GNSO gTLD Registries Stakeholder Group Statement

Issue: Internationalized Registration Data Expert Working Group Draft Final Report

Date: 21 April 2015

Ref: https://www.icann.org/public-comments/ird-draft-final-2015-03-09-en

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The Registries Stakeholder Group (RySG) respectfully submits the following comments to the DRAFT Final Report from the Expert Working Group on Internationalized Registration Data.

The RySG acknowledges that the working group's mission is "to recommend submission and display requirements for internationalized registration data (IRD) and produce a data model for the IRD that matches the requirements."

RySG comments and recommendations

1. The RySG believes that the purpose of any domain name registration data (DNRD), internationalized or not, is to find reliable contact information of any given domain name; and the role of registries is to ensure that the DNRD can be set and propagated end-to-end (i.e., registrant to registrar to registry to WHOIS/Registration Data Access Protocol (RDAP)) in native characters without any transformation (e.g.,translation or transliteration).   Therefore, the RySG recommends that the final report recommendations and requirements are set to meet the needs of the general users or registrants of domain names. Such users, in the context of domain name registration data, should only be required to input contact information in a language or script of their choice.

2. The RySG is supportive of an internationalized registration data model in which end-to-end registration data can use native characters (i.e., unrestricted UTF-8 as defined in RFC 5733). The RySG strongly recommends using the existing RFCs to address registry policy decisions and technical adjustments to enable consistent and reliable passing of registration data in native characters. We view this as the core responsibility of the existing registration data model. More specifically:

   a. We recommend a standard policy on the use of the EPP "loc" and "int" postal information. Registrars of gTLDs should be able to apply consistent rules for the passing of postal information across the gTLD registries. Country-code TLDs should be encouraged to follow the same policy.

   b. We recommend addressing the lack of support to Internationalized E-mail Addresses to enable internationalized e-mail addresses to be passed end-to-end. While the Contact EPP RFC 5733 XML schema fully supports internationalized characters, the RFC text references RFC 5322, which does not support internationalized e-mail address formats.

3. The RySG believes that the needs of users like law enforcement and trademark agents represent special and not general users of registration data (e.g., script-tagging data elements for future treatment or transformation) so it may not make sense for all users to subsidize the fulfillment of their needs. Hence, the registration data lookup services catered specifically to these specialized users may be out of scope from the existing end-to-end registration data flow.

4. The RySG firmly believes that the needs of specialized users should be met by a different system that could use DNRD as a source. Such a service (e.g., Enhanced Lookup of Registration Data Services) may be provided by a contracted third party to support the specific requirements of specialized consumers like law enforcement, trademark agents, and additional validation services that may be of importance to registrars and registries. The requirements for such a service or set of services could be driven and paid for by the specialized consumers instead of attempting to change or expand the scope of DNRD to meet their requirements, which in the end may not actually meet their requirements.

Additional recommended edits to the final report:

5. References to RFC 5322 should be updated to state RFC 6854.

6. Executive Summary, Page 5: The proposed requirement for Registrar Name should be consistent with the proposed requirement in Section 5.1.3 which reads: "Free-form text. The name of the sponsoring registrar should be the official name in the Registrar Accreditation Agreement (RAA) with ICANN." The sentence "in a language and script appropriate for the region in which the registrar is located" should be removed as it may conflict with the former requirement (i.e., official name in the RAA). For example, some registrars have legal names in English even though English is not the official language of the territory they operate in.

7. Table 7: There is a blank row between Contact Country/Territory and Contact Postal Code. If this is an intentional blank space, we recommend labeling it as such to avoid confusion.

8. Table 7: The Contact Country/Territory minimum and maximum length should be '2' so that it is consistent with ISO 3166 Alpha-2 codes (e.g., AU, AE, BE).

9. Table 7: The working group recommends requiring the language tag for the Contact Country/Territory code. However, given that this value is a 2-character ISO code, we see little value in making a language tag mandatory. We recommend changing the language tag requirement to optional or N/A (i.e., not applicable).