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## AT-LARGE ADVISORY COMMITTEE

### ALAC Statement on the Proposed Implementation of GNSO Thick Whois Consensus Policy Requiring Consistent Labeling and Display of RDDS (Whois) Output for All gTLDs Follow Updates

#### Introduction

Alan Greenberg, ALAC member of the North America Regional At-Large Organization (NARALO) and the ALAC Chair, developed an initial draft of the ALAC Statement.

On 09 January 2016, the first draft of the Statement was posted on the [At-Large Proposed Implementation of GNSO Thick Whois Consensus Policy Requiring Consistent Labeling and Display of RDDS \(Whois\) Output for All gTLDs Follow Updates Workspace](#).

On 11 January 2016, 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 26 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 31 January 2016, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 11 votes in favor, 0 vote against, and 0 abstention. You may view the result independently under: <https://www.bigpulse.com/pollresults?code=53397hkyDpYwPBt5ZeTSqgkA>.

## **ALAC Statement on the Proposed Implementation of GNSO Thick Whois Consensus Policy Requiring Consistent Labeling and Display of RDDS (Whois) Output for All gTLDs Follow Updates**

The timeline for the “Thick Whois” PDP was:

- The GNSO requested the Issue Report in September 2011;
- The PDP was initiated by the GNSO in March 2012;
- The Final Report was issued in October 2013;
- The Board approved the PDP Recommendations in February 2014.

Although the PDP Charter allowed and in fact required consideration of a number of issues, the main question being asked was whether all gTLD registries should be required thick Whois services (now Registration Data Directory Services - RDDS). The prime recommendation of the PDP is that *“The provision of thick Whois services, with a consistent labeling and display as per the model outlined in specification 3 of the 2013 RAA1, should become a requirement for all gTLD registries, both existing and future.”*

The Implementation Plan published on 25 November 2015 and the subject of this Public Comment outlines a three-phase process to implement the PDP recommendations, *“each with a specific scope and a dedicated timeline”*. These are:

- Phase 1 - Effective Date: 1 August 2016  
All gTLDs, excluding .COM, .NET and .JOBS, are required to display a Registration Data Directory Services (RDDS) output compliant with this Consensus Policy, with the exception of Registrar Registration Expiration Date and Reseller information.
- Phase 2 - Effective Date: [Dependent on completion of IETF work, but effective 6 months after such publication]  
All gTLDs, excluding .COM, .NET and .JOBS, are required to display a Registration Data Directory Services (RDDS) output fully compliant with this Consensus Policy.
- Phase 3 - Effective Date: [To be determined]  
All gTLDs, including .COM, .NET and .JOBS, are required to provide a thick Registration Data Directory Services (RDDS) fully compliant with this Consensus Policy.

The PDP Report explicitly stated, and the Implementation Plan acknowledged that the implementation of one part of the recommendation should not unnecessarily delay other parts, and the example given was that conversion to a Thick Whois for those registries that do not currently use it should not delay consistent labeling and display of data.

The ALAC would like to register its extreme dismay and dissatisfaction with the current state of this project. Specifically:

1. The prime rationale for the PDP and prime recommendation of the PDP was the move to a Thick Whois (now RDDS);
2. The Implementation Review Team acknowledges that this, now identified as “Phase 3”, has an independent timeline from the other phases.
3. The current proposal includes no plan and no target date for this prime requirement, but rather has focused on ancillary PDP recommendations.

Four years and four months after the issue was first addressed by the GNSO, and nearly two years after Board approval, we still have no progress and no projected completion date for the prime issue that the PDP focused on and recommended.

When people comment on the slow rate of policy development at ICANN, a common answer is that: "it takes time to develop good policy". There is no doubt some truth in that, and the same is likely true for the implementation of such policies.

However, soon after August 2016, the effective date of Phase 1 implementation and the only one with a firm target, we will be entering the SIXTH year of this work. Surely ICANN should be able to do better than that.