

New gTLD Policy - Required Implementation Time

The new [IRT gTLD Registration Data Policy](#) will require action by registrars, registries, and others. This document attempts to summarize the work that needs to be done, with references to the new Policy sections, in order to help us estimate how much time would be needed as the implementation buffer period. As usual, this is not legal advice or a substitute for reading and considering the draft Policy, nor is this a definitive and final list.

For each work item, we've attempted to indicate if EPP standards need changes and if the Registrar or Registry will need to do development work for their platforms, as well as if Resellers would need to do work on their side. From there, we've considered the overall scope of work in terms of small/medium/large/extra large, with awareness that platforms vary and so definite timeframes for the workload cannot be truly captured here.

Where the EPP standards require changes to come into alignment with the new Policy, it has been suggested that these standards could be left as-is, and a "hack" could be used instead (e.g. send "--" instead of data in a field that is no longer required) so that in the longer-term other solutions can be identified. This approach should certainly be discouraged; standards should meet our requirements, rather than legacy standards being maintained which are only partially suitable to our current (updated) needs.

Summary

There are significant pieces of work required to achieve compliance with the upcoming gTLD Registration Data Policy. **Due to the wide variety of platforms and systems in use by involved parties across a broad range of sizes and business models, it is essentially impossible to estimate the amount of time needed to complete this work.** We must remain aware of the reality of differing and limited resources, and remember that organizations cannot be expected to dedicate all existing resources to completing this task. As such, we should expect much of this work to occur in series (one item after another) rather than in parallel (working on more than one item at a time). The scope of required work is significant, and with ten large or extra-large and five medium-sized items, **we should anticipate more than six months and possibly more than a year of development time needed to complete this work.**

Remaining to consider: What is the transition period/method, phase in, etc? In what order should the work be completed?

Required work:

EPP Change: 1 Rr Changes: 15 Ry Changes: 10 Reseller Changes: 4 Escrow provider changes: 1 RDDS changes: 1	Scope small: Scope medium: 5 Scope large: 4 Scope extra-large: 6
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Optional work:

EPP Change: 0 Rr Changes: 3 Ry Changes: 3 Reseller Changes: 3	Scope small: Scope medium: Scope large: 2 Scope extra-large: 1
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Required Work

Task	EPP Change	Registrar Change	Registry Change	Reseller Change	Scope/Sizing
6.1, 6.2, 6.5 - Change what data Rr collects, which data elements are optional	NO	YES (inbound) API & UI	NO	YES - could send different or reduced data compared to current	Extra-Large
6.3 - Notify RNH about how the Tech contact works now	NO	YES - UI, as well as maybe Rr-Reseller contract updates to require the reseller to do some notifications	NO	YES	Medium
7 - Change what data Rr transfers to the Ry	YES	YES	YES	NO	Extra-Large

8 - Change what data Rr and Ry transfer to Escrow provider	NO	YES	YES	NO	Medium
9 - Change which data elements Rr and Ry publish in RDDS by default (e.g. reduced tech contact, no more admin contact)	NO	YES	YES	NO	Medium
9 - Change the text that Rr and Ry display when data is redacted in RDDS (e.g. "REDACTED FOR PRIVACY")	NO	YES	YES	YES	Medium
9.3.2 - Rr to provide opportunity for RNH to consent to publication in RDDS	NO	YES (UI and API both)	N/A at this time; perhaps YES in future (when we build out full ability for Rr to pass consent status & status changes to Ry)	YES (need to get the opportunity from Ry to RNH via Rs)	Extra-Large
9.3.3 - Rr to provide a contact URL or forwarding email for RNH in public RDDS	NO	YES	NO	NO	Large
9.3.4 - Rr and Ry to publish full Affiliated P/P data when the domain has P/P service	NO	YES	NO (May change once PPSAI is fully implemented and Ry is aware of which privacy services are Affiliated vs which are not; this is an open issue with	NO	Medium if no Ry work, otherwise Large or Extra-Large

			PPSAI team, not yet reached consensus)		
9.3.5/9.3.6 - Rr and Ry to redact RNH Org but Rr may publish depending on RNH consent	NO	YES (API and UI)	YES	YES (need to get the opportunity from Ry to RNH via Rs)	Large
10.2 - develop and publish a method for requesting disclosure of data to third party (this part is about what goes on the website, could include a form)	NO	YES	YES	NO	Extra-Large
10.5+ - follow policy-required processes and response times for disclosure requests (which means creating processes etc. within each CP)	NO	YES	YES	NO	Extra-Large
11 - Rr and Ry may need to change what they log	NO	YES	YES	NO	Large
12 - Rr and Ry may need to adjust data retention periods, request waiver, etc.	NO	YES	YES	NO	Extra-Large
Rr and Ry may need to delete existing Tech contact data (depending on Board decision)	NO	YES	YES	NO	Large

Optional Work

Task:	EPP Change	Registrar Change	Registry Change	Reseller Change	Sizing
2.2 - Differentiate on legal vs natural person basis	NO	YES	YES	YES - Depends on implementation/ how we pass through person type info; if the person type is determined as 'legal person' by content appearing in the "Organization" field, no other reseller work would be needed. However, if some organization paperwork or other identifier needs to be completed this would mean both UI and API changes.	Large
2.3 - Differentiate on geographic basis	NO	YES	YES	YES (to pass through geographic info, depending on implementation)	Large

6.7 - Delete existing Admin and Billing contacts	NO	YES	YES	YES (they should delete it also)	Extra-Large
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Referenced but outside this Policy

Task:	EPP Change	Registrar Change	Registry Change	Reseller Change	Sizing
5 - Enter into Data Processing Agreements	NO	YES	YES	YES	Extra-Large

Note: this probably needs to happen before we can put the other changes in place

Other notes:

- Contract between Registrar and Reseller will likely need changes, as well as reseller education that needs to happen
- Need to have a transition period to allow parties to come into compliance
- Need to consider the order of work and which things are dependent on which other things
- Escrow provider will also need to make changes to their validating parsers
- RDDS changes likely needed for section 9 - updates to RDAP Profile