Data Elements Will Require a Separate Review by the ICANN Community; a Second Interim Report & Public Notice

Throughout the Durban meeting process, the same question was asked again and again: ***what data elements is the EWG proposing for the Centralized Database (or any Whois database)?*** We received no clear answer.

The reason for the question is clear: in light of the abuses of Whois data, the laws that protect personal data, both for data protection and freedom of expression reasons, the dangers of centralized data, and the very personal and controversial nature of some of the data elements proposed for inclusion in the new database or databases, ***the specific data elements are very, very important to the public policy discussion that the EWG has asked to take place.***

We in the NCSG strongly recommend a future Whois/gTLD Directory database(s) fully streamlined with clear, minimal information (e.g., operating at the minimal "contactability" standard recommended by the Whois Review Team with only technical data and a validated telephone number OR email address). Such a database raises few of the privacy, speech and scope concerns that caused passionate comments and criticisms at the microphone in the EWG Durban meeting.

But the EWG Report, read closely***, includes the collection of numerous new data elements including those not even currently collected by Registrars today. Frankly, it was shocking for us to see such the EWG Report and its list of data elements. Such a collection of all possible information and data for all possible purposes without regard to legality, scope of ICANN, impossibility or dangers it presents is not appropriate and threatens the narrow scope, limit and fabric of ICANN.***

Accordingly, we reject for inclusion in any future Whois/Directory Database records which include:
Registrant Postal Address
Registrant Telephone Number AND Email Address (as only one is needed and validated per the Registrar Accreditation Agreement)

Registrant IP Address
Registrant Type
Registrant Purpose
And many other fields presented without clear explanation as to definition,
scope or purpose.

In fact, we find morally offensive the new move to categorize speech and
speakers through the new Directory Services in a way that moves ICANN
squarely and fully into the role of speech monitor and communications
overseer – so far outside ICANN's limited technical scope and mission that
these fields must be dropped immediately and subject to no further
discussion.

Conclusion:
While we have been told again and again that the EWG is still "deciding on
the data elements, *we must respectfully reject any final report that has
not previously published the exact data elements proposed to be included
in a future Whois/Directory Database prior to the final report -- in a
preliminary way that allows for initial evaluation, feedback and comment
by the Community.*

But on initial review, the drafts before us are shocking in their scope,
excessive in their inclusion, and reflecting a wish list of one Stakeholder
Group which happens to be over-represented on the EWG.

*The NCSG calls on the EWG to minimize and streamline information Data
Elements proposed for any new Whois or Directory Service plan – and to
publish it early and quickly for additional review by the ICANN and
Internet Community prior to any final proposal.*