Agenda Topics

• Brief Update
  – Audit Program Update
  – Operational Accomplishments
  – Compliance Initiatives
  – Compliance Metrics

• Q & A
Year-1 Audit Program Completed

- Launched 13 November 2012
- One third (1/3) of the Registrars and Registries randomly selected and audited.
- Over 99% of all Registrars collaborated with, or immediately remediated their findings if any were noted.
- Registries are under no explicit obligation to participate; many did in a collaborative effort to remedy any observations discovered.
- Published Year-One Audit Program Report at [http://www.icann.org/en/resources/compliance/reports](http://www.icann.org/en/resources/compliance/reports)
Year-1 Audit Program Results

The chart above provides an overview of the percentage of Registrars with potential deficiencies prior to remediation. Many of these issues were fully remediated after collaboration with the Registrar.
<table>
<thead>
<tr>
<th>Year-1 Audit Program Results</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Top Deficiencies Within Tested Areas</strong></td>
</tr>
<tr>
<td>3.16 Registrar public contact details not found on Registrar website (40%)</td>
</tr>
<tr>
<td>3.4.2 Payment documentation not provided (28%)</td>
</tr>
<tr>
<td>3.4.2 Registration Agreement not provided (23%)</td>
</tr>
<tr>
<td>3.3.1 to 3.3.5 Whois-Port43/Web, Corresponding Data Elements: Registrar Identity not returned in Whois query search results (22%)</td>
</tr>
<tr>
<td>4.3.1 Consensus Policies - IRTP: TEAC Phone provided in RFI did not match RADAR (22%)</td>
</tr>
<tr>
<td>3.3.1 to 3.3.5 Whois free public search not found on Registrar webpage or redirects (19%)</td>
</tr>
<tr>
<td>4.3.1 Consensus Policies - IRTP: TEAC Email provided in RFI did not match RADAR (19%)</td>
</tr>
<tr>
<td>3.12 Reseller agreement does not include provision 3.12.3 (18%)</td>
</tr>
<tr>
<td>3.12 Reseller agreement does not include provision 3.12.5 (18%)</td>
</tr>
<tr>
<td>3.12 Reseller agreement does not include provision 3.12.2 (17%)</td>
</tr>
<tr>
<td>4.3.1 Consensus Policies - Inter-Registrar Transfer Policy (IRTP): No FOA or Authinfo Code provided (17%)</td>
</tr>
</tbody>
</table>
Year-2 Audit Plan Scope and Dates

- Random Sample of remaining Registrars/Registries
- New gTLD Registries with 6 months of historical information
- Timeline
  - Planning & Organizing Phase - mid August - November 2013;
  - Pre-Audit Notice: Late October - mid November 2013
- Follow Compliance Process (1-2-3 Prevention Phases then Enforcement)
Operational Accomplishments

By ICANN 47 - July 2013

✓ Migrated complaints from Internic to ICANN.ORG
✓ Full automation of compliance process
✓ Added Pulse Survey in complaint closure email
✓ Added multiple complaint submission
✓ Added three registry complaint types
✓ Launched Pilot Bulk Complaint submission
Registrar Data Escrow Compliance check

**Proactive Exercise**

**Objective:** To ensure that the data being loaded into Iron Mountain is useable and represents the appropriate Registrant Information

**Scope:**
- ALL Registrars depositing with Iron Mountain
- The most recent deposit
- Compliance with Data Escrow Specifications

**Process:**
- Conducted an automated and manual review
- Reported results to ICANN Contractual Compliance
- Followed up with each Registrar to ensure proper formatting and RDE issues are corrected
Asia Pacific Outreach Activities Summary

✓ Registration Agreements - Registrars incorporated missing mandatory provisions from the RAA
✓ Documentation and records to identify gaps and flaws in record keeping and data retention.
✓ Conducted 2 general outreach sessions on Whois Inaccuracies, IRTP, Domain Renewal, and overall Compliance process
✓ Conducted other outreach calls in native language regarding IRTP, Whois Inaccuracies, UDRP, Domain Renewal, data escrow, and keeping up-to-date contact information.
Bulk Whois Inaccuracy Complaints

