ICANN Thick Whois Policy Implementation

Transition From thin to thick - Implementation Path Scorecard - Last updated: 25 July 2016

Legend:

Open	Item has been identified and is pending substantive discussion	Ongoing	Discussion of this item has started and is still ongoing	Closed	IRT reached agreement on a proposed answer

New Registration Track

#	Question/Open Item (Proponent)	Status	Comment/Proposal
1	**Milestones** for transition of new registrations from thin to thick	Closed	Current proposed milestones: - Registries to make system changes - Registrar notification of changes - Introduction of optional thick (contact support) in OT&E - Introduction of optional thick (contact support) in production - Registrar notification/transition period - Cutover to required thick (contacts) for new registrations in OT&E - Cutover to required thick (contacts) for new registrations in production
2	**Timeline estimate** for transition of new registrations from thin to thick	Closed	**Agreed** (19 July 2016): 15 months duration overall (see timeline attached to the scorecard) - 6 months for Registries to update Registry Systems (optional thick) - 3 months for Registries to release OT&E Environment - 12 months for Registrars to prepare for and complete the transition (required thick) from readiness of Registries OT&E Note: some IRT members believe the above timeline may shift due to potential data privacy issues, in connection with registrars legal analysis that may be conducted as apart of implementation

Existing Registration Track

#	Question/Open Item (Proponent)	Status	Comment/Proposal
1	**Bulk Transfer** - What options would registries provide for Bulk Transfer of existing registrations data?	Closed	**Agreed** (10 May 2016): Registries will provide EPP channel for transferring existing registrations under minimal validation rules (see #3). When registries can accept new registrations, nothing prevents backfill of existing registrations (caveat: new registrations validation rules would apply, as opposed to minimal validation rules).
1a	**Bulk Transfer** - Can **dedicated EPP connections** be made available for parallel processing? (Roger)	Closed	**Agreed** (29 June 2016): Registries' current proposal:Registrars to use Verisign's batch pool of EPP connections for backfilling of existing registrations data, in one of two ways: - either using an unlimited number of connections but with a limitation of 30 transactions per second (across all connections used) - or using a single connection with no rate limitation (tests conducted by Verisign seems to indicated that 80 tps throughput could be achieved) Registrars request that use of Verisign's standard pool of EPP connections still be considered considering that the current proposal (using the batch pool) may require significant development for some registrars (may need assessment of current usage of this connection pool by registrars). However Verisign expects this to be a matter of changing IP addresses in a registrar's implementation since batch and standard pools of EPP connections have the exact same functionality. The IRT agrees that further discussion of this topic is not needed for the drafting of the Consensus Policy language by ICANN Staff. Registries and Registrars may further discuss this matter independently.

#	Question/Open Item (Proponent)	Status	Comment/Proposal
1b	**Bulk Transfer** - Can an **alternative option** via bulk upload or file transfer be offered? (Roger, Jennifer) Bulk creation of contacts	Closed	**Agreed** (29 June 2016): To be confirmed and defined by Registries with specifications based on validation rules, with input from Registrars on how to achieve the two activities identified as necessary to complete bulk transfer: - creation of all contacts, (can be achieved via file transfer) - update of relevant domain names with these contacts once created Current proposal by Registries: - Bulk upload of contacts only, update of domains via EPP - Implementation Plan to leave alternative option open The IRT agrees that further discussion of this topic is not needed for the drafting of the Consensus Policy language by ICANN Staff. Registries and Registrars may further discuss this matter independently.
1e	**Bulk Transfer** - Can a **data escrow**-based mechanism be considered (Theo)	Closed	**Agreed** (21 June 2016): RrSG feedback suggesting use of the existing registrar Data Escrow files (would be cleaned up by Registrars and sent to Registries), or alternatively, provide reasons for not following this path. Registries not in favor of an RDE file-based bulk upload option (due to issues related to amount of work needed on Registry Systems and management of Auth Info, which may also require work from registrars). Alternative proposal is for file option based on the proposed validation rules (See #3). It could be a CSV file, with each column containing each data field. Verisign would process the file and send back results. IRT suggesting that implementation plan should indicate Registries would provide two options for transfer of existing data: EPP and file-based. On the latter option, registry would work with registrars to agree on the actual file format to be used.
2	How can we minimize throw-away code? (Roger)	Closed	**Agreed** (10 May 2016): Current EPP code path will be reused (see #1)

#	Question/Open Item (Proponent)	Status	Comment/Proposal
2a	Uniformity of Registries SDK is desirable (Jennifer)	Closed	**Agreed** (24 May 2016): This is already the case (Marc). Closed unless Jennifer would like to re-open/discuss further.
3	**Validation Rules** - Should there be a minimal set of validation rules - instead of no validation rules? (Marc)	Closed	**Agreed** (24 May 2016, 29 June 2016): – Only three fields would be mandatory: Contact ID, Postal Info Type (due to systems constraints) and Auth Info. This is to minimize impediment and ensure all available data is loaded (even if currently incomplete) – Minimal validation rules to also apply to new registrations during the transition of existing registration (or backfill of legacy data) because there is no way for EPP systems to distinguish between the two type of transactions
3a	**Validation Rules** - Confirmation of Postal Info Type Requirement as part of validation parameters (Marc)	Closed	**Confirmed**, see #3
3b	**Validation Rules** - Requirement for registrars to supply **all available data** (Steve)	Closed	**Agreed** (31 May 2016) - RDDS output be the same before and after the transition (Same amount of RDDS information is provided) - Implementation plan to include note that validation rules are only meant to ease the transition and not to change the contractual requirements as far as what data needs to be supplied.
3c	**Validation Rules** - Need to gather **Input from RySG and RrSG** on finalized contact validation rules (Theo, Marc, Roger)	Closed	**Agreed** (19 July 2016): Sought feedback from RySG and RrSG on proposed validation rules) in June 2016.No objection expressed to the proposal

