

Registration Data Directory Service (RDDS)

Roadmap of RDDS Related Activities



February 2020

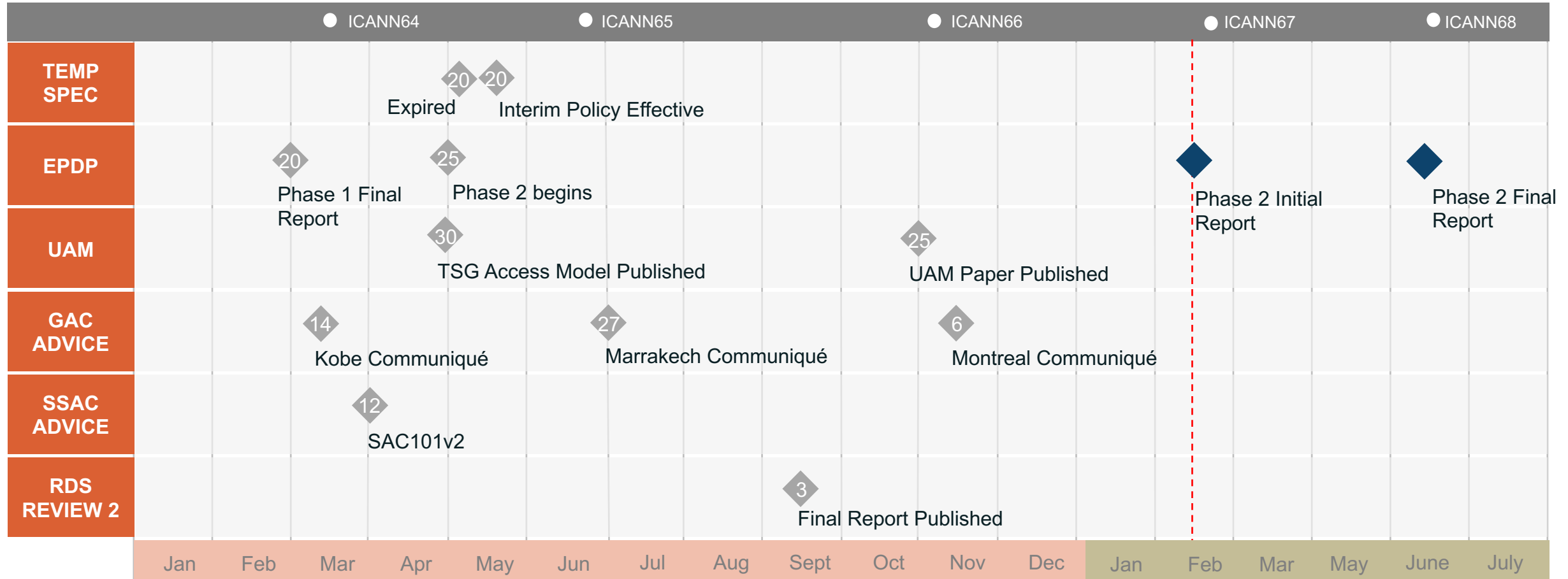
About This Document

This document provides a roadmap for various RDDS-related activities. ICANN org will publish an update twice a year on provide an update on whois.icann.org.

The roadmap and updates are provided to inform discussions and to provide visibility into RDDS-related work by the community and ICANN org.

The roadmap and updates are provided as per the Board-approved [Action Plan](#) for the WHOIS Policy Review Team Final Report.

