

[IRT discussion draft v1]: Proposed Privacy and Proxy Service Provider RDDS Requirements

Background

The [Final Report on Privacy & Proxy Services Accreditation Issues Policy Development Process](#) included a recommendation that, “To the extent that this is feasible, domain name registrations involving P/P service providers should be clearly labelled as such in WHOIS.”ⁱ

The Final Report added that “While this may be possible with existing fields, the WG has also explored the idea that the label might also be implemented by adding another field to WHOIS, and is aware that this may raise certain questions that should be appropriately considered as part of implementation. For clarity, references to ‘WHOIS’ in this Final Report are to the current globally accessible gTLD Registration Directory Service as well as any successors or replacements thereto.”ⁱⁱ

Also relevant, the Final Report states that “Privacy and proxy services (‘P/P services’) are to be treated the same way for the purpose of the accreditation process.”ⁱⁱⁱ

The ICANN organization believes there are multiple options to implement this Final Recommendation. The ICANN organization presents this alternative for Implementation Review Team discussion and feedback.

Note: These requirements, when finalized, will be incorporated into the Privacy and Proxy Service Provider Accreditation Policy (likely in Section II, Terms and Conditions of Accreditation Agreements) and the Privacy and Proxy Service Provider Accreditation Agreement.

Proposed RDDS Labeling Requirement

Summary: Four new RDDS fields

Benefits/Considerations: The Final Recommendations are of a general nature with respect to WHOIS labeling, to allow for specific details to be developed as part of the implementation process. The ICANN organization requests the IRT’s feedback on whether this proposal fulfills the PDP WG’s intent that PP registrations be “clearly labeled as such,” and also on whether other alternatives may be preferable to the community.

The ICANN organization considered other alternatives that would require additional changes to existing labeling requirements, such as:

- An additional field before each set of contacts (registrant, admin, technical) that would indicate whether each of those sets of contacts were protected by the Privacy and/or Proxy Service;
- Updates to existing field names to indicate which fields are Privacy and/or Proxy-protected (e.g. updating “Registrant Name” to “Proxy Registrant Name,” updating “Admin Email” to “Privacy Admin Email,” etc.).
- Additional field(s) for more Privacy/Proxy Service provider contact information immediately below the provider’s name and URL, and additional optional fields, such as a billing contact using a Privacy/Proxy Service provider.

While these additional labels could add additional information about the Privacy and/or Proxy Service, ICANN organization does not believe these alternatives are required for the RDDS record to be “clearly labeled.” The ICANN organization requests feedback regarding the IRT’s views on this topic.

ICANN requests the IRT’s feedback whether this proposal meets the intent of the PDP Working Group.

Proposal:

- A. Under this proposal, ICANN-accredited registrars and gTLD registry operators would be required to display up to four new fields in the Registration Data Directory Service. These fields would be required only where applicable.
 - 1. The four fields SHALL be displayed, as applicable, immediately after the Registrar abuse (or Reseller, if this field appears) contact fields.
 - (a) Domain Service: <PRIVACY> OR <PROXY> (either option populated in this field would include a link or URL for an ICANN-managed page for authoritative definitions for each type of service offering)
 - (b) Privacy/Proxy Service Provider: EXAMPLE PRIVACY SERVICE PROVIDER NAME
 - (c) Privacy/Proxy Service Provider ID: Privacy Service Unique Identifier
 - (d) Privacy/Proxy Service Provider URL: ExampleURL.tld
- B. This output would appear as shown below:

Domain Name: EXAMPLE.TLD
Registry Domain ID: D1234567-TLD
Registrar WHOIS Server: whois.example-registrar.tld
Registrar URL: <http://www.example-registrar.tld>
Updated Date: 2009-05-29T20:13:00Z
Creation Date: 2000-10-08T00:45:00Z
Registrar Registration Expiration Date: 2010-10-08T00:44:59Z
Registrar: EXAMPLE REGISTRAR LLC
Registrar IANA ID: 5555555
Registrar Abuse Contact Email: email@registrar.tld
Registrar Abuse Contact Phone: +1.1235551234
Reseller: EXAMPLE RESELLER¹
Domain Service: <PRIVACY> or <PROXY> - either option populated in this field would include a link or URL for an ICANN managed page for authoritative definitions for each type of service offering.
Privacy/Proxy Service Provider: EXAMPLE PRIVACY SERVICE PROVIDER NAME
Privacy/Proxy Service Provider ID: ##### - equivalent to the ICANN ID (i.e. Registrar = IANA)
Privacy/Proxy Service Provider URL: ExampleURL.tld
Domain Status: clientDeleteProhibited²
Domain Status: clientRenewProhibited
Domain Status: clientTransferProhibited
Registry Registrant ID: 5372808-ERL³
Registrant Name: EXAMPLE REGISTRANT⁴

Commented [AB1]: Note to IRT: If the IRT believes this proposal is consistent with the intent of the PDP WG, the question becomes, how will this be implemented from a process perspective?

For PPs Affiliated with a Registrar or otherwise in the Rr’s direct supply chain, this might be built into the Registrar’s registration process (e.g. checking a box, etc)? But what about when a PP is not related to the registrar? Could this be implemented by simply adding an additional step to the registration process, to ask if a registration involves a PP service and, if so, which one?

Commented [AB2]: Note to IRT: Following IRT feedback and discussion on fields to be required and on preferred locations for these fields, ICANN org will perform a final check to ensure consistency with new CL&D requirements.

Registrant Organization: EXAMPLE ORGANIZATION
Registrant Street: 123 EXAMPLE STREET
Registrant City: ANYTOWN
Registrant State/Province: AP⁵
Registrant Postal Code: A1A1A1⁶
Registrant Country: AA
Registrant Phone: +1.5555551212
Registrant Phone Ext: 1234⁷
Registrant Fax: +1.5555551213
Registrant Fax Ext: 4321
Registrant Email: EMAIL@EXAMPLE.TLD
Registry Admin ID: 5372809-ERL⁸
Admin Name: EXAMPLE REGISTRANT ADMINISTRATIVE
Admin Organization: EXAMPLE REGISTRANT ORGANIZATION
Admin Street: 123 EXAMPLE STREET
Admin City: ANYTOWN
Admin State/Province: AP
Admin Postal Code: A1A1A1
Admin Country: AA
Admin Phone: +1.5555551212
Admin Phone Ext: 1234
Admin Fax: +1.5555551213
Admin Fax Ext: 1234
Admin Email: EMAIL@EXAMPLE.TLD
Registry Tech ID: 5372811-ERL⁹
Tech Name: EXAMPLE REGISTRANT TECHNICAL
Tech Organization: EXAMPLE REGISTRANT LLC
Tech Street: 123 EXAMPLE STREET
Tech City: ANYTOWN
Tech State/Province: AP
Tech Postal Code: A1A1A1
Tech Country: AA
Tech Phone: +1.1235551234
Tech Phone Ext: 1234
Tech Fax: +1.5555551213
Tech Fax Ext: 93
Tech Email: EMAIL@EXAMPLE.TLD
Name Server: NS01.EXAMPLE-REGISTRAR.TLD¹⁰
Name Server: NS02.EXAMPLE-REGISTRAR.TLD
DNSSEC: signedDelegation
URL of the ICANN WHOIS Data Problem Reporting System: <https://www.icann.org/wicf/>

ⁱ See Final Report, p.9.

ⁱⁱ See Final Report, p. 9, footnote 15.

ⁱⁱⁱ See Final Report, p.8.