JPRS Comments on "Registration Data Access Protocol (RDAP) Operational Profile for gTLD Registries and Registrars"

Overall comments (beyond the RDAP profile itself)	* [The following comment might not specifically be on RDAP profile but on current RAA] Once the "thin" registries complete migration to "thick" registries, it seems that gTLD Registrars might hardly find the needs of offering RDAP services to public because all the data could be searched through gTLD Registry RDAP services. Has there been any consensus or convincing explanation ever made against this kind of anxiety in a public place? If not yet, community's consensus about the needs for gTLD Registrar RDAP services should clearly be made in prior to defining its profile, from a viewpoint of investment by gTLD registrars. * Considering the current situation where discussion about "differentiated access" is just started in the community, is there any possibility of later adoption of RDAP profile becoming a better choice?
Overall comments (related to the RDAP profile)	* Adding sample outputs for each profile item in JSON format would be very helpful for gTLD Registries/Registrars. This would strongly encourage the common/correct implementations of RDAP service by gTLD Registries/Registrars.

No.	Sub No.	Requirements	Comments for each requirement of profile
1. The following requirements apply to both gTLD Registries and Registrars(i.e. contracted parties)			
1.3	3	A client MUST be able to successfully validate the TLS certificate used for the RDAP service with a TLSA record from the DNS (RFC 6698 and RFC 7671). The Certificate Usage field of the TLSA record MUST have a value of 1 or 3.	* It is not clear whether the first sentence refers a requirement for RDAP clients or one for servers. Does it mean servers need to set a TLSA record? It might need more clarification.
1.4	3	The case (i.e. uppercase and lowercase) of the data returned in RDAP responses MUST preserve the case received via EPP.	* Clearer description might be needed for which items in EPP are applied to the "case-preserving" requirement. It seems to be required that gTLD Registries/Registrars must preserve the case of EPP input/output strings, for example, even for domain names, and it would be somewhat complicating and confusing because domain names are technically defined as case-insensitive.
	14	The RDAP database (i.e. database used to generate the RDAP responses) MUST only include registration data from the Registry or Registrar database, as the case may be. The RDAP database must be updated within the allowed Service Level Requirement (SLR) (e.g. RDDS update time, ≤60 minutes). In a case where the contracted party is querying its database directly, and therefore, using real-time data, the eventAction type last update of RDAP database MUST show the timestamp of the response to the query. [[The eventAction type last update of RDAP database is pending registration in the IANA RDAP JSON Values registry]].	* It seems that the first sentence refers to the data which is never retrieved by users (for example, data for system administration). If that is the case, is it really needed to be a requirement as the RDAP profile?
2. The following requirements apply to Registries only			
2.6.	1	Specification 3 of the RA specifies the format and content of the monthly reporting for Registry operators. The following rows are added to the Registry Functions Activity Report under section 2:	* There are two Field #42, so the following numbers need to be re-numbered. * Are the reasons for response truncation up to the implementers? Or based on some implicit criteria? Clearer description about this point would be helpful for gTLD Registries.
2.7	1	The base URL of RDAP services MUST be registered in the IANA's Bootstrap Service registry for Domain Name Space (https://www.iana.org/assignments/rdap-dns/rdap-dns.xhtml), as described in RFC7484. A separate entry is required for each TLD.	* Currently, there is no information of how to register the base URL of RDAP services. For a "MUST" requirement, it would be helpful for gTLD registries to be given the information about when and how this procedure will be provided.
3. The following requirements apply to Registrars only			
3.1	4	The entity handle in the RDAP response MUST contain the Repository Object Identifier (ROID of the contact object, <contact:roid>, as defined in RFC5733) for the Contact object. For example, a Registrar could obtain the ROID from the Registry via EPP and cache the information locally. The RAA 2013 defines that this information MUST be shown if available from the Registry. If this information is not available from the Registry (e.g., a "thin" Registry), the handle MUST contain the unique identifier within the Registrar.	* As for the requirement for "thin" registry specified by the last sentence, the specification seemed to be different from the one of gTLD WHOIS per ICANN Advisories (i.e. No. 46 in the RDDS Clarification Advisory says "Not Available From Registry" SHOULD be shown instead). Doesn't it matter?
	5	The eventAction type last changed reflects the date and time of the latest successful update known to the Registrar. Registrars are not required to constantly refresh this date from the Registry.	* As a requirement, it's better to have a "MUST" or "SHOULD"-like word in the first sentence.
Appendix A		Open Issues	* If there are some possibilities of another conclusions to the "possible solutions", they should be excluded from the specification of the RDAP profile at least for the initial implementation.
Appendix B		Data Elements Mappings	* Adding the new columns, which are the related section numbers of this document and the mandatory levels (MUST, SHOULD, MAY, etc.), to the tables of Appendix B would be helpful for RDAP implementers.