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Draft Zone Data Access Concept

Please accept the following comments in response to the publication Zone Data Access concept. ¹ Go Daddy reserves the right to future comments on this issue and our positions include, but are not necessarily limited to, the text herein.

General Comments

Go Daddy thanks the efforts of the Zone File Access Advisory Group, and for the opportunity to comment on their draft concept. The expected increase in the number of gTLDs will bring new operational challenges in exchanging Zone Data, and we generally support efforts to anticipate and address these challenges.

ICANN Should Not Operate the Zone System

Rather than operate the Zone Data exchange system directly, ICANN should solicit proposals from third parties to provide this service. Requirements should be established via publication of an RFP, and candidate operators should be examined to eliminate any potential conflicts of interest in their operation of the Zone Data system.

Replace or Augment Existing Models?

It is not clear whether the ultimate goal of this method would be to replace existing methods of exchanging Zone Data, or simply to offer an alternative channel. Small consumers of zone data may be interested in only one or two new gTLDs, and therefore would benefit less from an aggregated approach.

Maintain Current Fee Model

Zone data is currently made available to accredited registrars, at no charge, by the operating registry. Other (non-Registrar) parties can access the data for a fee. We ask that any new approach preserves this fee model, and minimizes the operational impact or investment required on the part of gTLD registries and accredited registrars.

New Service Model: Zone Archive?

An aggregated Zone Data exchange system has the potential to create a heretofore-unknown data type: historical centralized zone data. While zone data may be archived and analyzed by existing consumers, the Zone Data exchange system could make this data available through a single interface. Should the operator of such a

system seek to market this, or other, derivative products, it should seek comment from the ICANN community, and approval of the ICANN Board of Directors.

Conclusion

We recognize the operational benefits of centralized Zone data access for registrars and other consumers, but are wary of advocating new cost structures where none exist today. We look forward to the continued work of the ZFA-WG in its development of this concept.

Sincerely,
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1. <http://www.icann.org/en/announcements/announcement-22feb10-en.htm>