

Preliminary Issue Report on 'Thick' Whois

STATUS OF THIS DOCUMENT

This is the Preliminary Issue Report on 'Thick' Whois as requested by the GNSO Council. This report will be published for public comment for not less than thirty (30) days, and is to be followed by a Final Issue Report to be published after the closure of the public comment forum.

SUMMARY

This report is posted for public comment and submitted to the GNSO Council in response to a request received from the Council pursuant to a Motion proposed and carried during the Council teleconference meeting on 22 September 2011.

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1 Executive Summary

1.1 Background

- As recommended by the IRTP Part B Working Group, the GNSO Council requested an Issue Report on 'thick' Whois at its meeting on 22 September. The Issue Report is expected to *'not only consider a possible requirement of 'thick' WHOIS for all incumbent gTLDs in the context of IRTP, but should also consider any other positive and/or negative effects that are likely to occur outside of IRTP that would need to be taken into account when deciding whether a requirement of 'thick' WHOIS for all incumbent gTLDs would be desirable or not'*.
- In accordance with the proposed revised GNSO Policy Development Process, this Preliminary Issue Report is hereby published for public comment. Following review of the public comments received, the Staff Manager will update the Issue Report as appropriate and/or submit a summary of the comments received together with the Final Issue Report to the GNSO Council for its consideration.

1.2 Discussion of the Issue

- Section 4 describes in further detail the difference between 'thick' and 'thin' Whois, provides an overview of the current situation for incumbent gTLDs as well as for new gTLDs which will all be required to provide 'thick' Whois.
- In addition, this section highlights some of the issues that the GNSO Council might want to consider when it decides whether or not to initiate a Policy Development Process (PDP) and provides an initial list of potential benefits and/or negative effects that will need to be considered in further detail should a PDP go forward, including: consistent response; enhanced stability; enhanced accessibility; cost implications; potential issues related to database synchronization, and; potential need for exemptions.

1.3 Staff Recommendation

- ICANN staff has confirmed that the proposed issues are within the scope of the ICANN policy process and the GNSO. It is reasonable from the staff's perspective to expect that further investigation of 'thick' Whois for all incumbent gTLDs would be beneficial to the community

generally, as it would allow for an informed decision by the GNSO Council as to whether 'thick' Whois for all incumbent gTLDs should be required or not. ICANN staff, therefore, recommends that the GNSO Council proceed with a policy development process limited to consideration of the issues discussed in this report.

2 Objective

2.1 This report is submitted in accordance with Step 2 of the Policy Development Process described in Annex A of the ICANN Bylaws (<http://www.icann.org/general/bylaws.htm#AnnexA>).

2.2 In this context, and in compliance with ICANN Bylaw requirements:

a. The proposed issue raised for consideration:

The requirement of 'thick' Whois for all incumbent gTLDs. The Issue Report should not only consider a possible requirement of 'thick' Whois for all incumbent gTLDs in the context of IRTP, but should also consider any other positive and/or negative effects that are likely to occur outside of IRTP that would need to be taken into account when deciding whether a requirement of 'thick' WHOIS for all incumbent gTLDs would be desirable or not.

b. The identity of the party submitting the issue:

GNSO Council.

c. How that party is affected by the issue:

The GNSO is responsible for developing and recommending to the ICANN Board substantive policies relating to generic top-level domains. The GNSO includes various stakeholder groups and constituencies, which are affected in various ways by issues relating to 'thick' Whois. These issues are discussed in further detail in Section 4 below.

d. Support for the issue to initiate the PDP:

The GNSO Council voted with 17 votes in favor, and three abstentions, of requesting an Issue Report on 'thick' Whois at its meeting of 22 September 2011 (see <http://gnso.icann.org/resolutions/#201109>).

e. Staff recommendation:

i. Whether the issue is within the scope of ICANN's mission statement:

ICANN's mission statement includes the coordination of the allocation of certain types of unique identifiers, including domain names, and the coordination of policy development reasonably and appropriately related to these technical functions, which includes Whois related activities.

