RDA Scoping Team Poll - Assessing Support for Recommendations

Questions   **Responses**   13   Settings

13 responses

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Summary   Question   Individual
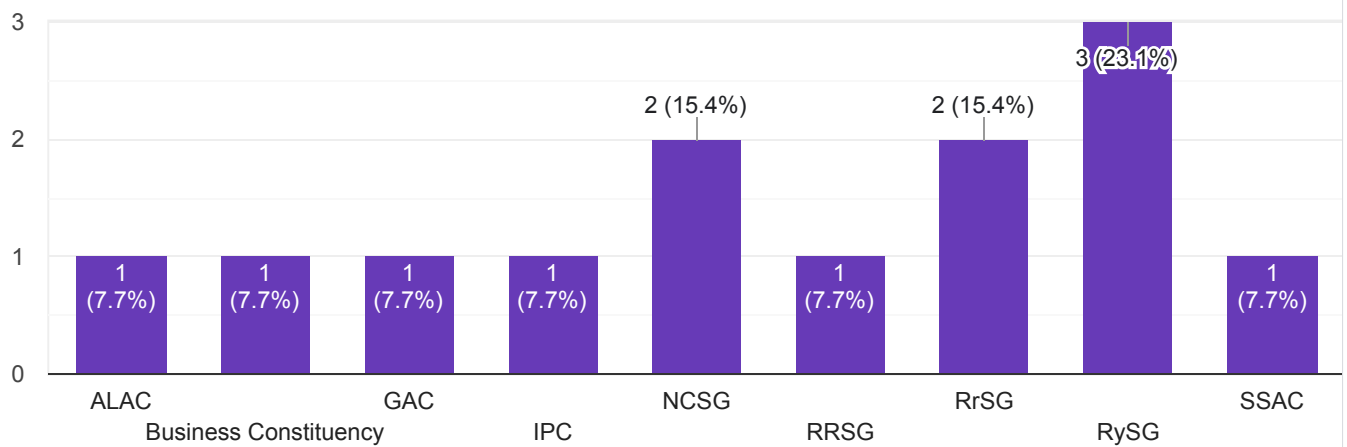
1. Please enter your name.

13 responses

Sarah Wyld

Volker Greimann

Lori Schulman

Susan Kawaguchi

Alan Greenberg

Steve Crocker

Elizabeth Bacon

Manju Chen

Roger Carney

Melina Stroungi - GAC

Marc Anderson

Stephanie Perrin

Sophie Hey

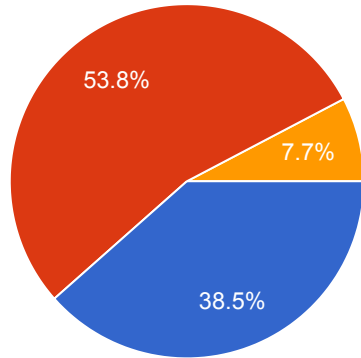# 2. Please enter your affiliation.   Copy

13 responses

Are there further proposals, in addition to the Registrar Survey, that the Scoping Team should consider and recommend to the GNSO Council to measure accuracy levels to help inform assignment #3?

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13 responses

- Yes* (*Note: if you agree that there are further proposals, you are required to provide further details about these proposals in the next question)
- No
- I don't have additional proposals of my own, but am willing to consider any additional proposals submitted.

4. If you answered "Yes" to question 3, please provide a specific additional proposal(s) below.

6 responses

4 a. - FINDING ACCURACY DATA ISSUES USING TEST CASES. ICANN could contract with a 3rd party (either a university or private vendor) to register a statistically significant sample of domain names across gTLDs using a fictitious entity. The contractor would monitor the number of domains that were flagged as needed further verification during the initial registration period and then followed to determine whether subsequent accuracy complaints are filed and how they are resolved.

4 b. - ICANN CPHs AND NIS2 CONSIDERATIONS. The recently negotiated EU NIS2 initiative is expected to pass this Fall. The RDA could work together to find solutions for implementation within ICANN's contract framework. NIS2 requires that internet service providers adopt and implement proportionate processes to verify registration data. ICANN should be adapting the Registrars survey to include questions that establish what the best practices are among cc's and gTLDs and come up with our recommendations as to what would be proportionate. Such data would be useful as the NIS2 is adopted by the member states. It would be a real breakthrough for community efforts come up with a joint agreement that could be socialized within ICANN and by jurisdictions that are proposing NI2 implementing language or similar laws outside of the EU. We can use this opportunity to stand together and demonstrate the strength of the MSM.

There are a number of actions that could be taken.

i. Registrar survey should include a measure of:
a. Number of domains sponsored by the registrar;
b. Number or percent of sponsored domains that have had their email contacts operationally verified;
c. Number or percent of sponsored domains that had had their phone contacts operationally verified.
d. A statement of whether the registrar analyzes all bounces of other indications of possible delivery failure or contact inaccuracy to rectify the situation.

ii. Registrar survey should include a request for other (i.e .non-RAA) checks that they do related to accuracy and/or identity that they perform either voluntarily of to satisfy requirements for specific gTLD registries or for ccTLDs.

iii. Discussion should be initiated with ICANN Org to identify specific incentives to registrars for completing the survey (if too complicated with no incentive, results will be rather limited)

iv. Contract for an independent study of the value of and feasibility of cross-filed verification (as required by the 2013 RAA but never enforced).

v. Stress-test the current RAA validation/verification rules by having ICANN Org contract for a study to register names with varying degrees of inaccuracy (in all of its varied definitions) and report to what extent these were recognized during registration).

vi. ccTLDs should be surveyed to identify the level of accuracy and process that they undertake. This should be done with the support of the ccNSO which will hopefully be supportive.

vii. There have been statements made by some team members that the current RAA requirements are not sufficient. The team should delve into this and develop a list of possible (and practical) other validation/verifications/whatever-appropriate-descriptor should be considered for future RAA revisions. These should each include a rationale as to what the benefit would be. Such checks could be made at the time of registration or at other specific times within the life of the registration.

