MARRAKECH – Thick WHOIS Policy Implementation - Meeting with the IRT

Sunday, March 06, 2016 – 12:00 to 13:00 WET
ICANN55 | Marrakech, Morocco

FABIEN BETREMIEUX: Hello, everyone. Thank you for coming this morning to the Thick WHOIS Implementation Review Team Meeting. Before we start, can I ask the IRT members around the table to introduce themselves so that we know who they are and we have a role call?

I will start. I’m Fabien Betremieux from ICANN staff.

JOE WALDRON: Joe Waldron from Verisign.

THEO GEURTS: Theo Geurts, Realtime Register.

FRÉDÉRIC GUILLEMAUT: Frédéric Guillemaut, SafeBrands Registrar.

ROGER CARNEY: Roger Carney, GoDaddy.

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SARA BOCKEY: Sara Bockey, GoDaddy.

JUNE [INAUDIBLE]: June [inaudible].

FABIEN BETREMIEUX: Thank you. Can I ask everyone in the room to just join the table? I think there will be enough room. If you’d like, you can please feel free to take a seat at the table.

Let’s get started. Let’s take a look at our agenda quickly. We’ll go through very quickly the background and status of implementation before we delve into our discussions on consistent labeling and display for us, and then on the transition from thin to thick.

I will move through quite quickly through the introduction slides and background because I think that the IRT members are familiar with it. If anybody else in the community is interested, they can always download the slides, which are published. If I’m moving too fast for IRT members, please let me know and we’ll stop. We only have an hour and we need to move forward our discussion on the various open items, so I want to make sure we get to those.
So in terms of background and status, just want to recall to everyone that we’re working against two expected outcomes. One is the transition from thin to thick of .com, .net, and .jobs, and the second outcome is consistent labeling and display for all gTLDs. We have decoupled the implementation of those two outcomes as per our previous discussion in the IRT.

This is the relation between the policy recommendation and outcomes. That should be familiar for IRT members.

In terms of recent activity, you may recall that we have concluded the drafting of a scoping paper for the analysis of existing registration, which we’ll discuss with the Registrar Stakeholder Group on Monday, so that’s the update on the transition from thin to thick.

Regarding consistent labeling and display, you are certainly aware that we’re still in the public comment period on the proposed consensus policy language.

Speaking about consistent labeling and display of WHOIS output for all gTLDs, this is a reminder of what’s proposed in the current draft under public comment, so the core of the proposal is about two and three, the standards by which we propose to realize labeling and display, Spec 3 of the RA 2013, the WHOIS qualification advisory, the registry agreement obviously.
Finally, as you may recall, we’ve also proposed that the implementation of consistent labeling and display be synchronized with that of the RDAP Operational Profile. So all this is, again, under public comment right now.

This is a reminder of an example of what would be the impact of the consistent labeling and display. The coloring code is green, no changes, blue, change to either the ordering or the data format or the labeling of the field, and red is an addition of a field.

That’s what distinguishes low impact from high impact and which motivated us to consider a phased implementation of consistent labeling and display. I’m getting to that in the next slide.

Phase one is for those changes that are not too substantial, that are just about formatting, or ordering, or labeling. Phase one excludes registrar registration expiration date and reseller information. We propose a principle of a six-month time frame to implement from the date the consensus policy is published.

Phase two is the inclusion of those fields that need to be added: registrar registration expiration date, reseller information, in particular. And here, we’ve proposed that this be completed
within six months of publication of the right of any EPP extensions at IETF.

In phase three, it's going into the transition, so that's not specifically about consistent labeling and display. But again, this should be all familiar to you IRT members.

Let's review what's been the community input to date in the public comments. The comments we've received addressed the issue of the registry and registrar expiration date with comments suggesting that the display of those two together could create confusion and may create concerns as well on the part of registrants and users. And also, there were concerns of the cost-benefit ratio of that implementation.

There were also comments on the interpretation of the policy recommendation, the consistent labeling and display, where commenters felt that new fields in the registry RDDS output was intended by the policy. Some comments underlying that the consistency of your RDDS output was achieved already through the WHOIS qualification advisory, which we refer in our proposed consensus policy language.

Finally, there were also on that topic, concerns with the fact that there were contractual references. The fact that this consensus
policy refers to an advisory in the RAA, that’s an issue from a registry perspective.

Then there were also comments on the relation of the consistent labeling and display implantation and technical standards, RDAP and EPP extension. On the RDAP, the comment was that the reliance of this implementation on RDAP is premature and out of scope. And regarding the EPP extension, there were comments suggesting that it should be defined prior to defining an implementation timeline for consistent labeling and display.

Because as you may recall, for phase two of the consistent labeling and display implementation, we need new EPP extensions, and our proposed timeline was six months from the availability of those EPP extensions. The comment here is that we should have the EPP extensions defined before even we set a timeline.

