Version 6, 27 September 2016 + WG Comments

GENERAL COMMENTS ON VERSION 6 STATEMENT MADE ON WG MAILING LIST (thru 3 OCT)

DATE	NAME	ITEM	COMMENT (SUMMARY)
29/09	Hollenbeck	?	Find (and fix) two more instances of "gTLD domain names". (This may have been already done in distributed v6 redline)
29/09	Perrin	?	See http://mm.icann.org/pipermail/gnso-rds-pdp-wg/2016-September/001718.html for overall commentary from Perrin.
29/09	Anderson	?	Perhaps a more fulsome consolidated RDS purpose statement could be: "The Purpose of RDS is to provide access to information about Domain Names, Name Servers and Registrars in a TLD."
3/10	Mounier		I am also supportive of the simplification to the goals and criteria proposed by Stephanie Perrin as I see value in keeping this statement of purpose as succinct as possible.
Draft Registration Data and Directory Service Statement of Purpose			• *Proposed Title: Draft Statement of Purpose for the Collection and Use of Registration Data, and a Potential Directory Service for the Disclosure of Registration Data (Stephanie Perrin- 29/9)*
This statement is intended to define the purpose(s) of a Registration Directory Service (RDS) for generic top-level domain (gTLD) names. The statement is grouped into two categories: 1) Overall Goals for this Statement of Purpose; 2) Specific Purposes. To ensure that the purposes are understood in the appropriate context, a list of prerequisite conditions of purposes is also provided.			• *Several implicit assumptions appear to have crept in, namely that an RDS is necessary, and that data will be released through it. Add "potential" before RDS; similar edit to Specific Purpose 3 intro. (Stephanie Perrin – 29/9)*
Note that it is important to make a distinction between the purpose(s) of individual registration data elements[1] versus the purpose(s) of a RDS, i.e., the system that may collect, maintain, and provide or deny access to some or all of those data elements [and services related to them, if any.] This purpose statement is intended to focus on the purpose(s) of the RDS as a whole, although some overlap may be unavoidable.			• *Add "the collection, use and disclosure of" before "individual registration data elements." After "system" replace "collect" by "assemble." The data has been collected already by registrars to register a domain name. (Stephanie Perrin- 29/9)* • *Regarding overlap within statement of purpose being "unavoidable": By creating this greatly enlarged statement of purpose for the RDS, have we not then leapt to the conclusion that we need a (new) RDS? (Stephanie Perrin 29/9)*

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[1] Here, "registration data elements" refers to data about generic top-level domain names collected in the relationship between registrars to registries and in the relationship between registrars/registries and ICANN.

Overall Goals for this Statement of Purpose	
a) To set unambiguous boundaries for RDS policy requirements and RDS consensus policies	• *Delete Goal a. "To set unambiguous boundaries for RDS policy requirements and RDS consensus policies." Too ambiguous. Not very helpful. (Greg Aaron - 30/9)*
b) To establish minimum criteria for RDS policy requirements and RDS consensus policies	• *Delete Overall Goals b-e (Stephanie Perrin – 29/9)* • *The purpose clause [is] to come up with a succinct purpose for the exercise in which we are engaged....to limit the exercise to the minimum until such time as we have agreed on policy, as it is generally understood that many policy issues have crept into the WHOIS and RDS without benefit of a full PDP deliberation. (Stephanie Perrin – 29/9)*
c) To describe why, specifically and explicitly, an RDS is needed (see Specific Purposes, below).	• *Delete Overall Goals b-e (Stephanie Perrin – 29/9)*
d) To communicate purpose(s) of the RDS to registrants (and others)	• *Delete Overall Goals b-e (Stephanie Perrin – 29/9)*
e) To establish sufficient relationship between the purpose(s) and the use(s) of the RDS	• *Delete Overall Goals b-e (Stephanie Perrin – 29/9)*
f) To provide a framework that enables contracted parties to comply with applicable laws	• *While a statement of purpose is necessary for the interpretation of ICANN's policies with respect to the collection, use, retention and disclosure of personal information in the context of its registration activities, this is not it...because it requires policy decisions, and we are not there yet. A goal can be compliance with national and regional law, and with internationally recognized human rights obligations, but not crafting the actual purpose statement. (Stephanie Perrin – 29/9)*
Goals for each RDS Purpose	• *Proposed Title: Goals for each use or disclosure of RDS Data (Stephanie Perrin – 29/9)*
i. Consistency with ICANN's mission	
ii. Consistency with other consensus policies that pertain to generic top-level domain (gTLD) names	
iii. Consistency with applicable laws	
iv. Helps to clearly articulate a rationale for an RDS	• *Delete Goal for each Purpose iv (help to articulate rationale). We are not drafting this purpose statement to justify creation of a new RDS. (Stephane Perrin – 29/9)*