- 3-month pilot started 10 July 2013
- 3 users
  - Security industry (KnujOn and Support Intelligence, Inc.)
  - Brand protection industry (MarkMonitor Inc.)
- Limited to 100 complaints per week/user
- Bulk complaints processed same as single complaint
- Review by Compliance to ensure ticket quality
- Abuse of bulk process will result in suspension/revocation of bulk & single ticket Whois access
- ICANN to assess with all parties after pilot

Link to appendix: TERMS OF USE
## Bulk Whois Inaccuracy Differences

<table>
<thead>
<tr>
<th>Old Bulk</th>
<th>New Bulk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Separate system</td>
<td>Integrated within consolidated system</td>
</tr>
<tr>
<td>2 Automatic Notices</td>
<td>Within Compliance process and review</td>
</tr>
<tr>
<td>Data file validation at submission only</td>
<td>Additional validation at ticket creation</td>
</tr>
<tr>
<td></td>
<td>• Data file validation</td>
</tr>
<tr>
<td></td>
<td>• Active domain status</td>
</tr>
<tr>
<td></td>
<td>• Non-duplicate complaint check (45 days)</td>
</tr>
<tr>
<td></td>
<td>• Valid gTLD</td>
</tr>
<tr>
<td>Outside of ticket process</td>
<td>Bulk tickets within same process and queue as single submission Whois inaccuracy complaints (bulk tag for identification and metrics)</td>
</tr>
<tr>
<td>No review of ticket quality</td>
<td>• Rejection of invalid tickets</td>
</tr>
<tr>
<td></td>
<td>• Periodic review/audit of tickets</td>
</tr>
<tr>
<td></td>
<td>• Outreach to submitters to improve ticket quality</td>
</tr>
<tr>
<td>No Terms of Use</td>
<td>Mandatory Terms of Use</td>
</tr>
<tr>
<td>No abuse penalties</td>
<td>Abuse penalties include suspension and revocation of access</td>
</tr>
<tr>
<td>Unlimited ticket submission</td>
<td>- Gradual rollout</td>
</tr>
<tr>
<td></td>
<td>- Limited to 100 submissions per user per week to ensure quality and scalability</td>
</tr>
<tr>
<td></td>
<td>- Submission limit will be revisited based upon performance and impact to contracted parties and ICANN</td>
</tr>
</tbody>
</table>
| One user                                      | Access application, training & agreeing to Terms of Use. Limited number of users.
Complaint Management System

Please refer to slides 37 - 42 for demo screen shots.
New Complaint Navigation, FAQ & Form

- Replaced complaint forms on Internic.net and redirected to new ICANN.ORG Complaint Submission landing page
- Three column page categorized to group similar FAQs or go directly to complaint form
- Added new navigation and updated 47 FAQs
- URL is http://www.icann.org/en/resources/compliance/complaints
Compliance System Home Page

• Displays the number of tickets by complaint type and by complaint status

• From the Home Page selection of the Status or Complaint type directs the staff user to a view of the actual tickets.

Note: This example contains test data.
Complaint status as it moves through the system

- Navigation bar for complaint type and/or status queue
- Consistent workflow
- Queues are used for outbound notices/inquiries to Registrars/Registries
- Work in Process (WIP) queues are used for ICANN processing steps
Example of Notice To Registrar

- Domain History & Reporter tabs: complaint historical data
- Audit tab: history of all key communications with recipient
- Consistent subject line on all notices
- Template library allows for consistent communications based on complaint type
- All templates are auto-populated which allows for consistent and efficient processing
... What next?

• Email notice sent by the system, which **require a reply** back from the registrar/registry

• The response should be:
  – Total email size with attachments should not be greater than 4MB
  – Preferred file formats .pdf,.doc(x), .txt
  – Reply directly to the email w/formal responses
  – Do not edit subject line
  – Other than replying to a ticket, please do not send emails directly to compliance-tickets@icann.org

• Complaint is either Closed or forwarded for Enforcement review

• Email closing the complaint is sent to the Reporter and the Registrar/Registry.
Pulse survey in closure notice email

**Reportor Survey Questions:**
- How easy was it to submit a complaint?
- How clear were the instructions?
- Was your complaint resolved?
- **Overall, how do you rate the complaint submission experience?**
- May we contact you for further clarification as needed?

