

Ticket ID: Q3C7C-0R3M5

Registry Name: GMO Registry, Inc. gTLD: .TOKYO .NAGOYA .YOKOHAMA

**Status: ICANN Review** 

Status Date: 2017-07-13 14:52:04 Print Date: 2017-07-13 14:57:44

### **Proposed Service**

Name of Proposed Service:

.SHOP Services for China

Technical description of Proposed Service:

This Service (the "Service") is offered by .shop (it is not available for any other TLDs operated by GMO Registry).

#### The gateway systems include:

1. The Service. A gateway has been established to be used by ICANN-accredited registrars located in mainland China who may opt to connect to the GMO Registry SRS via the gateway service. The Service would act as a gateway to the EPP system located on GMO Registry's registry infrastructure in Japan. The gateway enables registrars to register domain names in compliance with local Chinese laws (MIIT regulations) by facilitating the out-of-band verification of registrant contact information. It would also implement an object cache, which would improve round-trip times for Chinese registrars. In all other respects it functions as a gateway, passing EPP commands and responses between the registrar and primary registry system. For clarity, the gateway system does not have the ability to process EPP commands.

The same domain names will be available for registration for all registrars regardless of whether they connect via the gateway or directly to the registry system.

To enable the registry to comply with local Chinese laws and policies it is necessary for ZDNS to be able to place domain names on ServerHold during the Real Name Verification process (RNV), in the event that Real Name Verification (RNV) or Domain Name Verification (DNV) fails, or when requested by the Chinese government for any other reason ZDNS uses the EPP interface and a special EPP extension only available to ZDNSfor this purpose.

\*Please note that DNV and RNV take place entirely out of band and are carried out by a third party entirely independent of the registry.

### Consultation

Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?:



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see below

a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?:

n/a

b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?:

Since the launch of .shop was announced in April 2016, the Chinese domain industry has expressed strong interest in the .shop TLD and a strong desire to have the TLD available for registration and use in China. Chinese registrars have been strongly encouraging GMO Registry to launch this gateway because the Chinese government mandates it to operate. Without the gateway, registrants in China would be unable to register or use .shop domain names and so the registry and registrars receive many complaints from registrants.

c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?:

Consultation with any constituency group other than ICANN, our registrars and our registrants is not appropriate as no other constituency group is affected by this proposes arrangement.

d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?:

Yes, consultations with end users are appropriate -- specifically end uses in China. We have, directly and through our registrar distributors, communicated with many registrants in China about these registrants desire to be able to use their domains. Without exception they desire for us to establish this gateway so that they can use their domain names.

e. Who would endorse the introduction of this service? What were the nature and content of these consultations?:

Based on the above described consultations, we are confident that the entire Internet user base of China would endorse this service and that Chinese registrars would strongly endorse this service.



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f. Who would object the introduction of this service? What were(or would be) the nature and content of these consultations?:

We believe that no parties have any legitimate reason or right to object to the introduction of this service.

### **Timeline**

Please describe the timeline for implementation of the proposed new registry service:

The Registry launched the Service in January of 2017.

### **Business Description**

Describe how the Proposed Service will be offered:

The Serviced is offered by making use of ZDNS's existing solution. The technical work required to integrate the Registry with ZDNS's gateway system has already been completed.

Describe quality assurance plan or testing of Proposed Service:

Prior to deployment, the Registry performed a thorough functional test of ZDNS's registry gateway.

Additionally, once this internal test has been completed, ICANN accredited registrars in China were invited to perform functional and regression tests of the EPP gateway prior to going live.

Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.:

The gateway system interacts with the EPP and therefore a number of specifications impacted the creation of the service--to wit: ICANN specifications:

-----New gTLD Registry Agreement: -----Specifications 1, 3, 4, 5, 6, 7



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EPP-related RFCs:
RFC 5730 (EPP Base Specification)
RFC 5731 (Domain Mapping)
RFC 5732 (Host Mapping)
RFC 5733 (Contact Mapping)
RFC 5734 (Transport Over TCP)
RFC 3735 (Guidelines for Extending EPP)
RFC 3915 (Domain Registry Grace Period Mapping)
RFC 5910 (Domain Name System (DNS) Security Extensions Mapping)
EPP-related Internet-Draft specifications:
draft-ietf-eppext-launchphase-01 (Launch Phase Mapping)
draft-ietf-eppext-idnmap-01 (IDN Mapping)
draft-brown-epp-fees-01 (Registry Fee Mapping, version 0.4)
draft-brown-epp-fees-02 (Registry Fee Mapping, version 0.5)
RFC 3915 (Whois Protocol)

### **Contractual Provisions**

List the relevant contractual provisions impacted by the Proposed Service:

If ICANN deems this service to be a registry service, the following section would be impacted:

Section 2.1 Exhibit A

What effect, if any, will the Proposed Service have on the reporting of data to ICANN:

None

What effect, if any, will the Proposed Service have on the Whois?:

None

### **Contract Amendments**

Please describe or provide the necessary contractual amendments for the proposed service:



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The Registry believes that no contractual amendments are necessary for the implementation of the Proposed Service. However, If ICANN disagrees with this conclusion, we propose an amendment to Exhibit A of each RA to add the Proposed Services as an Approved Service.