Finally, there were several comments on the time taken to implement, concerns with the pace of implementation, and also concerns that the implementation of consistent labeling and display is delaying the implementation of the transition from thin to thick.

This is a high-level summary of the comments we’ve received in the public comments to date. It remains open for another two
weeks, and I’ll get to the next steps once this public comment period is closed.

But before we get to that, are there any comments on this summary? Not seeing any.

What we wanted to provide here is a reminder of the rationale for our consistent labeling and display proposal. We discussed this around the impact assessment, which we drafted back initially in November 2014 in which then we revised in February 2015.

The reason why we suggested this interpretation of consistent labeling and display is that when looking back at the PDP documentation, we found that in the objectives of the PDP were the consistency of response, and that was one of the drivers for the thick WHOIS and also accessibility of registration data. We figured that interpreting consistent labeling and display as requiring or as displaying all required fields in the RDDS output would serve those two objectives, and so that’s why we made that suggestion in the impact assessment and then in this consensus policy proposal.

I think I’ve addressed here the second point. In terms of the synchronization of consistent labeling and display with RDAP, our intent was to minimize the impact on affected parties. So
instead of having two separate implementations with a specific timeline, thick WHOIS on one hand, RDAP on the other hand, we would, by grouping the two, somehow reduce the impact and any potential duplication of effort.

Also, we saw in the RDAP Operational Profile an opportunity in itself to further the consistency of RDDS output because RDAP would provide all the data that would then need to be displayed in the right format. It would just be a question of ordering in the web output, for instance, in any user-friendly output.

So this is the summary of our rationale. We just wanted to make sure that this was on everybody's mind in the IRT. Are there any comments or questions regarding the input we're getting in the public comments on our rationale, on what IRT members think this means for the consistent labeling and display part of our implementation?

In any event, there's still time to discuss this. There is the RDAP session tomorrow, Monday at 1:30 in Toubkal where we're going to specifically discuss what was presented in the GNSO meeting this morning. This is the feedback we've gotten on the RDAP Operational Profile and the relation and interplay of that with consistent labeling and display.
There is still the public comment period open, again, for two weeks. We plan to provide a complete summary and analysis of the public comment by the first of April. Not a joke. Sorry. It was an easy one. I apologize.

More seriously, we would aim to finalize the consensus policy language and target for a publication of the final proposed consensus policy language by the end of July. So that would mean in the April, June timeframe, we’d expect to discuss our summary and analysis with the IRT and revise the proposal as needed.

Unless there is any specific comments or questions on this aspect of the policy implementation, if IRT members agree with this timeline here that’s presented for next steps, we can move to discussing the transition from thin to thick part of our implementation. But again, I want to make sure that we have time to discuss. Please go ahead.

JORDYN BUCHANAN: Thanks, Fabien. This is Jordyn Buchanan with Google, and I’ll note I haven’t been participating in the IRT, but as a concerned citizen I guess. I think you’ve done a good job of reflecting the sentiment in the public comments in this deck, so thank you for that.
I do just want to note that looking at this process, it feels like you guys have made a bunch of rational individual point decisions that end up, when you take a step back and look at what’s happening, doesn’t make any sense at all.

The goal of the consensus policy was to say, “Hey. There’s some TLDs that don’t really have thick WHOIS, and we should make it so those TLDs have thick WHOIS and make it so when they do that it looks like everyone else’s WHOIS.”

What you’ve done instead is you’ve gone and said, “Oh, you know what? This is a great opportunity to add a bunch of information to the WHOIS output.”

The goal of making consistent displays should be we’ll make a few people change in order to match how everyone else looks. Not we’re going to make everyone do wildly big changes to the output of their WHOIS, which is what the implementation ends up doing.

Further, it’s moved from an implementation that affects the display of data to the collection of data by registries, as well, and that’s not envisioned in the policy at all. There’s nothing about collection of data in the policy.

We’re going so far, it’s not only that you have to collect data, but we have to create new EPP extensions. It’s not even supported
by the underlying technical protocol to do these things. It’s just so far outside the remit of what you look at, the plain text of and the intent of the policy that I just feel like we’ve gone way off base, and therefore, you see a wide variety of stakeholders across the ICANN community saying: “It seems like things have gone haywire here.” For different reasons, but all getting to the same point, which is some people want to get to thick WHOIS faster. Registries are concerned about the implementation burden.

But if you just simplified things down to actually doing what the policy says, which is try to make it so these few TLDs that don’t currently have thick WHOIS have an output that roughly looks like all of the TLDs that are already doing thick WHOIS, I think you’d get there a lot faster and you’d have a lot less grumpy people writing public comments. Thanks.

