



ICANN | 53 
Buenos Aires

21-25 JUNE 2015





Registrars & Law Enforcement: RAA Whois Accuracy Spec Review

24 June 2015

Agenda

- ⦿ Introduction / Staff Update
- ⦿ Registrar Stakeholder Group's Comments
- ⦿ Law Enforcement Representatives' Comments
- ⦿ Discussion and Q&A

2013 RAA Whois Accuracy Specification



- New to the 2013 RAA
- Product of law enforcement recommendations and registrar-ICANN negotiations
- Substantial new requirements for ICANN-accredited registrars to validate and verify registration information
- Spec calls for review terms and conditions, in consultation with the Registrar Stakeholder Group
- The review is currently underway (in public comment)

Summary: Whois Accuracy Specification

For registrant and account holder data, registrars must:

- Validate for empty, required fields
- Validate for proper form of data
- Perform cross-field validation of postal address fields*
- Verify functionality of email address or telephone number by obtaining an affirmative response
 - Manual verification required if account holder fails to respond within 15 days
 - Manual verification or suspension required if registrant fails to respond within 15 days

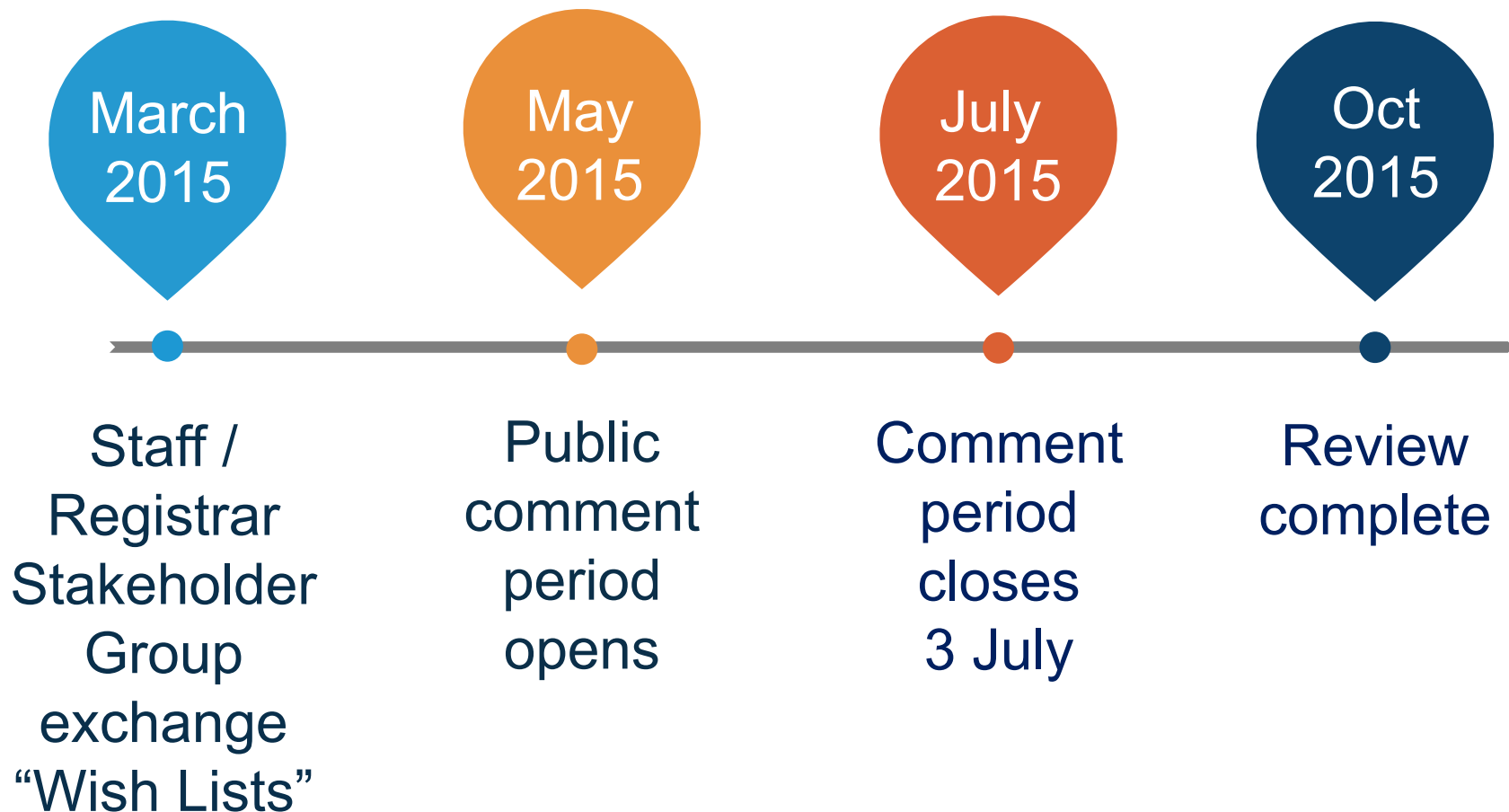
*Cross-field validation not required until registrar working group identifies technically and commercially feasible tools for cross-field validation.

