

Internationalized Domain Names Expedited Policy Development Process

C1, C2, C3, C3a



IDN-EPDP Team Meeting #84 | 1 June 2023

Agenda

1. Roll Call and SOI Updates (2 mins)
2. Welcome and Chair Updates (5 mins)
3. Recap of Previous Discussions and Continued Deliberation: C1, C2
4. Discussion of ROID: C3, C3a (50 mins)
5. AOB (3 mins)

Recap of Previous Discussions

C1, C2

Charter Questions: C1, C2

Same Entity - Extend to existing second-level labels?

C1) Both the SubPro PDP and the Staff Paper recommend that: 1) a given second-level label beneath each allocated variant TLD must have the “same entity”; and 2) all allocatable second-level IDN variant labels that arise from a registration based on a second-level IDN table must have the “same entity”.

Should this recommendation be extended to existing second-level labels?

Same Entity - Definition & potential adjustment to variant activation rules?

C2) Currently Registry Operators may activate the IDN variant labels at the second-level when requested by the sponsoring Registrar of the canonical name as described in the IDN Tables and IDN Registration Rules. Both the SubPro PDP and the Staff Paper recommend that at the second-level, the same entity definition can be achieved by ensuring that the registrant is the same.

Part 1: Should this recommendation be extended to the already activated IDN variant labels at the second-level?

Part 2: How does the “same entity” requirement impact the current rules for Registry Operators for activating IDN variant labels?

Summary of Preliminary Agreement

1. In principle, extend the “same entity” requirement to existing second-level labels
2. “Same entity” at the second-level is defined as the “same registrant”
3. Second-level variant labels may only be activated if they are registered to the same registrant of the canonical name (?)
4. Grandfather existing second-level variant labels if they are already registered to different registrants and allow them to continue to exist

Diverging Opinions Regarding Variant Label Activation of Grandfathered Second-Level Labels:

Opinion 1: Disallow further activation until only one registrant remains for the variant label set

Opinion 2: Allow further activation if any one registrant requests to register a variant label

C2 (Part 2) Background

Current: Contractual language allows for the activation of second-level variants labels (approved via RSEP)

- [#.2.1]. **By default** variant IDNs (as defined in the Registry Operator’s IDN tables and IDN Registration Rules) **must be blocked** from registration.
 - [#.2.2]. Variant IDNs **may be activated** when **requested by the sponsoring Registrar of the canonical name** as described in the IDN Tables and IDN Registration Rules.
 - [#.2.3]. Active variant IDNs must be provisioned in the TLD’s DNS zone file as zone cuts **using the same NS resource records as the canonical name**.
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- SubPro Recommendations 25.6 and 25.7 require second-level variants to only be allocated (or withheld for allocation) **to the same entity**.

Part 2: How does the “same entity” requirement impact the current rules for Registry Operators for activating IDN variant labels?

The contractual requirements above do not specify “same entity” requirements, but do require two different elements (e.g., request by sponsoring registrar; use same NS resource as canonical name). **Should existing ROs that already have this contractual amendment be required to rely on the “same entity” principle to allocate or withhold for allocation second-level variants in the future?**

Scenario Analysis

Set Up:

- **example.TLD** is registered to **Registrant A**
- **examplev1.TLD** is registered to **Registrant B**
- **example.TLD** and **examplev1.TLD** are grandfathered (i.e., continue to exist and be registered to different registrants)
- **examplev2.TLD** is a variant label from the variant label set and has not been registered

Scenario 1:

If **Registrant A** wishes to register **examplev2.TLD**, is it allowed?

Scenario 2:

If both **Registrant A** and **Registrant B** wish to register **examplev2.TLD**, who gets the domain?

C1 Background

SubPro made recommendations in line with the Staff Paper, specifically:

- Recommendation 25.6: A **given second-level label under any allocated variant TLD must only be allocated to the same entity/registrant**, or else withheld for possible allocation only to that entity (e.g., s1 under {t1, t1v1, ...}, e.g., **s1.t1 and s1.t1v1**).
- Recommendation 25.7: For **second-level variant labels** that arise from a registration based on a second-level IDN table, all allocatable variant labels in the set **must only be allocated to the same entity** or withheld for possible allocation only to that entity (e.g., all allocatable second-level labels {**s1, s1v1, ...**} under all allocated variant TLD labels {**t1, t1v1, ...**}).