Chinese Gateway. Subject to all of the terms of this Agreement, Registry Operator may offer to Chinese registrars an EPP gateway to be optionally used by ICANN-accredited registrars located in China so that Registry Operator and the Chinese registrars may comply with applicable local Chinese laws.

### **Benefits of Service**

Describe the benefits of the Proposed Service:

This service will allow registrants in China of .shop to register and renew domain names and to legally use their domain names once they are registered. Additional, the Service will permit registrants and registrars of .shop domain names to comply with local laws

### Competition

Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain.:

The Proposed Service will have a positive effect on competition, as it will help bring more competition into the Chinese domain name market.

How would you define the markets in which your proposed Registry Service would compete?:

The mainland Chinese domain name market.

What companies/entities provide services or products that are similar in substance or effect to your proposed Registry Service?:

XYZ.COM LLC offers a substantially similar service with the same service provider. The XYZ services has been reviewed and approved by ICANN.



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In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?:

No

Do you propose to work with a vendor or contractor to provide the proposed Registry Service? If so, what is the name of the vendor/contractor, and describe the nature of the services the vendor/contractor would provide.:

The vendor we use to operate the gateway in China is ZDNS Co., Ltd. ("ZDNS"). ZDNS will operate the gateway in China between Chinese registrars and the GMO Registry registry system. Real name verification pursuant to Chinese law will be provided by KNET Co., Ltd.

Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed Registry Service? If so, please describe the communications.:

The only entities that would be affected by this are the various Chinese registrars we work with.

Our Chinese registrars are affected by the Service. They strongly wish for the Service to be implemented so that their customers can continue to to register and use their domain names.

Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).:

None

## Security and Stability

Does the proposed service alter the storage and input of Registry Data?:

1) Data for registrations coming from mainland Chinese registrars that have been onboarded on the Service will be mirrored on servers in China. The storage of data for registrations coming from registrars not in China will not be mirrored. This is necessary to comply with Chinese law.

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of reponses to Internet servers or end systems:



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The round-trip times for EPP transform commands performed by registrars in China will not be significantly affected as the primary source of latency is the geographic distance between China and the primary operations centre in Japan.

Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?:

None

#### Other Issues

Are there any Intellectual Property considerations raised by the Proposed Service:

None

Does the proposed service contain intellectual property exclusive to your gTLD registry?:

No

List Disclaimers provided to potential customers regarding the Proposed Service:

None

Any other relevant information to include with this request:

Participating registrars (indeed all registrars) are required to be accredited in GMO Registry's EPP server. The gateway will pass on the credentials it received in the frame used to connect to it. Registrars using the gateway system must have signed the RRA and have an active account in GMO Registry's EPP server.

The ZDNS gateway will only contain a subset of the data held by GMO Registry. Any data held by ZDNS will be synchronized with GMO Registry's data, with GMO Registry's data being the authoritative data source. No EPP transform commands are processed by the ZDNS servers. The only function of these servers is to pass commands through to the GMO Registry SRS and to cache local data. The escrow deposits generated by GMO Registry from its own database will be



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full and complete and are not impacted by the provision of this service, so in an EBERO context, the registry could be fully restored on an emergency backend registry operator without any interaction with the Service or ZDNS.

Both the ZDNS Gateway and GMO Registry's normal system will be reachable within China. Which service a registrar chooses when performing a command will be beyond the control of the Registry Operator.

There is no impediment for the Registrars covered in the region served by the gateway to connect to GMO Registry's SRS. Registrars in China will be able to access GMO Registry's SRS. A Chinese user will still have normal access to the normal web-Whois just as they currently do. There is no change in the manner or ability of a Chinese registrant to access the normal web-whois.

ZDNS will only cache the objects registered through the gateway. The gateway will cache all the objects registered by Chinese registrars, include domain/contact/host. ZDNS will update the objects when registrars send commands through the gateway or the data is synchronized with the registry. ZDNS will never cache the objects outside of the gateway system. From the Chinese registrar's perspective, the gateway will look like a registry.

#### Disclaimer:

GMO Registry, Inc. believes that the Service is not a Registry Service because it does not meet the definition of Registry Service under the Registry Agreement, signed between GMO Registry, Inc. and ICANN. This is primarily true because the gateway could have been implemented and operated by a party that is not the Registry (such as the registrar). However, as an accommodation to ICANN, and in response to ICANN's request, GMO Registry, Inc. is filing this RSEP paperwork.