**Registrar/Registry Survey Questions:**
- Did the complaint have the appropriate information for processing?
- How clear were the instructions?
- How responsive was ICANN to your questions?
- **Overall, how do you rate the complaint experience?**
- May we contact you for further clarification as needed?
Contractual Compliance Initiatives
Compliance Initiatives

- Implement **Expired Registration Recovery Policy**, effective 31 August 2013
- Implement **2013 RAA** in phases; effective upon registrar signing and 1 January 2014
- Define and rollout **new Registry** related functions and complaint types
- Define and Implement Consumer Trust and Consumer Choice **metrics**
ICANN CONSENSUS POLICIES
Expired Registration Recovery Policy (ERP)

• Effective Date: 31 August 2013
• Purpose
  – Establish minimum communication requirements for registrars
  – Make renewal and redemption of registrations uniformly available
  – Align registrant expectations with registrar practices
• Link:
  http://www.icann.org/en/resources/registrarapolicies/consensus-policies/errp
## EDDP Requirement vs New EDDP Requirement

<table>
<thead>
<tr>
<th>EDDP Requirement</th>
<th>New EDDP Requirement</th>
</tr>
</thead>
</table>
| Registrar must publish fee charged for recovery of names during RGP on website    | 1. Registrar must publish renewal fees, post expiration renewal fees (if different), and redemption/restore fees on website;  
2. Must provide a link to fees in registration agreement; and  
3. Fees must be displayed on resellers’ websites.                                    |
| Registrar must send 2 renewal notices prior to domain name expiration            | Registrar must provide two notices of domain name expiration:  
1 month prior to expiration; and  
1 week prior to expiration  
If the name is not renewed by the registrant or deleted by the registrar within 5 days after expiration, registrar must send an additional expiration notice that includes instructions for renewal. |
| No Renewal Process Requirements                                                  | 1. Upon expiration until the time the registrar deletes the domain name, registrant is permitted by the registrar to renew the expired registration.  
2. Registrars may delete registrations any time after exp.  
3. Required DNS Resolution Interruption Period established in the ERRP.           |
| No Required Redemption Grace Period                                              | 1. Registries must offer a RGP of 30 days following the deletion of a registration, during which time the deleted registration may be restored; and  
2. During RGP, registry must disable DNS resolution and prohibit transfers.  
3. Registries must permit registrants to redeem deleted registrations during RGP. |
## 2013 RAA Effective Dates

### Effective Upon Registrar Signing

- **Must** enter into agreements with resellers (Section 3.12)
- Registration Data Directory Service Specification (Whois formatting)
- **Must** provide specific information to ICANN and publish on website:
  1. Correspondence address for the Registrar
  2. If the location or address of registrar’s principal place of business is different from the correspondence address, provide details including address, phone number, fax number and email address
  3. Officer(s) full name, contact information, and position
  4. Name of the ultimate parent entity of the registrar, if applicable
- **Must** provide notice to ICANN in 7 days of bankruptcy, convictions and security breaches (Section 3.20)
- Additional Reasons for Suspension and Termination (Sections 5.5 and 5.7)
- CEO Certification - Due 20 January 2014 (Section 3.15)
## 2013 RAA Effective Dates

<table>
<thead>
<tr>
<th>Effective 1 January 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Abuse Contact Requirements (Section 3.18)</td>
</tr>
<tr>
<td>- Description of Customer Service Handling Process (Section 3.7.11)</td>
</tr>
<tr>
<td>- Registrars and Resellers must provide a link to Registrant Benefits and Responsibilities (Sections 3.7.10 and 3.12.7)</td>
</tr>
<tr>
<td>- Whois Accuracy Program Specification</td>
</tr>
<tr>
<td>- Data Retention Specification</td>
</tr>
<tr>
<td>- Additional Registrar Operation Specification (DNNSEC, IDNs and IPV6)</td>
</tr>
<tr>
<td>- Section 2.2 of the Registration Data Directory Service Specification RE: Whois Service Level Agreement</td>
</tr>
<tr>
<td>- Registrars and Resellers must comply with the Proxy and Privacy Registration Program established by ICANN (Sections 3.12.4 and 3.14)</td>
</tr>
</tbody>
</table>
New gTLD Readiness Update
## New gTLD Compliance Readiness Plan