FABIEN BETREMIEUX: Thank you, Jordyn, for your input. I was just going to ask whether other IRT members representing other stakeholders or other categories of stakeholders would like to speak. Steve.

STEVE METALITZ: Steve Metalitz representing the Intellectual Property Constituency. I support a lot of what Jordyn just said. I
understand that there were a couple of additional paragraphs in the consensus policy that were inserted late in the process that refer to consistent labeling and display. But I think we may have – to use an expression – put the cart before the horse here, and we’re doing things that are delaying unnecessarily the achievement of the main goal of the consensus policy, which was thick WHOIS for all registries.

I guess my question now is if Jordyn's analysis is basically correct – and I think it is – how can we fix the problem now so that we can get thick WHOIS back on a faster track for implementation? I would be very interested in if others who agree with that analysis of the situation had specific suggestions about how we can fix the problem now and get back on track toward making thick WHOIS the top priority. Thank you.

KRISTA PAPAC: Krista Papac, ICANN staff. We’re implementing what the policy recommendations say.

Recommendation one is consistent labeling and display per the specification three of the 2013 RAA should become a requirement for all registries both existing and future and then thick WHOIS for all registries. We have policy recommendations,
and the board said, “Go implement these,” and so how do we bridge that gap?

We’re just following what the recommendations say, and these were the consensus recommendations that came from the GNSO to the Board. That’s what’s happening here.

I appreciate the layman’s term summary, Jordyn, and I get that, but we also have this document that has this stuff outlined in it, so I’m curious to know how you think we bridge the gap between what’s been approved by the GNSO, and the Board, and what you’re saying.

JORDYN BUCHANAN: Krista, we wrote a public comment that I think gets into this in a little bit more detail. But the gist of it is when there’s some confusion about the intent of the policy – so if there’s two ways of interpreting the policy – you could say, “Oh, look at the 2013 RAA.”

Based on that model, you could interpret it one of two ways. You could say, “Oh. That’s a rough format, and if that data is available, then this might be how you would present it.” That would be a way of interpreting the 2013 RAA as a model without having to impose any additional collection or new protocol burdens or anything like that.
Another way to interpret it would be the way that you are, which is like, “Oh, because it’s required by registrars to display this, therefore, we’re going to require registries to display this, as well.”

That’s a much more burdensome interpretation and gets quite far, I think, away from the intent of the proposal, which doesn’t literally say. There’s nothing about collection anywhere in the policy, so once you stray into changing what data registries are collecting, I think that’s an interpretation that doesn’t really match the discussion or the intent of the policy.

I think what you would do is look for an interpretation of this term that matches the intent of the policy and that imposes the least burden on the community. Like I said before, if you’re using the 2013 RAA as a model, you would say, “Okay. Here’s the fields that are present, and maybe we want to display them that way, but we don’t necessarily need to require that registries need to collect data that they’re not today because that’s not envisioned by the policy.”

FABIEN BETREMIEUX: Joe.
JOE WALDRON: Thanks, Fabien. I want to echo some of what Jordyn said.

I think where there’s been a number of comments as we’ve gone through several iterations of the WHOIS output. We’ve focused on the word consistent, and I think it’s a question of does consistent mean identical. I think that’s really the point that Jordyn was bringing up.

If you go back to the 2013 RAA, there is an example of what that WHOIS output looks like and where it’s appropriate and where that’s the data that’s collected by the registries. You have to go back and look at what the problem is that consistent labeling and display was trying to solve.

I think when you look at the consumers of WHOIS data, how are they able to consume that in a way that is consistent across registries? It doesn’t have to be identical.

I think part of this is who are the consumers and what problem are we trying to solve with consistent, and do we need to go so far as to make consistent output identical?

STUART CLARK: Stuart Clark, Internet user. I’m agreeing with what you’re saying that the two parts potentially don’t belong together at the moment because from a different perspective, the next
generation RDDS PDPs only just kicked off. It’s obviously going to be still quite a way from coming up with its own recommendations, but that’s likely to have an impact on data collection, data display, and so on.

If from an implementation perspective, this causes a lot of work for all the registries and registrars, and then 6-12 months later, a huge amount of more work, is that really worthwhile when we could just implement the thick WHOIS now based on something that looks similar to what we’ve got and then not have to do all that work until that second PDP is concluded?

FABIEN BETREMIEUX: Am I understanding that you’re suggesting that we take a lighter approach to the implementation of the transition to the implementation of thick WHOIS in preparation for bigger changes that are coming up with the potential output of the RDDS PDP?

STUART CLARK: As a couple of people have been saying, there’s basically two parts to this. It’s the thick WHOIS and the data consistency, and it sounds like the data consistency is the bit that’s slightly more contentious and potentially more work for people if you’re having to have EPP changes and so on and so forth.
FABIEN BETREMIEUX: Thanks for your input.

