

# ICANN Thick Whois Implementation Project - Consistent Labeling & Display Work Stream (CL&D)

## Detailed Impact Assessment

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### 1. Purpose of this document

This detailed impact assessment document is meant to help both the Thick Whois Implementation Project Team (ICANN) and the Implementation Review Team (GNSO) think through and develop an implementation plan that takes into account the nature and scale of the work required from all affected parties on the Consistent Labeling & Display aspect of the Policy Recommendations.

Once discussed and refined, this impact assessment should naturally lead into the development of the implementation plan which will need to include appropriate requirement documentation, timeframes for implementation by affected parties and relevant supporting measures.

### 2. Revisions

- Version 1 – 17 Nov. 2014 – First Draft by ICANN Staff Implementation Project Team (J. Denison, E. Lewis, B. Cobb, F. Betremieux)

### 3. Relevant Policy Recommendations (reminder)

Thick WHOIS Final Report: <http://gns0.icann.org/en/issues/whois/thick-final-21oct13-en.pdf>

Recommendation #1 : The provision of thick Whois services, with a consistent labelling and display as per the model outlined in specification 3 of the 2013 RAA, should become a requirement for all gTLD registries, both existing and future.

#### 4. Summary of Impact Assessment

The following table is a summary of the analysis conducted for all the affected parties identified. Where registries and registrars are concerned, a detailed analysis was conducted by comparing each relevant party with the differences between the relevant and currently required output vs. the expected Thick Whois Consistent Output. The detailed analysis is contained in a spreadsheet file communicated with this summary.

For the purpose of this analysis, the level of impact is outlined below:

- **High impact:** new data to be gathered by a party from another, potential distributed development required (such as changes to EPP interface requiring development in Registries and Registrars software systems)
- **Medium impact:** changes that would be required with some software development to the systems of the affected party only
- **Low impact:** changes that would only be a matter of configuration to output or static values in software systems of the affected party only
- **Directly/Indirectly:** this is specific to Registrars and either means that a Registrar will become an affected party directly (if subject of the policy recommendation – see outstanding questions), or it will become an affected party indirectly due to the fact that its relevant Registries may need new data to be sent over through the Registry/Registrar EPP interface

##### 4.1. Impact on Registries

Affected Parties	High Impact	Medium Impact	Low Impact
New gTLD Registries (post-2012)	<ul style="list-style-type: none"> <li>• Adding of new Registrar Data (Registrar Abuse Contact, Reseller)</li> </ul>		<ul style="list-style-type: none"> <li>• Renaming of various fields to match RAA 2013 field names</li> </ul>
Pre-2012 gTLD Registries under Thick registration model	<ul style="list-style-type: none"> <li>• Adding of new Registrar Data (IANA ID, Registrar Abuse Contact, Reseller)</li> <li>• Adding of new Registrant Data (ex: DNSSEC delegation, Phone/Fax ext, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• May need change of format of field values (ex: domain status, telephone numbers, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Renaming of various fields to match RAA 2013 field names</li> <li>• Reordering of fields in Whois output</li> <li>• Appending of custom fields not included in RAA 2013 at the end of the output</li> </ul>
Pre-2012 gTLD Registries under Thin Registration model	<p>Should Thin gTLD Registries be involved in CL&amp;D strand of work at this stage?            Could working towards CL&amp;D be an implementation step towards the transition from thin to thick?</p>		

## 4.2. Impact on Registrars

Affected Parties	High Impact	Medium Impact	Low Impact
Registrars under RAA 2013 <i>indirectly</i>		<ul style="list-style-type: none"> <li>● Provide Registrar Abuse Contact and Reseller information to Registries via EPP</li> </ul>	
Registrars under RAA 2009 for Pre-2012 Thick gTLDs <i>indirectly</i>	<ul style="list-style-type: none"> <li>● Collect Registrant Phone, Fax and Email information and communicated to registries</li> </ul>	<ul style="list-style-type: none"> <li>● Provide Abuse Contact, Reseller and Registrar Whois Information to registries</li> </ul>	
Registrars under RAA 2013 <sup>1</sup> <i>directly</i>	If registrars are subject to the Thick Whois Policy Recommendations, Low to no impact, unless non compliance ongoing.		
Registrars under RAA 2009 for Pre-2012 Thick gTLDs <i>directly</i> <sup>2</sup>	<ul style="list-style-type: none"> <li>● Registry Object ID (Domain, Registrant/Admin/Tech contact ID) to be retrieved through Registry SRS via EPP</li> <li>● DNSSEC delegation status to collected from Registrant</li> <li>● Registrant Phone/Fax/Email</li> </ul>	<ul style="list-style-type: none"> <li>● Domain statuses</li> <li>● Reseller</li> <li>● Depending on registrar, some format of field values could be needed</li> </ul>	<ul style="list-style-type: none"> <li>● Registrar IANA ID</li> <li>● Registrar Abuse Contact</li> <li>● Reordering of fields in Whois output</li> <li>● URL of ICANN Whois Data Problem Reporting System</li> <li>● Depending on the Registrar (room for interpretation in RAA 2009 spec) Renaming of various fields to match RAA 2013 field names &amp; Appending of custom fields not included in RAA 2013 at the end of the output</li> </ul>
Registrars under RAA 2009 for Pre-2012 Thin gTLDs	If Registrars are subject to the Thick Whois Policy Recommendations, should the thin gTLD Registrars on RAA 2009 be required to conform to Consistent Labeling and Display even if they are due to be involved in the transition from thin to thick ?		

<sup>1</sup> 833 Registrars under RAA 2013 as of 12 Oct 2014

<sup>2</sup> If registrars are subject to the Thick Whois Policy Recommendations (see Outstanding Questions below)

### 4.3. Impact on Other Parties

Affected Parties	High Impact	Medium impact	Low Impact
Registrants			<ul style="list-style-type: none"><li>● Low to no impact on registrant</li></ul>
Third Parties accessing Whois data		<ul style="list-style-type: none"><li>● Modification of output may require adaptation of automated systems or manual processes</li></ul>	

### 5. Outstanding questions in Impact Assessment

1. Should Thin gTLD Registries be involved in CL&D strand of work at this stage? Could working towards CL&D be an implementation step towards the transition from thin to thick?
2. Are Registrars subject to the Thick Whois Policy Recommendations?
3. If Registrars are subject to the Thick Whois Policy Recommendations, should the thin gTLD Registrars on RAA 2009 be required to conform to Consistent Labeling and Display even if they are due to be involved in the transition from thin to thick?

### 6. Relevant Resources

- Registration Data Directory Service (WHOIS) Specification of 2013 RAA: <https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en-whois>
- Registry Agreements: <https://www.icann.org/resources/pages/registries-2012-02-25-en>
- New gTLD Registry Agreement: <http://newgtlds.icann.org/sites/default/files/agreements/agreement-approved-09jan14-en.htm>
- Advisory: Clarifications to the New gTLD Registry Agreement, Specification 4; and the 2013 Registrar Accreditation Agreement (RAA), Registration Data Directory Service (WHOIS) Specification: <https://www.icann.org/resources/pages/registry-agreement-spec4-raa-rdds-2014-09-12-en>
- 2009 Registrar Accreditation Agreement: <https://www.icann.org/resources/pages/ra-agreement-2009-05-21-en>