



#ICANN50



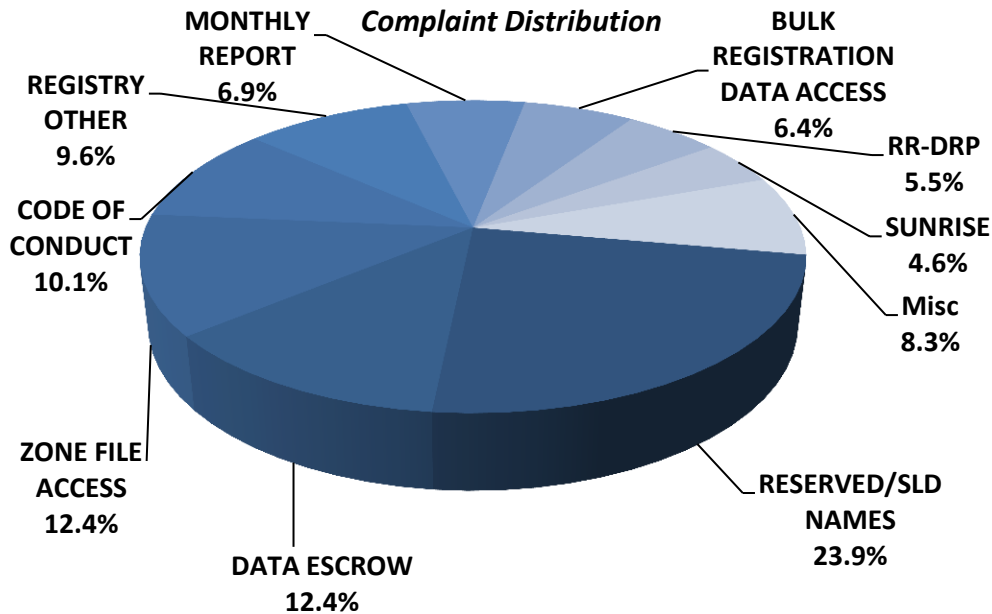
Contractual Compliance

Registries Outreach for Delegated TLDs

Thursday, 26 Jun 2014

Contractual Compliance – Mar 2014 – May 2014

Registry Complaint Types



Registry TAT	(in days)
Avg TAT 1st Notice	6.6
Avg TAT 2nd Notice	2.9
Avg TAT 3rd Notice	n/a