### Operational Readiness

- **✓ Dedicated resources**
- **✓ Reviewed and assessed operational needs and changes**
- **✓ Developed and implementing readiness plan**
- **➢ Enhance the complaint system to accept IDN & new complaint types**
- **➢ Prepare standard complaints communication templates**
- **✓ Designed an audit strategy**
- **➢ Design new gTLD metrics**
- **➢ Plan Outreach activities**

**Note:** Approach is based on proactive, automated monitoring and leveraging ICANN-wide tools
New gTLD Readiness Based on AGB

Timeline

Planning Phase
• Determine Ry contract obligations
• Assess how to monitor/audit obligations
• Identify needs
• Create Readiness Plan

Contracting Phase:
• Compliance Onboarding

Delegated Phase - Automated Processes:
• Data Escrow
• Monthly Reports
• Reserved Names
• Wildcard Redirection
• Code of Conduct
• DNS Zone File Transfer
List of new gTLD Complaints

New gTLD Complaints:
1. Reserved Names
2. Abuse Contact Data
3. Registry Operator Code of Conduct
4. Sunrise Period
6. Dispute Resolution Process
   • Public Interest Commitments,
   • Registry Restriction Dispute,
   • Uniform Rapid System,
   • Trademark Post Delegation Dispute
7. Code of Conduct

Internal, Monitoring-driven Complaints:
1. Data Escrow
2. Monthly Reports
3. Reserved Names
4. Wildcard Redirection Prohibition
5. Service Level Agreement
6. DNS Zone File to EBERO
7. Code of Conduct

NOTE: Complaints will follow compliance model
Contractual Compliance Metrics

Year to date metrics provided on slides 46 - 54
## Contractual Compliance
### Complaints per Notification Cycle
#### Apr 2013 - June 2013

<table>
<thead>
<tr>
<th>Complaint Summary</th>
<th>Apr – Jun Total Complaints Processed</th>
<th>Apr – Jun Total New Complaints Received</th>
<th>Apr – Jun Complaints Closed</th>
<th>Complaints Remaining Open After June 30</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>10,098</td>
<td>7,110</td>
<td>5,534</td>
<td>1,082</td>
</tr>
</tbody>
</table>

**Closure Rate 55%**

43% complaints closed before sending to Registrar

![Closure Rate Graph](chart.png)
Compliance Operations Scorecard

Complaint Count of June 2013

- UDRP 1.6%
- Transfer 16.9%
- Renewal/Redemption...
- Data Escrow Miss 1.1%
- Data Escrow Audit 0.6%
- Customer Service 30.0%
- Whois Inaccuracy 46.7%
- Whois Unavailable 0.6%

Registrar TAT

- Avg TAT 1st Notice: 11.2
- Avg TAT 2nd Notice: 12.1
- Avg TAT 3rd Notice: 5.3

June 2013

CC Staff TAT

- Avg TAT Open 1st Notice: 1.4
- Avg TAT 2nd WIP: 2.9
- Avg TAT 3rd WIP: 5.9
- Avg TAT Closed: 7.7

Complaint Count

<table>
<thead>
<tr>
<th>Category</th>
<th>June 2013</th>
<th>YTD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Service</td>
<td>568</td>
<td>4,368</td>
</tr>
<tr>
<td>Data Escrow Audit</td>
<td>11</td>
<td>23</td>
</tr>
<tr>
<td>Data Escrow Miss</td>
<td>21</td>
<td>44</td>
</tr>
<tr>
<td>Renewal/Redemption</td>
<td>46</td>
<td>382</td>
</tr>
<tr>
<td>Transfer</td>
<td>320</td>
<td>2,353</td>
</tr>
<tr>
<td>UDRP</td>
<td>31</td>
<td>330</td>
</tr>
<tr>
<td>Whois Inaccuracy</td>
<td>884</td>
<td>7,550</td>
</tr>
<tr>
<td>Whois Unavailable</td>
<td>11</td>
<td>58</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,892</strong></td>
<td><strong>15,108</strong></td>
</tr>
</tbody>
</table>