The Accuracy Team should revisit the idea of a registrar survey and discuss whether it makes sense to survey registrars on how they currently implement the requirements of teh RAAA Whois Accuracy Specification. We are unclear on how registrars implement the accuracy obligations.

Building on the ICANN74 Communique, the GAC encourages the team to explore additional and complementary work items, such as:
- measuring existing registrant data accuracy controls for new registrations,
- testing accuracy controls in a manner that is not dependent upon access to personal data (i.e., data that relate to an identified or identifiable individual),
- testing registrar safeguards/systems to see how cases of inaccurate data are handled. etc.

Moreover, on the separate topic of what further interim work may be done (separate and apart from the proposals for Registrars surveys and testing), we can discuss how current accuracy requirements are understood and enforced. We note that these requirements are not limited to accurate but also to reliable data (also confirmed by the GNSO instructions when forming the accuracy scoping team). The team has not yet analyzed whether there are procedures in place to ensure that the registration data are both accurate and reliable.

n/a

The Accuracy Scoping Team needs to have a discussion about whether it makes sense to survey registrars on how they currently implement the requirements of the RAA Whois Accuracy Specification. As it stands, we are unclear on how registrars implement the accuracy obligations. The results of the survey could be used to assist with measuring accuracy in the Annex D survey and provide more context for what is meant by validation and verification.
Please see draft survey attached to this email https://mm.icann.org/pipermail/gnso-accuracy-st/2022-May/000459.html

5. If you responded "yes" to question 3, and identified a specific proposal(s) in question 4, what kind of effort would this take, and by whom, to implement this proposal? Please also identify if you think this requires the Scoping Team to continue meeting on a weekly basis once the Council has approved the Scoping Team's recommendation.

6 responses

5 a. Corresponds to 4a. - This would take the scoping of an RFP and a bid for the work by ICANN staff with consultation from the RDA (probably a small working group) and would add an additional survey cost. However, the results could solve a lot of our questions as to the nature and scope of existing accuracy problems. Issues of GDPR liability are eliminated under this scenario as no rights will be violated due to fictitious nature of registrant.

5 b. Corresponds to 4b - The registrar survey could be drafted to include specific questions to explain the verification procedures that registrars employ, if the verification processes go beyond the minimum that ICANN requires within its contract, what percentage of domains are operationally verified, what the costs of such verification are to the Internet Service providers. There may not be any additional costs just rethinking of questions.

i. The Scoping Team must work with ICANN Org to develop the survey. The team must meet to enable such interaction with ICANN Org (at whatever intervals are necessary to support the ICANN Org work). There would be no need to meet which the survey is being carried out and until there is a preliminary analysis. However, there should be regular updates on the status and returns.

ii. If there is any indication that the survey is not been met with reasonable enthusiasm resulting in significant input, the Scoping Team should be re-convened to address this.

iii. Item vii above is a Scoping Team effort and it must meet to carry out this task.

Bi- weekly would likely be sufficient. ICANN ORG role: have the survey translated into the 6 UN languages, RRSG: work with ICANN Org to encourage registrars to respond to the survey, Scoping Team: Analyze the results of the survey and provide our report to Council. This could be done after the survey has closed, or the Scoping Team could meet while the survey is open to discuss how the results should be interepreted/reported.

This is something the Scoping Team should discuss in more detail in upcoming meetings. For instance, the following considerations should be discussed:
1. Who should conduct the testing? (ICANN? Academic researcher? Open invite to parties who may wish to conduct the testing at their own expense?).
2. How many test registrations should be conducted per registrar?
3. How many registrars should be tested and how should this sample be selected.
4. Cost considerations?

n/a

ICANN Org: have the survey translated into the 6 UN languages, create form for survey, distribute survey

RrSG: work with ICANN Org to encourage registrars to respond to the survey

Scoping Team: Analyse the results of the survey and report to Council. This could be done after the survey

has closed, or the Scoping Team could meet while the survey is open to discuss how the results of the survey should be interpreted.

6. Any other input or comments you would like to provide that will facilitate finalisation of the write up for assignments #1 and #2?

5 responses

I agree with the proposal to move forward with the registrar survey and only schedule further meetings as needed, thank you.

The IPC recognizes that we have come far in the drafts and that we still have open questions about how to include specific information. For example, when information should be directly included in text, footnoted, or appended. When in doubt, we support data being included in the main body of the report to facilitate ease of use for the readers of the reports.

No

Not specifically to assingments 1 and 2 but I would like to add support to moving to ad-hoc meetings until we have further information on Chair/EDPB/Survey

It's not clear to me that a registrar survey has been agreed to by the scoping team or if the scoping team would accept the results of such a survey and/or find them useful. Before finalizing the write up for assignments #1 and #2 the scoping team needs to discuss and agreed that we are or are not recommending the survey.