RSEP Fast Track - Registration Validation per Applicable Law with Proxy

July 9, 2019

Registry Operator
Donuts (Parent)
 ,

Request Details
Case Number: 00929681

Service Description

This service request should be used to submit a Registry Services Evaluation Policy (RSEP) request to implement the Registration Validation per Applicable Law with Proxy service, which permits Registry Operators to perform registration validation to comply with applicable law in a given jurisdiction with a supplementary proxy for SRS/EPP and RDDS services.

For Registry Operators who request approval to use a supplementary registration proxy in conjunction with registration validation, a port-43 supplementary registration information lookup service must be established. This service acts as a caching proxy to the Registration Data Directory Service (RDDS) and would be queried only by registrars in a specific jurisdiction. End users performing RDDS queries would not query this service and whois.nic.[TLD] will continue to point to the primary RDDS service. The format of responses produced by the supplementary registration information lookup service will be identical to those produced by the RDDS service and will comply with ICANN specifications.

The statements below reflect the standard implementation of the proposed service with no apparent significant security or stability issues as well as the standard amendment language for Registration Validation Applicable Law with Proxy. Please note this request will be published on the ICANN org RSEP webpage upon completion of the Completeness Check, which will be within 5 days from submission.

If any of the statements below do not apply to your registry's implementation of the proposed service, this RSEP Fast Track request may not be used. Instead, you must submit a standard "RSEP (Registry Services Evaluation Policy)" request. Please click here for more information about the process.

Complete the information requested below. All answers marked with a red asterisk are required. Click the Save button to save your work and click the Submit button to submit to ICANN.

Registry Operator Confirmation

1. My registry requests to implement the Registration Validation per Applicable Law with Proxy for the TLDs included in this request.
Yes

2. My registry confirms the amendment language below represents the proposed service in this RSEP request and my registry agrees to execute the Registry Agreement amendment without modification. My registry also understands it may be required to submit a Material Subcontracting Arrangement (MSA) request to ICANN for use of a supplemental proxy based on its response(s) to the Required Information section below.

Note: amendment execution will occur once the request has successfully passed ICANN Review for security, stability, and competition.

Registration Validation per Applicable Law
Registry Operator may perform registration validation to comply with applicable local law in a given jurisdiction. The registration validation process, by which the Registry Operator subjects domain name registrations to validation, will be subject to the criteria required by the applicable local law in the jurisdiction. Domain names that are subject to the registration validation process in the subject jurisdiction that do not pass registration validation in that jurisdiction may be suspended, deleted or otherwise updated by the Registry Operator as required by applicable local law.

Supplementary Registration Proxy
Registry Operator may offer this service through a Supplementary Registration Proxy (SRP), which provides a secondary gateway for access to Shared Registration System (SRS)/EPP, RDDS (via WHOIS – port 43 –, web-based Directory Service, or any combination), or both, subject to the following requirements:

1. Any Registry Service offered through an SRP shall be consistent and coherent with the corresponding primary Registry Service. In particular, a Registry Service offered through an SRP must provide the same Registration Data; offer the same functionality; and be subject to the same specifications, service-level requirements, and emergency transition thresholds (as specified in Specification 10) as the corresponding primary Registry Service offered by the Registry Operator.

2. Registry Operator must give ICANN a ten (10) calendar days advance notice of any new or changed SRP hostnames.

3. Registry Operator must obtain ICANN's approval pursuant to Section 7.5 of the Agreement for any subcontracting arrangement that relates to a SRP.

4. Registry Operator may offer an SRP provider access to Registration Data as long as such access complies with all the terms of this Agreement and any applicable laws.

5. Registry Operator shall provide additional Registry Functions Activity Report(s) for each SRP jurisdiction according to the requirements of Specification 3 in a manner agreed

with ICANN. If an SRP instance did not offer a particular Registry Service(s) (e.g. DNS) in a reporting period, the fields related to the Registry Service(s) not offered in the additional Registry Functions Activity Report(s) must contain the string "SRP".

