp. non-comm	[25]Enc #2	See #54.
57.	Report does not address Privacy/Proxy regulation	[26]IPC	See #49.
58.	Max protected registration should be limited	[27]BC #2	The diverse input received on this topic was helpful to inform the proposal detailed in the EWG's update report.
59.	Obligations of privacy/proxy should be specified	[27]BC #3	See #49.
60.	ARDS must address privacy/proxy issues	[32]MS pg4	See #49.
61.	Max protected registration is too broad	[32]MS pg5	See #58.
<b>Topic 6 – Data Disclosure Principles, Gated Access Model and Requestor Accreditation</b>			
62.	Gated access should not prevent Ry/RR access	[1]AFNIC pg3	See #41.
63.	Will RDS provide free access like WHOIS	[2]SYM #15	The EWG recommends that free anonymous public access still be provided to data elements that satisfy many common purposes, now further detailed in our report. See #85 for discussion of need to balance need vs. risk.
64.	Need details on “authentication” process	[3]COA I-B4	See #100.
65.	Gated access is based in invalid assumptions	[5]MAAWG #2	The EWG appreciates this feedback; it will inform our continuing discussion on gated access and permissible purposes.
66.	No change to current access level should be made	[14]IACC #1	See #63.
67.	Gated access is too complex	[14]IACC #2	See #65.
68.	Closed gated access must be vigorously opposed	[15]LS 1.1	See #63.
69.	Retain “open by default” system	[16]FWD #1	See #63.
70.	Important to Internet that all data be public	[22]AIFA #2	See #63.
71.	Recommend SSAC risk assessment of gated access	[27]BC #5	See #65.
72.	Credentialing should not apply to public data	[29]INTA III	See #63.
73.	Need to identify decision-maker for disputes	[29]INTA III	See #65.
74.	Gated access is unduly complex	[29]INTA III	See #65.
75.	Gated access may be detrimental to common user	[30]LAC #2	See #63.
76.	Same accreditation for ARDS & WhoWas	[32]MS pg2	The EWG's initial report recommended that RDS provide access to

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			historical "WhoWas" data – the use case that we called "Domain Name Registration History"
77.	Accreditation must be objective, user-friendly	[32]MS pg3	The EWG agrees and continues to work on accreditation principles; see our update report for additional detail.
78.	Strongly support tiered access	[33]AL #2	We agree. See #63.
79.	Why is change to public access justified	[34]SS Rec#3A	See #63.
80.	Gated approach has security, stability challenges	[34]SS Sect2.3	See #65.
<b>Topic 7 – Data Elements Principles</b>			
81.	Explore reducing volume/type of data collected	[1]AFNIC pg3	The EWG recommended principles that significantly reduce the number of data elements that are mandatory to collect, guided by use case needs.
82.	RDS support for multiple contacts	[2]SYM #6	In addition to registrant contact data essential to meet basic domain control needs, the EWG recommends support for optional, public role-based contact data elements to enable improved reachability.
83.	Common standardized data format examples	[2]SYM #7	We agree; this will be included in our final report.
84.	Better alignment of data with purposes	[3]COA I-B2	See #81
85.	Appropriate level (data) for public access	[3]COA I-B5	To maximize registrant privacy, the EWG has recommended principles that registrant-supplied data should be gated by default, except where there is a compelling need for public access that exceeds resulting risk.
86.	Data elements should be minimal	[11]NCSG	See #85
87.	Data restrictions should be driven by privacy	[14]IACC #3	See #85
88.	Ensure identification of registrants soliciting \$	[27]BC #8	The EWG continues to discuss whether additional data elements should be public when Registrant Type = Legal Person.
89.	Consider commercial vs non-commercial criteria	[27]BC #9	After considerable discussion, the EWG recommend that Domain Name Purpose NOT be included as a data element collected and disclosed by the RDS, but encompassed by principles that encourage commercial Internet users to uniformly publish more data elements to boost consumer confidence.

