Registry Stakeholder Group (RySG) feedback on the GNSO Council Accuracy Assignment Threshold Questions for SG Exploration

14 February 2025

Concept proposal:
Concept Proposal: Structured SG Assignments for Addressing Accuracy Scoping Team Recommendations and Way Forward

What are concrete and articulable examples of what inaccurate data DOES prevent or inhibit, and how does it do so?

As evidenced by previous working group efforts on the issue of accuracy, before we can effectively respond to this question, we must define:

1. What type(s) of data is being considered?
2. What is the definition of "inaccurate data"?

With respect to (1) above, the RySG suggests that for the purposes of the GNSO's discussion, the data in question should refer to registrant contact data. The discussion should not address technical data elements included in the Registration Data Directory Services (RDDS) such as the registrar of record, domain status information, domain create date, DNSSEC information and others. We believe that the purpose of these data elements is well understood and the "accuracy" of those elements is not under question here.

With respect to (2) above, we note that the Registrar Accreditation Agreement has important obligatory provisions that Registrars are required to abide by and which is expected to govern the topic of registration contact data. To have a productive discussion about data "inaccuracy," we must first be clear on whether "accuracy" refers to compliance with the relevant RAA obligations or some other standard that has yet to be defined.

It is important to note the distinction between a) accuracy of data which may comprise of syntactic accuracy (i.e., whether the data follows the relevant syntax expected from such a data field) or completeness of data (i.e., all data fields are complete and functional), and b) assessment of whether the data is truthful. The issue of accuracy and truthfulness may cause challenges to legitimate access seekers when confronted with the use of third party privacy and proxy services which may provide accurate and verifiable information but does

not meet the expectations of the access seekers. This however should be outside the scope of any conversations on the issue of accuracy and better addressed through the PPSAI IRT.

In responding to the questions from the GNSO Council, the RySG assumes data is accurate if it undergoes and passes the validation and verification requirements of the RDDS Accuracy Program Specification of the RAA.

As a starting point, gTLD registry operators do not require registrant contact data in order to perform the functions of provisioning a domain name via a registrar or operating the registry DNS servers required for that domain name to resolve. In other words, inaccurate registration data DOES NOT prevent or prohibit a gTLD registry from performing the following critical registry functions defined in Specification 10 of the Base Registry Agreement: DNS Service, DNSSEC proper resolution, EPP, or Data Escrow.

Most registry operators do not have a direct relationship with the registrants of domain names in their TLDs and do not have reason to independently and duplicatively validate and verify the registration data they hold. These registry operators do not have further examples to share on what inaccurate data may or may not prevent or inhibit.

Other registry operators operate TLDs with more onerous verification or validation requirements than those described in the RAA. These registry operators often do some form of verification of registration information themselves, whether to verify a registrant's location such as for a geoTLD or to ensure the registrant meets community eligibility requirements in a community TLD. Data that has not been properly verified or validated by the registrar will create issues during these processes. Where data has not been validated or verified, it is possible that the registry operator will be unable to make contact with the registrant, making their own verification procedures impossible.

What are concrete and articulable examples of what inaccurate data does NOT prevent?

Again, for purposes of responding to this question, the RySG assumes data is accurate if it undergoes and passes the validation and verification requirements of the RDDS Accuracy Program Specification of the RAA. We also reiterate that data accuracy or inaccuracy does not impact the registry's ability to perform the core functions of a TLD registry operator, including the Critical Functions identified in the Registry Agreement.

In the experience of the RySG, registration data accuracy is not relevant to the detection and mitigation of DNS Abuse. Some registry operators have publicly stated that they do not use registration data in addressing DNS Abuse at all.

Are there specific stakeholders, industries, or sectors particularly vulnerable to the effects of inaccurate registration data? If so, what are they and why?

As noted above, some registries have registration or other eligibility criteria that rely on accurate registration data. Inaccurate registration contact data may impact their ability to ensure compliance.

Given the examples provided in response to the three questions above (if any), please articulate a short problem statement for accuracy. The problem statement should consider:

- *What is the current problem or challenge?*
- *What are the consequences of this problem or challenge?*
- *What is the ultimate objective of working on this problem or challenge?*
- *Considering the limitations of data processing, how do you propose to address this problem?*

As mentioned previously, it is first important to define:

- what is the scope of accuracy/inaccuracy and what type(s) of data is being considered and how that differs from provisions in the RAA.
- whether this topic is about measuring compliance with the relevant RAA obligations or assessing compliance with another understanding of accuracy.

Any work on this topic must also make a clear distinction between

a) accuracy of data which may comprise of validation or syntactic accuracy (i.e. whether the data follows the relevant syntax expected from such a data field) or verification or completeness of data (i.e all data fields are complete and functional), and
b) verification of whether the data is truthful.

For the Scoping team, it would be of value to clearly flesh out a definition of accuracy or inaccuracy as it relates to this conversation keeping in mind the above bullet points and subsequently map out the size of this problem through evaluating data.

As noted in our examples above, there are very limited circumstances where registration data accuracy impacts registry operators. In the situations where registry operators are

impacted, the processes described in the RAA would be sufficient to remedy the impact to registry operators.

Is now the appropriate time to address the problem? For example, some stakeholders have mentioned the implementation of NIS2 as an important precursor to understanding new accuracy requirements. Should this or other examples be considered prior to engaging in potential policy work?

The RySG recognises that NIS2 represents broadly impactful legislation, and it may be prudent to wait until it is fully adopted by member states. We note that legislation is always evolving as is the related technology around verifying registrants such as electronic IDs.

Are the ICANN org alternatives proposals worth exploring, such as:

- *Provision of historical audit data that measures registrars' compliance with accuracy-related provisions in the RAA.*
- *Engagement with contracted parties and ccTLD operators on developments in European policymaking regarding registration data accuracy.*

The ICANN Org proposal on historical audit data is an interesting approach as it would contextualize the scope and size of the problem with regards to compliance with the RAA and provide a map of where the issue currently stands.
The RySG is open to exploring different options. We are unsure that historical audit data will provide value. An audit of registrar's compliance with existing accuracy obligations may be beneficial as a way of measuring the efficiency of existing practice without having to access registrant data directly.
The RySG notes that engagement with contracted parties and ccTLD operators on accuracy is already occurring regularly. Recent ICANN meetings have featured sessions on this topic involving gTLDs and ccTLDs.

What are the limitations of the ICANN proposals? Why should or should they not be pursued?

The engagement with ccTLD Operators may be useful in some respects but the approach must be grounded in the fact that ccTLD and gTLD operators are very different in terms of scope and governance and what works in the ccTLD world is not always operational in the gTLD world. Furthermore, prior to any such evaluation of ccTLD practices it is important

that ICANN establish firm evaluation criteria in order to determine the effectiveness of ccTLD practices. Additionally, the evaluation would first need a definition of "accuracy" in order to determine whether data was more or less accurate under certain ccTLD practices. Finally, ICANN be clear on the purpose behind the goal of increasing accuracy. If, for example, ICANN determined that data could be made 100% accurate, under whatever definition ICANN settled on, but it led to no improvement in the concerns identified by the GNSO under the questions above, is there any benefit to implementing such policies in the gTLD space?
The primary limitation is the ability to access and verify registration data (registrant contact info) directly. This prevents a full understanding of how big of a problem inaccuracy is (or isn't) or measuring if changes to policy/practice are effective in addressing inaccuracies.

What other possibilities can be explored to move our work on Accuracy forward?

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