6. Within ten (10) calendar days of any ICANN request Registry Operator shall provide additional Registration Data file(s) for each SRP instance according to the requirements of section 3.1 of Specification 4 with the data objects for which the SRP operator is allowed to process transactions in the SRS.

7. The SRP will pass EPP commands and responses between the registrar and primary RSP system, which will remain the authoritative source of registry data.

8. The SRP will comply with the standards and service level requirements described in the Agreement for the Registry Service for which there is a proxy.

Yes

Additional Information

This service request involves a Supplemental Registration Proxy, which may require that you submit a Material Subcontracting Arrangement (MSA) request to ICANN following approval of the RSEP request. Please provide complete responses to the questions below for ICANN to assess this request.

1. Do you propose to work with vendors/contractors to provide this Registry Service?
Yes

2. Please fill in the name of any proposed vendors or contractors next to the appropriate Critical Function (as identified in Specification 10, Section 6, and applicable to this RSEP request). If you do not have any proposed vendors or contractors, type N/A.

(a) DNS
N/A

(b) DNSSEC
N/A

(c) EPP
Beijing Teleinfo Network Technology Co., Ltd.

(d) RDDS
Beijing Teleinfo Network Technology Co., Ltd.

3. Describe the service(s) the proposed vendors or contractors would provide if they differ from your current Registry Service Provider of that Critical Function. If you do not have any changes from your current Registry Service Provider, type N/A.

1. EPP service.

An EPP gateway may be used by ICANN-accredited registrars located in a given region subject to certain validation requirements per applicable law. The gateway will act as a proxy to the "primary" EPP system located on Donuts' shared registry system ("SRS") located in the US. The gateway will be responsible for implementing local regulations and verification of registrant contact information. In all other respects it functions as a proxy, passing EPP commands and responses between the registrar and primary registry system, which would remain the authoritative source of registry data.

2. Supplemental Registration Information Lookup Service.

A port-43 supplementary registration information lookup service may be established. This service may act as a caching proxy to the WHOIS service. This supplemental information lookup service would be queried by local entities. End users performing WHOIS queries would not query this service and whois.donuts.co will continue to point to the primary WHOIS service. The format of responses produced by the supplemental registration information lookup service will be identical to those produced by the WHOIS service and comply with ICANN specifications.

Competition Questions

1. Do you believe the proposed service would have any positive or negative effects on competition? If so, please explain.
Bringing more TLDs into the gTLD marketplace in different geographic locations has a positive impact on competition.

2. How would you define the markets in which the proposed service would compete?
At this time, the proxy service is contemplated to be rolled out in China.

3. What companies/entities provide services or products that are similar in substance or effect to the proposed service?
Other service providers, including KNET, offer the proxy model in China.

4. In view of your status as a Registry Operator, would the introduction of the proposed service potentially impair the ability of other companies/entities that provide similar products or services to compete?
No.

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.
Beijing Teleinfo Network Technology Co., Ltd. Tele-Info will operate the proxy service in China between local registrars and the Donuts SRS. Tele-Info will also provide local data escrow services for Chinese registrants only. Our contractually required global data escrow will not be affected and will continue with Iron Mountain.

6. Have you communicated with any of the entities whose products or services might be affected by the introduction of the proposed service? If so, please describe the communications.
Yes, we have communicated with Chinese registrars regarding this service.

7. Do you have any documents that address the possible effects on competition of this proposed service? If so, please submit them with your application. ICANN will keep the documents confidential.

