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| Registration Directory Service (RDS-WHOIS2) Review |
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| Draft Report including F2F#3 agreements and action items  REC11 SUBGROUP REPORT - SECTION 3.8 ONLY FOR VOLKER TO PROVIDE REDLINED UPDATES |
| RDS-WHOIS2 Review Team |
| 30 July 2018 |
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3 Objective 1: Assessment of WHOIS1 Recommendations Implementation

3.8 WHOIS1 Rec #11: Common Interface

[SUBSECTION NUMBERS WILL BE ADJUSTED WHEN ADDED BACK TO MASTER DOC]

### Topic

Subgroup 1 - WHOIS1 Rec11 Common Interface is tasked with investigating, analyzing, and drafting recommendations (if needed) to address the following Review objective:

Consistent with ICANN’s mission and Bylaws, Section 4.6(e)(iv), the Review Team will (a) evaluate the extent to which ICANN Org has implemented each prior Directory Service Review recommendation (noting differences if any between recommended and implemented steps), (b) assess to the degree practical the extent to which implementation of each recommendation was effective in addressing the issue identified by the prior RT or generated additional information useful to management and evolution of WHOIS (RDS), and (c) determine if any specific measurable steps should be recommended to enhance results achieved through the prior RT’s recommendations. This includes developing a framework to measure and assess the effectiveness of recommendations, and applying that approach to all areas of WHOIS originally assessed by the prior RT (as applicable).

The specific [WHOIS1 Recommendation](https://www.icann.org/en/system/files/files/final-report-11may12-en.pdf) assessed by this subgroup appears below:

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| WHOIS Recommendation #11: Common Interface  It is recommended that the Internic Service is overhauled to provide enhanced usability for consumers, including the display of full registrant data for all gTLD domain names (whether those gTLDs operate thin or thick WHOIS services); operational improvements should include enhanced promotion of the service to increase user awareness. |

Noting the target of the above recommendation, the subgroup agreed to examine operational improvements, including enhanced promotion of the service to increase user awareness. Specifically, the subgroup agreed to examine these questions:

* Has the creation and deployment of the WHOIS microsite at the direction of the board met this recommendation, considering the old Internic service still exists unchanged?
* Does the WHOIS query service provided through the microsite (the common interface) provide clear and reliable access to full registrant data for all gTLD domain names?
* What promotional efforts has ICANN undertaken to increase user awareness of the common interface?
* Does the common interface provide clear instructions on how to notify ICANN, the sponsoring registrar and/or the registrant regarding data accuracy issues?

### Summary of Relevant Research

To conducts its research, all members of this subgroup reviewed the following background materials, posted on the [subgroup's wiki page](https://community.icann.org/display/WHO/WHOIS1+Rec+%2311%3A+Common+Interface):

* + [WHOIS Review Team (WHOIS1) Final Report](https://www.icann.org/en/system/files/files/final-report-11may12-en.pdf) (2012) and [Action Plan](https://www.icann.org/en/system/files/files/implementation-action-08nov12-en.pdf)
  + [WHOIS Review Team (WHOIS1) Implementation Reports](https://community.icann.org/display/WHO/WHOIS+Review+Implementation+Home), including
    - [Executive Summary of Implementation Report](https://community.icann.org/download/attachments/54691767/WHOIS%20Recs%201_16%2030Sept2016.pdf)
    - [Detailed implementation Report](https://community.icann.org/download/attachments/54691767/WHOIS%20Quarterly%20Summary%2031December2016.pdf)
  + WHOIS1 Implementation Briefings on Recommendations 5, 8, 10, 11: [PPT](https://community.icann.org/download/attachments/63145823/WHOIS1-Implementation%20Briefings_final.docx?version=1&modificationDate=1510566466000&api=v2), [PDF](https://community.icann.org/download/attachments/69279139/WHOIS1%20Implementation%20briefings%205%208%2010%2011.pdf?version=1&modificationDate=1506504731000&api=v2)
  + [Answers to RDS-WHOIS2 Questions on Implementation Briefings](https://community.icann.org/download/attachments/63145823/WHOIS1-Implementation%20Briefings_final.docx?version=1&modificationDate=1510566466000&api=v2)
  + Documents cited in briefing on Recommendation 11 include
    - [WHOIS Informational Microsite](https://whois.icann.org/en)
    - [WHOIS Consolidated WHOIS Lookup Tool](https://whois.icann.org/en/lookup?name=)
  + <https://www.internic.net/>

In addition, the subgroup requested additional materials from ICANN Org

* Available statistics on: use of the common interface, uptime, requests for help using the tool and what usage data is tracked by ICANN;
* The Team/Department that implemented and maintains the common interface;
* Any challenges with implementation and maintenance of the interface.

These materials included in written responses provided by ICANN Org:

* [Written briefing on query failures](https://mm.icann.org/pipermail/rds-whois2-comminterface/2018-March/000011.html), and
* [Written implementation briefing](https://community.icann.org/download/attachments/71604720/Written%20Implementation%20Request%20for%20Recommendation%2011.pdf?version=1&modificationDate=1521815094000&api=v2).

Finally, the subgroup applied the RDS-WHOIS2 review team's [agreed framework](https://community.icann.org/download/attachments/71604697/FinalRDS-WHOISRT2Effectivenes.docx?version=1&modificationDate=1519138360000&api=v2) to measure and assess the effectiveness of recommendations,

### Analysis & Findings

This recommendation has been fully implemented and over 4 million queries were made in a

6 month period in 2017. This is significant usage and may become more important after May 25th and the GDPR enforcement is in effect.

