

November was a policy month for the ALAC and they have recently ratified the following statements:

Registration Directory Service (RDS-WHOIS2) Review Team Draft Report of Recommendations

The primary concern for the ALAC in the RDS-WHOIS2 Review is the accuracy of registrant data (WHOIS data) and its use by security and law enforcement bodies in addressing the misuse and abuse of the DNS system. The ALAC summarized their positions on the 16 Recommendations under Objective 1, as well as Objectives 3, 5, 6 and the ICANN Bylaws.

ICANN Seeking Community Feedback on Proposed Unified Access Model

The ALAC cited their prior statement from 10 April 2018 relating to the access of WHOIS, and offered (4) general comments on the proposed UAM: (1) Any access model must be compliant with the GDPR, and ICANN should obtain legal advice from expert counsel to confirm compliance; (2) Internet end user rights should be part of the calculus, including knowledge of email sender identity, et al; (3) The UAM design should be scalable and not overly-reliant upon manual updates, and should have a well-defined taxonomy of abuse types, et al. Once an agreed upon set of inputs and outcomes is established, an automated system may be created to respond to WHOIS requests; (4) The various harms taken into account when considering the UAM must be done so in a non-biased fashion.

Proposed gTLD-Registration Data Access Protocol (RDAP) Profile

The ALAC recommends that ICANN adopt the RDAP quickly and effectively because they hold it is an essential step for ICANN to deploy a tiered-access model adequately. In addition, the ALAC recommends that ICANN address 5 ambiguities in the RDAP that are also present in the European Union's (EU) General Data Protection Regulation (GDPR), noting them in the statement.