Affected TLDs

Current Registry Operator	Top Level Domain	Registry Agreement Date
Donuts (Parent)	academy	2013-11-07
Donuts (Parent)	accountants	2014-03-20
Donuts (Parent)	actor	2013-12-12
Donuts (Parent)	agency	2013-11-14
Donuts (Parent)	airforce	2014-03-06
Donuts (Parent)	apartments	2014-12-11
Donuts (Parent)	army	2014-03-06
Donuts (Parent)	associates	2014-03-06
Donuts (Parent)	attorney	2014-03-20
Donuts (Parent)	auction	2014-03-20
Donuts (Parent)	band	2014-06-12
Donuts (Parent)	bargains	2013-11-14
Donuts (Parent)	bike	2013-08-27
Donuts (Parent)	bingo	2014-12-04
Donuts (Parent)	boutique	2013-11-14
Donuts (Parent)	builders	2013-11-07
Donuts (Parent)	business	2013-11-07
Donuts (Parent)	cab	2013-10-24

Donuts (Parent)	cafe	2015-02-11
Donuts (Parent)	camera	2013-08-27
Donuts (Parent)	camp	2013-11-07
Donuts (Parent)	capital	2014-03-06
Donuts (Parent)	cards	2013-12-05
Donuts (Parent)	care	2014-03-06
Donuts (Parent)	careers	2013-10-02
Donuts (Parent)	cash	2014-03-06
Donuts (Parent)	casino	2014-12-18
Donuts (Parent)	catering	2013-12-05
Donuts (Parent)	center	2013-11-07
Donuts (Parent)	charity	2018-04-11
Donuts (Parent)	chat	2014-12-04
Donuts (Parent)	cheap	2013-11-14
Donuts (Parent)	church	2014-02-06
Donuts (Parent)	city	2014-05-29
Donuts (Parent)	claims	2014-03-20
Donuts (Parent)	cleaning	2013-12-05
Donuts (Parent)	clinic	2014-03-20
Donuts (Parent)	clothing	2013-08-27
Donuts (Parent)	coach	2014-10-09
Donuts (Parent)	codes	2013-10-31
Donuts (Parent)	coffee	2013-10-17
Donuts (Parent)	community	2013-12-05
Donuts (Parent)	company	2013-11-07
Donuts (Parent)	computer	2013-10-24
Donuts (Parent)	condos	2013-12-05
Donuts (Parent)	construction	2013-09-16
Donuts (Parent)	consulting	2013-12-05

Donuts (Parent)	contact	2015-01-08
Donuts (Parent)	contractors	2013-09-10
Donuts (Parent)	cool	2013-11-14
Donuts (Parent)	coupons	2015-03-26
Donuts (Parent)	credit	2014-03-20
Donuts (Parent)	creditcard	2014-03-20
Donuts (Parent)	cruises	2013-12-05
Donuts (Parent)	dance	2013-10-24
Donuts (Parent)	dating	2013-12-05
Donuts (Parent)	deals	2014-05-22
Donuts (Parent)	degree	2014-03-06
Donuts (Parent)	delivery	2014-09-11
Donuts (Parent)	democrat	2013-10-24
Donuts (Parent)	dental	2014-03-20
Donuts (Parent)	dentist	2014-03-20
Donuts (Parent)	diamonds	2013-09-22
Donuts (Parent)	digital	2014-03-06
Donuts (Parent)	direct	2014-04-10
Donuts (Parent)	directory	2013-09-20
Donuts (Parent)	discount	2014-03-06
Donuts (Parent)	doctor	2016-06-02
Donuts (Parent)	dog	2014-12-04
Donuts (Parent)	domains	2013-10-17
Donuts (Parent)	education	2013-11-07
Donuts (Parent)	email	2013-10-31
Donuts (Parent)	energy	2014-09-11
Donuts (Parent)	engineer	2014-03-06
Donuts (Parent)	engineering	2014-03-06
Donuts (Parent)	enterprises	2013-09-20

