neustar

18 February 2016

Via Electronic Mail

RE: Registration Data Access Protocol (RDAP) Operational Profile for gTLD Registries and
        Registrars

Neustar Inc. (Neustar) welcomes the opportunity to comment on the Registration Data Access
Protocol (RDAP) Operational Profile for gTLD Registrars and Registries.

In addition to the comments provided below, Neustar also wishes to express full support for the
comments submitted by the RySG on this matter.

First and foremost, Neustar urges ICANN to publically state why it feels the RDAP Operational
Profile (the Profile) should be deployed ahead of policy development efforts instead of after
them. Neustar is concerned that ICANN is seeking to introduce the Profile prior to the
completion of policy development efforts currently underway, which will consider, among other
things, Registration Data Services, their acceptable use and their protection of Registrant's
Personally Identifiable Information.

Neustar is concerned that ICANN appears to be avoiding community forums such as the IETF in
implementing a protocol. The Profile is a particularly egregious example since RDAP was only
recently developed through the IETF. It follows that the bulk of any implementation expertise will
be found within the IETF for such a relatively new technology. This is particularly important
since many of the community concerns surround the enhanced opportunities for abuse, which
RDAP may offer. Neustar does not believe the that gTLD Tech mailing list and ICANN public
comment submissions are worthy replacements for the consensus driven model the IETF uses
to develop implementation documents.

Neustar acknowledges that implementing RDAP, the WHOIS successor protocol, is part of a
Registry's obligations under the Registry Agreement; but we note that the Registry Agreement is
silent on how this is to be achieved and certainly does not prescribe that the Registry Operator
will be required to overlay the protocol with an ICANN developed profile that was developed
outside the IETF.

Neustar disagrees with the need to support A-labels and U-labels within the same query.
Allowing A-labels and U-labels will be particularly unworkable for right to left languages unless
the RDAP server introduces arbitrary restrictions. It is important to remember that RDAP is
intended for machine-to-machine communication. Since RFC 7482 is very clear on this
guidance (do not mix the two) any software client that generates this sort of query is broken.
With the relative youth of the RDAP standard there is unlikely to be a large install base of
software clients with said broken implementation. If ICANN is aware of a software client that has
incorrectly implemented the RDAP standard and is now generating queries which combine A-
labels and U-labels then ICANN should take its concerns to the IETF where such challenges are
considered as part of any implementation discussion. Enshrining bad practice within the

Operational Profile will result in needless future changes to the technology or additional service restrictions.

Neustar disagrees with 1.3.4 of the Operational Profile, specifically the need to use a Certificate Authority, which is supported by browsers. Requirement 1.3.3 allows for both types of End Entity certificate usage to be implemented yet 1.3.4 effectively prevents certificate usage 3. A correctly developed DANE capable RDAP client can easily validate a domain issued certificate. Since browsers are unlikely to be the method of consumption for RDAP services, restricting RDAP implementations to the same poor level of DANE implementation as browsers will result in future requirements and implementation guideline additions to allow certificate usage 3. The cost of such additions will be borne by the community, for no clear benefit.

Regards

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