Closure Rates

May 2013 | June 2013
---|---
Volume Received All | 3,548 | 2,417
Volume Received Curr Month | 2,475 | 1,892
Volume Open Carryover | 642 | 244
Volume Closed | 1,834 | 1,335

- Closure Rate Received All (%) | 51.69 % | 55.23 %
- Closure Rate Curr Month (%) | 56.57 % | 55.71 %
- Closure Rate Before 1st Notice (%) | 42.78 % | 48.28 %
- Closure Rate Before 2nd Notice (%) | 4.57 % | 3.81 %
- Closure Rate Before 3rd Notice (%) | 1.21 % | 1.78 %
- Closure Rate Before Enforcement WIP (%) | 0.06 % | 0.00 %
- Open Carryover Rate (%) | 18.09 % | 10.10 %
### Registrar TAT Detail

Business Days/Complaint

<table>
<thead>
<tr>
<th>Service</th>
<th>Avg TAT 1st Notice</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact Update</td>
<td>6.0</td>
</tr>
<tr>
<td>Data Escrow Audit</td>
<td>5.4</td>
</tr>
<tr>
<td>Data Escrow Missed Weekly</td>
<td>6.0</td>
</tr>
<tr>
<td>Domain Renewal</td>
<td>6.0</td>
</tr>
<tr>
<td>Financial Transaction</td>
<td>6.2</td>
</tr>
<tr>
<td>Redemption</td>
<td>6.0</td>
</tr>
<tr>
<td>Registrar Contact</td>
<td>5.1</td>
</tr>
<tr>
<td>Transfer</td>
<td>5.8</td>
</tr>
<tr>
<td>UDRP</td>
<td>4.2</td>
</tr>
<tr>
<td>Whois Inaccuracy</td>
<td>17.6</td>
</tr>
<tr>
<td>Whois Unavailable</td>
<td>6.0</td>
</tr>
</tbody>
</table>

### Percent Registrars with Complaints

January 2012 ... June 2013

- 59.7% Europe
- 65.6% Asia/Australia/Pacific
- 35.4% North America
- 66.7% Latin America/Caribbean
- 14.3% Africa
- 0.0% Unknown

### Monthly New Complaint Volume

- May 2012: 10,000
- June 2012: 8,000
- July 2012: 6,000
- August 2012: 4,000
- September 2012: 2,000
- October 2012: 0
- November 2012: 0
- December 2012: 0
- January 2013: 0
- February 2013: 0
- March 2013: 0
- April 2013: 0
- May 2013: 0
- June 2013: 0
Compliance Operations Scorecard (3)

New, Processed & Closed Complaint Volume

Closure Rate matching complaint received volume

Positive Trend in closing complaints BEFORE sending to Registrar
Learn more about ICANN Compliance

http://www.icann.org/en/resources/compliance

Please send general questions to Compliance@icann.org

Subject line: ICANN47 Contractual Compliance
Thank you
Contractual Compliance Process & System Accomplishments

Standardized business processes & procedures for:

- Domain Redemption
- Domain Renewal
- Enforcement Notices
- Transfer
- Registrar Contact
- UDRP
- Whois Inaccuracy
- Whois Unavailability

✓ Standard correspondence templates
✓ Enabled consistent process for all complaint types, system & user self-help

Systems
✓ Migrated multiple ticket systems into one consolidated system
✓ Migrated Internic.net complaint forms to ICANN.ORG
✓ Revamped web navigation and added ~50 FAQs for complaint submittal
✓ Email notice subject line to Registrars follow standard layout
✓ Complaint notices sent to contact email from RADAR (ie. Transfer contact-> Transfer)
✓ Pulse survey invite to all Reporters and Registrars in complaint closure email

Metrics
✓ Public metrics published monthly at MyICANN.org (12 month rolling data)
✓ Public & Operational Compliance metrics
Complaint Life-Cycle

Complaint Processing Simple Steps
1) Reporter submits a complaint
2) ICANN Staff manages the complaint via the process
3) Complaint is then resolved and closed
Complaint Submission Landing Page

