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AL-ALAC-ST-0116-01-00-EN

ORIGINAL: English

DATE: 23 January 2016

STATUS: Final

AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the Registration Data Access Protocol (RDAP) Operational Profile for gTLD Registries and Registrars

Introduction

Holly Raiche, ALAC member of the Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO) and ALAC Leadership Team (ALT) member and Carlton Samuels, member of the Latin American and Caribbean Islands Regional At-Large Organization (LACRALO), developed an initial draft of the ALAC Statement.

On 04 January 2016, the first draft of the Statement was posted on the [At-Large Registration Data Access Protocol \(RDAP\) Operational Profile for gTLD Registries and Registrars Workspace](#).

On that same day, Alan Greenberg, Chair of the ALAC, requested ICANN Policy Staff in support of the ALAC to send a Call for Comments on the Statement to all At-Large members via the [ALAC-Announce Mailing List](#).

On 14 January 2016, a version incorporating the comments received was posted on the aforementioned workspace and the Chair requested that Staff open an ALAC ratification vote on the proposed Statement.

On 23 January 2016, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 14 votes in favor, 0 vote against, and 0 abstention. You may view the result independently under: <https://www.bigpulse.com/pollresults?code=5333p7i74gWzSWjyea43spnz>.

ALAC Statement on the Registration Data Access Protocol (RDAP) Operational Profile for gTLD Registries and Registrars

The ALAC welcomes the opportunity to comment on the Registration Data Access Protocol (RDAP) Operational Profile for gTLD Registries and Registrars.

While the new RDAP Operational Profile includes many new enhanced features from the previous Whois protocol, it does not include a list of mandatory features and provisions that will support an authentication and authorisation access control framework.

The SSAC in its 2011 report on Domain Name Whois Terminology and Structure (SAC 051) recommended the development of replacement protocol that would provide a uniform and standard framework for accessing Domain Name Registration Data (DNRD). That framework would 'define and implement verification methods, credential services and access control capabilities'. The Board accepted SSAC recommendations and established the Expert Working Group on gTLD Directory Services (EWG) to begin implementation of the recommendations. In its Final Report, the EWG recommended a paradigm shift whereby gTLD registration data is collected, validated and disclosed for permissible purposes only, with some data elements being accessible only to authenticated requestors that are then held accountable for appropriate use.

Therefore, while existing ICANN policies do not now require differentiated access to DNRD, it is clear from Board decisions and EWG recommendations that future ICANN policies will likely have that requirement.

The Operational Profile of RDAP, therefore, should include an obligation on all gTLD registries and registrars that the basic functionality will support an authentication and authorisation framework.

Specifically, the features to allow differentiated access must be required now, as part of this protocol – even if at this stage all access seekers will be in one class - the public. In that way, when differentiated access requirements are imposed, protocol features will already be deployed to provide such access.