JOE WALDRON: I just want to respond to that and just probably go back and explain why we are where we are from the perspective of putting consistent labeling and display first.

What we didn’t want to do was go through a thick WHOIS migration and then find out that there was going to be additional changes and essentially registries/registrars would have to – and certainly, Verisign is a big impact by this. But we didn’t want to have to essentially do that work twice if there were changes based on consistent labeling and display, so we wanted to get that nailed down first. I think that’s just the reason that we did the sequence the way we did.

FABIEN BETREMIEUX: Yeah, and I think from our perspective there was another reason because we expected that this could be achieved faster than defining precisely the implementation plan for the transition, so that’s why we decoupled the two so that we could move in parallel in those two fields without one delaying the other,
which was actually an implementation consideration in the PDP final report.

I understand as there was in Steve’s comment that the reverse is happening because your perception is that we’re spending too much time on consistent labeling and display, and therefore, delaying the implementation of the transition, which was certainly not our intent and is still not our intent. We’re trying to move those two together as fast as we can.

Unless there are any other comments on the consistent labeling and display aspect, I propose that we … Sorry. Did I miss anyone? Francisco, before we move on to transition.

FRANCISCO ARIAS: Francisco Arias from staff. Just another way to see at these issues is what I proposed this morning in the GNSO session. You look at this from the perspective of both the WHOIS and RDAP implementation, and we find that we’re in a difficult position here.

On one side, we have the registries that are saying, “Please don’t make us add four more fields to our RDDS output,” and on the other hand, we have the registrars then in the context of the RDAP discussion saying, “Don’t make us do RDAP.” Remember we are also thinking by implementing RDAP to get rid of WHOIS.
So if we were to do both, that is to not put the extra fields in the registry side and agree with the registrars that they don’t have to do RDAP, then that would mean that there will be four fields that are currently available for RDDS users to see that will not be available anymore if we were to do those.

So what we are thinking here is we can do one or the other, but probably not both.

JORDYN BUCHANAN: Hey, Francisco. I think that’s a fair observation.

I think somehow you need to figure out how to pull the conversations together because right now, it just feels like there’s two completely independent conversations happening. You guys maybe are seeing the whole view of it and have something in your head, but I think somehow you need to pull these threads together and make the tradeoffs and have the community consult you on making the tradeoffs instead of you guys just hoping to get it right and not being very visible to people who aren’t in these sessions and just looking at what the implementation streams look like because it’s not very obvious at all that that’s the consideration that’s being made.
JOE WALDRON: I’m having a hard time thinking of what the four fields are, but I know a couple of them Fabien had earlier in the deck here. Which ones did you have?

FABIEN BETREMIEUX: Francisco, we were talking about those ones that are bolded here on the after implementation column. Registrar and registration expiration date, registrar abuse contact, and reseller.

JOE WALDRON: I'll just focus on the first one, the registry expiration date and the registrar expiration date. I don’t know where the community ever decided that we needed to publish both of those in a WHOIS output, and I think that that creates confusion.

If I’m looking up my name and I see that the registry date is out of sync with the registrar date, again, what problem are we solving by changing the output of WHOIS, and again, trying to make it identical across all of the registries?

I think that this goes back to the point of extending EPP. This is the type of thing that is going to lengthen the project because you’ve got new RFCs that have to be published, you’ve got changes that have to be made on both the registries and
registrars sides, and again, I’m not sure why we’re making some of these changes other than in the interpretation of what consistent means.

FABIEN BETREMIEUX: Go ahead, Francisco.

FRANCISCO ARIAS: I just wanted to say that unfortunately, that first field that is bold there is probably the worst example to take here because that has a different set of issues that you just highlighted.

For the work tomorrow in the 1:30 meeting on RDAP, we intend to open the floor to talk about these issues. Just so you have an idea of what we’re thinking for tomorrow is we’re seeing three issues. One is differentiated access. That is not really related to WHOIS.

The other is what we were talking about; consistent labeling and display together with the request from the registrars to not implement RDAP. Those two issues, we see them together, as I mentioned before, because you can do one or the other, but not both.

The third issue we have highlighted is precisely the issue of this specific field. Some people had said that it may confuse people if
you have both expiration dates. But other people have also said they are not always the same, and it’s probably better to give the information to the end user or whoever is consuming this information.

There are different points of view here, and we intend to discuss this tomorrow. I’m not saying not to discuss it here; I’m just explaining what are the three issues we intend to highlight tomorrow for discussion.

JOE WALDRON: Just to follow up then, I think you’re right. It’s a very confusing issue. There are a lot of moving pieces to this between consistent labeling and display, adoption of thick WHOIS, RDAP.