Complaint Submission
1) Find & read about complaint type
2) Complete complaint FORM

http://www.icann.org/en/resources/compliance/complaints
Step 1: Fill out complaint form

Complaint Submission
1) Answer questions
2) Preliminary edit checks are performed at this point
3) Enter Captcha data
Step 2: Fill out complaint form (continued)

Complaint Submission
1) Answer questions
2) Enter ‘Submit’
Step 3: “submit another” or Stop

NEXT STEPS

• System checks that include: duplicate report submissions within 45 days (applies to Whois Inaccuracy only), Domain Status and valid domain name checks.
• The reporter may be asked for clarifying information
• Reporter must reply to a confirmation email request within 5 days or the complaint will be closed.
AGREEMENT BETWEEN USER AND ICANN
The ICANN Contractual Compliance Bulk Whois Complaint Submission Tool (“Bulk Tool”) Pilot Program is offered to you conditioned on your acceptance without modification of the terms and conditions herein.

Please read the following terms of use and disclaimers carefully before using the Bulk Tool. By accessing or using the Bulk Tool, you agree to the terms and conditions, and all applicable laws. If you do not agree to these terms, you will not be allowed to use the Bulk Tool.

TERMS AND CONDITIONS

1. The Bulk Tool is subject to ICANN’s modification and enhancements, without notice as deemed necessary.
2. The Bulk Tool may be suspended by ICANN at any time if in its discretion ICANN deems it necessary.
3. Login information for the Bulk Tool is personal to you, and must not be shared with others.
4. Each user is limited to submitting no more than 100 Whois inaccuracy complaints through the Bulk Tool per calendar week. A calendar week starts on Sunday at 00:00 UTC. Additional submissions beyond 100 per week will be rejected. ICANN in its sole discretion may modify the submission limit with advance notice to the users and registrars.

5. Bulk submissions shall use current Whois data and may only be submitted in the data format specified by ICANN.

6. Bulk submissions shall not be used to harass ICANN, any ICANN-accredited registrar, or any domain name registrant or contact.

7. ICANN will review Bulk Tool submissions for validity, and improper tickets will be rejected by ICANN. Bulk Tool submissions must contain sufficient information to allow ICANN to validate each complaint independently. Factors to determine validity include, but are not limited to, complaint data quality and contactability (ability to reach Whois contacts).
8. ICANN will conduct periodic reviews or audits of user's Bulk Tool submissions to: (i) determine compliance with these terms and conditions; and (ii) improve ticket validity levels. Users that do not demonstrate improvement for identified issues may have their Bulk Tool user access suspended or revoked.

9. ICANN may suspend or revoke Bulk Tool user access (either permanently or temporarily) for violations of these terms and conditions. Any suspension or revocation of Bulk Tool user access shall apply to single and multiple ("Submit another") Whois inaccuracy submissions.

10. Bulk Tool users must collaborate with ICANN to submit test data through a test Bulk Tool that conforms to these Terms of Use before being allowed to submit to production Bulk Tool.

11. Any and all information submitted to the Bulk Tool can be submitted to an ICANN-accredited Registrar or any other party that ICANN may need to notify related to a Bulk Tool submission. ICANN will not consider or treat any information submitted through the Bulk Tool as confidential.

12. ICANN retains that right to revise these terms and conditions at any time without notice.
Contractual Compliance

Metrics

2013 YTD
Contractual Compliance
Complaints per Notification Cycle
Jan 2013 - Jun 2013

<table>
<thead>
<tr>
<th>Complaint Summary</th>
<th>Jan – Jun Total Complaints Processed</th>
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<th>Jan – Jun Complaints Closed</th>
<th>Complaints Remaining Open After June 30</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>25,397</td>
<td>15,108</td>
<td>15,256</td>
<td>1,082</td>
</tr>
</tbody>
</table>

Closure Rate 60%

Backlog
During 2013 = 9,059
After June = 1,082

36% complaints closed before sending to Registrar

Closed Before 1st Notice = # tickets received AND closed without any notice being sent to a registrar
Complaints per Notification Cycle
January - June 2013

- Processed
- Received
- Closed Before 1st Notice
- 1st Notice
- 2nd Notice
- 3rd Notice
- Closed