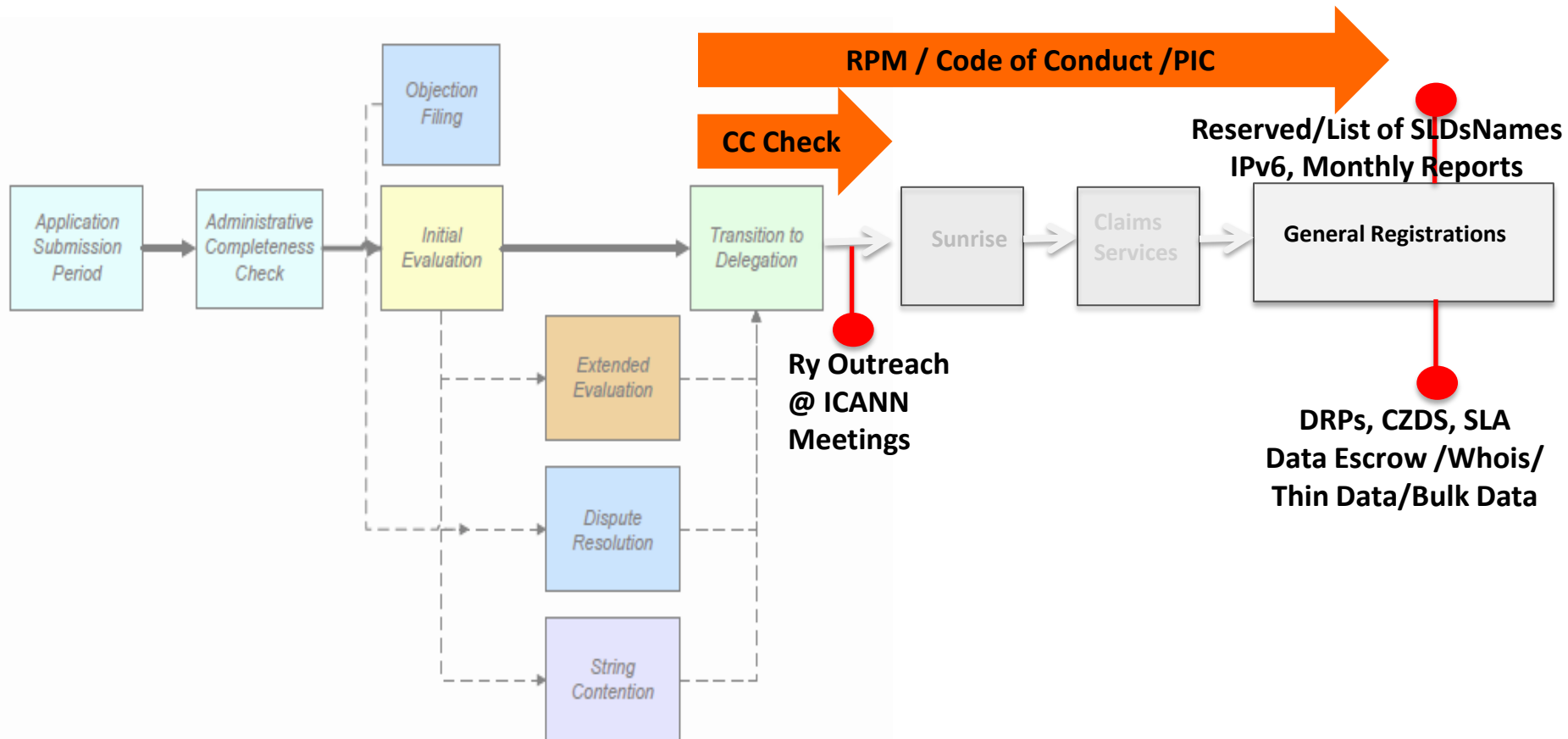
Enforcements	
Volume Breach	0
Volume Termination	0

* 'Registry Other' breakdown:	Qty
Customer Service	3
Pricing	3
Invalid Registrar	1
Publish Data	1
Miscellaneous	13
TOTAL	21

REGISTRY Complaints	Qty
ABUSE CONTACT DATA	4
BULK REGISTRATION DATA ACCESS	14
BULK ZFA	1
CLAIMS SERVICES	3
CODE OF CONDUCT	22
DATA ESCROW	27
MONTHLY REPORT	15
PIC-DRP	2
REGISTRY OTHER*	21
RESERVED/SLD NAMES	52
RR-DRP	12
SLA	2
SUNRISE	10
URS	4
WILDCARD PROHIBITION	2
ZONE FILE ACCESS	27
Total Complaints Processed	218
Total Complaints Closed	197

New Registry Agreement Efforts

Applicant Guidebook Timeline



Link to ICANN.org:

<http://www.icann.org/en/resources/compliance/registries>

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Compliance Scope

- The Registry Agreement and applicable Consensus Policies
- The Dispute Resolution Procedures
 - Public Interest Commitments
 - Community Registration Restrictions
 - Trademark Post-Delegation
 - Uniform Rapid Suspension
- The Sunrise Processes
- The Claims Services Processes
- The Audit is limited to the representations and warranties in Article 1, and the covenants in Article 2

Complaint Management Guidelines

Registry receives an inquiry or a notice...now what?

- **Please RESPOND** directly to the email
- Do NOT edit subject line
- Attachments should not be greater than 4MB
- Attachment file formats .pdf, .doc(x), .txt

Lessons Learned Since ICANN 49

- RPM: Allocation of domain names before Sunrise outside of allowed exceptions
- RPM: Failure to send LORDN timely
- Abuse Contact Data: failure to comply with website posting
- PIC: Missing mandatory provision in RRA
- End-User Zone File Access: Delayed response / Invalid denial
- Data Escrow: Missing registry operator's notification
- Monthly Reports: both reports required

Lessons Learned & Guidance

Zone File Access Requirements

Specification 4, Section 2 of the RA

- Act upon requests for zone file access via CZDS

Issue	Registry taking too long to respond
Guidance	Be open and transparent: Establish, publish and adhere to a policy that informs end-users by when they should reasonably expect a response