Activities in Advance of or in Board Consideration



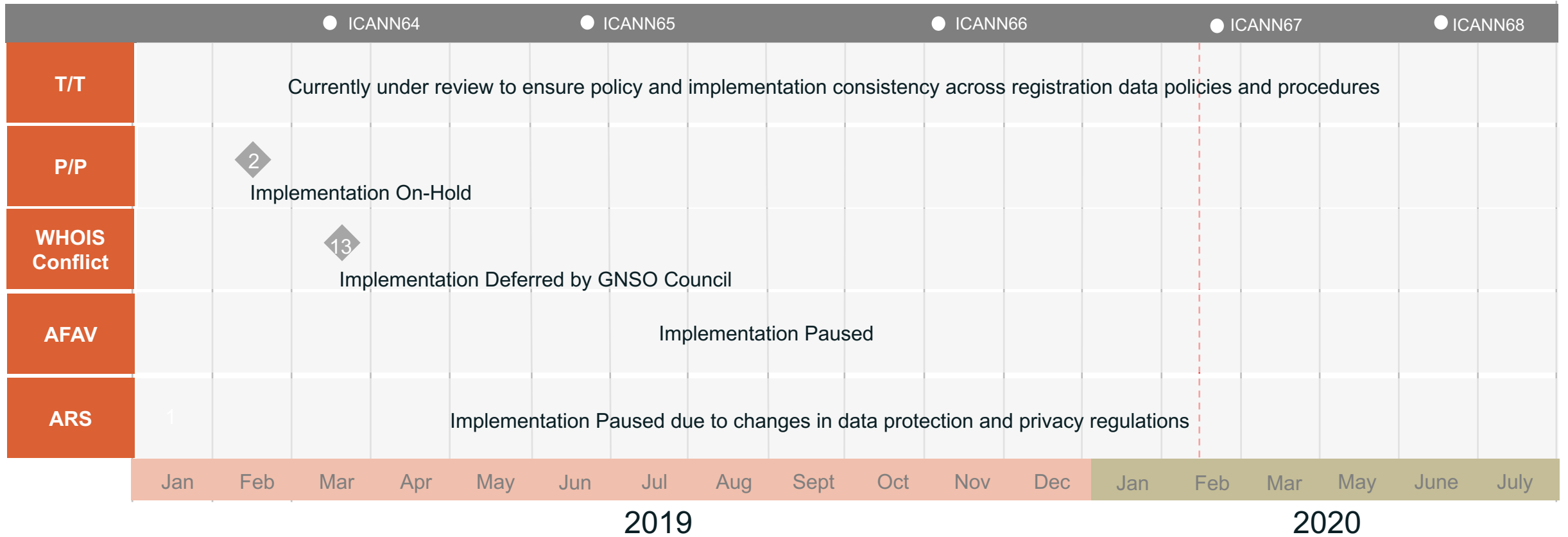
2019

2020

Temp Spec: Temporary Specification for gTLD Registration Data
EPDP: Temp Spec Expedited Policy Development Process
UAM: Unified Access Model
GAC Advice: Governmental Advisory Committee Advice

SSAC Advice: Security Stability Advisory Committee Advice
RDS Review 2: Registration Directory Service Review (RDS-WHOIS2)
RDS PDP: gTLD Registration Directory Services Policy Development Process
TSG: Technical Study Group on Access to Non-Public Registration Data

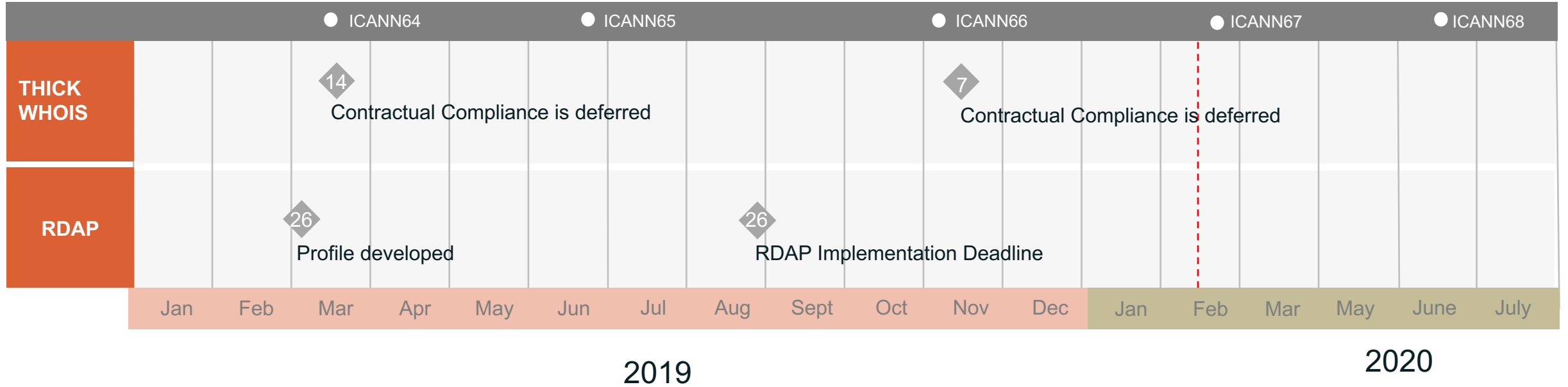
Community and Org Implementation Following Board Action



