RDRS

Registration Data Request Service:
RrSG Perspective

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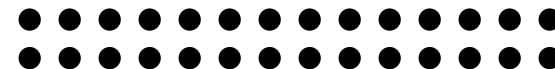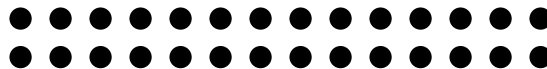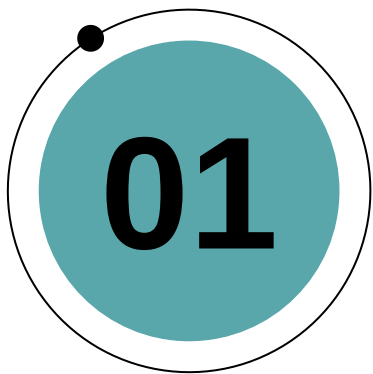
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Key points for registrars
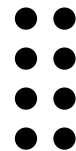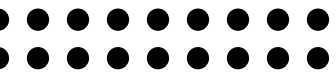
01

Participation

Broad registrar participation in the RDRS is essential to ensure that the Board has a full and accurate picture of the volume of disclosure requests

02

Workload

The **RDRS does not represent additional work** for registrars. We already respond to disclosure requests; this is just a new path to submit requests
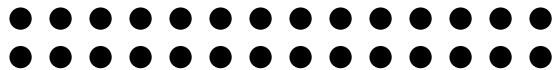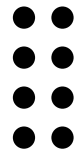
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Usage data

We should do our part to support the process and **help gather complete and accurate usage data** for the Board

02

# How we got here

- The EPDP Phase 2 Working Group Recommended (PDF) building a System for Standardized Access and Disclosure of non-public gTLD Registration Data ("SSAD")

- The SSAD Operational Design Assessment (PDF) provided a broad range of possible costs to operate the SSAD, depending on the volume of usage: the more requests overall, the lower the cost per request.

- **More information about SSAD usage volume would provide a more specific cost, allowing the Board to determine if the EPDP Phase 2 WG Recommendations are in the best interests of the ICANN Community**

- The RDRS is proposed as a "pilot" or trial, gathering volume data by managing the request intake and distribution process

03
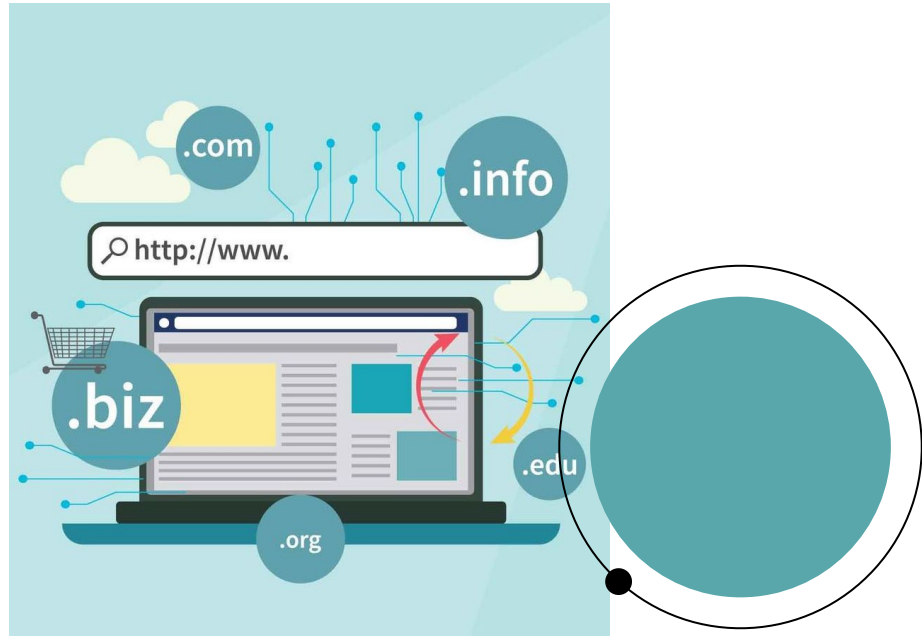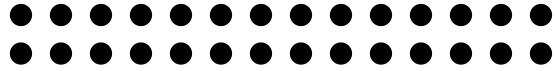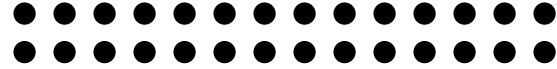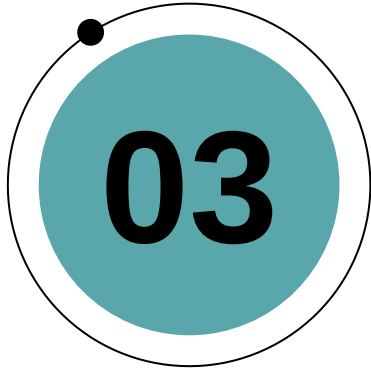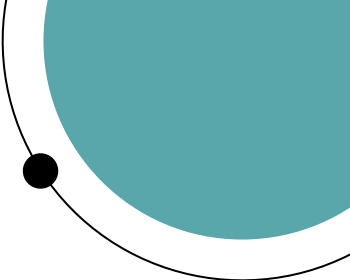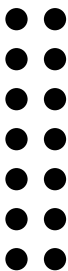
Process, system, and timeline
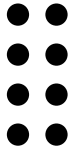
About the process

- The multistakeholder model brought us this far, it is important that we follow the process through until completion

