**ICANN Thick Whois Policy Implementation**

**Transition From thin to thick -** Implementation Path Scorecard- Last updated: 18 July 2016

Legend:

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| Open |  | Item has been identified and is pending substantive discussion | Ongoing |  | Discussion of this item has started and is still ongoing | Closed |  | IRT reached agreement on a proposed answer |

**New Registration Track**

| **#** | **Question/Open Item (Proponent)** | **Status** | **Comment/Proposal** |
| --- | --- | --- | --- |
| 1 | **Milestones** for transition of new registrations from thin to thick | Closed | Current proposed milestones:* Registries to make system changes
* Registrar notification of changes
* Introduction of optional thick (contact support) in OT&E
* Introduction of optional thick (contact support) in production
* Registrar notification/transition period
* Cutover to required thick (contacts) for new registrations in OT&E
* Cutover to required thick (contacts) for new registrations in production
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| 2 | **Timeline estimate** for transition of new registrations from thin to thick | Ongoing | Proposal discussed since Helsinki (29 June -12 July): 15 months duration overall* 6 months for Registries to update Registry Systems (optional thick)
* 3 months for Registries to release OT&E Environment
* 12 months for Registrars to prepare for and complete the transition (required thick) from readiness of Registries OT&E
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**Existing Registration Track**

| **#** | **Question/Open Item (Proponent)** | **Status** | **Comment/Proposal** |
| --- | --- | --- | --- |
| 1 | **Bulk Transfer** - What options would registries provide for Bulk Transfer of existing registrations data? | Closed | **Agreed** (10 May 2016): Registries will provide EPP channel for transferring existing registrations under minimal validation rules (see #3). When registries can accept new registrations, nothing prevents backfill of existing registrations (caveat: new registrations validation rules would apply, as opposed to minimal validation rules). |
| 1a | **Bulk Transfer** - Can **dedicated EPP connections** be made available for parallel processing? (Roger) | Ongoing | **Pending** (21 June 2016):Registries' current proposal:Registrars to use Verisign's batch pool of EPP connections for backfilling of existing registrations data, in one of two ways:* either using an unlimited number of connections but with a limitation of 30 transactions per second (across all connections used)
* or using a single connection with no rate limitation (tests conducted by Verisign seems to indicated that 80 tps throughput could be achieved)

Registrars request that use of Verisign's standard pool of EPP connections still be considered considering that the current proposal (using the batch pool) may require significant development for some registrars (may need assessment of current usage of this connection pool by registrars). However Verisign expects this to be a matter of changing IP addresses in a registrar's implementation since batch and standard pools of EPP connections have the exact same functionality. |
| 1b | **Bulk Transfer** - Can an **alternative option** via bulk upload or file transfer be offered? (Roger, Jennifer)Bulk creation of contacts | Ongoing | **Pending** (24 May 2016):To be confirmed and defined by Registries with specifications based on validation rules, with input from Registrars on how to achieve the two activities identified as necessary to complete bulk transfer:- creation of all contacts, (can be achieved via file transfer)- update of relevant domain names with these contacts once createdCurrent proposal by Registries:- Bulk upload of contacts only, update of domains via EPP- Implementation Plan to leave alternative option open |
| 1e | **Bulk Transfer** - Can a **data escrow**-based mechanism be considered (Theo) | Closed | **Agreed** (21 June 2016):RrSG feedback suggesting use of the existing registrar Data Escrow files (would be cleaned up by Registrars and sent to Registries), or alternatively, provide reasons for not following this path. Registries not in favor of an RDE file-based bulk upload option (due to issues related to amount of work needed on Registry Systems and management of Auth Info, which may also require work from registrars).Alternative proposal is for file option based on the proposed validation rules (See #3). It could be a CSV file, with each column containing each data field. Verisign would process the file and send back results. IRT suggesting that implementation plan should indicate Registries would provide two options for transfer of existing data: EPP and file-based. On the latter option, registry would work with registrars to agree on the actual file format to be used. |
| 2 | How can we minimize throw-away code? (Roger) | Closed | **Agreed** (10 May 2016):Current EPP code path will be reused (see #1) |
| 2a | Uniformity of Registries SDK is desirable (Jennifer) | Closed | **Agreed** (24 May 2016):This is already the case (Marc). Closed unless Jennifer would like to re-open/discuss further. |
| 3 | **Validation Rules** - Should there be a minimal set of validation rules - instead of no validation rules? (Marc) | Closed | **Agreed** (24 May 2016, 29 June 2016):* Only three fields would be mandatory: Contact ID, Postal Info Type (due to systems constraints) and Auth Info. This is to minimize impediment and ensure all available data is loaded (even if currently incomplete)
* Minimal validation rules to also apply to new registrations during the transition of existing registration (or backfill of legacy data) because there is no way for EPP systems to distinguish between the two type of transactions

