Privacy and Proxy Service Provider Accreditation Program IRT

Data Escrow and RDDS Labeling

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IRT Meeting
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Agenda

- Overview and Discussion: Data Escrow Specification v2
- Overview and Discussion: Labeling Specification

Background: Draft Data Escrow Specification

- IRT confirmed that data escrow should be required for all PP providers
- Data escrow industry standards have been updated since RAA was drafted
- IRT polled twice in June/July: Should PPAA include updated specification, similar to RA?
- **Poll and IRT discussion results**: Follow registrar requirements

Design Principles

- Data escrow of P/P data allows recovering the underlying registrant/contact information in case of disaster
- Re-use the registrar data escrow specification as much as possible
- Leverage RRI tool to allow P/P providers and ICANN organization learn the status of escrow deposits

Data Escrow Specification for P/P Providers

- Allow optional use of contact handles
- Require specific CSV headers and file name conventions
- Defined validation to be executed by DEAs similar to what is done for registries
- Daily full or incremental and weekly full deposits
- Deposit composed of encrypted and compressed tar file with a digital signature
- Allow splitting of large files

Domain Name Data to Be Escrowed

- Repository Object Identifier (ROID),
- Domain Name,
- Registrar IANA ID,
- Registrant Handle,
- Admin Handle,
- Technical Contact Handle,
- Billing Contact Handle (optional)

Contact Data to Be Escrowed

- Contact Handle,
- Name,
- Organization Name (optional),
- One street field, and optionally two more,
- City,
- State or Province (optional),
- Country Code,
- Postal Code (optional),
- Email,
- Phone, and optionally phone extension,
- Optionally, fax and fax extension

RRI Support for Privacy and Proxy Providers

- Similar functionality to that offered to Registries, allowing for full automation on all sides (i.e., P/P providers, DEAs, ICANN):
  1. P/P provider sends an escrow deposit to the Escrow Agent
  2. DEA validates the deposit, and if problems are found, DEA works with the P/P provider on fixing the issues
  3. The P/P provider notifies ICANN using the RRI that the escrow deposit was sent to the DEA
  4. The DEA notifies ICANN using the RRI that a deposit was received, validation results and object counts
  5. P/P provider has visibility through the RRI about the delivery of notifications from DEA and its escrow compliance status

Open Questions

- Do we need to consider a special case where registrar and P/P provider are affiliated?
- If so, can an affiliated P/P provider offer P/P services for other registrars?

Background: RDDS Labeling Specification

- IRT first discussed Registration Data Directory Service labeling in February
- **Final Report: "**To the extent that this is feasible, domain name registrations involving P/P service providers should be clearly labelled as such in WHOIS."
- After several telephone discussions and polls, the consensus of the IRT appeared to be to require three items in the "Registrant Organization" field:
  - Provider Name;
  - Provider ICANN ID; and
  - URL for ICANN-managed listing of Providers (with Provider contact information)

Background: RDDS Labeling Specification

- PPAA draft v1 included this requirement in Specification 4, Section 1.2:

- “Provider shall ensure that Provider’s full legal name, ICANN identifier and the URL for the ICANN-managed webpage containing Provider’s contact information are displayed in the Registration Data Directory Service records for all registrations utilizing Provider’s Services, at a minimum, in the Registrant/Contact Organization field, in the following format: Registrant/Contact Organization: Provider Name, ICANN ID, ICANN URL [to be designated before contract is finalized].”

- **IRT feedback is requested on this provision.**

Potential Improvements to Labeling Specification

- Order of required information could be updated to make it easier to identify between the three (most to least structured):
  - ID,
  - URL,
  - Name
- Requirement for Provider name could be removed (since ID will be listed)
- URL could be dependent on Provider ID (to link directly to provider's contact information)
- **Example:** Registrant/Contact Organization: 12345, https://icann.org/P/P/12345

Action Items, Upcoming Meetings

- Please provide any additional feedback on data escrow and RDDS labeling no later than 5 Sept.
- Please review PPAA draft v1 and identify any other sections you would like to discuss by sending them to the list this week. We are nearly finished with the issues list.
- **Next Week:** IRT will discuss de-accreditation process proposal v1
- **Upcoming topics:** Review of PPAA draft v2, incorporating edits based on IRT feedback; Applicant Guide (including proposed fees structure), data retention, next steps on LEA framework

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Thank You and Questions

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