

RDS PDP WG Work Plan – Proposed Revisions (through 16 March 2016)

Proposed Change (Summarized)	Rationale	Source
<p><b>a.</b> Q1 should be “What data should be collected, stored, and disclosed?”</p>	<p>I would find it helpful to understand what “gTLD registration data” is before I think about who should have access to it, so suggest that the current question #4 (“What data should be collected, stored, and disclosed?”) be moved to question #1  <i>Note: In work plan, data for each purpose is considered in Q4</i></p>	<p>S. Hollenbeck                      F. Folly +1                      S. Perrin +1                      K. Kleiman +1                      J. Standiford +2</p>
<p><b>b.</b> Q4 inputs should include RFC 7485</p>	<p>When we get around to asking “What data should be collected, stored, and disclosed?” it might be helpful to read <a href="#">RFC 7485</a>. It’s an inventory of information that was available via [gTLD and ccTLD] WHOIS at the time the IETF’s WEIRDS working group wrote the document. It might not be 100% accurate now, but I believe it’s still the best summary of current practice.</p>	<p>S. Hollenbeck</p>
<p><b>c.</b> Q1 should be “What DN registration data is collected and for what purpose?”</p>	<p>Starting with this question seems quite consistent with the mandate the Board assigned to our WG: “to define the purpose of collecting, maintaining and providing access to generic Top-Level Domain (gTLD) registration data”  <i>Note: In work plan, purpose is considered in Q1, data for each purpose in Q4</i></p>	<p>K. Kleiman</p>
<p><b>d.</b> Q2 should be “What steps are needed to protect data and privacy?”</p>	<p>The foundational question of what laws govern our evaluation of the collection, storage and disclosure of the data we will be discussing in #1. Before moving on to “Who should have access to the gTLD registration data and why,” it would help us to understand the requirements of law - particularly comprehensive data protection laws -- that differentiate the data collector/primary use (registrars) from secondary users who might seek additional access to the data via the RDS  <i>Note: In work plan, privacy [including applicable data protection laws] is Q5</i></p>	<p>K. Kleiman</p>
<p><b>e.</b> Q3 should be “What additional uses would people like to use registration data and why?” (currently part of Q1)</p>	<p>Deliberations as to whether these additional uses are legal, possible, optional  <i>Note: In work plan, all potential purposes are considered in Q1</i></p>	<p>K. Kleiman</p>
<p><b>f.</b> Q4 should be “What are the costs and benefits of providing data for secondary purposes?”</p>	<p><i>Note: In work plan, cost and benefit analysis is considered in Q9 and Q10</i></p>	<p>K. Kleiman</p>
<p><b>g.</b> Outreach tasks should include not only SOs and ACs, but the larger Internet Community</p>	<p><i>Note: In work plan, outreach tasks include #7, 9, 14, 17</i></p>	<p>K. Kleiman</p>
<p><b>h.</b> Q1 should be reworded “Potential Users and Potential Purposes”</p>	<p><i>Note: In work plan, Q1 develops “potential requirements” for Users and Purposes</i></p>	<p>K. Kleiman</p>
<p><b>i.</b> Phase 1 should not define “Requirements” or “Potential Requirements”</p>	<p>Loose wording is potentially misleading  <i>Note: In charter, Phase 1 goal is to reach consensus on requirements before WG</i></p>	<p>K. Kleiman</p>

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		<i>moves into Phase 2 to design policies intended to meet agreed requirements</i>	
<b>j.</b>	Add a new task to work plan to analyze the risks to data collectors and data subject	Need to analyze risks to registrars and registrants of making this data available to the users and for the purposes that secondary users would like <i>Note: In work plan, risk analysis is considered in Q11</i>	K. Kleiman
<b>k.</b>	Q1 should be the purpose of the WHOIS	It's hard to speak about any data, set of data without setting the purpose of the whole data processing (i.e. WHOIS here). Even if we started with defining the data requested we will surely bump into the question: For what purpose?	P. Kimpian
<b>l.</b>	Q1 should be registration data is collected for what purposes, or what data is collected?	EWG struggled with similar question in its deliberations; found it was difficult to answer what data should be collected without purpose / use cases. <i>Note: In work plan, purpose is considered in Q1, data for each purpose in Q4</i>	WG Call Discussion
<b>m.</b>	Add a new task to obtain input upfront from Data Protection Commissioners		WG Call Discussion
<b>n.</b>	Q1 foundational question should be "What is the purpose of registration data?"	SAC055 - Blind Men and Elephant Report also provides further insight into the suggested order of questions. SAC054 discussed data model for registration data which asked the question of purpose in a slightly different way.	WG Call Discussion
<b>o.</b>	Focus of Q1 should also be on what is within the remit of ICANN's mission	Many existing use cases are ancillary to management of the DNS - supporting the life cycle of a domain name - in the view of SAC054.	WG Call Discussion
<b>p.</b>	We will have the opportunity to interrogate each use and purpose [in Q1], but the global purpose [of gTLD registration data] will have to be threaded into each Q		WG Call Chat (Perrin)
<b>q.</b>	We need to identify who is paying. Can cost be specified as a requirement? (Q9)		WG Call Chat (Shattan)
<b>r.</b>	I think the approach is great but we need to make sure we set milestones and all work hard to meet them		WG Call Chat (Deacon) S. Prosser +1
<b>s.</b>	Would like to stress importance of step(s) that [invite community input]		WG Call Chat (Bos)
<b>t.</b>	"What data is collected due to registration?" is well past the remit of this group	We're talking about access via a registration data service, and I don't believe our charter extends to revising registration rules (which would affect what data is collected). I think therefore we should take as given the data that is being collected and the terms under which they are being collected, and instead worry only about	A. Sullivan