#	Question/Open Item (Proponent)	Status	Comment/Proposal
3d	**Validation Rules** - Once data is migrated, what rules to apply? Should new and existing registrations be treated differently based on their creation date and applicable RAA? (Roger)	Closed	**Agreed** (7 June 2016, 29 June 2016): Minimum validation rules apply to the transition of existing registration's contact data, until the end of "backfill" period. At such cut over date, standard validation rules in registry systems apply, indifferently to creates and any updates of new and existing contact data (to avoid adding levels of complexity). Once the transition is complete, a new domain can be created with an existing contact object that has limited data. Standard validation rules would only apply to this domain when the contact data is updated. Registrars remain bound by relevant provisions in their agreements, including: • Investigating and correcting Whois inaccuracies when notified directly by public or via ICANN • Complying with the Whois Accuracy Program Specification (2013 RAA),
3e	**Validation Rules - Multibyte support** for contact information by registries	Ongoing	**Pending** (19 July 2016) Registries provide UTF-8 support (one sort of multibyte encoding), as well as the possibility to declare contact information as Localized (loc) or International (Int).
3f	**Validation Rules - Length of fields** for address	Ongoing	**Pending** (20 July 2016) Request that registries consider extending address field length to 255, consistent with EPP Standard (Theo)
3g	**Validation Rules - IDN Support** for email	Ongoing	**Pending** (20 July 2016) Request that registries consider/confirm support of IDN email addresses
4	Should we aim to synchronize the new and existing registrations tracks?	Closed	**Agreed** (10 May 2016): Keep the two tracks separate to mitigate potential delays. Focus on New Registrations first.
5	How should **inter-registrar transfers** of registrations be handled if information is incorrect or incomplete? (Jennifer, Roger, Theo)	Ongoing	**Agreed** (7 June 2016): No issues identified that would be specific to the transition from thin to thick. Can be handled using current procedures/practices. **Pending** (29 june 2016): Conclusion needed on what validation rules apply to transfers requiring the creation of new contacts (registrar-based ROIDs needed) when data is missing for these contacts

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6	How should **inter-registrar transfers** be handled when registrars are at different stages of data migration in the transition from thin to thick? (Jodi)	Ongoing	**Pending** (7 June 2016, 19 July 2016): Discussion of potential "corner cases" related to the time taken by registrars to complete the transition of their existing registrations from thin to thick: (a) Loosing registrar is thick (already transitioned) but gaining registrar is thin (not yet transitioned) (b) Loosing registrar is thin but gaining registrar is thick One suggestion include requiring registrars to continue providing a Whois Service during the transition (Joyce) Proposed solution for scenario (a) above, considering the general practice that registrars do not transfer contact objects and instead create their own objects in the registry systems: gaining registrar could remove contacts in the registry systems (Staff). Marc to investigate.
7	**Timeline** - What timeline should be considered for transferring existing registrations from thin to thick? (Staff)	Closed	**Agreed** (19 July 2016): • Start date will be determined by announcement of policy effective date, currently assumed to be in January 2017 (Staff) • End date will likely be the cut off date after which regular validation rules apply (Marc, Roger) 24 months duration overall (see timeline attached to the scorecard): - 3 months for Registries to release an OT&E environment - 3 months for Registrars to prepare for the transition - 6 months for Registries to update Registry Systems (optional thick) - 18 months for Registrars to complete the transition from the time the Registries' production system allow the transition of existing registrations Concerns: – total 24 months implementation window when adding 6 months needed for registries to prepare for the transition (Steve Metalitz) – impact of changes in data localization laws on the migration of data (Steve DelBianco) not reflected in current timeline (Joe Waldron) because impact is not yet know (Theo)
7a	**Timeline** - Need for a way to estimate system throughput on contact creation (Theo, Roger)	Closed	**Agreed** (19 July 2016): Discussions were inconclusive on this topic.

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7b	**Timeline** - Need to factor in coordination of 2000+ registrars, including potential non-responsiveness (Theo)	Ongoing	Current proposal by registries to offer the same window for all registrars considering second-hand experience of the .ORG transition and amount of registrars involved in this transition. **Pending** (31 May 2016, 12 July 2016): Further discussion needed to flesh out details, including potential incentives or measures to encourage transition of existing data before the end of the transition window (Steve) and to avoid bottlenecks right before closure of the migration window, considering that: - it may be challenging to mobilizing silent registrars (Theo) as well as small registrars based on the .ORG precedent (Jodi) - driving uptake of transition by requiring Thick in OT&E before cutover in production may not be effective due to modest use of OT&E currently It is suggested that this topic be discussed with the community in Helsinki. IRT members are asking if ICANN has any tools available to encourage registrars not to take the full 18 months (Steve), including auction proceeds (Theo) GoDaddy would start with the transition of domains set to expire after the policy effective date (end of implementation) and work backwards from there (Jody)

Transition Implementation Path – Timeline (19 July 2016)