What we’re trying to do is ensure that we aren’t going down a path that takes us to a dead end that we have to then back track and re-do work. I think that’s part of what we’re trying to achieve and getting better clarity. I think it’s helpful to have representation of all those different stakeholders in this meeting as well as the RDAP meeting, and I think that they need to remain coordinated.

FABIEN BETREMIEUX: Frédéric.
FRÉDÉRIC GUILLEMAUT: I just have a question for Francisco. Would you think at one point we should consider that the registrar registration expiration date would be in RDAP, the registry expiry date in RDAP, and then according to the level of access you have to RDAP?

For example, registrants, end users, we don’t have access to both data, so it wouldn’t create confusion, but maybe some people would have access to both.

FRANCISCO ARIAS: That’s an interesting question. At this point, we don’t have visibility on whether the RDS PDP will say yes to differentiated access or not, so I would be speculating if I were to say one way or another. But that’s a potential way forward I guess.

FRÉDÉRIC GUILLEMAUT: In that case, it wouldn’t create confusion for the end user if you wouldn’t show it to everyone. You could use that expiration date for registrars, or maybe for people who want to stop phishing websites or so on. Maybe you could use it for a technical and legal issue, so you would give access to only some allowed or authorized users, and then as it would be only in RDAP, we
would have a lot of time to implement that, so maybe it could be a mixed solution between all the things. Just my two cents.

JORDYN BUCHANAN: It’s Jordyn Buchanan again, hopefully, with my last comment. To synthesize what I’ve been hearing from a bunch of people, Francisco, it feels to me like you could take out the discussion of what the future in RDAP is going to look like. It should probably be its own conversation and doesn’t need to be part of the transition to thick WHOIS.

I understand Joe’s concern that Verisign doesn’t want to do a big WHOIS implementation and then a few months later be told, “Aha, and now you have to change what’s in WHOIS.”

But if instead of thinking about it that way, we think, “Okay, WHOIS is going to look like WHOIS looks today,” and we’ll try to keep it as consistent as possible with what registries are already doing, and that will provide the community with consistent output.

To the extent you guys think it’s really important to change some of the field names or something like that, because that’s what they’re called in the 2013 RAA. I’m sure some people will push back on that, but that’s less of a fuss than adding a bunch of new data fields.
Then separately, as we’re figuring out what RDAP’s going to look like, all of these tradeoffs about like, “Oh. Are the registrars going to implement RDAP OR NOT,” depending on the answer to that, whether this data needs to be collected by the registries or not, needs to be worked out, but it just doesn’t need to be part of this conversation.

Similarly, the RDAP Operational Profile doesn’t need to be part of this conversation if we simplify it down to having this change just focused on making the few registries that don’t have thick WHOIS today have a thick WHOIS that roughly looks like the registries that do have thick WHOIS today.

I think that if you took that model, we can move all the rest of this conversation about data collection into the RDAP discussions where it probably belongs.

FRANCISCO ARIAS: Just very quickly on what you said, Jordyn. If I understand what you’re saying, you’re saying let’s keep up the status quo in regards to who shows what. I don’t want to make a judgment on that, but for me, that would imply that the registrars do RDAP. I don’t know if the registrars are okay with that.
JORDYN BUCHANAN: Sorry, Francisco. I’m saying that’s a separate question. We’ll get to that question of whether or not the registrars need to do RDAP when we decide. When we decide whether or not the registrars need to do RDAP, then we can decide whether the registries need to pull this information up and put it in RDAP.

WHOIS is going to exist for a while and RDAP is going to exist for a while. But once we figure out what the future with RDAP looks like, then we start to figure out how to navigate to that point. And I don’t think we’re going to have to change what WHOIS looks like in order to get to an RDAP profile and an RDAP operational practice between registries and registrars.

FRANCISCO ARIAS: But that conversation is happening now. We are trying to get the profile finalized, so we need to have that discussion at this point anyway.

JORDYN BUCHANAN: Sure. I’m just saying separate it from this. This is thick WHOIS for a small number of registries, and there’s a totally separate conversation about what the RDAP universe is going to look like. Trying to conflate them is making your life complicated and people grumpy.
FABIEN BETREMIEUX: I just want to mention that we talked about RDAP in this implementation for another reason, and that’s for the transition from thin to thick, because RDAP was seen as a potential tool to address conflict jurisdictions. That is, if the transfer of data is challenged for legal reasons.

It was identified in the legal review memo that RDAP could be a tool that could help us address that. Because in the RDAP protocol, there is a possibility of redirection. Which if registries and registrars implemented RDAP, then for a given set of registration for which the transfer of data would be challenged, we could achieve, from a user perspective something that looks like a thick WHOIS experience through the redirection from the registries RDAP to the registrars RDAP, which would be serving different sets of data.