- ii. Whether the issue is broadly applicable to multiple situations or organizations:
As Whois affects all registrants of gTLDs, registrars and registries, and a large part of the user community, the issue is broadly applicable to multiple situations or organizations. Any changes to the policy or the rules that may result from a PDP would also be broadly applicable to multiple situations or organizations.
 - iii. Whether the issue is likely to have lasting value or applicability, albeit with the need for occasional updates:
A requirement for 'thick' Whois for all incumbent gTLDs is expected to have lasting applicability.
 - iv. Whether the issue will establish a guide or framework for future decision-making:
A requirement for 'thick' Whois for all incumbent gTLDs is expected to set a framework for future decision-making in relation to this issue.
 - v. Whether the issue implicates or affects an existing ICANN policy.
Currently no policy exists on the use of 'thick' Whois as ICANN specifies Whois service requirements through the registry agreements for generic Top Level Domains (see <http://www.icann.org/en/registries/agreements.htm>). Registries satisfy their Whois obligations using different services.
- 2.3 Based on the above, the launch of a dedicated policy development process limited to consideration of this issue has been confirmed by the General Counsel to be properly within the scope of the ICANN policy process and within the scope of the GNSO.
- 2.4 In accordance with the proposed revised GNSO Policy Development Process, the Staff Manager shall publish the Preliminary Issue Report for public comment in order to allow for community input on additional information that may be missing from the Preliminary Issue Report, or the correction or updating of any information in the Preliminary Issue Report. In addition, the public comment period will allow for members of the ICANN Community to express their views to the GNSO Council on whether or not to initiate a PDP. Following review of the public comments received, the Staff Manager will update the Issue Report as

appropriate and/or submit a summary of the comments received together with the Final Issue Report to the GNSO Council for its consideration.

3 Background

3.1 Introduction

In the context of the Inter-Registrar Transfer Policy (IRTP) Part A as well as the Part B Working Group, the issue of 'thick' Whois was discussed and it was noted that:

The benefit would be that in a thick registry one could develop a secure method for a gaining registrar to gain access to the registrant contact information. Currently there is no standard means for the secure exchange of registrant details in a thin registry. In this scenario, disputes between the registrant and admin contact could be reduced, as the registrant would become the ultimate approver of a transfer¹.

At the same time it was noted that even though requiring 'thick' Whois for all incumbent gTLDs would have benefits in the context of transfers, it would be important to explore 'any other potential positive or negative effects that are likely to occur outside of IRTP that would need to be taken into account'. As a result, the IRTP Part B Working Group recommended requesting:

an Issue Report on the requirement of 'thick' WHOIS for all incumbent gTLDs. Such an Issue Report and possible subsequent Policy Development Process should not only consider a possible requirement of 'thick' WHOIS for all incumbent gTLDs in the context of IRTP, but should also consider any other positive and/or negative effects that are likely to occur outside of IRTP that would need to be taken into account when deciding whether a requirement of 'thick' WHOIS for all incumbent gTLDs would be desirable or not.

This recommendation that was adopted by the GNSO Council at its meeting on 22 September 2011 (see <http://gnso.icann.org/resolutions/>).

¹ See [IRTP Part B Final Report](#)

4 Discussion of Proposed Issue

4.1 Difference between 'thick' vs 'thin' Whois²

For the generic top-level domain (gTLD) registries, ICANN specifies Whois service requirements through the registry agreements (ICANN 2009 Registry Agreements). Registries satisfy their Whois obligations using different services. The two common models are often characterized as “thin” and “thick” Whois registries. This distinction is based on how two distinct sets of data are managed. One set of data is associated with the domain name, and a second set of data is associated with the registrant of the domain name. A thin registry only stores and manages the information associated with the domain name. This set includes data sufficient to identify the sponsoring registrar, status of the registration, creation and expiration dates for each registration, name server data and last time the record is updated in its Whois data store. Registrars manage the second set of data, which is the complete set of domain registration information as required by RAA 3.3 for those domains they sponsor. COM and NET are examples of thin registries.

Thick registries maintain both sets of data (domain name and registrant). INFO and BIZ are examples of thick registries.

To illustrate thick and thin Whois, consider the Whois response for two domains, cnn.com and cnn.org. Both domains are registered by Turner Broadcasting System, but one of the registrations is managed in a thin registry (COM) manner and the other is managed as a thick registry (ORG).

