17 January 2018

From: Registry Service Provider (RSP) Discussion Group
To: Leadership of the Subsequent Procedures PDP Working Group

Cc: The Registrar Stakeholder Group (RrSG)

Dear Cheryl and Jeff,

I am writing to you in my capacity as Chair of the Registry Stakeholder Group's RSP Discussion Group (RSP DG) and in follow-up to my previous letter to you dated 9 July 2017. The letter provided an overview of the work currently being undertaken by the DG and areas of common ground with the Subsequent Procedures PDP WG (SubPro PDP WG). In my letter of 9 July 2017, I committed to providing you with an overview of our initial analysis with a view to this being incorporated into the SubPro PDP WG's own work.

The RSP DG was born of a desire by the RySG to provide input into issues that as registries we are often on the front line of. These include consideration of a need to streamline the process for changing back-end registry providers and responding to ICANN GDD staff observations that repeated operational (SLA-related) issues were being detected.

We were aware that the SubPro PDP WG had been tasked with looking at overall aspects of the 2012 New gTLD program and we envisioned that measures agreed to streamline the process could be used to inform the SubPro PDP WG. To that end, you may recall that the RSP DG had identified 6 work tracks:

1. A more secure, stable, and resilient RSP operation
2. A more streamlined process associated with changing RSPs
3. Transition from technical testing to an ongoing monitoring solution
4. Improved services by creating the option for a direct communication between ICANN and RSPs
5. Reducing the financial and administrative burdens for the Registry Operator associated with changing RSPs
6. Enhancing the security and stability of the DNS.

The RSP DG met face-to-face in Abu Dhabi and discussed the progress of each work track effort. The RSP DG has developed a substantive paper, currently in draft form, that is primarily intended to address items 1 and 6 above, and is also likely touch on the other items. While good progress has been made, there are a number of issues that are being debated within the RSP DG that are taking some time to resolve. We believe that this paper may be helpful for the SubPro PDP WG discussions surrounding RSPs and we hope to be in a position to provide a copy of this paper to you in the near term.

The RSP DG also had considerable discussion of item 4., with a number of RSPs providing some insight into the challenges they experience not being able to

communicate directly with ICANN during a possible SLA breach event as well as changes to RSPs. This is an issue that we agreed should be reasonably simple to resolve, as did Russ Weinstein from ICANN's GDD. To that end we will be developing a process, which will be consistent with the RySG response to Q.1.1.5 of the CC2 request from the SubPro PDP WG.

We do not believe that items 2 and 5 are directly relevant to the SubPro PDP WG effort as they more directly relate to the immediate challenges associated with swapping out an RSP. The RSP DG continues to work through these issues in conjunction with GDD staff and we will endeavour to inform you of the outcome of this work.

We understand that the SubPro PDP WG, WT1, will be discussing RSP related issues during a call on 6 February 2018, and we have encouraged members of the RSP DG to be present during that call so that they can inform the WT of the RSP DG efforts absent written input from the DG at this time. In addition, we reiterate the comments made by the RySG in response to the CC2 request from the SubPro PDP WG as they relate to the RSP discussion. In particular, we support the notion of an RSP pre-approval process intended to provide efficiencies to the next new gTLD application process, by removing the current requirement that each applicant submit answers to technical questions and undergo pre-delegation testing (or PDT).

Please let me know if you have any questions or follow-up comments.

Best regards,

Stéphane Van Gelder
Chair
RySG RSP Discussion Group