T/T: Translation and Transliteration of Contact Information
P/P: Privacy/Proxy Service Provider Accreditation

WHOIS Conflict: ICANN Procedures for Handling WHOIS Conflicts with Privacy Laws
AFAV: Across-Field Address Validation
ARS: gTLD Registration Data Accuracy Reporting System

Contracted Parties Implementation



Thick WHOIS: Transition from Thin to Thick WHOIS Policy for .COM, .NET, .JOBS

RDAP: Registration Data Access Protocol

Appendix

Background Overview

Temporary Specification for gTLD Registration Data

- The Temporary Specification for gTLD Registration Data (Temp Spec) established temporary requirements that allowed ICANN and gTLD registry operators and registrars to continue to comply with existing ICANN contractual requirements and community-developed policies in light of the GDPR.
- The Temp Spec was adopted by the ICANN Board on 17 May 2018, became effective on 25 May 2018 and expired on 20 May 2019.
- Pursuant to the requirements for the establishment of Temporary Policies and Temporary Specification or Policies as defined in the Registry and Registrar Accreditation Agreements, the ICANN Board reaffirmed the temporary adoption of the Temp Spec every 90 days for a total period not to exceed one year in order to maintain the Temp Spec in effect until such time it become a Consensus Policy.
- The Interim Policy became effective on 20 May 2019 and requires gTLD registry operators and ICANN-accredited registrars to continue implementing measures consistent with the Temporary Specification for gTLD Registration Data on an interim basis, pending the implementation of the Registration Data Policy.

Relevant Dates

- 17 May 2018 – [Adopted](#) by the ICANN Board
- 25 May 2018 – Became effective
- 21 August 2018 – [Reaffirmed](#) by the ICANN Board
- 19 February 2019 – [Reaffirmed](#) by the ICANN Board
- 17 May 2019 Interim Registration Data Policy for gTLDs became effective
- 20 May 2019 – Temp Spec expired

Information on the Temp Spec is available at <https://www.icann.org/resources/pages/gtld-registration-data-specs-en>.

Expedited PDP on the Temporary Specification for gTLD Registration Data

- On 19 July 2018, the GNSO approved the initiation of an expedited PDP on the Temporary Specification.
 - The scope of the EPDP Team’s efforts includes confirming, or not, the Temporary Specification. Additionally, the scope includes discussion of a standardized access model to nonpublic registration data; however, the discussion of a standardized access model will occur only after the EPDP Team has comprehensively answered a series of “gating questions”, which have been specified in the EPDP Team’s Charter.
- On 20 February 2019, the EPDP Team submitted to the GNSO Council its [Final Report](#) and the GNSO Council adopted all 29 recommendations in the EPDP Final Report on 4 March 2019.
- The GNSO Council also approved for the EPDP Team to begin its work on Phase 2 of the charter and on 2 May 2019, the EPDP Phase 2 team began their work on a System for Standardized Access/Disclosure (SSAD) to non-public gTLD registration data, deferred items from the EPDP Team’s Phase 1 deliberations, and issues in the Annex to the Temporary Specification (“Important Issues for Further Community Action”).
- The Summary and Analysis report for the [public comment](#) was published on 23 April 2019 and The Board [adopted](#) the recommendations, with some exceptions, on 17 May 2019.