These recommendations have already been adopted by the ICANN Board at ICANN76 and are currently in implementation.

Question: *Should these recommendations be extended to existing second-level labels?*

In other words, for a given **existing** second-level label (**example.tld**) should:

- **example.tld**, **example.tldv1**, **example.tldv2**, etc. be allocated to or withheld for possible allocation only to the same entity; and
- **example.tld**, **examplev1.tld**, **example.tldv1**, **examplev1.tldv1**, etc. only be allocated to or withheld for possible allocation only to the same entity?

C2 (Part 1) Background

Current: Contractual language allows for the activation of second-level variants labels (approved via RSEP)

- [#.2.1]. **By default** variant IDNs (as defined in the Registry Operator's IDN tables and IDN Registration Rules) **must be blocked** from registration.
 - [#.2.2]. Variant IDNs **may be activated** when **requested by the sponsoring Registrar of the canonical name** as described in the IDN Tables and IDN Registration Rules.
 - [#.2.3]. Active variant IDNs must be provisioned in the TLD's DNS zone file as zone cuts **using the same NS resource records as the canonical name**.
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- SubPro Recommendations 25.6 and 25.7 require second-level variants to only be allocated (or withheld for allocation) **to the same entity**.

Part 1: Should this recommendation be extended to already activated IDN variant labels at the second-level?

In other words, for a given **existing** second-level label **example.tld** and its **existing** variant **examplev1.tld, examplev2.tld, etc.** where existing requirements were followed (i.e., requested by sponsoring registrar) but where in theory, the **registrant may not be the same**, what should be done?

Discussions of ROID

C3, C3a

Charter Questions: C3, C3a

Same Entity - mechanism to identify the same registrant

C3) The WG and the SubPro IRT to coordinate and consider the following question in order to develop a consistent solution: **what is the appropriate mechanism to identify the registrant as the “same entity” at the second-level for future and existing labels?**

The Staff Paper recommends using ROID to ensure that the same label beneath all variant labels is allocated to the same entity.

However, some registrars in practice may not reuse contact objects for different registrations by the same registrant, and there is no existing data on the number/percentage of ICANN accredited registrars that reuse contact ROID.

Is ROID a reasonable mechanism to determine the same registrant at the second-level for both future and existing labels?

If not, what mechanism/functional definition can be used to ensure the second-level variant labels are allocated to the same entity for both current and future TLDs? Consider this question by taking into account the data to be collected in the “Data and Metric Requirements” section of this charter.

Conditional question

C3a) If the Working Group determines to use ROID as the mechanism to identify the registrant as the “same entity” at the second-level, are there additional requirements to ensure the “same entity” principle is followed?

Staff Paper considered the following mechanism to identify the same registrant:

1. Using the Repository Object Identifiers (ROIDs)
2. Having all registrant fields be the same
3. Having a core subset of registrant fields be the same
4. Requiring a cryptographic probe to ensure the same registrant

Staff Paper recommends Option 1 - ROIDs

Background: ROID

What is the ROID?

A globally unique identifier assigned by a registry to a contact object (i.e., admin, tech, or registrant) when the object is created

How is the ROID created?

The registry generates a ROID using its repository; a registry's repository can encompass one or multiple gTLDs managed by the registry

Registries must register their repositories with IANA:

<https://www.iana.org/assignments/epp-repository-ids/epp-repository-ids.xhtml>

How does a ROID look like?

Local identifier for a contact object + hyphen + registry's repository identifier (e.g., 5372809-EXAMPLE)

How are ROIDs used?

Registry Agreement requires the use of ROIDs for some instances, e.g., RDS output, data escrow, BRDA, EPP, Trademark Database List of Registered Domain Names

How are ROIDs stored?