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| 3a | **Validation Rules** - Confirmation of Postal Info Type Requirement as part of validation parameters (Marc) | Closed | **Confirmed**, see #3 |
| 3b | **Validation Rules** - Requirement for registrars to supply **all available data** (Steve) | Closed | **Agreed** (31 May 2016)* RDDS output be the same before and after the transition (Same amount of RDDS information is provided)
* Implementation plan to include note that validation rules are only meant to ease the transition and not to change the contractual requirements as far as what data needs to be supplied.
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| 3c | **Validation Rules** - Need to gather **Input from RySG and RrSG** on finalized contact validation rules (Theo, Marc, Roger) | Ongoing | **Pending** (7 June 2016):Expecting feedback from RySG and RrSG on proposed validation rules) by 21 June 2016 (Marc, Theo)RrSG: no objection expressed to the proposalRySG: no update yet, may require two more weeks |
| 3d | **Validation Rules** - Once data is migrated, what rules to apply? Should new and existing registrations be treated differently based on their creation date and applicable RAA? (Roger)  | Ongoing | **Agreed** (7 June 2016, 29 June 2016): Confirmation of current proposal: minimum validation rules apply to the transition of existing registration’s contact data, until the end of "backfill" period. At such cut over date, standard validation rules in registry systems apply, indifferently to creates and any updates of new and existing contact data (to avoid adding levels of complexity).**Pending** (29 June 2016)Discussion to be confirmed: once the transition is complete, a new domain can be created with an existing contact object that has limited data. Standard validation rules would only apply to this domain when the contact data is updated. |
| 4 | Should we aim to synchronize the new and existing registrations tracks? | Closed | **Agreed** (10 May 2016):Keep the two tracks separate to mitigate potential delays. Focus on New Registrations first.  |
| 5 | How should **inter-registrar transfers** of registrations be handled if information is incorrect or incomplete? (Jennifer, Roger, Theo) | Ongoing | **Agreed** (7 June 2016): No issues identified that would be specific to the transition from thin to thick. Can be handled using current procedures/practices.**Pending** (29 june 2016):Conclusion needed on what validation rules apply to transfers requiring the creation of new contacts (registrar-based ROIDs needed) when data is missing for these contacts |
| 6 | How should **inter-registrar transfers** be handled when registrars are at different stages of data migration in the transition from thin to thick? (Jodi) | Ongoing | **Pending** (7 June 2016):Discussion of potential "corner cases" related to the time taken by registrars to complete the transition of their existing registrations from thin to thick: * Loosing registrar is thick (already transitioned) but gaining registrar is thin (not yet transitioned)
* Loosing registrar is thin but gaining registrar is thick

One suggestion include requiring registrars to continue providing a Whois Service during the transition (Joyce) |
| 7 | **Timeline** - What timeline should be considered for transferring existing registrations from thin to thick? (Staff) | Ongoing | Discussion to date:* Start date will be determined by announcement of policy effective date, currently assumed to be in January 2017 (Staff)
* End date will likely be the cut off date after which regular validation rules apply (Marc, Roger)

**Pending** (21 June - 12 July):Discussion settling on the following topics (see also #7a, 7b):* + 18 months window is seen as reasonable by registrars (Theo) in particular if EPP connections are limited at 30 transaction per second given that 5 to 10 transactions for 63M domains would require between 6 and 12 months to complete (Jodi)
* Options to be considered to potentially reduce the time needed to transition existing registration data:
	+ Offering of unlimited throughput connections by Registries (may suit the needs of large registrars) - See #1a
	+ Use of bulk upload via file, RDE-based in particular (may suit the need of smaller registrars) - See #1e
* Uniqueness of this transition compared to .ORG's in terms of scale and tools available (such as the RDE specification)

Registrars (Theo/Jodi) requesting a 18 months window (from the time the production systems of the registries are ready) be the working assumption until the IRT has more visibility into potential reasons for shortening this timeframe. Concerns:* total 24 months implementation window when adding 6 months needed for registries to prepare for the transition (Steve Metalitz)
* impact of changes in data localization laws on the migration of data (Steve DelBianco) not reflected in current timeline (Joe Waldron) because impact is not yet know (Theo)
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| 7a | **Timeline** - Need for a way to estimate system throughput on contact creation (Theo, Roger) | Ongoing | **Pending** (31 May 2016): Registries to investigate possibilities to address the needs of the dozen of so high volume registrars and report back by 13 June 2016 |
| 7b | **Timeline** - Need to factor in coordination of 2000+ registrars, including potential non-responsiveness (Theo) | Ongoing | Current proposal by registries to offer the same window for all registrars considering second-hand experience of the .ORG transition and amount of registrars involved in this transition.**Pending** (31 May 2016, 12 July 2016): Further discussion needed to flesh out details, including potential incentives or measures to encourage transition of existing data before the end of the transition window (Steve) and to avoid bottlenecks right before closure of the migration window, considering that:* it may be challenging to mobilizing silent registrars (Theo) as well as small registrars based on the .ORG precedent (Jodi)
* driving uptake of transition by requiring Thick in OT&E before cutover in production may not be effective due to modest use of OT&E currently

It is suggested that this topic be discussed with the community in Helsinki.IRT members are asking if ICANN has any tools available to encourage regitrars not to take the full 18 months (Steve), including auction proceedings (Theo)GoDaddy would start with the transition of domains set to expire after the policy effective date (end of implementation) and work backwards from there (Jody) |