EN

AL-ALAC-ST-1022-02-00-EN
ORIGINAL: English
DATE: 19 October 2022
STATUS: Ratified

AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the Universal Acceptance Roadmap for Domain Name Registry and Registrar Systems

Ratification

On 31 August 2022, the Public Comment proceeding opened for the Universal Acceptance Roadmap for Domain Name Registry and Registrar Systems. An At-Large workspace was created for the Public Comment submission. The At-Large Consolidated Policy Working Group (CPWG), decided it would be in the interest of end users to develop and submit an At-Large Advisory Committee (ALAC) statement. Satish Babu volunteered to draft the initial ALAC statement and presented it to the CPWG.

On 10 October 2022, Satish Babu drafted the initial ALAC statement, which was posted to its workspace by ICANN Policy staff in support of the At-Large community. The recommendations and At-Large positions were discussed during weekly CPWG calls. At-Large members were invited to provide input during the CPWG calls and via email.

On 20 October 2022, the CPWG finalized the At-Large Public Comment submission. The ALAC chair, Jonathan Zuck, requested that an Executive Summary be added before statements are voted on by the ALAC.

On 31 October 2022 staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favor, 0 votes against, and 0 abstentions. Please note 100% of ALAC Members participated in the poll. The ALAC Members who participated in the poll are (alphabetical order by first name): Bill Jouris, Carlos Aguirre, Dave Kissoondoyal, Eduardo Diaz , Joanna Kulesza, Jonathan Zuck, Laura Margolis, Marcelo Rodriguez , Matthias Hudobnik, Maureen Hilyard, Naveed Bin Rais, Raymond Mamattah, Sarah Kiden, Satish Babu, Tommi Karttaavi. You may view the results here.

AT-LARGE ADVISORY COMMITTEE

Executive Summary

The At-Large Advisory Committee (ALAC) and At-Large community appreciate the opportunity to submit comments on the Universal Acceptance (UA) Roadmap for Domain Name Registry and Registrar Systems.

The ALAC believes that the Roadmap will highlight the issue of UA compliance within the registry and registrar communities, and will assist the community to achieve compliance. However, there are a few areas where the ALAC believes the Roadmap could be improved:

1. The report has chosen not to consider the issue of Internationalized Domain Name (IDN) variants.
2. There is no mention of the role of resellers.
3. The report does not take into account the continuing changes to access mechanisms for registration data.

Our enclosed comment explains these areas of concern in greater detail.

ALAC perspectives on the report

1. ALAC appreciates the opportunity to comment on this report.
2. ALAC appreciates the Universal Acceptance Steering Group's (UASG) efforts to publish this report, as it provides a systematic roadmap for assisting Registries and Registrars to achieve UA compliance. ALAC believes that the document will highlight the issue of UA compliance within the registry and registrar communities, and will assist the community to achieve compliance.
3. Since the document is largely targeted at Registries and Registrars, and direct end-user impact is limited to some well-known protocols already documented, ALAC would like to provide the following comments on a few topics that may help build better clarity.
4. The report has chosen not to consider the issue of Internationalized Domain Name (IDN) variants, presumably as the policy for delegating top-level variants (as well as for harmonizing policies on IDN variants at the second level) is being created as we speak.
   a. As the report concedes, IDN variants will have a significant impact on the software used by registries and registrars, as, for the first time, there may be a need to treat a source label together with its variants in the form of a variant set.
   b. This is new functionality, and every test for UA compliance would need to check for the integrity of the whole variant set as well. On this topic, we believe that a slightly deeper analysis of the nature and magnitude of the impact of IDN variants--as and when policies are adopted to integrate them--would add value to

the report, and also provide the Registry-Registrar communities with advance notice of this issue.

5. The report does not mention the role of resellers. Given that the role of resellers is important, and they need to be UA-ready as well, an analysis of their operations and software use--such as standalone software or API-integration to registrars--would enhance the completeness of the report.

6. The report also does not take into account the continuing changes to the access mechanisms for registration data, although it does mention WHOIS and Registration Data Access Protocol (RDAP). An analysis of the impact of regulatory frameworks such as the General Data Protection Regulation (GDPR) and its possible impact on UA Readiness of Registries and Registrars would also be useful.