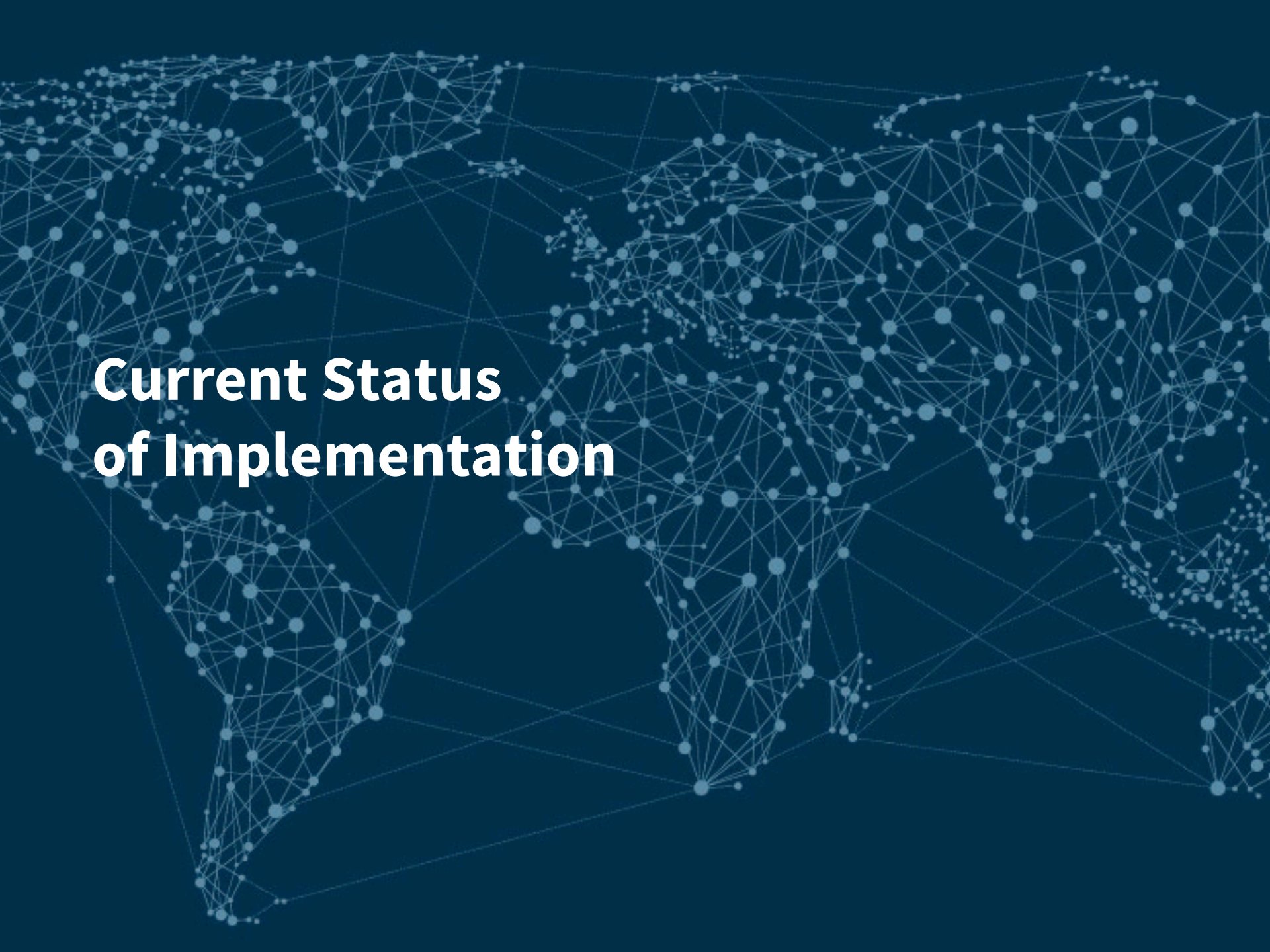
Thick WHOIS Implementation

Meeting with the IRT | ICANN 52 | 12 February 2015

Agenda

- Current Status of Implementation
- Consistent Labeling & Display
  Revised impact Assesment
  Proposed implementation timeline
- Transition from thin to thick WHOIS for .COM, .NET and .JOBS
  Update on the Legal Review of laws applicable to the transition