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	<p>what of that data should be queryable and by what class of querier ... It could be [changed by this PDP, but I am arguing that we should start with a working assumption that we won't do that because (1) we can take the data collected as a given and simply pick from what's available (2) new policies could bring new fields. If we want to do something useful, we could specify considerations for what to do with a new consensus-policy registration data field.</p> <p><i>Note: In work plan, access paradigm is considered in Q2</i></p>	
<p><b>u.</b> We wouldn't be able to answer questions pertaining to "What data is being collected by the RDS?" (Q4) before we've worked out what classes of querying party and what they ought to be able to do (Q1).</p>	<p>Once RDAP is deployed, it will be possible also to acquire (some portion of) the login credentials for the party making the query. In addition, it seems to me, operators of RDAP services could collect other data associated with a given login, in order to provide greater or lesser access to things. For instance, an operator might provide some EULA-accredited large-scale access to the whois data to researchers, but only to some fields. I can imagine these kinds of data collection activities could be part of our effort here, but there's not that much to it &amp; I think we wouldn't be able to answer these questions before we've worked out what classes of querying party we imagine and what they ought to be able to do</p>	<p>A. Sullivan</p>
<p><b>v.</b> Q1 should be "Is this required and why"</p>	<p>I have been worrying this WHOIS matter for some time and truly appreciate why a guiding structured framework for action is necessary The ALAC so very long ago adjudged and advised that we must begin with the "Is this required and why" questions before anything else. And that was the approach that the EWG took in its deliberation</p>	<p>C. Samuels</p>
<p><b>w.</b> Should Q1 include consideration of process to add new users or purposes</p>	<p>During WG meeting, a question was asked about whether another PDP would be needed to add new purposes in the future. It was noted that requirements developed in phase 1 can potentially include a requirement for a process to add new users or purposes, if the WG chooses</p>	<p>WG Meeting</p>
<p><b>x.</b> Work plan should include consideration of migration/coexistence with 2013 RAA WHOIS requirements</p>	<p>New consensus policies developed in this PDP can change the RDDS (whois) requirements currently specified in the 2013 RAA. Where there is a policy change, consensus policy trumps contract requirements, but implementation of policy must then take place (for example, Thick WHOIS policy)</p> <p><i>Note: In work plan, Coexistence is considered in Q6</i></p>	<p>WG Meeting</p>
<p><b>y.</b> Work plan should include consideration of RDAP-related policies</p>	<p><i>Note: In charter, RDAP is considered in Q4 (data elements), Q8 (system model), and Phase 3 (implementation guidance)</i></p>	<p>WG Meeting</p>

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<b>z.</b>	Work plan should include consideration of how WHOIS Accuracy improvements	Will need to coordinate with continuing improvements <i>Note: In charter, WHOIS ARS is considered input to Q3</i>	WG Meeting
<b>aa.</b>	Q1 should cover not just who should have access but also why they should have access (that is, for what purpose)	<i>Note: “And why” was added to the process framework’s Q1 in the charter in response to public comment requesting that Q1 more clearly indicate that it is intended to include what is the purpose of gTLD registration directory services. However, the WG can further clarify or add questions as part of its work.</i>	WG Meeting
<b>bb.</b>	Work plan should include consideration of IDNs and translation/transliteration PDP	Will need to coordinate with continuing improvements <i>Note: In charter, identified as input to Q8 (system model)</i>	WG Meeting
<b>cc.</b>	Will the PDP WG revise the process framework?	<i>Note: In the work plan, the WG decides how to apply the framework to the work plan and deliberation on possible requirements as part of Task 11</i>	WG Meeting
<b>dd.</b>	Examine only a limited set of purposes and the data elements for those purposes and application of data protection laws to that data before considering all other purposes and their data elements		WG Meeting
<b>ee.</b>	When can additional questions be added?	<i>Note: In the work plan, occurs during Task 12 if the WG deliberates and determines that a requirement for gTLD registration directory services does not fit into existing Qs</i>	WG Meeting