Specific Purposes for Registration Data and Registration Directory Services	
1. A purpose of gTLD registration data is to provide information about the lifecycle of a domain name (as specified by ICANN's Diagram of gTLD Lifecycle) to enable management of a domain name registration.	• *In purpose of data, "provide" seems to be the wrong word, although I'm unsure if store/manage/maintain/record/define are any better (Rob Golding – 29/9)* • *In purpose of data, replace "enable" by "assist with" (Rob Golding – 29/9)* • *Delete "to enable management of a domain name registration"- does not belong in a purpose statement; deals with a potential use case. (Marc Anderson – 29/9)*
2. A purpose of a system to collect, maintain, and provide access to gTLD registration data (hereafter referred to as "the RDS") is to provide information that is needed by authorized parties to operate a generic top-level domain name in the DNS.	• *We've already defined it as systems to "collect, maintain and provide" so the extra "provide" here should probably be "handle" or "manage" (Rob Golding – 29/9)* • *re: Golding, proposed alternative: "facilitiate the management of" (Stephanie Perrin – 29/9)* • *Replace "needed by authorized parties to operate a generic top-level domain name" by "regarding a generic top-level domain name" (Rob Golding – 29/9)* • *RDS does not collect or maintain gTLD registration data – it provides access to that data, the Registration system itself that registries make accessible to registrars via EPP is the system that collects and maintains gTLD registrations data. How about: "A purpose of RDS is to provide information that is needed by authorized parities to operate a generic top-level domain name in the DNS". (Marc Anderson – 29/9)*

3. Further specific purposes of the RDS include:	• *Renumber 3a and 3b as purposes 3 and 4 respectively. (Marc Anderson – 29/9)*
	• *I believe that the specific purposes currently listed under 3a) and 3b) should not be regarded as secondary to 1) and 2). They should therefore be listed as 3) and 4) as suggested by Marc Anderson and Greg Aaron. There is certainly a TLD Operations perspective to the purpose of an RDS, but we must also recognize that operations of TLDs have socio-economic impacts that lead to other purposes of an RDS, as is the case for:*
	  ○ *facilitating contact with registrants,*
	  ○ *registrars and proxy/privacy service providers enabling release of accurate gTLD registration data. (Gregory Mounier – 3/10)*

a. To enable contact with registrants, registrars, (registries?), and proxy/privacy service providers associated with generic top-level domain names, for specific policy-defined purposes	• *Comment offered during last WG call; Fabrico to propose new text. (concern may be addressed by Marc's proposal below?) (Fabricio Vayra – 28/9)* • *Delete "for specific policy-defined purposes" – doesn't belong in a RDS purpose statement, it's more appropriate to deliberation phase. Revise to read: "A purpose of RDS is to facilitate contact with registrants, registrars and proxy/privacy service providers associated with generic top-level domain names." (Marc Anderson – 29/9)* • *Re: Anderson, proposed alternative: "A purpose of RDS is to identify and facilitate contact with domain contacts, registrars, and proxy/privacy service providers associated with generic top-level domain names." Because "Registrants" does not cover other contact types. (Greg Aaron – 30/9)*
b. To enable release of accurate gTLD registration data that may not otherwise be publicly available, under specific and explicit policy-defined conditions	• *Having accurate data may be a goal, but the purpose is to display the data of record – a potential use case is to facilitate data correction. Revise to read: "A purpose of RDS is to enable the release of gTLD registration data that may not otherwise be publicly available." (Marc Anderson – 29/9)* • *This is the doc's only mention of data accuracy, an important topic. The doc says that accuracy is a concern only in cases of gated or*

	preferential access, but ICANN policy has always been to encourage data accuracy across the board. Add as separate Specific Purpose 5: "A purpose of a system to collect, maintain, and provide access to gTLD registration data (hereafter referred to as "the RDS") is to collect and provide information that is accurate." (Greg Aaron – 30/9) • *Although I support the simplification to the language of specific purposes 3a) and 3b) (which should be renumbered 3 and 4), as proposed by Marc, I share Greg's views that the notion of "accurate" gTLD registration data should not just be deemed a feature, but rather an integral part of the purpose considering the importance of maintaining a repository of accurate data form a public policy perspective. As you know, the GAC has consistently advised that gTLD WHOIS services "should provide sufficient and accurate data about domain name registrations and registrants subject to national safeguards for individuals' privacy" (per its 2007 GAC WHOIS Principles[gacweb.icann.org], which it referred to in its 2015 comments on the RDS PDP Preliminary Issue Report[forum.icann.org]). I therefore support Greg Aaron's suggestion to add a fifth purpose: "A purpose of a system to collect, maintain, and provide access to gTLD registration data (hereafter referred to as "the RDS") is to collect and provide information that is accurate." (Gregory Mounier – 3/10)* • *A purpose of an RDS may be to release registration data that IS publicly available in other ways. Current examples include domain and nameserver data found in zone files and the DNS, registrar contact info, etc. (Greg Aaron – 30/9)* • *"under specific and explicit policy-defined conditions" is not just about release – it implies that all allowable usages can be defined, managed, and enforced. A complicated and controversial area; too open-ended. Revise to read: "To enable release of gTLD registration data that may or may not otherwise be publicly available, where the released types of data are determined by policy-defined conditions." (Greg Aaron – 30/9)*