Current Status of Implementation

Background

- Thick Whois Policy Development Process (Mar. 2012 – Oct. 2013)
- Policy Recommendations adopted by the ICANN Board in Feb. 2014
- Two expected outcomes (policy recommendation #1)
  - Consistent labeling and display for all gTLDs per Spec 3 RAA 2013
  - Transition from thin to thick WHOIS for .COM, .NET and .JOBS
- Decoupling of implementation of the two outcomes in line with Implementation Considerations (Final Report of Thick WHOIS PDP)

Recent Activity

Transition from thin to thick WHOIS for .COM, .NET, .JOBS

- Call for experts from parties most affected to work out implementation details : 12 volunteers representing 10 registrars

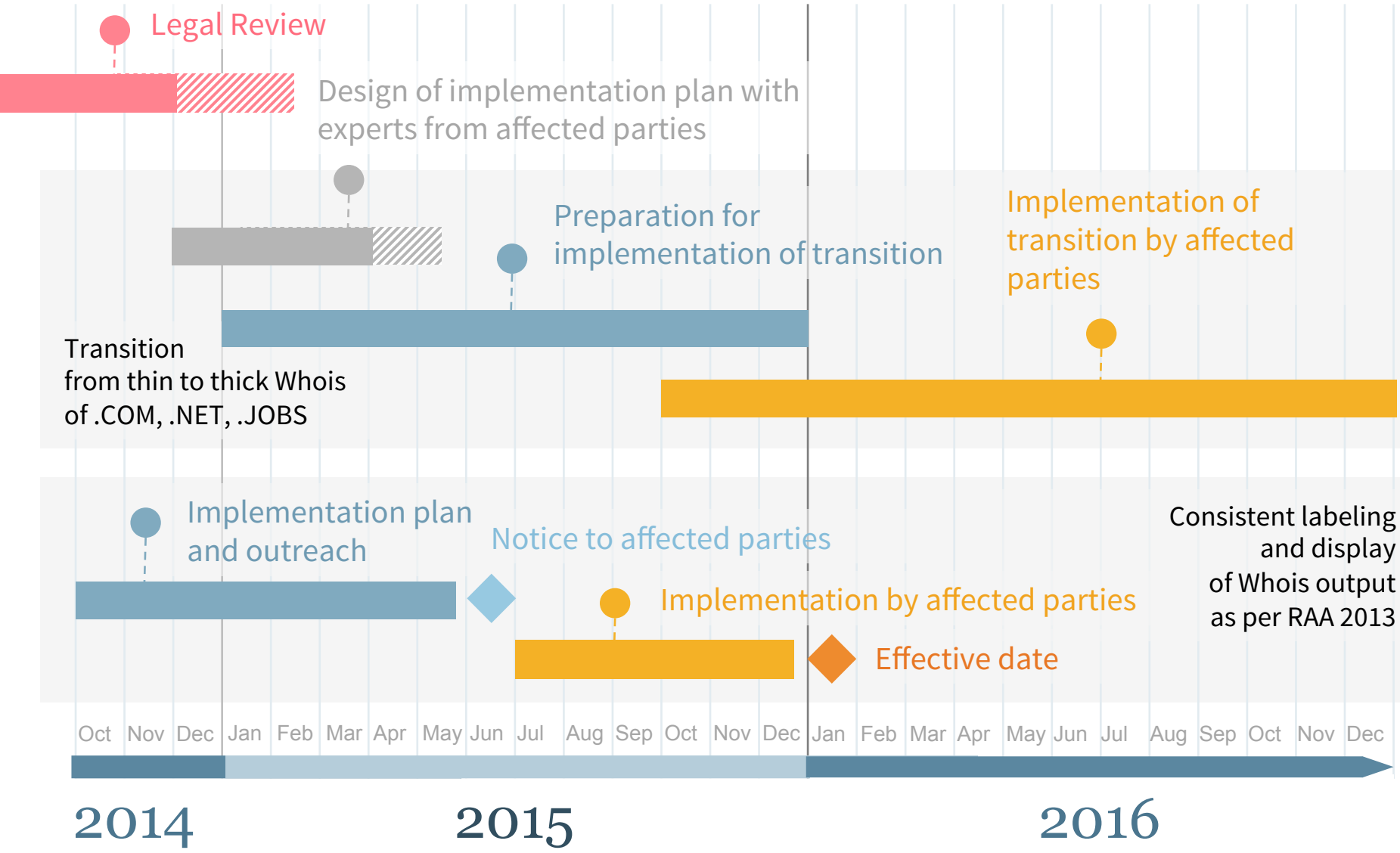
- Legal Review of Applicable laws for the transition ongoing since Aug. 2014
  - Preliminary conclusions discussed with IRT on Dec. 4
  - Feedback provided by some IRT members on Dec. 18

