

Zone Transfer Policy Review - Proposed New Policy Submission

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The proposed policy can be summarised in two sentences "Access to transfer zones is at the discretion of the DNC. Access is unlikely to be given without evidence of public benefit and protection of privacy". It appears to have ignored many of the submissions that were made on the previous policy.

Clause 3.1 should be reworded to say "Zone files will generally not be released to third parties in order to protect registrants' privacy and interests" (not change of ordering to emphasise that not releasing is protecting the privacy interest, rather than that the zones are not being released in order to hinder the protection of that privacy interest).

The policy should address other sources of data that might be obtained from the zone file; for instance summary statistical information is already published, and there might well be a procedure whereby specific statistics could be requested from the DNC if they are only needed once.

In general I think that zone transfers are most appropriate where there is an ongoing need for information -- for instance to track trends -- rather than once only. This should be reflected both in the policy and in the process. Indeed the process should probably require a defence as to why the information that will be extracted from the zone transfer cannot be obtained in some other fashion. (Where there is a need for an ongoing set of data I would say that the general rule should be towards approving the transfers as the most expedient way to provide the ongoing access. One off transfers should be an exceptional case.)

I tend towards the view that there is nothing private in the zone data itself; it's been published in the DNS after all. However it is obviously a useful set of source data for someone who wants to engage in "data mining" via the whois server or otherwise. Possibly the privacy concerns should be reworded in light of that observation (i.e., that the data itself is not sensitive, but that it can be used for activities which may result in privacy violations).

I also don't think that a lack of public good should be fatal to an application. Providing there isn't public detriment, I think that an application should be approved if it otherwise meets the criteria. Public good coming out of the release would obviously be a positive factor in favour of the release.

In view of the fact that these comments go to the "core" of the proposed policy I would like to suggest that a revised version be prepared and consulted on again.