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<b>#</b>	<b>Comment</b>	<b>Who / Where</b>	<b>WG Response</b>
90.	Data access limits should be tied to privacy needs	[29]INTA III	See #85
91.	Public access to widely available data (see list)	[32]MS pg3	The EWG has recommended principles that make the data elements cited by this comment always public (domain name, DNS) or public by default (registration/creation dates, updated/expiration dates, client and server status, registrar and reseller). However, for privacy reasons, we have recommended that the registrant's postal address be gated by default.
92.	Need clear definition of data for each purpose	[35]ISP #6	The EWG has proposed a list of data elements, accompanied by definitions and a list of purposes/users that appear to need them.
93.	Which now-accessible data s/b restricted & how	[34]SS Rec#3B	See #85. Gated access methods are further detailed in our report.
94.	Why are more sensitive data elements proposed	[34]SS Rec#3D	See #85. The EWG recommends that more sensitive data elements be gated by default, in accordance with risk. The two data elements cited by this comment are indeed classified as high risk, for internal use, accessible only to Registrars.
<b>Topic 8 – Access Method (including Authentication) Principles</b>			
95.	What access credential system is envisioned	[2]SYM #1	The EWG expects that the IETF's Registration Data Access Protocol (RDAP) will be used by clients to request information from service providers. RDAP includes support for federated authentication systems like OAuth and OpenID. A federated authentication system can be used to issue and manage access credentials.
96.	Cap on number of requests/day	[2]SYM #3	Service providers will likely need to impose rate limits that are similar to those used in today's WHOIS implementations. We do not envision a need for absolute daily request caps.
97.	Digitally sign query responses for auditing	[2]SYM #9	As currently specified in draft form, the IETF Registration Data Access Protocol (RDAP) provides data integrity services using secure HTTP. Signed query responses would require a protocol extension that has not been specified by the IETF. It could be done with community consensus.
98.	Need further detail on Premium Services	[3]COA I-B3	"Accreditation regime" refers to the process used to review requests for privileged access and validate stated purposes for use.

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99.	Unclear how credentialing would be established	[19]USG #2	See #95.
100.	Report does not address authentication details	[26]IPC	See #95.
101.	Need details on authenticated access	[29]INTA III	See #95.
<b>Topic 9 – Validation, Update, and Accuracy Principles</b>			
102.	Registrants will ignore contacts from ARDS	[1]AFNIC pg3	The EWG recommends that Registrars remain primary points of contact for Registrants. There may be no need for the RDS to contact Registrants.
103.	Registrant updates s/b applied to cached data	[2]SYM #2	The EWG recommends that Registrant updates be validated syntactically and operationally and applied to data accessed through or cached by the RDS.
104.	Require update after domain resale	[2]SYM #12	The EWG recommends that all updated data are validated and verified; the RDS would be updated with changed registration data after domain name sales.
105.	Clarify data accuracy improvements vs 2013 RAA	[3]COA I-C	In addition to requirements for WHOIS accuracy in the 2013 RAA, we have recommended that RDS-accredited Validators be used to further improve accuracy by applying multiple levels of validation, required revalidation upon change, and automated audits.
106.	Ensure accuracy, including abuse detection	[6]Mark #4	The EWG recommends that accuracy be ensured by validating data syntactically and operationally at time of collection and using accredited Validators to continually audit accuracy.
107.	Links requirements to accuracy improvements	[17]NBC #1	See #105.
108.	Data validation should build on 2013 RAA	[19]USG #4	See #105.
109.	Report does not address accuracy vs 2013 RAA	[26]IPC	See #105.
110.	More detail needed on validation, periodic checks	[29]INTA IV	See #105.
111.	EWG should apply SSAC 58 validation to RDS	[30]LAC #4	SSAC58 calls for syntactic, operational and Identity validation of some data elements; our initial report adopted this principle and our update elaborates on how it could be applied by the RDS.
112.	Clarify RDS validation vs 2013 RAA	[32]MS pg2	See #105.
113.	How will data accuracy complaints be handled	[32]MS pg4	Complaints would still be submitted to ICANN as they are today. See #43 for additional discussion on contractual compliance.

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114.	Strongly support centralized accuracy	[33]AL #3	We believe that many use cases support centralized validation.
115.	EWG should apply SAC058 recommendations	[34]SS Rec#4	See #111.
116.	Provide more detailed accuracy justifications	[34]SS Sect2.4	We recommend that sensitive data elements, such as contact data, should be protected them by making them gated by default while allowing Registrants to opt into making them public if desired.
<b>Topic 10 – Contractual Relationship Principles</b>			
117.	Avoid creating a super monopoly	[15]LS 1.3	The EWG did not intend to recommend creating a monopoly. For example, Registrars and Registries would still have their own customer's registration data, even if the RDS provides centralized access to all gTLD registration data. We will take these concerns into account when formulating recommendations for contractual relationships between all parties involved in the RDS.
118.	Distribute power to ensure access	[16]FWD #2	See #117.
119.	ARDS creates dangerous monopoly	[22]AIFA #1	See #117.
120.	ARDS operator should not have ICANN contract	[32]MS pg4	The EWG recommended the RDS be operated by a neutral third-party, under contract with ICANN. We further recommend the RDS operator be prohibited from simultaneously performing other ICANN-contracted services that would pose a conflict of interest (e.g., not also be a Registrar or Registry).
<b>Topic 11 – Storage, Escrow, and Logging Principles</b>			
121.	Requirements should reflect stakeholder needs	[27]BC #10	The EWG agrees and welcomes input on stakeholder needs.
<b>Topic 12 – Cost Principles (including Migration)</b>			
122.	Gated access and gathering data is costly	[1]AFNIC pg3	The EWG agrees that there are costs associated with gated access and collecting data. The EWG recommends that the RDS be deployed using a cost-recovery business model, following a detailed cost-benefit analysis that identifies parties impacted and benefited.
123.	Investigate further business model	[1]AFNIC pg3	See #122.
124.	Define transition process to RDS	[2]SYM #10	The EWG considered ease of transition in its comparison of alternative models. We agree that a detailed transition plan will be