Consistent Labeling and Display of WHOIS Ouput

- Draft Impact Assessment circulated with IRT on Nov. 18

- Feedback from IRT in writing and during the Dec. 4 teleconference

Overall Timeline Assumptions (as of 4 Dec. 2014)



Consistent Labeling and Display
of WHOIS Ouput

Revised Impact Assement after IRT Input

Understanding of Policy Recommendation #1

The provision of thick Whois services, with a consistent labelling and display as per the model outlined in specification 3 of the 2013 RAA, should become a requirement for all gTLD registries, both existing and future.

- IRT Feedback
  - understanding of “consistent” as “identical” was unintended
  - adding Registrar data such as Abuse Contact and Reseller not contemplated when the Thick Whois PDP was initiated
  - Primary concern of IRTP B was access to regisitrant contact data

Revised Impact Assement after IRT Input

Understanding of Policy Recommendation #1

The provision of thick Whois services, with a consistent labelling and display as per the model outlined in specification 3 of the 2013 RAA, should become a requirement for all gTLD registries, both existing and future.

- **Findings of research conducted by the IPT**
  - IRTP B Final Report called for consideration of effects beyond IRTP
  - The Thick WHOIS Issue Report identified consistent response as an issue to be considered
  - The Thick WHOIS Final Report made several references to benefits of uniformity in terms of accessibility and response consistency

Revised Impact Assement after IRT Input

Understanding of Policy Recommendation #1

The provision of thick Whois services, with a consistent labelling and display as per the model outlined in specification 3 of the 2013 RAA, should become a requirement for all gTLD registries, both existing and future.

- IPT Recommendation
  - Implementation aligned with the understanding of "consistent labeling and display" as as requiring the consistent display of all the required WHOIS Output fields (or label/value pairs)
  - and include measures to minimize impact on affected parties
  - Unless IRT compels otherwise

Revised Impact Assement after IRT Input

Assessment of Impact on Registries and Registrars

- **High impact**
  new data to be gathered by a party from another, potential distributed development required (such as changes to EPP interface requiring development in both Registries and Registrars software systems)

- **Medium impact**
  changes that would be required with some software development to the systems of the affected party only

- **Low impact**
  changes that would only be a matter of configuration to output or static values in software systems of the affected party only