Donuts (Parent)	equipment	2013-08-27
Donuts (Parent)	estate	2013-08-27
Donuts (Parent)	events	2013-12-05
Donuts (Parent)	exchange	2014-03-06
Donuts (Parent)	expert	2013-11-21
Donuts (Parent)	exposed	2013-12-05
Donuts (Parent)	express	2015-02-11
Donuts (Parent)	fail	2014-03-06
Donuts (Parent)	family	2015-04-02
Donuts (Parent)	fan	2014-03-06
Donuts (Parent)	farm	2013-11-07
Donuts (Parent)	finance	2014-03-20
Donuts (Parent)	financial	2014-03-06
Donuts (Parent)	fish	2013-12-12
Donuts (Parent)	fitness	2014-03-06
Donuts (Parent)	flights	2013-12-05
Donuts (Parent)	florist	2013-11-07
Donuts (Parent)	football	2014-12-18
Donuts (Parent)	forsale	2014-05-22
Donuts (Parent)	foundation	2013-12-05
Donuts (Parent)	fund	2014-03-20
Donuts (Parent)	furniture	2014-03-20
Donuts (Parent)	futbol	2013-09-20
Donuts (Parent)	fyi	2015-04-02
Donuts (Parent)	gallery	2013-09-13
Donuts (Parent)	games	2015-05-28
Donuts (Parent)	gifts	2014-07-03
Donuts (Parent)	gives	2014-03-06
Donuts (Parent)	glass	2013-11-07

Donuts (Parent)	gmbh	2016-01-29
Donuts (Parent)	gold	2015-01-22
Donuts (Parent)	golf	2014-12-18
Donuts (Parent)	graphics	2013-09-13
Donuts (Parent)	gratis	2014-03-20
Donuts (Parent)	gripe	2014-03-06
Donuts (Parent)	group	2014-08-15
Donuts (Parent)	guide	2013-09-13
Donuts (Parent)	guru	2013-08-27
Donuts (Parent)	haus	2013-12-05
Donuts (Parent)	healthcare	2014-06-12
Donuts (Parent)	hockey	2015-03-19
Donuts (Parent)	holdings	2013-08-27
Donuts (Parent)	holiday	2013-11-07
Donuts (Parent)	hospital	2016-10-20
Donuts (Parent)	house	2013-11-07
Donuts (Parent)	immo	2014-07-10
Donuts (Parent)	immobilien	2013-11-07
Donuts (Parent)	industries	2013-12-05
Donuts (Parent)	institute	2013-11-07
Donuts (Parent)	insure	2014-03-20
Donuts (Parent)	international	2013-11-07
Donuts (Parent)	investments	2014-03-20
Donuts (Parent)	irish	2014-08-07
Donuts (Parent)	jetzt	2014-01-09
Donuts (Parent)	jewelry	2015-03-05
Donuts (Parent)	kaufen	2013-11-07
Donuts (Parent)	kitchen	2013-09-20
Donuts (Parent)	land	2013-09-10

Donuts (Parent)	lawyer	2014-03-20
Donuts (Parent)	lease	2014-03-06
Donuts (Parent)	legal	2014-10-16
Donuts (Parent)	life	2014-02-06
Donuts (Parent)	lighting	2013-08-27
Donuts (Parent)	limited	2014-03-06
Donuts (Parent)	limo	2013-10-17
Donuts (Parent)	live	2014-12-04
Donuts (Parent)	loans	2014-03-20
Donuts (Parent)	ltd	2014-09-25
Donuts (Parent)	maison	2013-12-05
Donuts (Parent)	management	2013-11-07
Donuts (Parent)	market	2014-03-06
Donuts (Parent)	marketing	2013-11-07
Donuts (Parent)	mba	2015-04-02
Donuts (Parent)	media	2014-03-06
Donuts (Parent)	memorial	2014-10-16
Donuts (Parent)	moda	2013-11-07
Donuts (Parent)	money	2014-10-16
Donuts (Parent)	mortgage	2014-03-20
Donuts (Parent)	movie	2015-02-05
Donuts (Parent)	navy	2014-03-06
Donuts (Parent)	network	2013-11-14
Donuts (Parent)	news	2014-12-18
Donuts (Parent)	ninja	2013-11-07
Donuts (Parent)	partners	2013-12-05
Donuts (Parent)	parts	2013-12-05
Donuts (Parent)	photography	2013-09-20
Donuts (Parent)	photos	2013-10-17