If we query COM's Whois server for cnn.com, we get the following results:

```
Domain Name: CNN.COM
Registrar: CSC CORPORATE DOMAINS, INC.
WHOIS Server: whois.corporatedomains.com
Referral URL: http://www.cscglobal.com
Name Server: NS1.TIMEWARNER.NET
```

² From [Whois Service Requirements Report](#) (July 2010)

Name Server: NS3.TIMEWARNER.NET
Name Server: NS5.TIMEWARNER.NET
Status: clientTransferProhibited
Updated Date: 04-feb-2010
Creation Date: 22-sep-1993
Expiration Date: 21-sep-2018³

However, if we query the .org's whois server, we get the full result of Whois information:

Domain ID:D5353343-LROR
Domain Name:CNN.ORG
Created On:16-Apr-1999 04:00:00 UTC
Last Updated On:04-Feb-2010 22:48:15 UTC
Expiration Date:16-Apr-2011 04:00:00 UTC
Sponsoring Registrar:CSC Corporate Domains, Inc. (R24-LROR)
Status:CLIENT TRANSFER PROHIBITED
Registrant ID:1451705371f82308
Registrant Name:Domain Name Manager
Registrant Organization:Turner Broadcasting System, Inc.
Registrant Street1:One CNN Center
Registrant Street2:13N
Registrant Street3:
Registrant City:Atlanta
Registrant State/Province:GA
Registrant Postal Code:30303
Registrant Country:US
Registrant Phone:+1.4048273470
Registrant Phone Ext.:
Registrant FAX:+1.4048271995
Registrant FAX Ext.:
Registrant Email:tmgroup@turner.com

...

The content of registration data provided via Whois may differ across TLDs registries. Some gTLD

³ To get the registrant's information, the user or client application must make a referral query to whois.corporatedomains.com

registry agreements, such as .tel, have provisions in place that in certain circumstances exclude personal information from the public Whois. For example, .tel Whois output for individuals may only mention registrant's name with no other contact information'.

In relation to 'Thick' vs. 'Thin' Whois, it is noted that there have been considerable debates on the merits of thin Whois versus thick Whois⁴. From a technical perspective, a thick Whois model provides a central repository for a given registry. Historically, centralized databases are operated under a single administrator that sets conventions and standards for submission and display, archival/restoration and security have proven easier to manage. By contrast, a thin Whois model is a decentralized repository⁵. Registrars set their own conventions and standards for submission and display, archival/restoration and security registrant information. Today, for example, Whois data submission and display conventions vary among registrars. The thin model is thus criticized for introducing variability among Whois services, which can be problematic for legitimate forms of automation.

A thick Whois model offers attractive archival and restoration properties. If a registrar were to go out of business or experience long-term technical failures rendering them unable to provide service, registries maintaining thick Whois have all the registrant information at hand and could transfer the registrations to a different (or temporary) registrar so that registrants could continue to manage their domain names. A thick Whois model also reduces the degree of variability in display formats. Furthermore, a thick registry is better positioned to take measures to analyze and improve data quality since it has all the data at hand. From a technical perspective, some argue that the thin Whois model has its benefits as well. For example, they comment that the extensible provisioning protocol (EPP) was not designed to handle the extensive updates every time a registrar makes changes to the Whois record.⁶

⁴ See GNSO discussions outlined by this thread:

<http://gnso.icann.org/mailinglists/archives/registrars/thrd35.html#02038>

⁵ To be more precise, the data model for a thin registry has two "chunks". The registry still centrally manages all the domain name related data (it's in one place, under one administrator, etc.). Each registrar, in turn, manages its set of sponsored names – but these are **separate** databases, each is a unique database and not part of a decentralized one. The more accurate term might therefore be a hierarchical vs flat (monolithic) database model.

⁶ See above thread

4.2 Situation of incumbent gTLDs

The following table was developed by the IRTP Part A Working Group and has been updated with the recent addition of .xxx as a gTLD:

gTLD	Thin	Thick
.AERO		✓
.ASIA		✓
.BIZ		✓
.CAT		✓ ⁷
.COM	✓	
.COOP		✓
.INFO		✓
.JOBS	✓	
.MOBI		✓
.MUSEUM		✓
.NAME	✓	✓ ⁸
.NET	✓	
.ORG		✓
.PRO		✓
.TEL		✓ ⁹
.TRAVEL		✓
.XXX		✓

⁷ .CAT has requested changes to its agreement to allow for tiered access to Whois data in a similar way that .TEL currently provides (see <http://www.icann.org/en/registries/rsep/index.html#2011007>).