Impact on new gTLD Registries WHOIS Output

Currently	After Implementation
Domain Name: EXAMPLE.TLD	Domain Name: EXAMPLE.TLD
Domain ID: D1234567-TLD	Registry Domain ID: D1234567-TLD
WHOIS Server: whois.example.tld	Registrar WHOIS Server: whois.example-registrar.tld
Referral URL: http://www.example.tld	Registrar URL: http://www.example-registrar.tld
Updated Date: 2009-05-29T20:13:00Z	Updated Date: 2009-05-29T20:13:00Z
Creation Date: 2000-10-08T00:45:00Z	Creation Date: 2000-10-08T00:45:00Z
Registry Expiry Date: 2010-10-08T00:44:59Z	Registrar Registration Expiration Date: 2010-10-08T00:44:59Z
Sponsoring Registrar: EXAMPLE REGISTRAR LLC	Registrar: EXAMPLE REGISTRAR LLC
Sponsoring Registrar IANA ID: 5555555	Registrar IANA ID: 5555555
	Registrar Abuse Contact Email: email@registrar.tld
	Registrar Abuse Contact Phone: +1.1235551234
	Reseller: EXAMPLE RESELLER1
Domain Status: clientDeleteProhibited	Domain Status: clientDeleteProhibited
Domain Status: clientRenewProhibited	Domain Status: clientRenewProhibited
Domain Status: clientTransferProhibited	Domain Status: clientTransferProhibited
Domain Status: serverUpdateProhibited	
Registrant ID: 5372808-ERL	Registry Registrant ID: 5372808-ERL
Registrant Name: EXAMPLE REGISTRANT	Registrant Name: EXAMPLE REGISTRANT
Registrant Organization: EXAMPLE ORGANIZATION	Registrant Organization: EXAMPLE ORGANIZATION
Registrant Street: 123 EXAMPLE STREET	Registrant Street: 123 EXAMPLE STREET
Registrant City: ANYTOWN	Registrant City: ANYTOWN
Registrant State/Province: AP	Registrant State/Province: AP
Registrant Postal Code: A1A1A1	Registrant Postal Code: A1A1A16
Registrant Country: EX	Registrant Country: AA
Registrant Phone: +1.5555551212	Registrant Phone: +1.5555551212
Registrant Phone Ext: 1234	Registrant Phone Ext: 12347
Registrant Fax: +1.5555551213	Registrant Fax: +1.5555551213
Registrant Fax Ext: 4321	Registrant Fax Ext: 4321
Registrant Email: EMAIL@EXAMPLE.TLD	Registrant Email: EMAIL@EXAMPLE.TLD

Impact on new gTLD Registries WHOIS Output

Currently	After Implementation
Admin ID: 5372809-ERL	Registry Admin ID: 5372809-ERL
Admin Name: EXAMPLE REGISTRANT ADMINISTRATIVE	Admin Name: EXAMPLE REGISTRANT ADMINISTRATIVE
Admin Organization: EXAMPLE REGISTRANT ORGANIZATION	Admin Organization: EXAMPLE REGISTRANT ORGANIZATION
Admin Street: 123 EXAMPLE STREET	Admin Street: 123 EXAMPLE STREET
Admin City: ANYTOWN	Admin City: ANYTOWN
Admin State/Province: AP	Admin State/Province: AP
Admin Postal Code: A1A1A1	Admin Postal Code: A1A1A1
Admin Country: EX	Admin Country: AA
Admin Phone: +1.5555551212	Admin Phone: +1.5555551212
Admin Phone Ext: 1234	Admin Phone Ext: 1234
Admin Fax: +1.5555551213	Admin Fax: +1.5555551213
Admin Fax Ext:	Admin Fax Ext: 1234
Admin Email: EMAIL@EXAMPLE.TLD	Admin Email: EMAIL@EXAMPLE.TLD
Tech ID: 5372811-ERL	Registry Tech ID: 5372811-ERL
Tech Name: EXAMPLE REGISTRAR TECHNICAL	Tech Name: EXAMPLE REGISTRANT TECHNICAL
Tech Organization: EXAMPLE REGISTRAR LLC	Tech Organization: EXAMPLE REGISTRANT LLC
Tech Street: 123 EXAMPLE STREET	Tech Street: 123 EXAMPLE STREET
Tech City: ANYTOWN	Tech City: ANYTOWN
Tech State/Province: AP	Tech State/Province: AP
Tech Postal Code: A1A1A1	Tech Postal Code: A1A1A1
Tech Country: EX	Tech Country: AA
Tech Phone: +1.1235551234	Tech Phone: +1.1235551234
Tech Phone Ext: 1234	Tech Phone Ext: 1234
Tech Fax: +1.5555551213	Tech Fax: +1.5555551213
Tech Fax Ext: 93	Tech Fax Ext: 93
Tech Email: EMAIL@EXAMPLE.TLD	Tech Email: EMAIL@EXAMPLE.TLD
Name Server: NS01.EXAMPLEREGISTRAR.TLD	Name Server: NS01.EXAMPLE-REGISTRAR.TLD
Name Server: NS02.EXAMPLEREGISTRAR.TLD	Name Server: NS02.EXAMPLE-REGISTRAR.TLD
DNSSEC: signedDelegation	DNSSEC: signedDelegation
DNSSEC: unsigned	
	URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2009-05-29T20:15:00Z <<<	>>> Last update of WHOIS database: 2009-05-29T20:15:00Z <<<