Donuts (Parent)	pictures	2014-03-06
Donuts (Parent)	pizza	2014-06-26
Donuts (Parent)	place	2014-04-24
Donuts (Parent)	plumbing	2013-09-10
Donuts (Parent)	plus	2015-02-05
Donuts (Parent)	productions	2013-12-05
Donuts (Parent)	properties	2013-12-05
Donuts (Parent)	pub	2013-12-12
Donuts (Parent)	recipes	2013-10-17
Donuts (Parent)	rehab	2014-03-06
Donuts (Parent)	reise	2014-03-13
Donuts (Parent)	reisen	2014-03-06
Donuts (Parent)	rentals	2013-12-05
Donuts (Parent)	repair	2013-11-07
Donuts (Parent)	report	2013-12-05
Donuts (Parent)	republican	2014-03-20
Donuts (Parent)	restaurant	2014-07-03
Donuts (Parent)	reviews	2013-09-13
Donuts (Parent)	rip	2014-07-10
Donuts (Parent)	rocks	2013-11-14
Donuts (Parent)	run	2015-03-19
Donuts (Parent)	sale	2014-10-16
Donuts (Parent)	salon	2014-12-11
Donuts (Parent)	sarl	2014-07-03
Donuts (Parent)	school	2014-12-18
Donuts (Parent)	schule	2014-03-06
Donuts (Parent)	services	2014-02-27
Donuts (Parent)	shoes	2013-10-02
Donuts (Parent)	shopping	2016-03-31

Donuts (Parent)	show	2015-03-05
Donuts (Parent)	singles	2013-08-27
Donuts (Parent)	soccer	2015-03-26
Donuts (Parent)	social	2013-11-07
Donuts (Parent)	software	2014-03-20
Donuts (Parent)	solar	2013-11-07
Donuts (Parent)	solutions	2013-11-07
Donuts (Parent)	studio	2015-02-11
Donuts (Parent)	style	2014-12-04
Donuts (Parent)	supplies	2013-12-19
Donuts (Parent)	supply	2013-12-19
Donuts (Parent)	support	2013-10-24
Donuts (Parent)	surgery	2014-03-20
Donuts (Parent)	systems	2013-11-07
Donuts (Parent)	tax	2014-03-20
Donuts (Parent)	taxi	2015-03-19
Donuts (Parent)	team	2015-03-05
Donuts (Parent)	technology	2013-09-13
Donuts (Parent)	tennis	2014-12-04
Donuts (Parent)	theater	2015-03-19
Donuts (Parent)	tienda	2013-11-14
Donuts (Parent)	tips	2013-09-20
Donuts (Parent)	tires	2014-11-07
Donuts (Parent)	today	2013-09-20
Donuts (Parent)	tools	2013-11-21
Donuts (Parent)	tours	2015-01-22
Donuts (Parent)	town	2014-03-06
Donuts (Parent)	toys	2014-03-06
Donuts (Parent)	training	2013-11-07

Donuts (Parent)	travel	
Donuts (Parent)	university	2014-03-06
Donuts (Parent)	vacations	2013-12-05
Donuts (Parent)	ventures	2013-08-27
Donuts (Parent)	vet	2014-03-06
Donuts (Parent)	viajes	2013-10-17
Donuts (Parent)	video	2014-10-16
Donuts (Parent)	villas	2013-12-05
Donuts (Parent)	vin	2015-06-18
Donuts (Parent)	vision	2013-12-05
Donuts (Parent)	voyage	2013-08-27
Donuts (Parent)	watch	2013-11-14
Donuts (Parent)	wine	2015-06-18
Donuts (Parent)	works	2013-11-14
Donuts (Parent)	world	2014-06-12
Donuts (Parent)	wtf	2014-03-06
Donuts (Parent)	xn--czrs0t	2013-12-19
Donuts (Parent)	xn--fjq720a	2014-05-22
Donuts (Parent)	xn--unup4y	2013-07-14
Donuts (Parent)	xn--vhquv	2013-08-27
Donuts (Parent)	zone	2013-11-14