

## **RrSG Public Comment on**

"Review of the Draft Registry Service Provider (RSP) Handbook - New gTLD Program"

### **Public Comment Page**

<https://www.icann.org/en/public-comment/proceeding/review-of-the-draft-registry-service-provider-rsp-handbook-new-gtld-program-13-03-2024>

### **Proposal Seeking Input**

<https://itp.cdn.icann.org/en/files/registry-services/draft-rsp-evaluation-handbook-13-03-2024-en.pdf>

### **Deadline**

April 22, 2024

## **INTRODUCTION**

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to provide a comment on the Draft Registry Service Provider (RSP) Handbook for the new gTLD Program. This is a significant undertaking by ICANN org and the ICANN community, and the RrSG appreciates the dedication of the team in addressing this matter. The RrSG supports the recommendations in the Draft Registry Service Provider (RSP) Handbook, and encourages RSPs to adhere to relevant technical standards in order to allow broad uptake of their services.

The RrSG is constituted of a diverse body of members, serving different demographics, regions, markets, and business models. Some RrSG members either are currently or plan to be vertically integrated with gTLD (and/or ccTLD) Registries and/or offer Registry Services as outlined in the document receiving comment. Our members provide registrar service to clients covered under RA Specification 13 gTLDs ("dotBrand"), but the majority of the membership works with the open marketplace, so these comments are provided primarily towards gTLDs that are open and available to register within the mass market.

### **General Comments**

The RrSG closely follows the outcomes of these new rounds, as affordable choice and support as well as our ongoing efforts to reduce DNS Abuse are in constant focus.

The Registrar channel is a crucial layer as we facilitate registrant engagement in the marketplace. Registrars work with a growing number of registry platforms as the namespace expands and new entrants join the marketplace.

In the 2012 round of new gTLDs we saw that the benefits of market competition and consumer choice also came with the burden of integrating with a growing number of registry service providers and other services. Those engagements have multiple layers of integration that increase our operational, technical, financial, legal, and other day-to-day resourcing and maintenance obligations.

## Shared Technical Standards

Focusing on the technical aspects of the process, adhering to shared standards is absolutely essential. While there are RFCs that define some high-level operating standards, the details matter in how those standards are applied. These details include business logic, error codes, availability, premium pricing handling, and other aspects of the technical interactions. While it may seem that one could simply copy existing programming code and make minor changes to integrate with new TLDs, differences in those implementation details can cause significant challenges for Registrars.

We note that these implementation choices do not appear to be a part of the technical evaluation process. Understanding that this would be difficult for ICANN Org to provide for, the question, "How different is your system from what we're used to integrating with?" will be fundamental to Registrars. We encourage those intending to apply in subsequent rounds to strongly consider their approach to standardization. There is an inverse and proportional relationship between the amount of extra and different things done by a TLD/SRS and the number of registrars that will be attracted to integrating.

The RrSG are appreciative and positive about the approach taken in this coming round; decoupling the technical evaluations should hopefully deliver cost reduction for ICANN Org and increased pace for applicants. Further, the ability for RSP applicants to conduct technical testing, and do so iteratively until a final passing run, and providing those applicants with escalation resources in order to conclude their testing within 180 days, seems very sensible as far as process, structure, and predictability.

## Premium Domain Standardization

One notable absence in the Draft Handbook is the suggested use of [RFC 8748](#) to provide for clear, consistent and predictable marketplace pricing. The 2012 TLD launches introduced a number of different approaches, often processed out-of-band to the SRS as special handling, which led to domain registrar integrations with registries that offered premium pricing not having the most up-to-date information at the time of a customer interaction. The result was some expensive chaos, where registrants were delighted customers who believed they had just registered a great domain name only to be notified that the price was exponentially higher than expected and they had to either pay the difference or lose the domain name.

This can also tie up registrar prepaid funds and prevent additional registration or other provisioning activity, but more notably the situation leads to upset customers and expensive processes, resulting in the loss of customers and diminished sentiment about the new TLD program. RFC 8748 introduced some consistency and order, reducing at very least the potential of misunderstanding over the price of premium domains, and following this standard would provide clarity and predictability to registrars.