Revised Impact Assement after IRT Input

Assessment of Impact on Registries

Affected Parties	High Impact	Medium Impact	Low Impact
New gTLD Registries (post-2012)	• Adding of new Registrar Data (Registrar Abuse Contact, Reseller) [1]		• Renaming of various fields to match RAA 2013 field names
Pre-2012 gTLD Registries under Thick registration model	• Adding of new Registrar Data (IANA ID, Registrar Abuse Contact, Reseller) [1] • Adding of new Registrant Data (ex: DNSSEC delegation, Phone/Fax ext, etc.)	• May need change of format of field values (ex: domain status, telephone numbers, etc.)	• Renaming of various fields to match RAA 2013 field names • Reordering of fields in Whois output • Appending of custom fields not included in RAA 2013 at the end of the output
Pre-2012 gTLD Registries under Thin Registration model	No impact. Thin Registries not involved in the implementation of Consistent Labeling and Display as decoupled from the transition of .COM, .NET and .JOBS from thin to thick WHOIS. Discussion with the IRT led to the conclusion that it would be more appropriate to make changes to thin Registries's WHOIS output when these registries are transitioning to thick WHOIS.		

Revised Impact Assement after IRT Input

Assessment of Impact on Registries

- IRT Feedback on Registrar Abuse Contact and Reseller Information
  1. not discussed in the Thick Whois PDP
  2. not required for a registry to be thick
  3. should be optional for registries
  4. implementation would lead to delays if fields required

- IPT Recommendation
  1. Discussion as part as engagement with IRT
  2. In reference to the Final Issue Report (Difference between 'thick' and 'thin' Whois) these are a valuable additions in line with the spirit of Thick Whois
  3. If data exists in the SRS, registries would display these fields
  4. implementation is anticipated to required an additional 6 month for development of an EPP extension

Revised Impact Assement after IRT Input

Assessment of Impact on Registrars

- Direct Impact:
  A Registrar becomes an affected party directly if subject of the policy recommendation

- Indirect impact:
  A Registrar becomes an affected party indirectly due to the fact that its relevant Registries may need new data to be sent over through the Registry/Registrar EPP interface