I just wanted to mention here that it was not just staff bringing RDAP into the discussion of consistent labeling and display, but that the connection between the two existed from the start when we started discussing the transition from thin to thick.

KRISTA PAPAC: Steve, can I add one thing real quick? He’s got you, Steve. I just want to add one more thing to what Fabien is saying.
We also synchronized these because you guys asked us to. I understand things change, but it’s not just some random thing that staff came up with. You guys asked us to synchronize like activities as much as we could, so it is in an effort to make it easier for you. I realize it’s still not easy – and maybe we need to relook at that – but that’s more context.

STEVE METALITZ: First, on the RDAP point, my recollection of the legal opinion, which I don’t have in front of me, was that RDAP was identified as a potential solution to a possible future problem. I think the legal opinion – if I can simplify it – gave a green light to thick WHOIS, but said problems could arise down the road, and if so, RDAP may be part of the solution.

I think that’s pretty consistent with what Jordyn was saying, which was we don’t have to do these simultaneously. Obviously, we should keep working on RDAP, but if it has to come a little bit after the transition to thick WHOIS, that at least from that perspective on the legal issue, I don’t think that would be a fatal problem.

The other point I wanted to make is in response to what Krista just said and Fabien what you said earlier. I agree. We came to a fork in the road. If we started down the wrong fork in the road, it
wasn’t because the staff was driving us with a whip to do this. We thought that this would be a sufficient way to approach it. As you said earlier, Fabien, it would be faster to focus first on this, and I think we’re finding that that may have been the wrong decision.

I guess my question is are we in a position now, where perhaps with a minimum amount of backing up, we can get back on the fork of prioritizing the transition to thick WHOIS and moving forward faster on that fork? That’s really what our request is. What do we do now to try to get the priorities back to where perhaps they should have been? Thank you.

FABIEN BETREMIEUX: Thank you, Steve. I think if you allow me, I would like to take your comment as a segue into the discussion of the transition. This is not just a tactic. We’ve been moving forward, I think, pretty well in the last few months on the discussion of the transition from thin to thick. We obviously need to ponder how to move forward on the consistent labeling and display track, and that’s going to come with the summary and analysis of the comments and the subsequent discussion we’ll have with you.

But in the meantime, we’re moving forward on the discussion of the transition. My feeling is that the pace has picked up recently.
We welcome that and we would like to encourage and contribute to that for sure, so let’s, if you don’t mind, move on to that discussion. Let me get to the section in the presentation.

What’s been discussed over the last few IRT meetings – I believe the last three meetings – is an implementation path that would be composed of two tracks. The new registration track for registration that would be created once the policy is effective, and an existing registration track, or what’s been called the back field of data.

Before we get into where we are on each of these tracks, I wanted to mention that we have two open items on these that are relevant to both tracks. This came up with the discussion of a scoping paper that we’ll talk about shortly.

The fact that currently in the registries proposal – the registry for .com and .net – the contact address and phone fields would not be required. Where we were seeing this as being potentially required as a side effect of consistent labeling and display, and certainly, there were comments of IRT members that they were surprised by the fact that address and phone were not required by the registry operator.

So we had a discussion of this being a systems requirement from the registry and that there were also contractual or potential
policy requirements that could apply. I just wanted to mention it here, and also, there was a discussion around the billing contact requirement. That’s a topic that was raised on the mailing list, but not discussed because most of the discussion went into the address and phone requirements.

Where I believe that that’s an open question as to whether in the context of the transition, billing contact would need be required on it. Sorry. I’ve lost a pen. Thank you.

Are there any comments or questions on those two topics? As the staff and IRT here, we need to clarify what is going to be the expectation in those areas. Will address and phone be required eventually when .com and .net are thick? I think address and phone are required for .jobs, that’s why it’s not mentioned here. And will billing contact be required or not for .com, .net, and .jobs when they’re thick? I think we will need to close those items as soon as possible. I just wanted to flag those. We will need to be discussing it, and unless somebody would like to comment to this, I will move on.

Regarding the new registration track, Verisign proposed the following milestones to consider in defining the timeline and plan for the transition of new registrations. I’m not going to read those. You have them on the screen. That was discussed already in the last meeting.
Subsequent to the last IRT meeting, there were some discussion on the mailing list about how that should translate into a timeline. I believe it was Jody, or it might have been Roger, I apologize for not remembering exactly, who proposed in terms of timeline that this should be at least 12 months. This whole series of milestones should fit into a timeframe of at least 12 months, and that there may be a need for additional time depending on some specifics of system changes on the registry systems.

There was also a comment – I believe this was from Steve – that we need to define a firm date for this implementation consistent with our prior discussion, if I may use the word consistent.

I just wanted to see if anybody had any reaction to this. In particular, Joe, if you are in a position to share some expectation as to how potential registry system changes would justify that this timeline be extended beyond 12 months.

