

Proposal to Increase Whois Utility and Relevancy: The
Operational Point of Contact

Rationalizing the gTLD Whois System and Specific Contact Records

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Implementing an Operational Point of Contact

Overview

The purpose of this proposal is to rebalance the information contained in the gTLD Whois System and how it is made available in order to make it more appropriate for its intended use given the changing nature of gTLD Registrants, the domain name system and the Internet.

There are four main areas of consideration dealt with by this proposal;

- a) The type of contact data published by Registrars via Whois
- b) The type of contact data published by Registries via Whois
- c) The mechanism by which inaccurate data is dealt with and corrected
- d) The mechanism by which prospective gaining registrars obtain the underlying contact information from prospective losing registrars at the time of domain name transfers.

This proposal pre-supposes that 1) domain name contact data not be available through any sources other than those discussed by this proposal, unless by Registrars, and in that case at the Registrar's option, and that 2) regardless of the information displayed, that the domain name contact data collected by registrars remain as specified in the RAA ("Underlying Whois Contact Data").

Proposal

The Type of Contact Data Published by Registrars;

Accredited Registrars will publish three types of data pertaining to the domain name registration in their respective gTLD Whois repositories;

- a) The name of the Registered Name Holder
- b) The contact information for the primary operational point of contact (oPOC), which must include, but is not limited to;
 - a. The contact name of the oPOC
 - b. The contact address of the oPOC
 - c. The contact telephone number of the oPOC
 - d. The contact email address of the oPOC
- c) The following registry level data:
 - a. The Registered name
 - b. The identity of the Sponsoring Registrar
 - c. The URI of the authoritative Whois server
 - d. All authoritative nameserver names associated with the domain name registration record
 - e. The status of the Registered Name (LOCK, HOLD, EXPIRED, or any other Registry specified value)
 - f. The creation date of the Registered Name.

Registrars may choose to allow Registrants to specify additional operational points of contact. If the Registrant exercises this option, the Registrar must publish these additional records in the record of delegation for the domain name in question in a manner consistent with the publication of multiple nameservers in other areas of this same record.

This proposal does not require the publication of any additional data; however Registrars may choose to provide additional data at their discretion.

The Type of Contact Data Published by Registries;

gTLD Registries will publish a limited data set concerning each Registered Name. Registries must not publish or provide any additional data. This Registry Level data is solely limited to;

- a. The Registered name
- b. The identity of the Sponsoring Registrar which shall consist of separate fields indicating;
 - c. the Registrar Name and;
 - d. the corresponding IANA Registrar Identification Number
- e. The URI of the authoritative Whois server
- f. All authoritative nameserver hostnames and corresponding IP addresses associated with the domain name registration record
- g. The status of the Registered Name (LOCK, HOLD, EXPIRED, or any other Registry specified value)
- h. The creation date of the Registered Name.

Correcting Inaccurate Whois Data;

In addition to preserving the existing requirement for Accredited Registrars to promptly update registration records when a Registered Name Holder provides them with updated information¹, Registrars must also positively respond to notices of alleged inaccuracies in a timely manner. Specifically, when a Registrar receives notice of an alleged inaccuracy in the whois record for a particular domain name;

- a. the Registrar must notify the Operational Point of Contact or the Registered Name Holder in a timely manner.
- b. The oPOC or the Registered Name Holder must correct the alleged inaccuracy or defend the accuracy of the data, also in a timely manner.
- c. If the oPOC or the Registered Name Holder does not update the contact record with corrected information within this time period, the Registrar must either place the domain name on "hold" or revoke the registration.
- d. Before accepting the new information, the Registrar must verify that the oPOC or the Registered Name Holder is contactable using the new email address provided.

A standardized mechanism should be used to convey notices of alleged inaccuracy from the internet community and distribute them to the relevant registrar.

¹ ICANN web site, "Registrar Accreditation Agreement", Section 3.3.2, <http://www.icann.org/registrars/ra-agreement-17may01.htm#3.2.2> .

Facilitating Inter-registrar Domain Name Transfers

In order to ensure continued domain name portability, Registrars must continue to be able to transfer detailed contact records between one another at the request of the Registered Name Holder or oPOC. Therefore, this proposal recommends that the Sponsoring Registrar must make the data outlined in section 3.3.1 of the RAA be made available to the prospective gaining registrar upon request for the purpose of confirming the Registrant/oPOC identity and validating the authenticity of the domain name transfer request. This proposal further recommends that this mechanism be augmented, when appropriate, by the use of EPP AUTH-INFO tokens/codes.

Finally, this proposal recommends that the existing Inter-registrar Transfer policy be amended to recognize the authority of the Operational Point of Contact and sunset that of the Administrative, Technical and Billing Contacts.

Motivations

Recent discussions of the gTLD Whois System and specific contact types illustrate deficiencies in current Whois-related policies. These issues should be resolved as expeditiously as permitted by the bottom-up consensus based approach used by the GNSO. Implementing this proposal will require further consideration in the following specific areas;

1. Issue: *The requirement to include contact data for registrants given the administrative, technical and operational management responsibilities of the other contacts requires further examination.*

Background: The responsibilities delegated to the Administrative and Technical contacts are sufficient to deal with all nature of inquiry within the scope of purpose described in this document. Further, out-of-scope inquiries are adequately dealt with through "direct to registrar" inquiries which provides for extended levels of cooperation, either through due process or other mutual agreement regarding additional data that registrars collect via the registration and delegation process by virtue of their relationship with the registrant and potentially the registrant's services provider.

2. Issue: *The requirement to include multiple points of contact in a delegation record given the organizational diversity of Registrants requires further examination.*

Background: Not all registrants differentiate between the roles assigned by GNSO policy to the two different contact types. Some registrants simply populate these fields with identical information; others delegate responsibility to third parties, or different parts of their own organization. It would be useful to re-examine the requirement to include a specific Administrative and Technical contact in light of current practice which suggests that a primary operational point of contact may suffice, but also allow a Registrant to specify additional operational points of contact, similar to the way that a registrant may specify many nameservers as part of their record of delegation.

3. Issue: *The requirement for Registries to publish comprehensive Whois information in addition to the authoritative records published by Registrars requires further examination.*

Background: The current arrangement of allowing Registries to publish non-authoritative data regarding domain name delegations creates far too much legal, operational and technical confusion to be acceptable. One of the primary design features of the domain names system is simplicity – gTLD Whois policy should attempt to maintain this.

4. Issue: *The lack of a requirement to preserve chain of delegation data requires discussion.*

Background: Current gTLD management policy does not specify that registrars or registries must preserve historical delegation data beyond the cursory data retention requirements in their operating contracts. Further examination of the suitability of these requirements is warranted.

5. Issue: *The process by which inaccuracies in the data provided by Registrants is corrected and kept up to date requires further development.*

Background: A high degree of accuracy in delegation records is desirable. The current policy and processes concerning data accuracy in these records requires further definition and clarification based on experience to date.

6. Issue: *The security, uniformity and efficacy of the processes by which Registrants transfer delegations to one another requires discussion.*

Background: Current policy and practice allows Registrants to transfer delegations to one another in any manner that they see fit. Discussion regarding the appropriateness of current arrangements and the security of current practices is warranted in order to determine whether or not this is an area that could benefit from the development of new policy.

7. Issue: *The security, uniformity and efficacy of the processes by which Registrants change Registrars requires further development.*

Background: The GNSO is currently refining these processes.