⁸ 'Thick' Whois information is available, but only after payment

⁹ 'Thick' Whois information is available, but tiered access is provided consistent with a registry request approved by ICANN in order for the registry to harmonize with UK data protection requirements.

4.3 Thick Whois in new gTLDs

Within the context of the new gTLD programme, new gTLD registries will be required to operate a 'thick' Whois model. As outlined in the [new gTLD Program Explanatory Memorandum Thick vs. Thin Whois for new gTLDs](#):

While current registry agreements have differing provisions with regards to the Whois output specification, ICANN's intent with the next round of new gTLDs has been to have the agreements as standard as possible, with minimal or no individual negotiation and variation of provisions such as a registry's Whois output specification. In an attempt to standardize on a one-size fits-all approach for new gTLDs, the first draft of the proposed new registry agreement suggested a least-common denominator approach under which all registries would have been required to be at least thin, but registries could opt on their own to collect and display more information at their discretion. This was consistent with the approach used by ICANN for at least the past five years in which registry operators have been free to suggest their own preferred Whois data output and whatever specification each registry proposed was incorporated into the that registry operator's agreement.

Registrars would continue to display detailed contact information associated with registrations, so there is no question about the total set of data elements that will be published concerning each registration, the only question is whether all of the data will be maintained/published by both the registry and the registrar, or whether the full data will be displayed by the registrar only and the registry could, if it so elected, maintain just a subset of data as in the example above.

Many commenters on the proposed registry agreement have requested a change to the agreement to mandate thick Whois for all new registries. The commenters have suggested that such a requirement would be in line with the status quo since most gTLD agreements require thick Whois output (all except com, net and jobs, as noted above). Comments have suggested substantial benefits from mandating thick instead of thin Whois, including enhanced accessibility and enhanced stability.

Critics of the proposed thick Whois mandate have raised potential privacy concerns as a reason to require thin Whois only, but proponents of thick Whois point to ICANN's community-developed "Procedure For Handling Whois Conflicts with Privacy Law"

<http://www.icann.org/en/processes/icann-procedure-17jan08.htm> as a means for resolving any potential situations where a registry operator's Whois obligations are alleged to be inconsistent with local legal requirements concerning data privacy. Also it could be argued that, as indicated above, all of the data that might be published by a thick registry is already public data since it would already be published by the registrar. ICANN's Registrar Accreditation Agreement obligates registrars to ensure that each registrant is notified and consents to the purposes and recipients of any personal data collected from the registrant in association with every domain registration <http://www.icann.org/en/registrars/ra-agreement-17may01.htm#3.7.7.4>.

Proponents of requiring thick Whois argue that being able to access the thick data at both the registry and the registrar level will ensure greater accessibility of the data. The draft report of the Implementation Recommendations Team put together by ICANN's Intellectual Property Constituency stated "the IRT believes that the provision of WHOIS information at the registry level under the Thick WHOIS model is essential to the cost-effective protection of consumers and intellectual property owners." <http://icann.org/en/topics/new-qtlds/irt-draft-report-trademark-protection-24apr09-en.pdf>. There are at least two scenarios in which the additional option of retrieving the data at the registry would be valuable:

- 1. Where the registrar Whois service might be experiencing a short- or long-term outage (in violation of the registrar's accreditation agreement), and*
- 2. Where the registrar has implemented strong (or sometimes overly-defensive) measures to prevent large-scale automated harvesting of registrar data.*

Also, in the event of a registrar business or technical failure, it could be beneficial to ICANN and registrants to have the full set of domain registration contact data stored by four organizations (the registry, the registry's escrow agent, the registrar, and the registrar's escrow agent) instead of just two organizations (the registrar and the registrar's escrow agent).

4.4 Issues to consider when deciding whether or not to initiate a PDP

As part of its reason for abstaining from the vote on the request for an Issue Report, the Registries Stakeholder Group (RySG) noted that it believed that the issue 'is just directed at one member of the Registry Stakeholder Group' as all the current gTLDs that have a 'thin' Whois are operated by VeriSign. As a result, some have suggested that instead of dedicating community resources on a PDP, the issue should be discussed directly with VeriSign. It should be noted that the IRTP Part B Working Group specifically requested that this effort should 'consider any other positive and/or negative effects that are likely to occur outside of IRTP that would need to be taken into account when deciding whether a requirement of 'thick' WHOIS for all incumbent gTLDs would be desirable or not'. While registry agreement amendments are typically subject to public comment prior to adoption, a PDP would have the advantage of being designed to incorporate at an early stage the full range of effects on the community and community views.