Revised Impact Assement after IRT Input

Assessment of Impact on Registrars

Affected Parties[1]	High Impact	Medium Impact	Low Impact
Registrars under RAA 2013 *indirectly*	• Provide Registrar Abuse Contact and Reseller information to Registries (via EPP at least for the Reseller information)		
Registrars under RAA 2009 for Pre-2012 Thick gTLDs *indirectly* [1]	• Provide Abuse Contact, Reseller Information to registries	• Communicate Registrant Phone, Fax and Email information to registries, to collected if needed	
Registrars under RAA 2013[2] *directly*	As per discussion with the IRT, it has been confirmed that Registrars are out of scope of the Thick WHOIS Policy implementation. There for all corresponding row have been greyed out and need no be considered in the implementation effort.		
Registrars under RAA 2009 for Pre-2012 Thick gTLDs *directly*	• Registry Object ID (Domain, Registrant/Admin/Tech contact ID) to be retrieved through Registry SRS via EPP • DNSSEC delegation status to collected from Registrant	• Domain statuses • Reseller • Depending on registrar, some format of field values could be needed	• Registrar IANA ID • Registrar Abuse Contact • Reordering of fields • URL of ICANN Whois Data Problem Reporting System • Depending on the Registrar (room for

Revised Impact Assement after IRT Input

Assessment of Impact on Registrars

- IRT Feedback on Registrar Abuse Contact and Reseller Information
  1. The policy does not affect Registrars directly
  2. Renewals of RAA 2009 registrars into RAA 2013 should be considered

- IPT Findings
  - Renewal in 2015: 73 registrars
  - Renewal in 2016: 147 registrars
  - Renewal in 2017: 34 registrars
  - Renewal in 2018: 20 registrars

- IPT Recommendation
  1. Registrar only indirectly affected for the needs of implementation by Registries
  2. Consider RAA 2009 renewal in the final implementation plan, in relation to the implementation timeline

Proposed Implementation Timeline

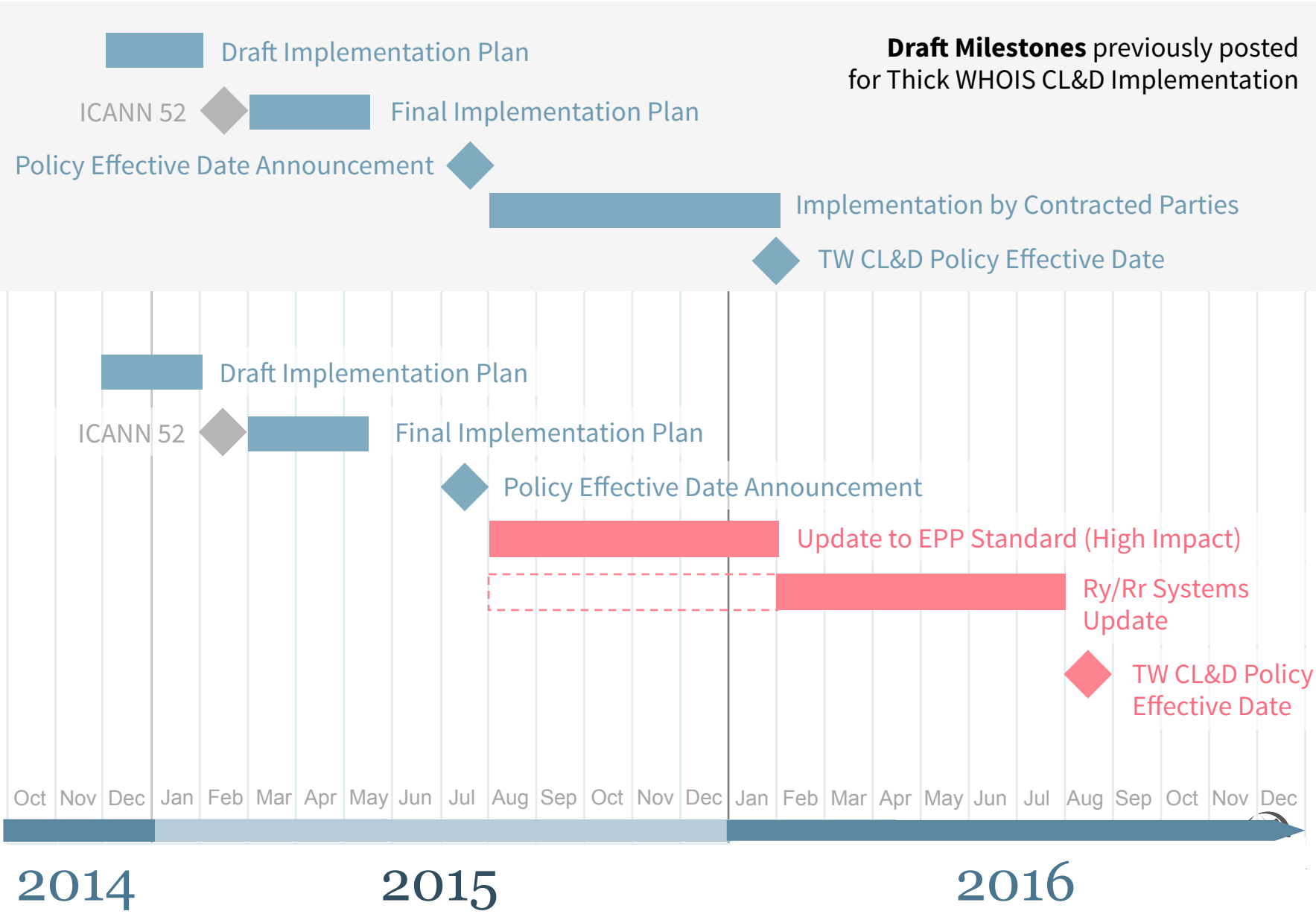
As suggested in IRT feedback, implementation should be considerate of other relevant initiatives affecting WHOIS

