



## RSEP Fast Track - Registration Validation per Applicable Law with Proxy

August 15, 2022

### Registry Operator

ShortDot SA  
29, Boulevard Grande-Duchesse Charlotte  
Luxembourg, Luxembourg L-1331

### Request Details

Case Number: 01119419

### Service Description

This service request should be used to submit a Registry Services Evaluation Policy (RSEP) request to implement the Registration Validation per Applicable Law with Proxy service, which permits Registry Operators to perform registration validation to comply with applicable law in a given jurisdiction **with** a supplementary proxy for SRS/EPP and RDDS services.

For Registry Operators who request approval to use a supplementary registration proxy in conjunction with registration validation, a port-43 supplementary registration information lookup service must be established. This service acts as a caching proxy to the Registration Data Directory Service (RDDS) and would be queried only by registrars in a specific jurisdiction. End users performing RDDS queries would not query this service and whois.nic.[TLD] will continue to point to the primary RDDS service. The format of responses produced by the supplementary registration information lookup service will be identical to those produced by the RDDS service and will comply with ICANN specifications.

The statements below reflect the standard implementation of the proposed service with no apparent significant security or stability issues as well as the standard amendment language for Registration Validation Applicable Law with Proxy. Please note this request will be published on the ICANN org [RSEP webpage](#) upon completion of the Completeness Check, which will be within 5 days from submission.

If any of the statements below do not apply to your registry's implementation of the proposed service, this RSEP Fast Track request may not be used. Instead, you must submit a standard "RSEP (Registry Services Evaluation Policy)" request. Please click here for more information about the process.

Complete the information requested below. All answers marked with a red asterisk are required. Click the Save button to save your work and click the Submit button to submit to ICANN.

## Registry Operator Confirmation

1. My registry requests to implement the Registration Validation per Applicable Law with Proxy for the TLDs included in this request.

Yes

2. My registry confirms the amendment language below represents the proposed service in this RSEP request and my registry agrees to execute the Registry Agreement amendment without modification. My registry also understands it may be required to submit a [Material Subcontracting Arrangement \(MSA\)](#) request to ICANN for use of a supplemental proxy based on its response(s) to the Required Information section below.

*Note: amendment execution will occur once the request has successfully passed ICANN Review for security, stability, and competition.*

#### **Registration Validation per Applicable Law**

Registry Operator may perform registration validation to comply with applicable local law in a given jurisdiction. The registration validation process, by which the Registry Operator subjects domain name registrations to validation, will be subject to the criteria required by the applicable local law in the jurisdiction. Domain names that are subject to the registration validation process in the subject jurisdiction that do not pass registration validation in that jurisdiction may be suspended, deleted or otherwise updated by the Registry Operator as required by applicable local law.

#### **Supplementary Registration Proxy**

Registry Operator may offer this service through a Supplementary Registration Proxy (SRP), which provides a secondary gateway for access to Shared Registration System (SRS)/EPP, RDDS (via WHOIS – port 43 –, web-based Directory Service, RDAP or any combination), or both, subject to the following requirements:

1. Any Registry Service offered through an SRP shall be consistent and coherent with the corresponding primary Registry Service. In particular, a Registry Service offered through an SRP must provide the same Registration Data; offer the same functionality; and be subject to the same specifications, service-level requirements, and emergency transition thresholds (as specified in Specification 10) as the corresponding primary Registry Service offered by the Registry Operator.
2. Registry Operator must give ICANN a ten (10) calendar days advance notice of any new or changed SRP hostnames.
3. Registry Operator must obtain ICANN's approval pursuant to Section 7.5 of the Agreement for any subcontracting arrangement that relates to a SRP.

4. Registry Operator may offer an SRP provider access to Registration Data as long as such access complies with all the terms of this Agreement and any applicable laws.
5. Registry Operator shall provide additional Registry Functions Activity Report(s) for each SRP jurisdiction according to the requirements of Specification 3 in a manner agreed with ICANN. If an SRP instance did not offer a particular Registry Service(s) (e.g. DNS) in a reporting period, the fields related to the Registry Service(s) not offered in the additional Registry Functions Activity Report(s) must contain the string "SRP".
6. Within ten (10) calendar days of any ICANN request Registry Operator shall provide additional Registration Data file(s) for each SRP instance according to the requirements of section 3.1 of Specification 4 with the data objects for which the SRP operator is allowed to process transactions in the SRS.
7. The SRP will pass EPP commands and responses between the registrar and primary RSP system, which will remain the authoritative source of registry data.
8. The SRP will comply with the standards and service level requirements described in the Agreement for the Registry Service for which there is a proxy.

Yes

## Additional Information

This service request involves a Supplemental Registration Proxy, which may require that you submit a [Material Subcontracting Arrangement \(MSA\)](#) request to ICANN following approval of the RSEP request. Please provide complete responses to the questions below for ICANN to assess this request.

1. Do you propose to work with vendors/contractors to provide this Registry Service?

Yes

2. Please fill in the name of any **proposed** vendors or contractors next to the appropriate Critical Function (as identified in Specification 10, Section 6, and applicable to this RSEP request). If you do not have any proposed vendors or contractors, type N/A.

(a) DNS

n/a

(b) DNSSEC

n/a

(c) EPP

Internet Domain Name System Beijing Engineering Research Center Ltd. ("ZDNS")

(d) RDDS

Internet Domain Name System Beijing Engineering Research Center Ltd. ("ZDNS")

3. Describe the service(s) the proposed vendors or contractors would provide if they differ from your current Registry Service Provider of that Critical Function. If you do not have any changes from your current Registry Service Provider, type N/A.

1. EPP

An EPP gateway may be used by ICANN-accredited registrars located in a given region subject to certain validation requirements per applicable law. The gateway will act as a proxy to the "primary" EPP system located on the CentralNic system located in the UK. The gateway will be responsible for implementing local regulations and verification of registrant contact information. In all other respects it functions as a proxy, passing EPP commands and responses between the registrar and primary registry system, which would remain the authoritative source of registry data.

## Competition Questions

1. Do you believe the proposed service would have any positive or negative effects on competition? If so, please explain.

Bringing more TLDs into the gTLD marketplace in different geographic locations has a positive impact on competition.

2. How would you define the markets in which the proposed service would compete?

At this time, the proxy service is contemplated to be rolled out in China.

3. What companies/entities provide services or products that are similar in substance or effect to the proposed service?

Other service providers, including Teleinfo , offer the proxy model in China. We are submitting this request to correct the previously submitted Registration Validation RSEP request for .icu since the service requires use of a proxy.

4. In view of your status as a Registry Operator, would the introduction of the proposed service potentially impair the ability of other companies/entities that provide similar products or services to compete?

No

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

Internet Domain Name System Beijing Engineering Research Center Ltd. ("ZDNS") will operate the proxy service in China between local registrars and the CentralNic system. Zdns will also provide local data escrow services for Chinese registrants only. Our contractually required global data escrow will not be affected and will continue with Denic.

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

Yes, we have communicated with Chinese registrars regarding this service.

7. Do you have any documents that address the possible effects on competition of this proposed service? If so, please submit them with your application. ICANN will keep the documents confidential.

**Affected TLDs**

<b>Current Registry Operator</b>	<b>Top Level Domain</b>	<b>Registry Agreement Date</b>
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ShortDot SA	icu	2015-01-08
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