An additional consideration might be that should the outcome of a PDP be that 'thick' Whois should be required for all gTLDs, this would allow for a uniform application of this requirement, while addressing this issue through bilateral discussions might leave the door open for different approaches for future or existing gTLDs.

4.5 Potential positive and/or negative effects

The request for the Issue Report specifically refers to 'any other potential positive or negative effects that are likely to occur outside of IRTP that would need to be taken into account'. The IRTP Working Groups were clear on the benefits of 'thick' Whois in relation to transfers as outlined in section 3, but other issues that may need to be considered include:

- Consistent response – a 'thick' Registry can dictate the labeling and display to be sure the information is easy to parse, and all Registrars/clients would have to display accordingly, which could be considered a benefit but also a potential cost
- Enhanced stability – as outlined above, 'in the event of a registrar business or technical failure, it could be beneficial to ICANN and registrants to have the full set of domain registration contact data stored by four organizations (the registry, the registry's escrow agent, the registrar, and the registrar's escrow agent'

- Enhanced accessibility - as noted by the Implementation Review Team 'the provision of WHOIS information at the registry level under the Thick WHOIS model is essential to the cost-effective protection of consumers and intellectual property owners', while at the same time privacy concerns have been raised.
- What are the cost implications for registries, registrars but also registrants of a requirement for 'thick Whois as a transition to 'thick Whois for all incumbent gTLDs would affect over 110 million domain name registrations?
- Potential issues related to database synchronization between the registry and registrars
- Consideration would need to be given to those 'thick' Whois registries that currently provide a subset of the full thick data in some cases (see notes above about and whether an exemption would need to be provided should there be a recommendation for a requirement for 'thick' Whois for all incumbent gTLDs.

For each of these issues highlighted above, which is not necessarily an exhaustive list, further data gathering and analysis would need to be carried out in order to make an assessment of the overall positive and/or negative effects of requiring 'thick' Whois for all incumbent gTLDs.

4.6 Other issues to consider if a PDP goes ahead

Should the GNSO Council decide to initiate a Policy Development Process (PDP) on this issue, a Working Group would need to consider at a minimum, in addition to the issues outlined above, the following issues:

- **Relationship with other Whois activities** A number of other activities are ongoing in relation to Whois such as, amongst others, the Whois Service Requirements Drafting Team (<http://gns0.icann.org/issues/whois/policies>), the GNSO approved Whois Studies (<http://gns0.icann.org/issues/whois/studies>) and the Whois Policy Review Team (<http://www.icann.org/en/reviews/affirmation/review-4-en.htm>) and even though Staff has not been able to identify a direct relationship between this effort and other ongoing projects at this stage, it might be beneficial for the PDP Working Group to keep an eye on these other initiatives to identify potential overlaps.
- **Are there other models that could / should be considered?** For example, in the context of registrar deliberations on this issue, it was suggested that 'depositing the [W]hois at a common

third party across all ICANN-contracted TLDs' could be considered¹⁰.

- **Transition:** Should a recommendation be made for a 'thick' Whois requirement, consideration would need to be given to transitioning to such a system and whether there are any implications for existing 'thick' Whois registry operators (e.g. as a result of new requirements that might be part of a potential 'thick' Whois consensus policy).
- **Benefits /downsides of a uniform vs. patchwork approach** – The effort should also consider whether there are any broader implications of opting for a 'thick' Whois requirement for all incumbent gTLDs versus maintaining the current situation where it is decided on a case by case basis which model should apply.
- **Potential impact on registrants, registrars and users**– the potential impact on registrants as well as registrars would need to be considered both in relation to maintaining status quo and requiring 'thick' Whois for all incumbent gTLDs.
- **Resources available** - As also pointed out in the UDRP Final Issue Report, 'the GNSO Council will need to consider, taking into account the current workload and resources, whether there is sufficient bandwidth [to take on this issue] at this time, or whether other projects need to be halted should it decide to move forward'.