Relevant Dates

- 19 July 2018 – EPDP [Initiation](#) and [Charter](#) Adopted by GNSO
- 21 November 2018 – Initial Report Published
- 20 February 2019 – Final Report Published
- 4 March 2019 – Final Report Adopted by GNSO
- 15 March 2019 – Board adopts 27 recommendations
- 2 May 2019 – EPDP Phase 2 Commenced
- 7 February 2020 – Phase 2 Initial Report Published

Information on the expedited PDP is available at <https://gns0.icann.org/en/group-activities/active/gtld-registration-data-epdp>.

Framework for a Possible Unified Access Model

- ICANN received guidance from the Data Protection Authorities (DPA); which was endorsed by the European Data Protection Board (EDPB) that “WP29 expects ICANN to develop and implement a WHOIS model which will enable legitimate uses by relevant stakeholders, such as law enforcement, of personal data concerning registrants in compliance with the GDPR, without leading to an unlimited publication of those data.”
- On 18 June 2018, ICANN org published [Framework Elements of a Unified Access Model for Access to gTLD Registration Data](#). The framework lays out a series of central questions to help frame discussions about how such a model may work.
- On 20 August 2018, ICANN org published a [Draft Framework for a Possible Unified Access Model for Continued Access to Full WHOIS Data – For Discussion](#) for community input and to continue dialogue with the EDPB to seek legal clarity for such access mechanism. Lowering the legal risk for data controllers/contracted parties is necessary to develop a workable unified access model.
- On 14 December 2018, [the Technical Study Group](#) on Access to Non-Public Registration Data began its work on developing technical solutions for providing access to non-public data.
- On 20 February 2019, the EPDP Team on the Temporary Specification for gTLD Registration Data finalized and submitted to the GNSO Council its Final Report. The EPDP Team started its work on Phase 2 of the charter, which includes a System for Standardized Access to Non-Public Registration Data in May 2019.
- On 2 March 2019, [the Technical Study Group on Access to Non-Public Registration data](#) published [TSG01: Technical Model for Access to Non-Public Registration Data](#).
- On 25 October 2019, ICANN org sent to the [European Data Protection Board \(EDPB\)](#) a paper, "[Exploring a Unified Access Model for gTLD Registration Data](#)," which outlines a proposed Unified Access Model (UAM) based on the [Technical Study Group's technical model](#).
- On 12 December 2019, ICANN org received [a non-binding letter](#) from the Belgian Data Protection Authority in response to the Exploring a Unified Access Model paper

Information ICANN’s work relating to a framework for a possible unified access model is available at <https://www.icann.org/dataprotectionprivacy>.

GAC Communiqué

Kobe

- On 14 March 2019, the GAC provided advice to the ICANN Board in its [Kobe Communiqué](#) concerning the Data Protection Regulations and Potential Future New gTLD Rounds.
- On, 15 May 2019, the ICANN Board adopted the scorecard titled “[GAC Advice – Kobe Communiqué: Board Action \(15 May 2019\)](#)” in response to the items of GAC advice in the Kobe Communiqué.

Marrakech

- On 27 June 2019, the GAC provided advice to the ICANN Board in its [Marrakech Communiqué](#) concerning the New gTLDs Subsequent Procedures, .AMAZON 2-letter codes, and IGOs.
- On 08 September 2019, the ICANN Board adopted the scorecard titled “[GAC Advice – Marrakech Communiqué: Board Action \(8 September 2019\)](#)” in response to items of GAC advice in the Marrakech Communiqué.

Montréal

- On 06 November 2019, the GAC provided advice to the ICANN Board in its [Montréal Communiqué](#) concerning Domain Name Registration Directory Service and Data Protection, .AMAZON, and the CCT Review and Subsequent Procedures of the New gTLDs.
- On 26 January 2020, the ICANN Board adopted the scorecard titled “[GAC Advice – Montréal Communiqué: Actions and Updates \(26 January 2020\)](#)” in response to items of GAC advice in the Montreal Communiqué.