- The RDRS supports the Board's ability to determine if the EPDP Phase 2 WG Recommendations are in the best interests of the ICANN Community

- The Board requires comprehensive data on which to base their decision

- **If Registrars do not participate, the data gathered by the RDRS may not be sufficient for the Board to make a data-driven decision**

About the system
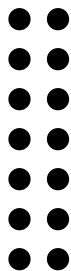
- As with request sent to registrars directly, each RDRS request must be accompanied by demonstration of valid legal basis to access the data, and submission of a request does not guarantee disclosure of data

- Many requestor parties are hesitant to use the RDRS *because* submission of requests does not guarantee the disclosure of data
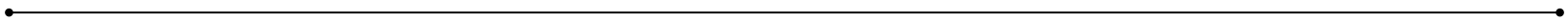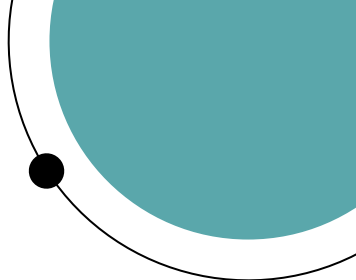
About timing
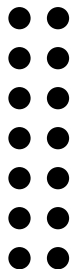
- The RDRS is expected to begin accepting requests in December 2023

- The RDRS will run for a maximum of two years

- There will be regular monthly public reporting on usage rates and other metrics

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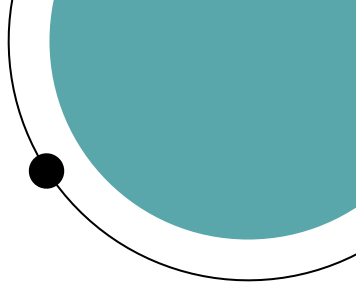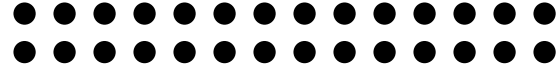
Questions & Answers
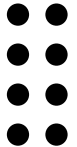
If I get a request through RDRS does that mean I MUST disclose data?

No. As with disclosure requests sent directly to the registrar, RDRS requests are still expected to go through the registrars' review process, and the **registrar determines if the requestor has a valid purpose and legal basis to access the data**.

When logging the outcome in the RDRS, where appropriate registrars will indicate if requested data was **not** disclosed.

If I start using RDRS, can I opt out and stop using it?

Yes, RDRS participation is voluntary and you can opt out at any time.

We encourage all registrars to join in and help gather this information to support the Board's ability to make a data-driven decision.

Does RDRS participation duplicate work?

No, you only need to process each request once.

The RDRS creates a path to submit requests which may be supplemental to your own request submission process.

Who can see the request and response data? Can ICANN access it?

Request information is stored in the RDRS platform; **ICANN can access full request data** including supporting information or evidence.

Data disclosure is managed outside the RDRS platform, with data sent by the registrar directly to the requestor. **Since it is outside the RDRS, ICANN has no way to access the disclosed data.**

Request outcomes (approval or denial; if denial, the reason why) are tracked in RDRS; **ICANN accesses and tracks outcome information.**

ICANN provides **public reporting of metrics** (e.g. number of requests, number of approvals, number of denials, etc) but will not publish full request data.

Why should I make this process easier for anyone?

Participation in RDRS now makes things easier for us in the long-term.

The RDRS supports the Board's ability to determine if the EPDP Phase 2 WG Recommendations are in the best interests of the Community.

If Registrars do not participate, the data gathered by the RDRS may not be sufficient for the Board to make a data-driven decision.

This could lead to a decision based on insufficient or incomplete information, or a need to continue operating the RDRS for a longer period to gather more data.

What else can I do to help?

Help socialize **awareness of the RDRS by adding the URL and information to your auto-responders and online help or knowledge bases**, informing requestors of this system which they can use to submit requests to all participating registrars!

The RrSG Communications team will provide suggested wording and response templates when the RDRS URL is available.

What is the cost (both technical and financial) to participate?

Required actions for RDDS are not very time-consuming and so **costs should be fairly minimal:**

1. checking NSp for requests, which can also be sent to you via email,
2. processing requests (as you already must do),
3. periodically reporting outcomes to ICANN

An API may be established at a later time which would require development resources to integrate into registrar systems. This is optional; some registrars may find integration preferable and worth putting resources into.
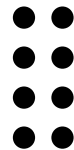
How long do we have to do this for?

The **RDRS will run for a maximum of two years,** and possibly less if enough useful information is gathered sooner than that

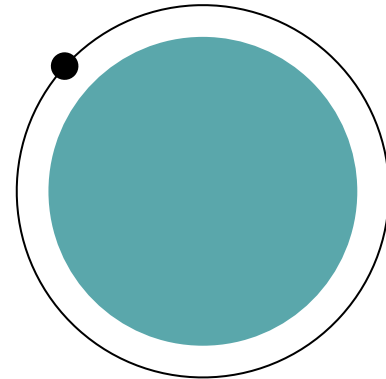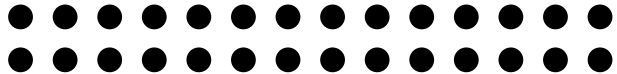Since participation is voluntary, you can stop participating whenever you decide to do so.

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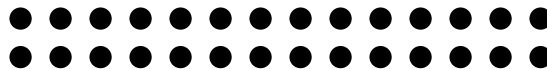
Relevant links

[ICANN Wiki > EPDP Phase 2 Small Team page](#)

Thanks!

www.rrsg.org