JOE WALDRON:

Thanks. I’m not sure what the total timeline looks like, but I will talk about what I think our expectations are and our standard practices both based in practice and what’s required under the current patch upgrade and update policy in the .com and .net agreements.
If I walk through the milestone list. We have the policy, which will cause us to make certain changes to the registry to accept additional data, assuming that there is no EPP extension work that needs to happen. I’m just going to pass on that one for now just so we aren’t compounding the issues. It should look like other thick registries that we run today.

So, we make those changes within the system, we announce those to the registrars. That announcement is required to be a minimum of 90 days before we go into production, and then that environment would be available in OT&E for 30 days before that production date, as well. So that just gives you some of the timeline in terms of what we would expect in order to begin this optional period.

Now, the importance of that period between the optional support and the required support is it’s unrealistic to expect that all 2,000 registrars out there will make that change within their systems and start populating the data within a very short period of time. In order to provide sufficient time for all of the registrars to make those modifications is going to drive that registrar transition period.

I think I would not want to be speaking for registrars in terms of how long that would take. Any one registrar may be able to tell you how long it’s going to take for them, but when we look
across the population, we would want to make sure that we’re certainly not aiming at a very low percentage of adoption before we force that thick transition.

And then again, once we move into that next phase of requiring the thick data for all of the new registrations, we would follow that same 90-day notification prior to making the change, and then that would be reflected in our OT&E environment 30 days before it’s available in production.

So, hopefully, that gives you a little bit more sense of what the flow looks like and the timeline for these milestones.

FABIEN BETREMIEUX: Thanks. So, if I do the math correctly – that’s just the engineer mind in me – you’re saying that all the way to introduction of operational thick in production, that would be 120 days. 90 plus 30. Is that correct?

JOE WALDRON: No, the 30 is consumed within the 90. It’s a 90-day notice, so then think 60 days after that the environment would be reflected in OT&E and then another 30.
FABIEN BETREMIEUX: So I need to redo my math.

JOE WALDRON: I left a big variable, X undefined, in part of this as well.

FABIEN BETREMIEUX: Essentially, based on the GoDaddy’s proposal that there should be at least 12 months, taking into account your 90-day period in two of them, that would leave six months for the potential transition of the data from those 2,000 registrars. Does that sound like something that’s reasonable?

ROGER CARNEY: Maybe I just need to add some clarity to my statement that I made on the mailing list. Actually, the 12 months came from bullet four. Once Verisign did there work, we’re looking for 12 months after that.

JOE WALDRON: I appreciate the clarification. I think that’s helpful. I'll give you one of the only reference points I have. I know we’ve referenced .org a number of times.

When .org transitioned – I don't remember the time because they also moved to a thick registry, and I think they took about
12 months. I don't know, Roger, if you remember how long that took, but that was .org.

The other significant migration that Verisign made – and now, I'm going way back in time – when we moved from RRP to EPP, we had this parallel opposite phase, or the optional phase, where registrars could choose when to make that migration. I think that was about 18 months, so that's probably at the longer end of it.

I think 12 months for a large registrar. But then you're also accounting for a lot of other registrars that don't have their own in-house engineering and have to coordinate. It's not just a simple task to get 2,000 registrars all ramped up at once, and that's why I look at the .org pieces, probably representative in terms of what the flow looked like and the progress of registrars making that change as it was done.

Another comment just to add onto that. It's something that Jennifer put on the mailing list, as well, is there's other initiatives going on. It's not going to take us 12 months to do this work, but there's a lot of work in the pipeline already. We have IRTP C&D coming up. We have others, maybe RDAP. I'm hoping not. But even if we don't have to put up an RDAP server, we're
still going to have to create an RDAP client and everything, so we have a lot of other work in the pipeline that's going to affect this timeline, as well.

FABIEN BETREMIEUX: So can we move forward with a first assumption today that a timeline could look like something between 15 months and 18 months? Can we start with this assumption, and work from there, and see how that evolves in the next meetings?

I think if we can put this timeframe on the table and get feedback on it, it will help us refine, so I would suggest we do that, and consider we have currently on the table a proposal for 12 plus 3 months, so 15 months to 18 months as a first approach of the timeline for completing the transition of new registrations.

Steve, you had a comment? Sorry.

STEVE METALITZ: Yes. I guess my question was, first, about the first bullet, and I think we may have a linguistic problem here. What has to happen before we achieve the first bullet? Because my understanding from the GNSO perspective is that that first bullet was achieved on February 7, 2014. What has to happen before
the first bullet and we start this, let’s assume, 15 to 18 month countdown?

FABIEN BETREMIEUX: I think it would take what it took for consistent labeling and display, and that is writing into a consensus policy language document the timeline proposal. What is the minimum language that would become consensus policy that we would need to put out there, and that would need to go for public comment. I think those are the two main steps.