- On 14 June 2018, the SSAC issued [SAC101](#): Advisory Regarding Access to Domain Name Registration Data. The advice is being considered by the ICANN Board.
- On 12 December 2018, SSAC published [SAC101v2](#) to replace SAC101 to reflect evolving circumstances in relation to the Temporary Specification for gTLD Registration Data and the ongoing Expedited Policy Development Process (EPDP). Version 1 of SAC101 has been retired and version 2 is authoritative.
- On 6 February 2019 ICANN org shared their statements of understandings for the recommendations provided in the SAC101v2 with SSAC, concluding Phase 2 of the Board Advice Registrar Phases.

Information on SAC101v2 is available at: <https://www.icann.org/groups/ssac/documents>

Registration Directory Service (RDS)/WHOIS 2 Review

- Per the ICANN Bylaws, the Board shall cause a periodic review (no less frequently than every five years) to assess the effectiveness of the then-current gTLD RDS and whether its implementation meets the legitimate needs of law enforcement, promoting consumer trust and safeguarding registrant data.
- The first RDS Review delivered its [Final Report](#) and Recommendations to the ICANN Board in May 2012.
- The second RDS Review Team began its work in June 2017 and published its [Draft Report](#) on 4 September 2018.
- The RDS Review Team published its [Final Report](#) on 03 September 2019.

Information on the RDS/WHOIS 2 review is available at <https://www.icann.org/resources/reviews/specific-reviews/whois>.

Translation and Transliteration of Contact Information

- On 13 June 2013, the GNSO initiated a PDP on the Translation and Transliteration of Contact Information. The PDP Working Group delivered its [final report](#) on 12 June 2015.
- The Board [adopted](#) the PDP Working Group Recommendations on 28 September 2015.
- Since commencing implementation work in July 2016, the IRT and GDD have produced a [preliminary policy document](#).
- Due to complexities emerging from the Implementation Review Team's (IRT's) discussions and work in other areas related to Registration Data Directory Services (RDDS)—in particular the [Temporary Specification for gTLD Registration Data Expedited Policy Development Process](#) (EPDP)—the implementation's projected announcement and effective dates are to be determined.
- Given the T/T implementation's relationship to the evolution of registration data policies and procedures, the T/T Recommendations are being assessed in accordance to Recommendation 27 of the Phase 1 Team of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process(EPDP) to ensure policy and implementation consistency across the many work streams in this area.

Information on Translation and Transliteration of Contact Information is available at <https://gns0.icann.org/en/group-activities/active/transliteration-contact>.

Privacy/Proxy Service Provider Accreditation

- The 2013 Registrar Accreditation Agreement (RAA) contemplates the development and implementation of a privacy and proxy service accreditation by ICANN.
- The Board [adopted](#) the GNSO Council-approved Privacy and Proxy Service Provider Accreditation policy recommendations on 9 August 2016.
- On 18 October 2016, an Implementation Review Team (IRT) was convened to pursue an expedited timeline in light of the upcoming expiration of the 2013 RAA's interim specification on privacy and proxy registrations (in June 2019).
- In light of the many issues surrounding the European Union General Data Protection Regulation (GDPR) and ongoing efforts of the Expedited Policy Development Process on the Temporary Specification for gTLD Registration Data (EPDP), and as there are important and overlapping issues to Privacy & Proxy Service Accreditation being analyzed within the context of the EPDP, ICANN org placed the Privacy & Proxy Services Accreditation Issues (PPSAI) implementation work on hold, pending the implementation of the forthcoming EPDP Phase 2 recommendations.
 - EPDP Phase 1 policy development and the current implementation of EPDP Phase 1 recommendations are critical to the implementation of a comprehensive policy for the treatment of Privacy and Proxy (PP) services. These include defining the relevant set of data for contracted parties to collect, transfer, retain, and escrow, as well as creating necessary data protection arrangements between and among ICANN org, the contracted parties, and other ecosystem partners (data escrow agents, dispute, resolution service providers, etc.).
 - The EPDP Phase 2 Team, per its Charter, is considering whether to recommend a policy governing disclosure of redacted data elements to authorized users. Org believes that it is necessary to establish a baseline approach for data disclosure through the EPDP Phase 2 Team's efforts, and then assess, in consultation with the PP IRT, whether any modifications are necessary to address the specifics of PP registrations.
- The draft Accreditation Agreement and related materials is presumed to be published for Public Comment once the EPDP Team's implementation work has been completed.

