

Paul Vixie

With respect to:

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My first comment is as follows.

The immediate impact of the DAAR methodology report is to enter into public evidence the following quite damning fact:

A Whois query is the only means available to obtain the identity of a domain name's sponsoring registrar[.]

This was an accident of history, overlooked during the IFWP process which separated registrar functions from registry functions for the first time.

We needed a machine-readable way to determine, at scale, the identity of the sponsoring registrar for a domain. by "at scale" i mean that hundreds of millions of us needed and still need to determine the identity of a domain's sponsoring registrar, in a way performant enough to use this identity as part of the acceptance criteria for transactions.

The absence of such a facility has allowed many registrars to operate in a very dirty, ugly, extractive, and public-abusive way. it's common to register domains and then drag one's feet about complaints. there is no business risk to a registrar who behaves in this way. absent such business risk, these public-abusive behaviours have scaled quite well. and that's a problem.

Abuse scoring will be normalized and thus it will be more difficult for consumers of the report to deduce individual registries or registrars.

That makes DAAR less useful, bordering on academic. please reconsider. we must have a wall of shame; no icann-oriented process of review can be fast enough or adaptive enough to provide business risk to badly behaving registrars. Spamhaus reports on registries, but lacks fine grained sponsoring-registrar data and thus cannot report on registrars.