



Registries Stakeholder Group Statement

Issue: **Proposed gTLD-Registration Data Access Protocol (RDAP) Profile**

Date statement submitted: **12 October 2018**

Reference URL: <https://www.icann.org/public-comments/proposed-rdap-profile-2018-08-31-en>

Background¹

On 17 May 2018, the ICANN Board passed a [resolution](#) adopting a [Temporary Specification for gTLD Registration Data](#). As part of that Temporary Specification, gTLD registries and registrars are required to implement a Registration Data Access Protocol (RDAP) service within 135 days of ICANN org requesting implementation. The Temporary Specification also called for a gTLD-RDAP Profile.

Registries Stakeholder Group (RySG) comment:

The Registries Stakeholder Group (RySG) appreciates the opportunity to provide the following feedback on the “Proposed gTLD- Registration Data Access (RDAP) Profile” (the “RDAP Profile”) and ICANN Org’s input to the proposal documents (the “ICANN Input”).

The RySG strongly endorses the position reflected in both the RDAP Profile and in the ICANN Input that the RDAP Profile documents should neither create nor modify existing policy, but rather be limited to mapping current policy requirements to the RDAP implementation with flexibility to incorporate future policy changes with minimal engineering. The RySG recognizes the importance of SAC-051 as an anchor point for the rationale and direction for RDAP implementation and evolution, and notes that the consensus position set forth above is fully consistent with the guidance contained within the SAC-051 Roadmap published by ICANN in 2012:

“It is important to note that the goal of the protocol is provide capability to implement policies, but the protocol *should not* dictate policy, which should be developed in the respective policy bodies.” (emphasis in original).

¹ *Background*: intended to give a brief context for the comment and to highlight what is most relevant for RO’s in the subject document – it is not a summary of the subject document.

The RySG submits that the position that the RDAP Profile should not create policy must be similarly applied in the contractual context: the RDAP Profile's requirements should reflect and implement existing contractual requirements in the registry agreement and registrar accreditation agreement, rather than attempt to extend or create new contractual requirements.

Given the RDAP Profile's recognized role as limited to implementing policy, the RySG endorses the revised structure of the RDAP Profile documents, which essentially partitions the documentation for the RDAP Profile into elements which are policy-independent (the "RDAP Technical Implementation Guide") and policy-dependent (the "RDAP Response Profile"). The RySG encourages the RDAP Profile to both maintain and further refine this distinction.

The RDAP Pilot Program has provided a valuable environment in which to evolve and improve the specifications for the ICANN RDAP Profile. Without this Pilot Program, the specifications would have been far less well-informed. The RySG recommends an extension of the RDAP Pilot Program with the goal of conducting further testing of additional RDAP functionality such as authenticated access and the referral model, among others. The RySG also expects further evolution and improvement of the RDAP Profile documents, and encourages updates to the RDAP Profile documents based on implementation experience from both Registry Operators and Registrars.
