

July 9, 2009

## Registrar Constituency Position on VeriSign's Proposed Registry Service Requests

### BACKGROUND

VeriSign, Inc. ("VeriSign") recently submitted several Registry Service Requests to ICANN. Among its proposals, VeriSign submitted requests for a "Registry-Registrar Two-Factor Authentication Service" and a "Domain Name WhoWas Service" (collectively, the "Proposed Services"). This Position Paper captures the overall sentiment expressed by the RC Members who provided feedback about these Proposed Services. Due to time constraints, however, no formal vote regarding this Position Paper was taken.

### RC POSITION

The RC is concerned with certain statements contained in the Proposed Service applications related to VeriSign's communication related to the Proposed Services. For example, page "3" section (c) of the Domain Name WhoWas Service application asks:

*"Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?"*

VeriSign's response is:

*"VeriSign has discussed this concept with members of the Intellectual Property Constituency and **Registrar Constituency**. VeriSign received positive feedback from these initial discussions, especially with respect to the registry providing an authoritative source of historical registration data."* (emphasis added).

Furthermore, page 2 section (b) of the Domain Name WhoWas Service application asks:

*"Were consultations with gTLD registrars or the registrar constituency appropriate? **Which registrars were consulted? What were the nature and content of the consultation?**"* (emphasis added).

VeriSign's response is:

*"VeriSign is currently discussing the Domain Name WhoWas concept with both registrars and non-registrars."*

Similar responses were provided regarding the Two-Factor Authentication Service. The RC notes that VeriSign's answers are not fully responsive to the questions. The RC believes that VeriSign should identify the nature of its consultations with registrars, without necessarily providing the names of the individual registrars. The RC also does

not believe that consultations with individual members should supplant consultations with the constituency group as a whole.

The RC is concerned that consultation between VeriSign and registrars on the Proposed Services have, thus far, been insufficient. To date, no known consultations between VeriSign and the RC have occurred, and it is unclear which RC members, if any, were consulted.

Because these Proposed Services may directly impact registrars, the RC believes that a formal consultation process between VeriSign and the RC is appropriate. Accordingly, the RC requests that ICANN delay making a preliminary determination until July 31, 2009 to give VeriSign time to appropriately consult with the RC. This will allow the RC time to fully understand the proposed registry services, and provide the necessary information for ICANN to make an informed preliminary determination as called for under the Registry Services Evaluation Policy.

The RC generally believes that consultation on proposed Registry Service Requests is extremely important. Accordingly, the RC requests that ICANN not approve any registry funnel requests that do not fully and completely respond to the questions related to consultations. Moreover, the RC offers to assist ICANN and the Registry Constituency in establishing a formal process for RC consultations on future Registry Service Requests. The RC believes that a formal consultation process for these and future applications would reduce the risk of mis-understandings between registrars and registries.

The RC is not commenting on the substantive nature of the Proposed Service applications at this time, however it anticipates possibly offering substantive comments after the requested consultations.

## **CONCLUSION**

The opinions expressed by the RC in this Position Paper should not be interpreted to reflect the individual opinion of any particular RC member.