Information about Privacy/Proxy Service Provider Accreditation is available at <https://gns0.icann.org/en/group-activities/active/ppsa>.

ICANN Procedures for Handling WHOIS Conflicts with Privacy Laws

- In November 2005, the GNSO [concluded a policy development process](#) (PDP) establishing a procedure to allow gTLD registry operators and ICANN-accredited registrars to demonstrate when they are prevented by local laws from fully complying with the provisions of their respective ICANN contracts regarding personal data in WHOIS.
- The ICANN Board [adopted](#) the recommendations in May 2006 and directed ICANN org to develop such a procedure. A contracted party that credibly demonstrates that it is legally prevented from complying with its WHOIS obligations can invoke the procedure.
- ICANN launched a review of the procedure in May 2014. In May 2016, the Implementation Advisory Group submitted its [final report](#) to the GNSO Council and recommended that the WHOIS Procedure be revised to incorporate an "Alternative Trigger," in addition to the existing trigger to invoke the procedure. In February 2017, the GNSO Council passed a [resolution](#) adopting IAG's recommendation and confirmed that the modification to the WHOIS Procedure does not change the intent of the original GNSO policy recommendations.
- The revised procedures, including the alternative trigger, went into effect on 18 April 2017.
- On 22 February 2018, the GNSO Council adopted a Charter for an Implementation Advisory Group, which is tasked with providing the GNSO Council with recommendations on how to address the comments and input that have been received in response to the public comment forum on the Revised ICANN Procedure for Handling WHOIS Conflicts with Privacy Law
- 24 January 2019 - Per the Council's recent discussions, noting the current workload and activities that may impact the IAG's work, staff is refraining from circulating the call for volunteers to the GNSO Stakeholder Groups until the EPDP Team completes certain milestones (e.g., delivery of its Initial Report).
- 13 March 2019 – During its meeting on 13 March 2019, the GNSO Council voted to defer the call for volunteers for 12 months, pending the outcome of EPDP Phase 1 implementation and Phase 2 work.

The ICANN Procedures for Handling WHOIS Conflicts with Privacy Laws is available at <https://www.icann.org/resources/pages/whois-privacy-conflicts-procedure-2008-01-17-en>.

Across-Field Address Validation

- The 2013 Registrar Accreditation Agreement (“RAA”) requires ICANN org to review requirements under the WHOIS Accuracy Program Specification in consultation with the Registrar WHOIS Validation Working Group to identify a set of tools that will enable accredited registrars to complete validation actions required in the Agreement.
- In 2014 and 2017, the WHOIS Validation Working Group created a Request for Information (RFI) to determine if a third party could have or could produce any solutions deemed to be ‘technically and commercially feasible’ based on the current RAA language.
- In February 2018, ICANN completed the (RFI) and nine (9) responses were received. These responses contained updated information regarding current services available to complete across field address validation and verification. A summary of these nine responses are located on the [Across Field Address Validation WIKI page](#) and have been provided to the Registrar Working Group.
- In December 2018, concerns of the potential impact of GDPR were raised regarding the implementation of AFAV. ICANN org reviewed this project in light of these concerns and determined that the GDPR does not negate the RAA requirements for data accuracy validation, and the AFAV requirement is in line with the accuracy principle of the GDPR.
- As of late 2019, despite significant efforts by ICANN and registrars, there has not been mutual agreement on identification of a commercially and technically feasible solution for the implementation of AFAV.
- In late 2019, ICANN formally paused efforts to implement AFAV for a period of two years. Following the pause, ICANN will reassess the market for commercial solutions that may have advanced since the last assessment in late 2017.

