AT-LARGE ADVISORY COMMITTEE
ALAC Statement on the Planned Implementation of the New Registration Data Access Protocol (RDAP)

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 06 November 2015, the first draft of the Statement was posted on the At-Large Planned Implementation of the New Registration Data Access Protocol (RDAP) Workspace.

On 09 November 2015, 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 23 November 2015, 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 28 November 2015, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 10 votes in favor, 0 vote against, and 0 abstention. You may view the result independently under: https://www.bigpulse.com/pollresults?code=5243kVbgtgUpdTfNyx7KcQXZ.

ALAC Statement on the Planned Implementation of the New Registration Data Access Protocol (RDAP)

The ALAC is very concerned that the planned implementation of the new Registration Data Access Protocol (RDAP) may not support enhanced privacy protections proposed by the Expert Working Group on gTLD Directory Services (EWG).

At a [session in ICANN 54 on the implementation of the RDAP](), Francisco Arias, Director of ICANN Technical Services, suggested that when implementing the new RDAP, it would be "voluntary" for contracted parties to include additional features in the protocol that would allow differentiated access to registration data.

The existing Whois protocol allows every user the same anonymous public access to gTLD registration data – access that is no longer in line with increasingly accepted privacy protection law. The EWG recommendations provide a better balance between the privacy rights of registrants and the legitimate needs to access that information in the way that registration data is collected, stored and accessed.

Following on from the EWG recommendations, the Internet Engineering Task Force (IETF) developed the RDAP which has features that allow for differentiated access to registration data, depending on the authentication and accreditation of requestors.

The basic features of the RDAP comply with existing Whois policy requirements. However, unless the additional RDAP features that allow differentiated access to registration are adopted as a mandatory part of the RDAP, the protocol would not allow differentiated access to registration data.

While the final Issues Report on next-generation gTLD registration directory services (RDS) to replace WHOIS was approved only in October 2015 and its Policy Development Process is yet to start, this policy work will proceed on the foundation of the EWG recommendations and part of this work concerns with how data should be collected, stored, and disclosed and how these data elements are mapped to RDAP.

The ALAC is strongly arguing against "voluntary" adoption of the RDAP features that allow differentiated access to registration data. While those features are not now required under existing WHOIS policies, they will most likely be required under new RDS consensus policies as recommended by the EWG.

On these facts, the ALAC strongly argues that the RDAP implementation profile must include the feature set that will support differentiated access. This will ensure that when the future policies, which follow the EWG recommendations, on differentiated access to data are finalized, the protocols will be in place to ensure that these may be readily switched on and implemented.