1. Additional Whois Information Policy (AWIP)
   - Low impact to Registries and Registrars
   - Effective date to be syncrhonized with Whois Clarifications Advisory

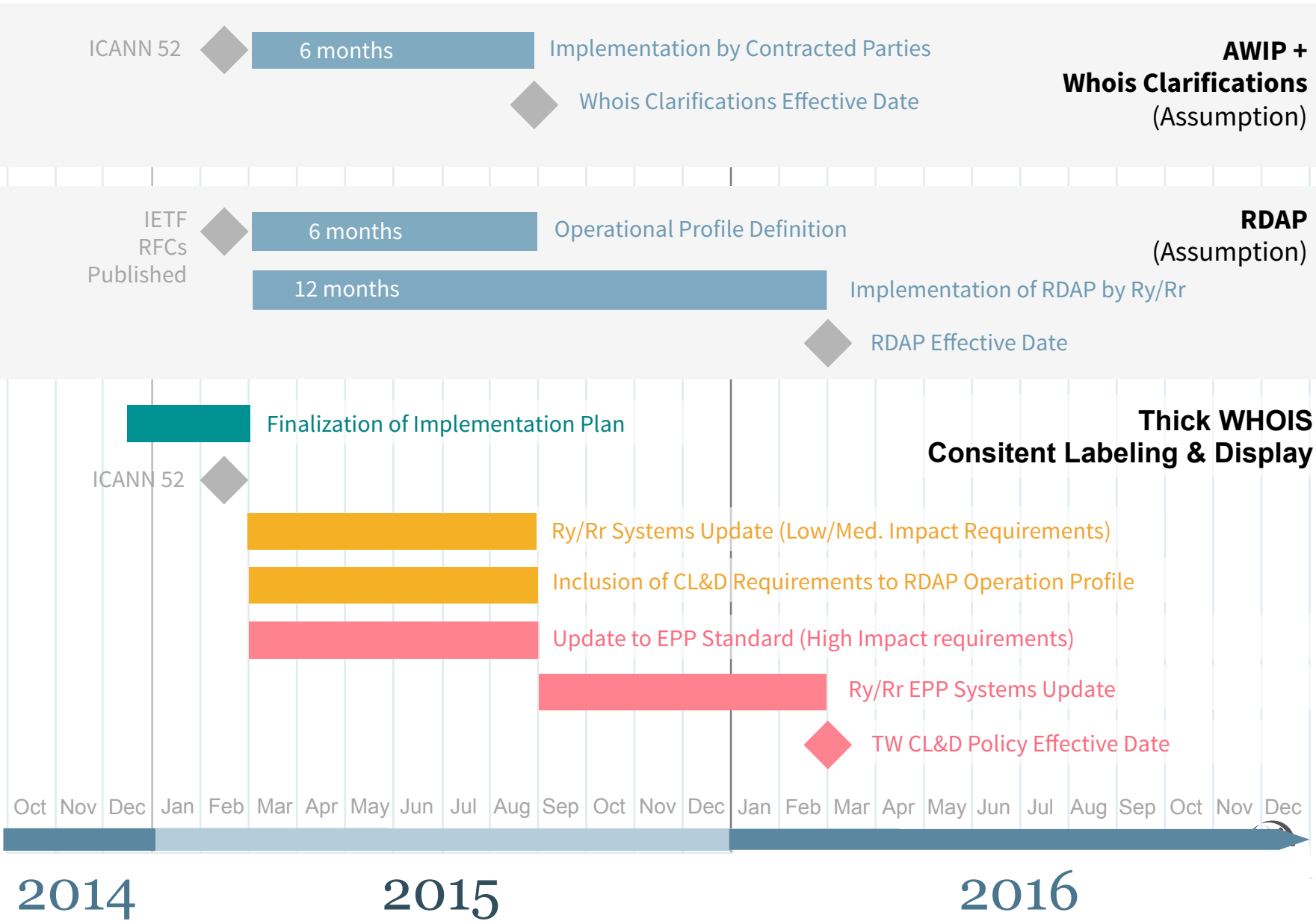
2. Whois Clarifications Advisory
   - Low to medium impact to Registries and Registrars
   - Effective date to be discussed during ICANN 52