Information on Across-Field Address Validation is available at <https://community.icann.org/display/AFAV>.

WHOIS Accuracy Reporting System

- To implement the first WHOIS Review Team's recommendations and address GAC's concerns on WHOIS accuracy, ICANN org initiated the development of the WHOIS Accuracy Reporting System (ARS)—a framework for conducting repeatable assessments of WHOIS accuracy, publicly report the findings, and provide data to the ICANN Contractual Compliance team to follow up on potentially inaccurate records with registrars.
- The most recent WHOIS Accuracy Report was published in June of 2018 (<https://www.icann.org/news/announcement-2018-06-15-en>)
- Based on the lack of predictable publicly available registration data and given the community work from the GNSO's Expedited Policy Development Process (EPDP), the ARS process remains paused to consider the impact of the EPDP efforts and assess ICANN org's ability to effectively administer ARS.
- The completion of implementation work from EPDP Phase 1 will inform the operationalization of policies and services such as WHOIS ARS that was paused in FY19 due to changes in data protection and privacy regulations.

Information on the WHOIS ARS is available at <https://whois.icann.org/en/whoisars>.

Thick WHOIS

- On 14 March 2012, the GNSO [initiated](#) a PDP on the transition to thick WHOIS for all gTLDs.
- On 21 October 2013, the PDP Working Group published the [final report](#).
- On 7 February 2014, the ICANN Board [adopted](#) the policy recommendations.
- On 13 May 2018, ICANN Board passed a [Resolution](#) to defer [THICK WHOIS](#) contractual compliance enforcement for six months.
- On 14 March 2019, ICANN Board passed a [Resolution](#) to defer contractual compliance enforcement.
- On 7 November 2019, ICANN Board passed a [Resolution](#) to defer [THICK WHOIS](#) contractual compliance enforcement until all of the following have occurred:
 - the gTLD Registration Data Policy Implementation Review Team (IRT) completes its review and establishes an implementation timeline estimate of the EPDP Team's [recommendations](#).
 - ICANN org and the IRT provide the GNSO Council with information on the impacts of the EPDP Team's recommendations on existing policies and procedures (including the Thick WHOIS Transition policy),
 - the GNSO Council makes a determination on whether to take action on updates to relevant policies and procedures impacting the Thick WHOIS Transition Policy.

Information on Thick WHOIS is available at <https://www.icann.org/resources/pages/thick-whois-transition-policy-2017-02-01-en>.

Registration Data Access Protocol (RDAP)

- RDAP was developed by the technical community in the [Internet Engineering Task Force](#) (IETF). RDAP is a protocol that delivers registration data like WHOIS, but its implementation will change and standardize data access and query response formats.
- On 17 May 2018, the ICANN Board passed a [resolution](#) adopting a [Temporary Specification for gTLD Registration Data](#). As part of that Temporary Specification, gTLD registries and registrars are required to implement a Registration Data Access Protocol (RDAP) service within 135 days of ICANN org requesting implementation. The Temporary Specification also called for a gTLD RDAP Profile, SLA, and registry Reporting requirements to be developed prior to RDAP deployment.
- On 26 February 2019, the Registries and Registrars Stakeholder Groups [endorsed](#) the RDAP profile developed by the RDAP Profile Working Group.
- On 27 February 2019, ICANN sent the registries and registrars a [notice](#) requesting implementation of RDAP according to the gTLD-RDAP profile(s). Registries and registrars are required to implement an RDAP service by 26 August 2019.
- 26 August 2019 is the deadline for the Registry and Registrar Stakeholder Groups to implement RDAP.
- ICANN initiated ongoing negotiations to amend the RA & RAA to include more robust requirements for RDAP including a contractually binding profile, reporting requirements and service level agreements (SLAs).

Information on RDAP is available at <https://www.icann.org/rdap>.