# Comments from the Internet Infrastructure Coalition (i2Coalition) On Proposed gTLD-Registration Data Access Protocol (RDAP) Profile

**2 INTERNET INFRASTRUCTURE COALITION**

**October 2018**

The Internet Infrastructure Coalition (I2Coalition) is pleased to provide feedback on the proposed gTLD-Registration Data Access protocol profile. Our coalition is made of up mainly small to medium sized businesses and is comprised of cloud providers, data centers, registrars, registries and other foundational Internet enterprises. While we appreciate the work of working groups, discussion groups, and ICANN staff, on both the technical implementation guide and the RDAP response profile proposal, our feedback is centered on ICANN staff's comments to the contracted parties' proposal documents. Our comments are listed below by topics of concern.
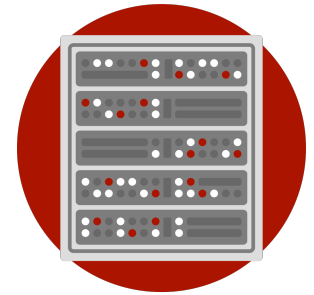
## Regarding ICANN's proposal to enable reverse search capabilities (Item 27 in ICANN's input):

ICANN's suggestion that reverse search should be permitted is highly problematic and would create considerable risk for many of our members. It is also unclear how such capabilities could be made GDPR compliant. The value does not appear to outweigh the risk.

## Regarding the proposal to require the use of a TLS server certificate issued by a well-known Certificate Authority (CA):

We understand that to thwart a man-in-the-middle attack, an RDAP client needs, among other things, a way to validate the identity of the RDAP server. Public services that use HTTPS on the Internet are usually deployed using TLS certificates issued by a well-known CA that is trusted by the major browsers and that complies with the baseline requirements from the CA/B Forum. We do not disagree with the proposal but agree with the working group's position that the language stating that certificates "must" rather than "should" be issued by a well-known CA. The mandatory language creates an unfeasible requirement, particularly because the words "well-known" in this context is ambiguous.

## Regarding the proposal to require the showing of data for most optional elements where data exists:

We agree with the pilot working group's assessment that if the field "eventAction type last changed" is optional it should not be displayed. The issue here again is mandatory language ("must") being included in the profile with respect to eventAction types without appropriate specificity as to the context. For our members who are registrars, we support the working group recommendation that when they include a reseller role or have an eventAction type registrar expiration, it should remain as "may" or as an optional language in accordance with the 2013 Registrar Accreditation Agreement.

## Regarding the proposal to require only one registrant, administrative, and technical contact per domain name:

We support the working group's assessment of the proposed section 2.7.4 modification and believe that multiple entities should be allowed. Because contacts vary by business model, each registrar/registrant should be determining the number and not the RDAP profile.

## Regarding the proposal to allow contacts the possibility to opt-in to a publication of full contact data (including email):

We agree with both the proposal and the pilot working group that registries and registrars "may" publish an email contact if given consent to do so. It is a business decision that must be taken in light of competing legal and policy requirements. These organizations should be allowed flexibility in determining whether to have this practice and how to manage it.

**Thank you for the opportunity to comment.**

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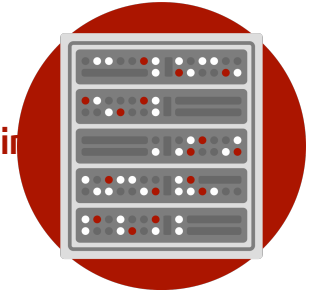
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