3. RDAP
   - High impact to Registries and Registrars
   - RFCs making headway at IETF, coud be implemented by 2016-2017

Scenario 1 – No synchronization with other initiatives



Scenario 2 – Synchronization with other initiatives



Next Steps

- IRT to provide feedback on Implementation Scenarios by Feb 20.

- IPT to Draft Implementation Plan including
  - Final implementation timeline
  - Policy Requirements
  - Supporting measures

Transition from thin to thick Whois
for .COM, .NET and .JOBS

Legal Review

- Recommendation #3 of the GNSO Council Consensus Policy Recommendations on Thick Whois adopted by the Board on 7 February 2014 (the "Thick Whois Policy") required ICANN to

  "process a legal review of law applicable to the transition of data from a thin to thick model that has not already been considered in the EWG memo."

Legal Review

- The EWG Memo identified and considered a comprehensive list of generally applicable principles of data privacy and protection law, including:

  Transfer,
  purpose limitation,
  data quality and proportionality,
  transparency,
  security and confidentiality,
  rights of access, rectification, deletion and objection,
  sensitive data,
  direct marketing,
  data retention,
  accountability, adequacy (e.g., Standard Contract Clauses, Safe Harbor, Binding Corporate Rules, approval, consent),
  notice,
  legitimacy, etc.

Legal Review

- In light of the exhaustive scope of the EWG Memo, ICANN has not identified any additional principles of data privacy and protection law concerning the transition from thin to thick Whois

- ICANN will deliver its more detailed and final legal review in the April/May timeframe, which will include guidance on mechanisms that may be implemented to address any potential legal conflicts with applicable law

- Additionally, ICANN notes that the Procedure for Handling WHOIS Conflicts with Privacy Law ("Whois Conflicts Procedure"), which itself was an implementation of GNSO consensus policy, and is currently under review, is available to ICANN contracted parties "*in order to facilitate reconciliation of any conflicts between local/national mandatory privacy laws or regulations and applicable provisions of the ICANN contract regarding the collection, display and distribution of personal data via the gTLD Whois service.*"

Transition to thick Whois - Next Steps

- Release of final legal review (April/May 2015)
- IPT to consider approach to engage with experts from affected parties to work out the implementation details of the transition

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