24 July 2024

RE: Combatting internet abuse and applicability of RDRS

National Cyber Security Center NCSC
Florian Schütz
Schwarztorstrasse 59, 3003 Bern

Dear Mr. Schütz

Thank you for your letter highlighting your concerns regarding access to domain name registration data. We appreciate and understand your concern that GovCERT.ch can no longer automate gathering public registration information to obtain the data your organization uses to combat phishing and other forms of abuse.

ICANN launched the Registration Data Request Service (RDRS) in November 2023 to aid organizations like yours in requesting access to nonpublic registration data for generic top-level domains (gTLDs.) The RDRS was developed to provide a more consistent and standardized format for handling these requests from individuals and entities with a legitimate interest in nonpublic gTLD registration data. It was developed with the ICANN community's input as a two-year pilot program and implemented at the direction of the ICANN Board to help inform policy decisions related to a System for Standardized Access/Disclosure (SSAD).

RDRS was not intended to be a replacement for the WHOIS service or the Registration Data Access Protocol (RDAP), and registrar participation in the pilot is voluntary. Currently there are 90 registrars participating in RDRS, representing 59 percent of gTLD domains under management. ICANN org is working closely with ICANN's policy-making community to implement enhancements to the RDRS that will improve the requestor's experience. One recommended enhancement, which the GNSO Standing Committee is currently discussing, is a scalable bulk submission feature, as you suggest.

Regarding your concerns about the data provided in the Registration Data Directory Services (RDDS), applicable ICANN Consensus Policies require the contracted parties to collect and provide registration data in a consistent manner, while adhering to applicable privacy regulations. Currently, the contracted parties must adhere to the requirements in the Interim Registration Data Policy for gTLDs and an implementation phase-in period for new policy requirements will begin on 21 August 2024. The new Registration Data Policy, published on 21 February 2024, is the result of broad community efforts to develop registration data policy requirements that can be implemented in compliance with applicable law. The policy requires contracted parties to collect and provide registration data in a consistent manner, while adhering to privacy regulations.

We appreciate your thorough feedback on RDRS. ICANN org will share your feedback with the Generic Names Supporting Organization's RDRS Standing Committee, the community group tasked with working with the ICANN team on agreeing on enhancements and assessing metrics related to the system's usage. We welcome any further feedback you want to share and would

welcome a discussion with our project team to discuss any other ideas or questions you may have. If you have further feedback on the system or wish to discuss further, please contact Eleeza Agopian, ICANN's Vice President for Strategic Initiatives, at eleeza.agopian@icann.org.

Sincerely,

Sally Costerton
Sr. Advisor to President and SVP, Global Stakeholder Engagement & Interim President and CEO Internet Corporation for Assigned Names and Numbers (ICANN)