The briefing indicates that there has been a 99.9% up time for the common interface but other statistics on usage are not tracked. Clarification on what the definition of uptime is would be helpful. The availability of the tool may not be a problem but not sure that is an indication that all queries result in providing WHOIS information. Anecdotally, I was not able to retrieve WHOIS information for several new gTld look ups. Either user error or it didn’t work. I did go back at a later time and the queries worked.

According to information provided by ICANN staff It may not be practical to track other data elements associated with usage.

This number cannot be calculated with precision. Because the current WHOIS protocol does not enforce any standard error handling, failures must be inferred. Failure rate is not currently being calculated or tracked.

Users are encouraged to file a contractual complaint ticket if they identify any issues with the WHOIS record. A link to file a ticket is provided on the page where results are displayed.

ICANN Contractual Compliance proactively monitors registrar WHOIS availability and will send registrars a compliance notice if it is not available. Registrar and registry web-based WHOIS services are also tested during registry and registrar audits.

If the result returned by the registry or registrar is blank or is a very small package of data then the web page could display blank fields. If the returned result is in a format that cannot be parsed this too could cause the web page to display blank fields. In either case, users could look at the raw record displayed below the form for more information. If users identify any issues with the WHOIS record, they are encouraged to file a contractual complaint ticket. A link to file a ticket is provided on the page where results are displayed.

[NEED TO SUMMARIZE KEY FINDINGS/ANALYSIS, LINKED TO SUBGROUP'S QUESTIONS]

### Problem/Issue

The common interface recommendation was intended to ensure that anyone looking up a WHOIS record could do that easily and from one source. The InterNIC was not overhauled, but a common interface was provided.

However, the common interface has no metrics that can be used to determine its effectiveness. Metrics and SLAs could be used to address this and also to proactively spot non-compliance. Lack of tracked metrics to ensure the tool provides the data it should or is consistent in providing the data is not acceptable.

Service level agreements could be put in place to ensure the interface works reliably. Specific metrics should be tracked:

* How often are fields returned blank?
* Is data displayed consistently?
* Do all gTLDs return results consistently?
* How often does the tool not return results for specific gTLDs?
* How big or small is this problem?

Furthermore, as a result of GDPR Temporary Specification implementation, registrar and registry interpretations may now result in different registration data returned by WHOIS for the same domain name (e.g., the registry may redact data that the registrar displays.

Finally, in any further recommendations made by this subgroup, the recommendation should be more explicit about intent of common interface (i.e., one stop access to data, across all gTLDs and registrars/resellers). Any such recommendation should also apply to either the current common interface or any future replacement for it.

### Recommendations (if any)

Based on its analysis, members of this subgroup agree that this WHOIS1 recommendation has been fully-implemented. One further recommendation is provided here to address the problems/issues identified above.

Recommendation R11.1: The ICANN Board should direct the ICANN Organization to define metrics or SLA’s to be tracked and evaluated to determine consistency of results of queries and use of any common interface (existing or future) used to provide one-stop access to registration data across all gTLDs and registrars/resellers. Specific metrics that should be tracked for any such common interface include:

* How often are fields returned blank?
* How often is data displayed inconsistently (for the same domain name), overall and per gTLD)?

How often does the tool not return any results, overall and per gTLD)?

Findings: The current common interface (whois.icann.org) has no metrics that can be used to determine its effectiveness. It is therefore difficult to determine if effectiveness can and/or needs to be improved and what specific steps would be necessary for such improvement.

Rationale: Metrics and SLAs could be used to address this and also to proactively spot non-compliance or implementation issues that affect the provision of the service.

The significance of the recommendation can only be appropriately assessed after its implementation as the prevalence of lookup failures is currently unknown. Anecdotal evidence suggests the existence of lookup issues. By generating metrics that will assist in recognizing systemic issues or noncompliance, the recommendation aligns well with

ICANN’s Strategic Plan and Mission as it helps foster a healthy, resilient and secure identifier ecosystem. The recommendation is in compliance with scope Review Team set

Impact of Recommendation: This recommendation will impact WHOIS service SLAs and data accessibility by identifying potential issues with service delivery by contracted parties. ICANN compliance will be impacted by receiving an additional tool to verify compliance with contractual service levels. Users of the WHOIS service will be positively impact by reductions in lookup failures as a result of appropriate use of these metrics.

Feasibility of Recommendation: The RT believes this recommendation is feasible as basic log data for analysis is already being collected and generation of metrics from this data should not create a significant operational or technical impact.

Implementation:

Initially, the ICANN community should define (by public comment or other mechanisms) what metrics should be tracked. Based on this determination ICANN org should analyze whether the logs currently generated for the service provide sufficient data for these metrics, and if necessary (and legally possible) expand the logs generated. Building upon the logs, ICANN should create the recommended metrics in regular intervals for analysis by ICANN compliance to allow them to proactively investigate failure causes and - if possible – create or suggest remedies.

Priority: This recommendation has a low priority and should be implemented by existing teams.

Level of Consensus: No F2F3 objections

Recommendation R11.2:

The ICANN Board should direct the ICANN Organization to maintain the common interface to display all publicly-available WHOIS output for each gTLD domain name (i.e., both the registry and registrar WHOIS output).

Findings: As noted above, registry and registrar interpretations of GDPR may now result in different registration data returned by WHOIS for the same domain name.

Rationale: The common interface must be maintained to adapt to such changes, to ensure that it continue to display all publicly-available WHOIS output.

Impact of Recommendation: To be provided

Feasibility of Recommendation: This recommendation will need to be assessed for compliance with applicable laws.

Implementation: To be provided

Priority: To be provided

Level of Consensus: No F2F3 objections

### Possible impact of GDPR and other applicable laws

[TO BE PROVIDED]