Summary: Whois Accuracy Specification

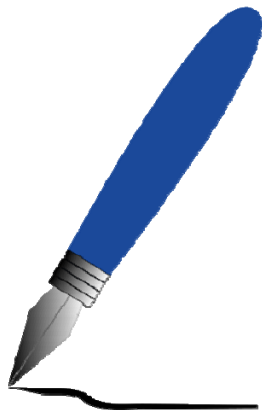
Triggers:

- Validation and verification required within 15 days of registration, transfer-in, or any change to contact data
- [Re-]verification of email address required if registrar has information suggesting it is incorrect (e.g., bounced message)
- Termination or suspension required if registrant:
 - Willfully provides inaccurate or unreliable Whois information, or
 - Does not respond within 15 days to registrar's inquiry, until registrar has validated the information

Timeline: Whois Accuracy Specification Review



Staff Recommendations



Staff input:

- Based primarily on Compliance team's experience with the specification
- Identified areas of frequent confusion
- Seeks clarification of existing requirements (not substantive changes)

Staff Recommendations (cont'd)

- Define “validation” and “verification,” as terms sometimes don’t translate well into other languages

Verification: The process by which a registrar confirms or corrects the accuracy of Whois data by contacting and receiving an affirmative response from the Registered Name Holder.

Validation: The process by which a registrar ensures that the format of Whois data is consistent with standards.

- Clarify meaning of “manual verification”

Staff Recommendations (cont'd)

- Clarify that validation and verification are not required upon renewal (solely because a domain renews)
- Clarify that suspension is required if validation fails after fields are changed (not just if verification fails)
- Registrars should be required to validate and verify Whois information if a domain has been suspended due to inaccurate Whois data.

The current text says registrars must “validate” data in this circumstance, but presumably, the data already passed the validation check, so verification seems to have been the intent.



Registrar Stakeholder Group:

Proposed Updates to Whois Accuracy
Specification

RrSG Proposed Updates

- Require validation/verification only when a domain is registered, not for transfers or other changes
- Consider allowing non-UPU formatting sources
- Eliminate the cross-field validation requirement
- Provide registrars leeway to use alternative processes for email and telephone number verification
- Require validation and verification of changed fields only when a change is “substantial”
- Provide a 45-day window for a registered name holder to respond to a registrar’s verification requests
- Review the Whois accuracy specification annually
- Explicitly allow registrars to comply via third-party services

Law Enforcement:

Proposed Updates to Whois Accuracy Specification

Discussion & Community Q&A

Please Submit Public Comments!

The public comment period closes **3 July 2015**.

Please file public comments at
<https://www.icann.org/public-comments/2013-whois-accuracy-spec-review-2015-05-14-en>.

Engage with ICANN



Thank You and Questions

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