
ICANN
COMMUNITY FORUM
64
KOBE
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Technical Study Group on Access to Non-Public Registration Data

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ICANN64 (Kobe)
10 March 2019

Agenda

- What is the Technical Study Group?
- Assumptions
- Draft Technical Model overview
- Draft design schematic
- Timeline and plans
- Questions

What Is The Technical Study Group (TSG-RD)?

Home Page: https://www.icann.org/tsg

TSG Charter: Includes Purpose, Assumptions, Key Questions and Considerations

Motivation and Background:

1. Balance data protection requirements with legitimate interests of third parties to access non-public gTLD registration data
2. Intent to reduce potential liability faced by gTLD registries and registrars when providing such access

TSG Purpose:

Explore technical solutions for authenticating, authorizing, and providing access to non-public registration data for third parties with legitimate interests, built on the Registration Data Access Protocol (RDAP)

TSG Remit:

No decisions or recommendations on policy questions (e.g., who gets access, which data fields, under what conditions should access be given, what is a legitimate interest, etc.)

Who are the TSG-RD?

Role	Name	Affiliation/Employer
Sponsor	**Göran Marby**	**ICANN**
Coordinator	**Ram Mohan**	**Afilias**
Team Members	**Benedict Addis** **Gavin Brown** **Jorge Cano** **Steve Crocker** **Scott Hollenbeck** **Jody Kolker** **Murray Kucherawy** **Andy Newton** **Tomofumi Okubo**	**Registrar of Last Resort** **CentralNic** **NIC Mexico** **Shinkuro** **Verisign** **GoDaddy** **Facebook** **ARIN** **DigiCert**
ICANN Org Support Team	**Eleeza Agopian** **Francisco Arias** **John Crain** **Daniel Halloran** **Gustavo Lozano** **Diana Middleton** **Erika Randall** **Yvette Guigneaux**	**ICANN**

TSG Process

ENGAGEMENT MODEL
Consensus driven, iterative, technical focus

1. Define **key questions** and considerations
2. Identify main **assumptions**
3. Identify **use cases** & user journey
4. Define system **requirements** (functional, operational, management)
5. Create functional requirements and mapping
6. Build actor models
7. Determine implementation considerations
8. Arrive at proposed **solution** (the Technical Model)
9. Notify **considerations** for other entities and organizations
10. Invite community feedback
11. Review and revise Technical Model

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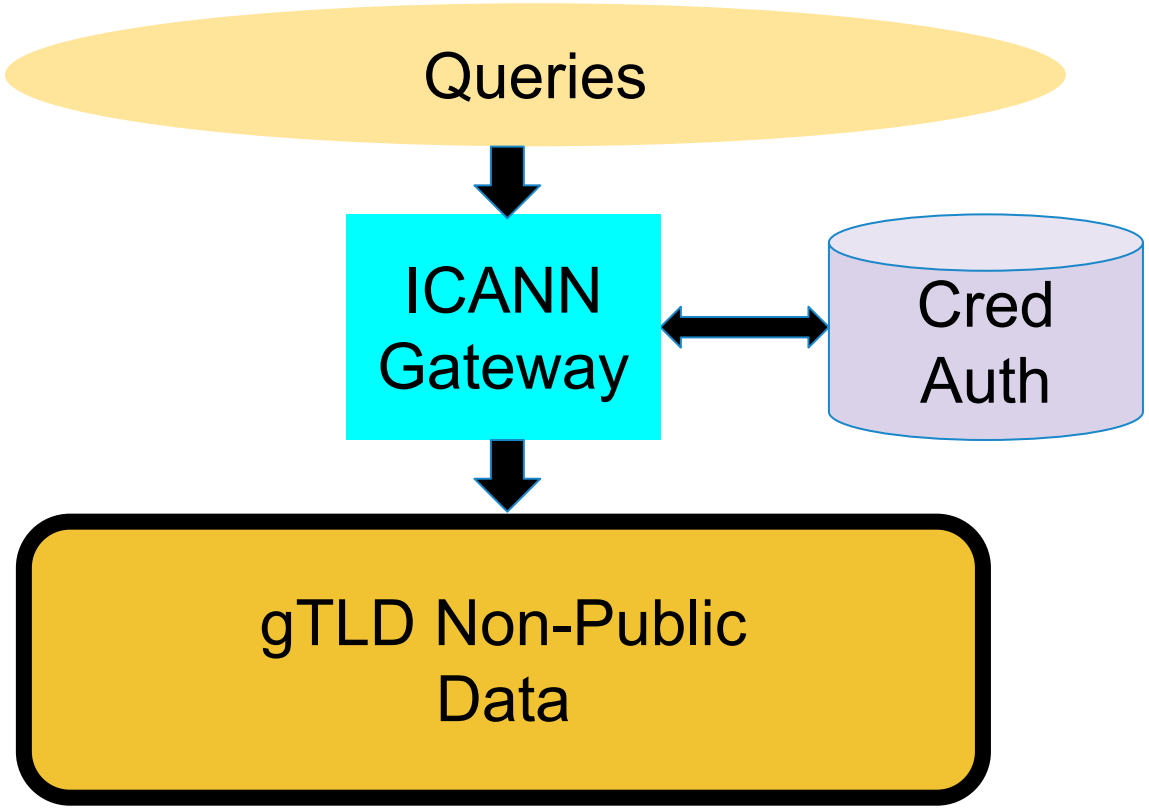
Assumptions