January: 47
February: 47
March: 47
April: 47
May: 47
June: 47
Contractual Compliance - Global Complaint Trend
January – June 2013

North America

Europe

Asia/ Australia/ Pacific

Latin America

Africa - 0

Global Complaint Count Trend

Thousands

Global Complaint Count Trend

Jan-13  Feb-13  Mar-13  Apr-13  May-13  Jun-13

2.5  2.4  2.7  2.5
Contractual Compliance - Global Registrar Response TAT
January – June 2013

North America

Europe

Latin America

Asia/ Australia/ Pacific

Africa: no activity

TAT = Average Turn Around Time, in Business Days
### Complaints per Domain Volume
**January – June 2013**

<table>
<thead>
<tr>
<th>Region</th>
<th>Domain Volume/Million</th>
<th># Complaints</th>
<th>% Complaints per Domain Volume</th>
</tr>
</thead>
<tbody>
<tr>
<td>N. America</td>
<td>100.6M</td>
<td>5,516</td>
<td>.005%</td>
</tr>
<tr>
<td></td>
<td>741</td>
<td>262</td>
<td>35.4%</td>
</tr>
<tr>
<td>Latin America</td>
<td>1.3M</td>
<td>276</td>
<td>.021%</td>
</tr>
<tr>
<td></td>
<td>24</td>
<td>16</td>
<td>66.7%</td>
</tr>
<tr>
<td>Europe</td>
<td>22.8M</td>
<td>1,530</td>
<td>.007%</td>
</tr>
<tr>
<td></td>
<td>159</td>
<td>95</td>
<td>59.7%</td>
</tr>
<tr>
<td>Asia/A/P</td>
<td>23.2M</td>
<td>4,024</td>
<td>.017%</td>
</tr>
<tr>
<td></td>
<td>160</td>
<td>105</td>
<td>65.6%</td>
</tr>
</tbody>
</table>

**Legend**
- March 2013 Domain Volume/Million
- # Complaints
- % Complaints per Domain Volume
- # registrars per region
- # registrar w/ Complaints
- % registrars with complaints per region

*Note: “# registrars per region” data may contain some obsolete registrars but is retained for reporting history*
# Complaint Types and Phases

January – June 2013

## All Complaints Received by Type

<table>
<thead>
<tr>
<th>Prevention Phase</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Service</td>
<td>4,368</td>
</tr>
<tr>
<td>Data Escrow Review</td>
<td>23</td>
</tr>
<tr>
<td>Data Escrow Miss</td>
<td>44</td>
</tr>
<tr>
<td>Transfer</td>
<td>2,353</td>
</tr>
<tr>
<td>UDRP</td>
<td>330</td>
</tr>
<tr>
<td>Renewal/Redemption</td>
<td>382</td>
</tr>
<tr>
<td>Whois Unavailable</td>
<td>58</td>
</tr>
<tr>
<td>Whois Inaccuracy</td>
<td>7,550</td>
</tr>
<tr>
<td>Total Complaints</td>
<td>15,108</td>
</tr>
</tbody>
</table>

## Enforcement Phase

<table>
<thead>
<tr>
<th>Enforcement Phase</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breach</td>
<td>47</td>
</tr>
<tr>
<td>Suspension</td>
<td>0</td>
</tr>
<tr>
<td>Terminated/Non-Renewal</td>
<td>7</td>
</tr>
</tbody>
</table>

15,108 Complaints
54 Enforcement Actions
Complaint Types and Phases
January - June 2013

15,108 Complaints
54 Enforcement Actions

### All Complaints Received by Type

<table>
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<th>Quantity</th>
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<tbody>
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### Enforcement Phase

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<th>Action</th>
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<tbody>
<tr>
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<td>7</td>
</tr>
</tbody>
</table>

---

**January - June 2013**

- Whois Inaccuracy: 50.0%
- Transfer: 15.6%
- Customer Service: 28.9%
- Data Escrow Audit: 0.2%
- Data Escrow Miss: 0.3%
- Whois Unavailable: 0.4%
- UDRP: 2.2%
- Renewal/Redemption: 4.0%