

| Relevant Text From PDP Report  | Proposed Resolution   | Questions for IRT   | IRT Feedback  |
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| (Final Report, p. 9) "To the extent that this is feasible, domain name registrations involving P/P service providers should be clearly labelled as such in WHOIS."   | 4 new fields (listed immediately below)   | 1. Is this proposal consistent with the intent of the PDP WG?   | Steve Metalitz (on list, 13 Feb): did the staff consider alternatives that would not involve any additional new fields -- for instance requiring certain words or characters in entries in existing fields? This would build upon the status quo in which a fairly reliable indication can be gleaned from the Whois record as to whether a proxy/privacy registration is involved.   |
| (Final Report p. 9, footnote 15) "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." | 1. The four fields SHALL be displayed, as applicable, immediately after the Registrar (or Reseller, if this field appears) abuse contact fields.<br>(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)<br>(b) Service Provider: EXAMPLE PRIVACY SERVICE PROVIDER NAME<br>(c) Service Provider ID: Privacy Service Unique Identifier<br>(d) Service Provider URL: ExampleURL.tld | 2. Should anything be changed to improve this from a registrar/operational perspective (including proposed new fields and locations of those fields)?                       | Theo Geurts (on-list 13 Feb): +1 Steve<br>That would be good to know.<br><br>Though the proposal is very good in the sense that it becomes very clear WHOIS output wise, I am not sure however how that would work with third party service providers in obtaining that information.  |
|  |   | 3. Are there any questions/issues with how this will be implemented from an operational perspective (particularly where a PP service is not affiliated with the registrar)? | Volker Greimann (on list 13 Feb): I think this proposal is shooting at sparrows with cannons, in other words: it makes too much out of a small thing, it overengineers a simple issue. Labeling as such means nothing more than ensuring that when looking at the whois it has to be visible that the domain is under privacy. In most cases, this is achieved by saying so in the registrant name sections. Lets try to keep this lightweight without having to send this to our tech teams to achieve something that is already achievable in the current whois.<br>The fields also seem to be over-specific as the WG never specified any information beyond the fact that a privacy service is used to be included in the whois.  |
|  |   |   | Volker Greimann (on 14 Feb call): This seems like another case of ICANN over-designing a very clear recommendation. The intent of what we had was mainly only to say to anyone looking at the WHOIS that it was a privacy/proxy service provider that put the data there--not any of the other things you introduced in this. Basically, many providers already fulfil this by having a name that includes "privacy" or "proxy" in the name or organization field--that should be sufficient. We as a WG tried to describe what was already in place and tried to apply that to how it would have to look for other service providers without having to change much. Let's try to move back and make this as simple as possible while also fulfilling the requirements that the WG put forward. |
|  |   |   | Theo Geurts (2/14 call) I'm not sure how a third party PP would actually update those fields or make sure there is any contact info in those fields if they are not the registrar.  |

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|                               |                     |                   | Greg DiBiase (2/14 call) If PP is not owned by the Rr who updates these fields? How does that work from a functional perspective?   |
|                               |                     |                   | Steve Metalitz (in chat)--did you consider ease and speed of implementation?  |
|                               |                     |                   | Volker Greimann (in chat): the recommendation does not require identification of the provider. It requires the provider to be labeled as such.  |
|                               |                     |                   | Darcy +1 Volker   |
|                               |                     |                   | Steve Metalitz (2/14 call): I don't see whether you could just require something to be put in an existing field that would indicate that it was a PP registration (basically what Volker was saying). This is not the first time ICANN has encountered this- ICANN has commissioned studies where researchers had to try to figure out whether a registration was PP. They may not have been 100% accurate but were pretty accurate. Many PPs name themselves in such a way that would give a pretty good hint that they are a PP. Look at these studies. Also as Volker indicated, you as staff have access to names of PPs that are affiliated with Rrs--have you looked to see if you can tell from the names? If so we could do this without creating new fields/defining new fields. THIS would delay implementation for quite awhile. It is fair to say that WG did not come to a definitive answer to this question--they didn't say how that should be done and this is an open question but in terms of ease and speed there is a lot to recommend that something specific has to appear in the registrant name or some other field. |
|                               |                     |                   | Sara Bockey (2/14 call): I just want to echo agreement with Volker and Steve. I don't think we need to over-complicate this. Currently we have been indicating who providers are in the current fields--we could be more specific. I don't think new fields would make a difference in terms of clarifying who the providers are. This is far more complicated than intended. This is working for the most part as it is currently. If there are discrepancies we can sort those out using existing fields.   |
|                               |                     |                   | Chris Pelling (2/14 chat) We are making a mountain out of a molehill here. +1 to Sara as names would be the same  |
|                               |                     |                   | Eric Rokobauer--+1 Sara   |
|                               |                     |                   | Theo Geurts (2/14 call) We can do this from a very practical POV. If we are going down this road you put third party PPs at a huge disadvantage--they would have to set up an API connection with every Rr on the globe. That's just not going to work.   |
|                               |                     |                   | Greg DiBiase (2/14 call) If we are doing an accreditation process ICANN will have a list of providers actual names so that may help confusion (and a lot of Rrs have similar names too).  |

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|                               |                     |                   | <p>Volker Greimann (chat) :<br/> Volker Greimann: [16:22:20] Volker Greimann: Here is how we do it: Registrant ContactName: On behalf of [Domain Name] ownerOrganization: c/o whoisproxy.com<br/> Email:owner@[domain].whoisproxy.org[16:22:29] Volker Greimann: I would call that clear labeling</p> |
|                               |                     |                   | <p>Darcy--agree with Volker--that's clear labeling without ANY additional fields</p>  |
|                               |                     |                   | <p>16 green checkmarks supporting the idea that we should develop a proposal for using existing fields.</p>   |