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			needed to provide a smooth migration from WHOIS to a next-generation RDS
125.	Cost recovery should be built into RDS	[3]COA II-C	See #122.
126.	Preserve WHOIS history during migration	[17]NBC #2	See #124.
127.	Indicate how costs shift and will be covered	[19]USG #3	See #122.
128.	Need for cost and benefit analysis	[21]GK pg2	See #122.
129.	Imperative that basic WHOIS remain free	[23]DP #1	The EWG recommended that free anonymous public access to basic data elements should continue to be offered.
130.	Report does not address cost allocation	[26]IPC	See #122.
131.	Cost recovery model, borne by those who benefit	[27]BC #11	See #122.
132.	Who will bear third-party validation costs	[29]INTA IV	See #122.
133.	Everybody who benefits could be charged	[35]ISP #8	See #122.
<b>Topic 13 – Suggested Model</b>			
134.	Would RDS be less authoritative than WHOIS	[2]SYM #4	The EWG considered the possibility of data latency in its comparison of alternative models. Like thick gTLD Registries do now, the RDS will need to sync with data collected by Registrars.
135.	Will SLA and response times be guaranteed	[2]SYM #8	Performance metrics will need to be defined by the RDS operator.
136.	Strongly support aggregated model	[3]COA I-A	Given diverse feedback on the EWG's proposed storage model, the EWG applied numerous criteria to assess the pros and cons of centralization; see our update report for summary results.
137.	Centralized system is unnecessary and unstable	[4]CDT #3	See #136.
138.	Centralized system is beneficial	[6]Mark #2	See #136.
139.	Strongly object to a centralized system	[7]NCSG	See #136.
140.	Centralized data poses risks and punitive powers	[15]LS 1.2	The EWG considered security and availability risks in its comparison of alternative models; we agree that the risks of any implementation will need to be assessed and minimized. Some smaller Registries might need assistance to ensure consistent security/availability; see our update for additional explanation.
141.	Centralized closed system single point of failure	[19]USG #1	See #140.
142.	Centralized RDS will facilitate LE, TM needs	[25]Enc #1	See #136.

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143.	Risks of centralization could outweigh benefits	[27]BC #1	See #136.
144.	May be safer to centralize data	[27]BC #4	See #136.
145.	Big data source requires best ever security	[28]JPNIC #1	See #140.
146.	Model, big data could enable insider abuse, attack	[30]LAC #1	See #140.
147.	Fully support many potential benefits of ARDS	[32]MS pg2	See #136.
148.	How frequently would ARDS be updated	[32]MS pg4	See #135.
149.	Model must address privacy, reliability, resiliency	[33]AL #5	See #140.
150.	Support ARDS model; Registry s/b authoritative	[35]ISP #1	See #134.
151.	Consideration s/b given to decentralized system	[35]ISP #3	See #136.
152.	ARDS data availability risks are significant	[34]SS Sect2.2	See #140.

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Comments submitted to EWG Mailbox - <http://mm.icann.org/pipermail/input-to-ewg/2013/thread.html>

