

Registries Stakeholder Group Comments

on the

Draft Implementation Plan for the WHOIS Online Accuracy and Reporting System

Due to time constraints, including travel schedules around the ICANN Singapore meeting, the Registries Stakeholder Group (RySG) did not take a formal vote on these comments. They were circulated on our mailing list and discussed; no Member expressed opposition to these positions.

The Registry Stakeholder Group appreciates the opportunity to comment on the [Draft Implementation Plan for the WHOIS Online Accuracy and Reporting System](#).

The use of the Whois lookup system has evolved from when it was established as a method for system administrators to communicate. As the Internet has changed, the uses have changed, particularly as the commercialization of the system created more needs to contact domain name holders. In addition to operational purposes, accuracy has become important in order to address matters that arise in areas such as consumer self help, law enforcement, Internet abuse, and various commercial rights protection arenas. Please note that this comment addresses only the topic of accuracy. The RySG is making no comment on issues related to domain registration data availability policies.

The RySG understands the documents and policies that have led to the issuance of a draft plan for an Accuracy and Reporting System. However, we must begin by expressing our reservations about the value of the results from any such project. A statistical sampling is not the same as full data analysis and presents the potential for results that do not lead to valid conclusion.

In addition, the RySG believes that any review of domain name records will have value largely from examining information concerning the beneficial holders of domains. By definition, registrations through privacy and proxy services will be excluded from the program, thereby clouding the validity of any reviews or the value of a proactive review system.

The RySG applauds the draft plan's recommendation to include stakeholders in subsequent steps. Expertise available from the Registrar Stakeholder in particular will be essential in developing any Whois accuracy system. We also suggest that examination of complaints submitted to the ICANN Whois Data Problem Reporting System may provide guidance in formulating analytical criteria for proactive reporting of inaccurate Whois data.

In addition, the Draft Implementation Plan's suggestion to use the hierarchical Syntactic, Operational, Identity Validation process presented in SAC 058¹ is an excellent start. The SSAC strategy presented a solid tiered approach to examining the accuracy of registration data.

Obviously, the basic framework cannot stand alone. It needs a methodology to gauge the results of any analyses. The RySG has a significant concern about the suggested processes that we must raise at the outset. As SAC 058 and the draft plan note, automated processes will have to give way to hands-on analyses as a record review moves up the hierarchy. Some record element checks will, of necessity, be subjective, especially at the Identity step. If the studies are to be accurate, normalization or review mechanisms must be part of record validity determinations.

¹ SSAC Report on Domain Name Registration Data Validation, <http://www.icann.org/en/groups/ssac/documents/sac-058-en.pdf>

The RySG hesitates to comment further on the suggested model because we understand that it is a suggested approach. Detailed comments must wait for examining the specific methodology of a submitted plan. However, we will note issues such as 1) the granularity of a five step scale and if a scale should have equal differentials between each level: 2) whether all data elements should be treated equally or weighted: and 3) if the three steps in the review hierarchy should be given equal weight or treated independently; *e.g.*, should a failure at the manual Identity level outweigh passing automated Syntactic and Operational checks in a grading system or require a review of “OK” lower level checks.