¹⁰ See <http://gns0.icann.org/mailling-lists/archives/registrars/msg02057.html>

5 Staff recommendation

5.1 Scope considerations

In determining whether the issue is within the scope of the ICANN policy process and the scope of the GNSO, Staff and the General Counsel's office have considered the following factors:

Whether the issue is within the scope of ICANN's mission statement

ICANN's mission statement includes the coordination of the allocation of certain types of unique identifiers, including domain names, and the coordination of policy development reasonably and appropriately related to these technical functions, which includes Whois related activities.

Whether the issue is broadly applicable to multiple situations or organizations.

As Whois affects all registrants of gTLDs, registrars and registries, the issue is broadly applicable to multiple situations or organizations. Any changes to the policy or the rules that may result from a PDP would also be broadly applicable to multiple situations or organizations.

Whether the issue is likely to have lasting value or applicability, albeit with the need for occasional updates.

A requirement for 'thick' Whois for all incumbent gTLDs is expected to have lasting applicability.

Whether the issue will establish a guide or framework for future decision-making.

A requirement for 'thick' Whois for all incumbent gTLDs is expected to set a framework for future decision-making in relation to this issue.

Whether the issue implicates or affects an existing ICANN policy.

Currently no policy exists on the use of 'thick' Whois as ICANN specifies Whois service requirements through the registry agreements for generic Top Level Domains (see <http://www.icann.org/en/registries/agreements.htm>). Registries satisfy their Whois obligations using different services.

5.2 Staff recommendation

ICANN staff has confirmed that the proposed issues are within the scope of the ICANN policy process and the GNSO. It is reasonable from the staff's perspective to expect that further investigation of 'thick' Whois for all incumbent gTLDs would be beneficial to the community generally, as it would allow for an informed decision by the GNSO Council as to whether 'thick' Whois for all incumbent gTLDs should be required or not. ICANN staff, therefore, recommends that the GNSO Council proceed with a policy development process limited to consideration of the issues discussed in this report.

Annex 1 – GNSO Council Request for Issue Report

The Adoption of the IRTP Part B Recommendation #3 (Issue Report on 'Thick' WHOIS)

WHEREAS on 24 June 2009, the GNSO Council launched a Policy Development Process (PDP) on IRTP Part B addressing the following five charter questions:

- a. Whether a process for urgent return/resolution of a domain name should be developed, as discussed within the SSAC hijacking report <http://www.icann.org/announcements/hijacking-report-12jul05.pdf>); see also (<http://www.icann.org/correspondence/cole-to-tonkin-14mar05.htm>)
- b. Whether additional provisions on undoing inappropriate transfers are needed, especially with regard to disputes between a Registrant and Admin Contact (AC). The policy is clear that the Registrant can overrule the AC, but how this is implemented is currently at the discretion of the registrar;
- c. Whether special provisions are needed for a change of registrant when it occurs near the time of a change of registrar. The policy does not currently deal with change of registrant, which often figures in hijacking cases;
- d. Whether standards or best practices should be implemented regarding use of a Registrar Lock status (e.g. when it may/may not, should/should not be applied);
- e. Whether, and if so, how best to clarify denial reason #7: A domain name was already in 'lock status' provided that the Registrar provides a readily accessible and reasonable means for the Registered Name Holder to remove the lock status.

WHEREAS this PDP has followed the prescribed PDP steps as stated in the Bylaws, resulting in a Final Report delivered on 30 May 2011;

WHEREAS the IRTP Part B WG has reached full consensus on the recommendations in relation to each of the five issues outlined above;

WHEREAS the GNSO Council has reviewed and discussed these recommendations;

WHEREAS the GNSO Council resolved at its meeting on 22 June to 'consider IRTP Part B Recommendation #3 concerning the request of an Issue Report on the requirement of 'thick' WHOIS for all incumbent gTLDs at its next meeting on 21 July'.

RESOLVED, the GNSO Council requests an Issue Report on the requirement of 'thick' WHOIS for all incumbent gTLDs. Such an Issue Report and possible subsequent Policy Development Process should not only consider a possible requirement of 'thick' WHOIS or all incumbent gTLDs in the context of IRTP, but should also consider any other positive and/or negative effects that are likely to occur outside of IRTP that would need to be taken into account when deciding whether a requirement of 'thick' WHOIS for all incumbent gTLDs would be desirable or not. (IRTP Part B Recommendation #3).