We need to draft consensus policy language based on the implementation path or plan that’s designed, submit that for public comment, and then publish a final version of that consensus policy. So those are the main milestones we have to get to that first bullet. Does that make sense?

I just want to clarify that this bullet was just copy-paste from the proposal we had on the mailing list. You would have deserved some editing to clarify.

STEVE METALITZ: Okay, I think I understand that. So that’s before the 15 to 18 month starts. But what was it that the Board of Directors did on
February 7, 2014? Didn't they adopt a consensus policy regarding thick WHOIS, and if so, what are we doing here?

KRISTA PAPAC: This is a very common misconception by the way. The GNSO makes policy recommendations, and that's what the Board approves, and that's what we have from February 2014.

What we do with those is then we draft an implementation plan and an official consensus policy, which is what Fabien’s referring to right now. That gets published for public comment and becomes the consensus policy. Does that make sense?

STEVE METALITZ: Yes, it does. So since you’ve had 25 months now to work on this, how fast could you publish that?

FABIEN BETREMIEUX: Can I attempt at a response?

KRISTA PAPAC: Please.
FABIEN BETREMIEUX: We need to agree with the IRT on the implementation plan. The implementation path needs to be transformed into a plan, and then it’s a matter of a few months what it took us on the consistent labeling and display, I assume, to officialize it.

KRISTA PAPAC: If I can just add that the drafting of the language is actually the easy part. Getting agreement here and in the community is the much harder part.

In the consensus policy language typically – I don't mean to say that it's easy because it's not easy, but it's the easiest part. The languages typically tries to be very clear and straightforward, but we need to come to agreement to Fabien's point on what the implementation path is in order to create that draft. Just to maybe give you, hopefully, a little bit of comfort, Steve, we're not waiting for everything here to be decided to draft. We have documents in place that we would just be able to pull together fairly easily, but we have to sort out the things that we're talking about in here now before we can publish that.

STEVE METALITZ: So were those two points on the previous slide the only two points that still need to be resolved before you can issue a consensus policy for public comment?
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FABIEN BETREMIEUX: The two points on the previous slides were the contact address and phone and billing contract requirements. So I believe in addition to those, we need to have an agreed upon defined timeframe that needs to be incorporated into the consensus policy language.

Regarding the existing registration, I guess this is one of the main parameters really, in implementation plan that needs to make it into the consensus policy.

I see that we’re running out of time. I want to make sure we have [eminent] to talk about the existing registrations track. Do you mind, Steve?

STEVE METALITZ: [inaudible]

FABIEN BETREMIEUX: Okay, so next steps on the new registration track. We’re suggesting here that we keep the discussion going obviously with the registries and registrars and make sure we agree on a detailed timeline by May of this year, so we’re talking about the new registrations track here.
I’m not seeing any objection or reaction or at least objection. So regarding the other track of the transition, the transition of existing registrations, you may recall that we’ve completed our drafting of a scoping paper for the analysis of data of existing registrations by registrars. We will discuss that scoping paper on Tuesday. I’m not going to go into the detail of the paper. You should be familiar with it by now.

We’ve revised it twice I believe, so we should focus our attention now to the discussion with the registrars and the outcome of that discussion. Because ideally, we’d recruit 10 or 20 registrars that would be willing to conduct that study or look at their existing registration and identify, and also quantify the types of problems that we are likely to face when transitioning that existing data to the registries based on the requirements that the registries shared with us and which we shared in the scoping paper.

I think here in terms of next steps and timeline, we’re targeting for completion of this analyses by early June, and that’s assuming that we have recruited registrars by the 1st of April, and that within the two months of April and May, we’re able to drive that analysis and the conclusion and the findings from that analysis. So again, that’s to be discussed with the registrars on Tuesday.
We would be in a position to define an implementation plan, ideally, in June/July. So to your question, Steve, this means that if all goes according to plan, by this summer, we should be able to be in a position to reflect any implementation planning to propose consensus policy. That could then be submitted for public comment.

Any questions or comments? I believe Theo will be running the discussion with the registrars on Tuesday. Obviously, all IRT members are invited to take part in the discussion. It will be at 11:00 local time on Tuesday in – I apologize. I missed adding the room here. Toubkal room at 11:00 on Tuesday.

Please come to the session and participate in the discussion. We really need to obtain the contribution of as many registrars as we can so that the findings are solid, and our plan is solid, and we can move to implementing the transition.

Thank you all for your participation today. Apologies for the delay and those two minutes over the time. And we look forward to the discussion on Monday. RDAP session at 1:30 room Toubkal, as well, so it's the same room, and Tuesday 11:00 AM. Thank you again for your time, and speak with you soon.

[END OF TRANSCRIPTION]