#	Submitted By	On Behalf Of	Message Subject
1.	Pierre Bonis	Afnic	<a href="#">Comments made by Afnic on the EWG proposal</a>
2.	Jessica Crewse	Personal capacity (Symantec Corporation)	<a href="#">Input / Questions Regarding the Next Generation gTLD Directory Services Model</a>
3.	Steven Metalitz	Coalition for Online Accountability	<a href="#">Comments of Coalition for Online Accountability</a> + <a href="#">COA Attachment</a>
4.	Joseph Lorenzo Hall	Center for Democracy & Technology	<a href="#">CDT Comments on ICANN EWG WHOIS report</a> + CDT Attachment
5.	Jerry Upton	M3AAWG	<a href="#">M3AAWG Comments on the EWG Initial Report</a> + <a href="#">M3AAWG Attachment</a>
6.	Kiran Malancharuvil	MarkMonitor	<a href="#">Comments of MarkMonitor</a> + <a href="#">MarkMonitor Attachment</a>
7.	Kathy Kleiman	NCSG	<a href="#">We Strongly Object to a Centralized Whois/Registrant Data Database</a> + <a href="#">NCSG Attachment #2</a>
8.	"	"	<a href="#">Who on the EWG Specializes in Abuse of the Whois Data?</a> + <a href="#">NCSG Attachment #1</a>
9.	"	"	<a href="#">Why is the Whois Broken?</a> + <a href="#">NCSG Attachment #3</a>
10.	"	"	<a href="#">The EWG Use Cases Seem Fundamentally Flawed</a> + <a href="#">NCSG Attachment #4</a>
11.	"	"	<a href="#">Data Elements Will Require a Separate Review</a> + <a href="#">NCSG Attachment #5</a>
12.	Edward Morris	NCSG	<a href="#">Potential Conflict of Interest</a> + <a href="#">NCSG Attachment #6</a>

**Expert Working Group (EWG) on Next-Generation Registration Directory Services (RDS)  
Summary Response to Public Comments on the EWG's Initial Report**

13.	"	"	<a href="#">Has the EWG Evaluated Closely What is at Stake for Registrants?</a> + <a href="#">NCSG Attachment #7</a>
14.	Travis Johnson	International AntiCounterfeiting Coalition	<a href="#">IACC Comments re: EWG Report on ARDS</a> + <a href="#">IACC Attachment</a>
15.	John Horton	LegitScript	<a href="#">LegitScript Comments on EWG Proposal</a> + <a href="#">LegitScript Attachment</a>
16.	Libby Baney	FWD Strategies International	<a href="#">Joint comments to the EWG</a> + <a href="#">FSI Attachment</a>
17.	Meredith Baker	NBCUniversal	<a href="#">Comment for submission</a> + <a href="#">NBCUniversal Attachment</a>
18.			
19.	Suzanne Radell	NTIA/OIA	<a href="#">Preliminary USG Comments on the Initial Report from the EWG on gTLD Directory Services</a> + <a href="#">NTIA/OIA Attachment</a>
20.	Avri Doria	NCSG	<a href="#">NCSG endorses Kleiman/Morris Input</a>
21.	George Kirikios	Leap of Faith Financial Services Inc.	<a href="#">Pearls before Swine:</a> <a href="#">Comments on the EWG proposed Next Generation Registration Directory Service</a>
22.	Di Giorgio Domenico	Counterfeit Prevention Unit AIFA - Italian Medicines Agency	<a href="#">ICANN working group proposal regarding WHOIS</a>
23.	Danny Pryor	Personal capacity (Rodan Media Group)	<a href="#">Thoughts on EWG Next Gen</a>
24.	Frederick Felman	MarkMonitor	<a href="#">MarkMonitor Response to False Claims of Conflict</a> + <a href="#">MarkMonitor Attachment</a>
25.	Tom Barrett	Personal capacity (EntCirca)	<a href="#">Let's make sure we strike a balance</a>
26.	Kristina Rosette	IPC	<a href="#">Comments on the Initial Report of the Expert Working Group on gTLD Directory Services</a> + <a href="#">IPC Attachment</a>

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27.	Steve DelBianco	BC	<a href="#">Business Constituency comments on Initial Report from the EWG</a> + <a href="#">BC Attachment</a>
28.	Maemura Akinori	Japan Network Information Center	<a href="#">A response from JPNIC</a>
29.	Claudio Di Gangi	International Trademark Association	<a href="#">Comments of the INTA Internet Committee</a> + <a href="#">INTA Attachment</a>
30.	Fatima Cambroner	LACRALO	<a href="#">LACRALO on Next Generation gTLD Directory Services Model</a> + <a href="#">LACRALO community link</a> (translation will be posted)
31.	Erin Kenneally	Personal capacity (elChem)	<a href="#">Comments Regarding ARDS</a> + <a href="#">ElChem Attachment</a>
32.	Russel Pangborn	Microsoft	<a href="#">Microsoft WhoIs EWG comment</a> + <a href="#">Microsoft Attachment</a>
33.	ICANN At-Large Staff	ALAC	<a href="#">ALAC Statement on the "Explore the Draft Next Generation gTLD Directory Services Model"</a> + <a href="#">ALAC Attachment</a>
34.	Julie Hedlund	SSAC	<a href="#">Comment from the SSAC</a> + <a href="#">SSAC Attachment</a>
35.	Wolf-Ulrich Knoben	Internet Services Provider and Connectivity Provider Constituency (ISPCP)	<a href="#">Input to EWG made by the ISPCP constituency</a> + <a href="#">ISPCP Attachment</a>