ROIDs are stored in the Shared Registry System (SRS), which is maintained by the registries and supports business functions of a domain registration service by registrars

Domain Name Data⁴

- **Query format:** whois EXAMPLE.TLD
- **Response format:**
 - Domain Name: EXAMPLE.TLD
 - Registry Domain ID: D1234567-EXAMPLE
 - Registrar WHOIS Server: whois.example-registrar.tld
 - Registrar URL: http://www.example-registrar.tld
 - Updated Date: 2009-05-29T20:13:00Z
 - Creation Date: 2000-10-08T00:45:00Z
 - Registry Expiry Date: 2010-10-08T00:44:59Z
 - Registrar Registration Expiration Date: 2010-10-08T00:44:59Z
 - Registrar: EXAMPLE REGISTRAR LLC
 - Registrar IANA ID: 5555555
 - Registrar Abuse Contact Email: email@registrar.tld
 - Registrar Abuse Contact Phone: +1.1235551234
 - Reseller: EXAMPLE RESELLER1
 - Domain Status: clientDeleteProhibited <https://icann.org/epp#clientDeleteProhibited>
 - Domain Status: clientRenewProhibited <https://icann.org/epp#clientRenewProhibited>
 - Domain Status: clientTransferProhibited <https://icann.org/epp#clientTransferProhibited>
 - Registry Registrant ID: 5372808-EXAMPLE⁵**
 - Registrant Name: EXAMPLE REGISTRANT
 - Registrant Organization: EXAMPLE ORGANIZATION
 - Registrant Street: 123 EXAMPLE STREET
 - Registrant City: ANYTOWN
 - Registrant State/Province: AP
 - Registrant Postal Code: A1A1A16
 - Registrant Country: AA
 - Registrant Phone: +1.5555551212
 - Registrant Phone Ext: 12347
 - Registrant Fax: +1.5555551213
 - Registrant Fax Ext: 4321
 - Registrant Email: EMAIL@EXAMPLE.TLD
 - Registry Admin ID: 5372809-EXAMPLE⁶**
 - Admin Name: EXAMPLE REGISTRANT ADMINISTRATIVE
 - Admin Organization: EXAMPLE REGISTRANT ORGANIZATION
 - Admin Street: 123 EXAMPLE STREET
 - Admin City: ANYTOWN
 - Registry Tech ID: 5372811-EXAMPLE⁷**
 - Tech Name: EXAMPLE REGISTRANT TECHNICAL
 - Tech Organization: EXAMPLE REGISTRANT LLC
 - Tech Street: 123 EXAMPLE STREET
 - Tech City: ANYTOWN
 - Tech State/Province: AP
 - Tech Postal Code: A1A1A1
 - Tech Country: AA
 - Tech Phone: +1.1235551234
 - Tech Phone Ext: 1234
 - Tech Fax: +1.5555551213
 - Tech Fax Ext: 93
 - Tech Email: EMAIL@EXAMPLE.TLD

Background: ROID (Cont.)

What are the benefits of using ROIDs?

- As a ROID is a globally unique identifier
- A ROID is generated by a registry's repository for the gTLDs it manages, it should point to the same contact object within the registry
- ROIDs can be verified by a third party having access to RDS
- Only requires verification of one field (i.e. Registry Registrant ID)

What are drawbacks of using ROIDs?

- Registry Agreement only requires unique-per-object ROID
- The same ROID may not be assigned to the **same registrant** across gTLDs managed by the registry
- Registrars may not reuse contact objects for different registrations by the same registrant

Anecdote of Current Practice

Information shared by Michael Bauland (e.g., Knipp - a back-end registry service provider & a registrar)

- Common mechanisms for managing second-level variant domains by registries:
 - Variants-as-objects
 - Variants-as-attributes (i.e., a single domain object points to a single registrant contact)
- In the “variants-as-objects” mechanism, the registry internally uses contact handle to identify registrant
 - Behavior externally is exactly the same as ROIDs
 - Contact handles are not globally unique across registries, but variant relationships are also locally to a registry
- Registrar does not check for same entity and does not know whether two domains are registered as variants
- Registrar re-uses the same contact handle if the contact for a newly registered domain has the exact same value of an existing one
- A minor change in one of the contact’s fields may lead to a different contact handle, even if the registrant is exactly the same (e.g., "Martin-Schmeisser-Weg 9" vs. "Martin-Schmeißer-Weg 9")

C3) Mechanism to identify the same registrant

Question 1: Should the ROID be used to identify a registrant as the same entity? Why or why not?

Question 2: If not, what would be a better mechanism to identify the same entity? What are some practices in place today that Rys/Rrs use to identify the same entity?

- Note, the CPH TechOps group has been asked to consider this question and if possible, provide a recommendation.

Question 3: Is any additional data or information needed to help facilitate this discussion?