RDDS Policy Framework - Project Overview

BBQ Group[1]
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Background

The WHOIS system, now referred to as Registration Data Directory Services, is an ancient part of the Internet. It originated in the earliest days of the Arpanet. The published names were the administrative and technical contacts for the time-shared hosts on the Arpanet. The creation of the Internet, the creation of the domain name system, and the explosive growth of the commercial domain name registration process all came later.

Several controversies and tensions concerning the WHOIS system have persisted over the past few decades. The main points of complaint are:

- Accuracy   The information in the WHOIS database is often inaccurate or out of date.

- Privacy   The information is used in ways that violate the privacy of the registrants. The violations range from spam to harassment.

- Cost   Registrars and registries bear the cost of collecting and providing the data but others are the primary beneficiaries.

- Uneven Access   The details with a registration vary from one registrar to another

- Unclear Meaning   The authority and responsibility associated with the Admin and Tech contacts are unclear or meaningless.

There have been multiple attempts within ICANN's Policy Development Process to revise the existing rules. These attempts have repeatedly faltered because the several interested parties have focused on either preserving the status quo or avoiding a change deleterious to their particular interests.

The advent of the European General Data Protection Regulation (GDPR) has forced a change in the direction of privacy. As a consequence, there is now an expectation that collection and

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[1] The BBQ Group is a small group of experts who prefer not to be identified explicitly to avoid implying their work represents the official positions of their respective organizations. The group has no official status or authority and asks that its work stand on its own merits. "BBQ Group" is a play on the French Bourbaki Group who published math papers in the last century without disclosing the names of the authors.

disclosure rules in the future will require explicit justification, and that accessibility to information will vary depending on the credentials and purpose of the party making the request.

The GDPR is a blunt instrument. On the positive side, it has broken the long-standing stalemate. On the other hand, it doesn't provide detailed guidance. Moreover, the GDPR is just one of several similar regulations that are coming into existence.

Our Goals

Unquestionably there are differences in values and judgment that have to be resolved through political negotiations. That said, we believe it will be possible to improve these discussions by unpacking the details involved in specific policy proposals and providing tools and approaches for comparing the impact of competing proposals.

The BBQ Group is developing a RDDS Policy Framework as a method of expressing RDDS policies at a granular level in hopes of providing a tool that improves the precision and clarity in policy discussions.

The approach is to consider all of the information collected from registrants and other operational data that arises during the lifetime of the registration and to provide a vocabulary for expressing the rules under which such information is collected and disclosed to requesters. The list of data elements is more inclusive than just the usual Registrant, Admin and Tech contacts, and the level of detail and the range of disclosure policies is intended to encompass everything from data that is necessarily publicly available, e.g. the DNS records, to highly sensitive data such as passwords and payment details that must be kept confidential except in very specific circumstances.

We are not advocating any specific policy or policies, but we do hope this work will assist others in understanding what aspects of proposed policies are likely to be acceptable across multiple constituencies. We also expect some aspects of proposed policies that have not been clear before will become better illuminated.

We do not expect this work will magically resolve all conflicts, but we do expect this work will assist others in reducing the number of conflicts and sharpening the discussions.

We invite anyone interested to contact us.

Relationship to Other RDDS Activities

This project is distinct from the several officially chartered efforts related to future RDDS policies and systems, but we think this project is addressing aspects that will facilitate their efforts. The following is not necessarily a complete list.

Expedited PDP (ePDP)   ICANN's GNSO ePDP is considering whether to adopt the Temporary Specification ICANN adopted in response to the GDPR. This project is may be able to provide some useful vocabulary and modes of thinking for the ePDP.

Technical Study Group (TSG)   The Technical Study Group was chartered to develop a design for an RDAP-based system including an ICANN gateway for access to non-public data for the gTLD registrations. We have coordinated with the TSG and believe the policies that can be expressed within our framework can be implemented within the TSG's design. Conversely, the TSG expressed belief the policies their design is expected to support can be expressed within our framework.

InfoNetworks Design   Michael Palage and Frank Cona have been developing an access model. Their primary focus is on identification, authentication and authorization of requesters. We have coordinated with them and believe our approaches are focused on different aspects of the overall problem and are compatible with each other.