ICANN reduces gTLD registrars' and registries' GDPR liability

(1, 2) RDAP is the mechanism; port 43 deprecated
(3) Access to gTLD Non-public data only via ICANN
(7) Queries from unauthenticated sources per policy
(5, 10) ICANN oversees credential protection and validity

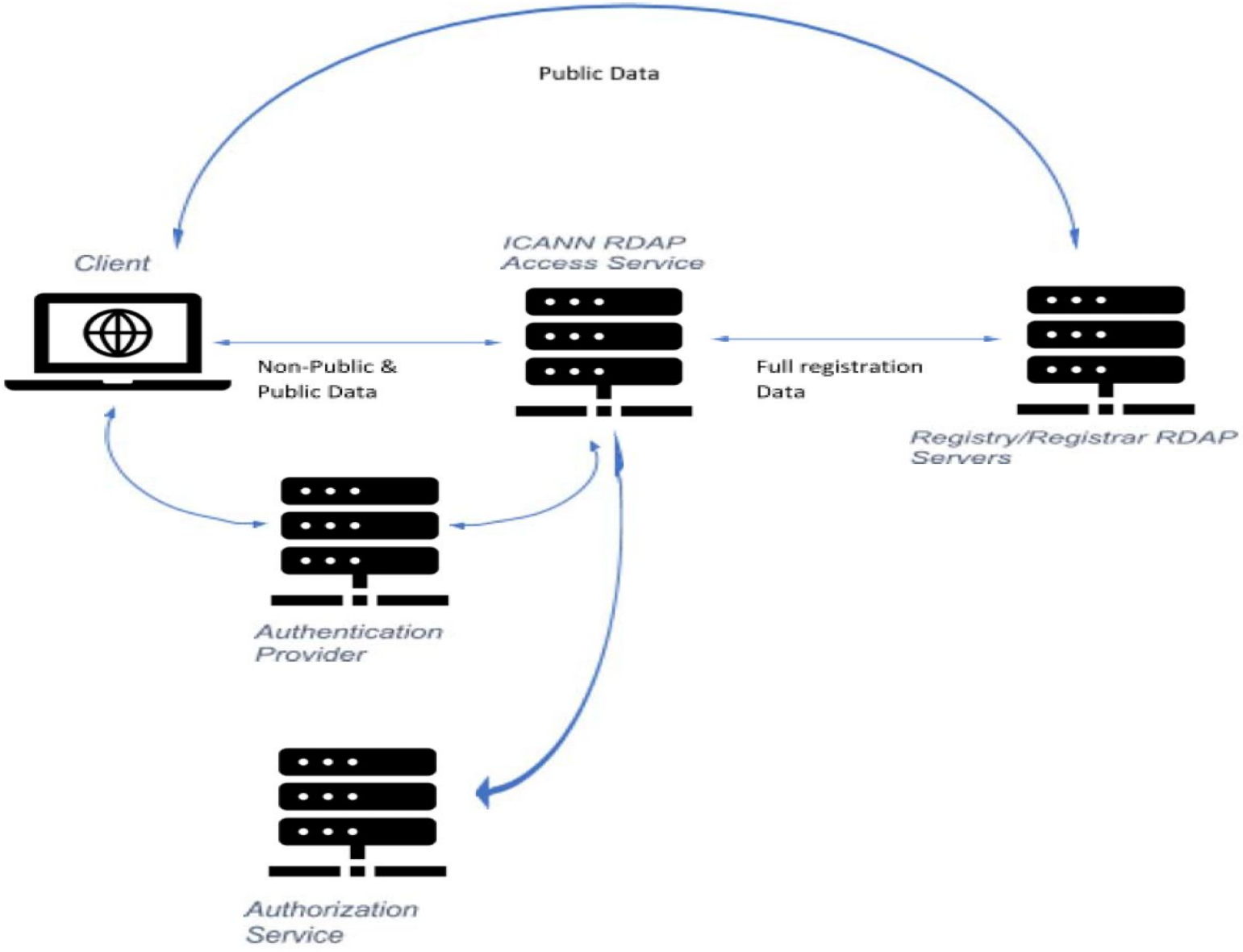
Draft Technical Model overview

- 12 assumptions
- 5 use cases
- 9 system requirements

Five Use Cases

- Use Case #1: Authorized users (e.g., security researchers, law enforcement, registrars, registries, etc.) require access to domain records, which might include single queries or multiple queries. (Critical/Must have)
- Use Case #2: User receives authorization online and gets data immediately. Authorization can be broad and ongoing, or specific and constrained. (Critical/Must have)
- Use Case #3: Unauthorized, unauthenticated users request access to data elements associated with domain records. (Critical/Must have)
- Use Case #4: Authenticated user requests data for which user is not authorized. (Critical/Must have)
- Use Case #5: Data subject requests their own data via this system. (Useful/but not necessary)

Draft Design Schematic



Considerations

1. Data Retention: Any data stored by these systems should be regulated by policies developed outside of the TSG and communicated to the data processors, audited and enforced.

2. SLAs: Contracted parties will be subject to SLAs for their own RDAP services. However, ICANN org as the operator of the RDAP Gateway, Identity Providers and Third Party Authorizers should also be subject to SLAs. It is also RECOMMENDED that ICANN org provide transparent reporting on the service level performance of each of the actors in the system.

3. ICANN Org Obligations: ICANN org should review the operational outcomes of operating such a system to determine feasibility as well as operational and financial impact. ICANN should also publish this review for public comment.

4. ICANN as Coordinating Party: ICANN may be exposed to significant operational and legal risks if ICANN will be credentialing requestors. ICANN should identify, assess and take steps to mitigate these risks.

Considerations

5. Risks to Contracted Parties: The TSG cannot comment on whether the new system reduces or increases the risk to contracted parties. It will be up to the contracted parties to determine their own risk based on their own legal advice.

6. Transparency: It is recommended that ICANN publish a regular report that provides statistics for request for access to non-public gTLD registration data.

7. Mechanism For Handling Complaints: Users should have a means to escalate their requests if they are denied through a complaint process. ICANN org should also have a process for deleting data under Article 17 of the GDPR.

Timeline and plans

- ICANN64: Community input to be incorporated into the draft Technical Model
- March-April 2019: TSG-RD continues discussions to finalize Technical Model
- 23 April 2019: Final Technical Model published

Contact the Technical Study Group

Home Page: https://www.icann.org/tsg

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Engage with ICANN

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