Lessons Learned & Guidance

Zone File Access Requirements

Specification 4, Section 2.1 - 2.3 of the RA

- Reasons to deny or revoke access to zone files

Issue

1. Registry denying access because not yet in sunrise
2. Registry denying access until requestor proves lawful purposes

Guidance

Neither is a valid reason to deny access – Three reasons per RA:

- (i) failure to satisfy credentialing requirements of §2.1.2
- (ii) not providing correct or legitimate credentialing requirements of §2.1.2
- (iii) reasonable belief that requestor will violate terms of §2.1.2

Lessons Learned & Guidance

Reserved Names

Article 2.6 and Specification 5 Section 3.3 of the RA

- Additional character strings may be blocked at additional time

Issue

Consumer Confusion – consumer belief that ICANN mandated that name to be reserved

Guidance

Be open and transparent

When denying registrations due to reserved names per Spec 5, Section 3.3, consider not using the same statement used for names that are not in the mandatory list of reserved names

Lessons Learned & Guidance

List of SLDs to Block

Specification 6, Section 6 of the RA

- Registries must block the names on the List of SLDs to Block

Issue

Consumer Confusion

Guidance

Be open and transparent

Consider whether statements can be made to inform the end-user that the name cannot be registered because it is in the List of SLDs to Block

Lessons Learned & Guidance

List of SLDs to Block

Specification 6, Section 6 of the RA

- Registries must block the names on the List of SLDs to Block

Issue	Not returning a NXDOMAIN
Guidance	Proper implementation should return NXDOMAIN message when DNS is queried

Lessons Learned & Guidance

Trademark Clearinghouse Rights Protection Mechanisms Requirements

Sections 2.1.1 & 2.2.4

- To “Allocate” is to “designate, assign, or otherwise earmark” a Domain Name (DN). Subject to exceptions, a Registry Operator can’t Allocate a DN to a registrant that is not a Sunrise-eligible rights holder prior to the Allocation or registrations of all Sunrise-Registrations.

Issue	Improper Allocation/ earmarking before sunrise ends
Guidance	Improper Allocation occurs irrespective of sunrise preemption or whether the earmarking was converted to a registration

Lessons Learned & Guidance

Data Escrow

Specification 2 Part A Section 7 of the RA

- Daily deposits and two daily notifications to ICANN: one from the Registry Operator; and another from the Escrow Agent

Issue

ICANN not receiving the notification corresponding to the Registry Operator

Guidance

Ensure both notifications are received daily by ICANN

Post –Delegation Procedures

1. URS – one valid complaint received
2. Registry Restriction DRP & TM Post-Delegation DRP: zero complaints or referrals received
3. Public Interest Commitments
 - zero complaints received
 - Included in new registry agreement audit plan

ICANN 49 Outreach Q&A follow up:

Question: Where can registries get the full list of country and territory names, and how can we get updates when it is amended?

Answer: ICANN is working on providing a full list; updates are announced and published via ICANN website.

ICANN 49 Outreach Q&A follow up:

Question: Can you explain the difference between corrective and preventive action? What is the root cause?

Answer: A corrective action remediates the deficiency; it might/might not prevent similar failures.

A preventive action is intended to permanently prevent the failure from happening again.

ICANN does not ask for a full root cause. It listened to the feedback provided by registries and modified its templates. It is asking now for reasonably detailed explanation of the cause of the non-compliance.

ICANN49 Singapore Outreach Q&A follow up:

Question: CZDS Interface

Answer:

In order to use the CZDS interface, the registry must:

- must create a username and profile at: <https://czds.icann.org>
- Registry Operator's CZDS Contact will become "Super Manager"
- The Super Manager has authority to enter into the Terms & Conditions of the CZDS agreement on behalf of the Registry Operator.
- For further guidance, please see the GDD Portal Guidance document, which can be downloaded in the [GDD Portal](#).

ICANN50 London Outreach Q&A follow up:

- Q: Whether a power of attorney is required to grant ICANN the power to enter into the Terms & Conditions (T&Cs) with a CZDS end-user on behalf of the Registry Operator
- A: No. The T&Cs are entered into between the Registry Operator and the end-user. Per Specification 4, Section 2, ICANN only facilitates and administers it as the Centralized Zone Data Access Provider. The Registry Operator agreed to this process upon signing of the registry agreement.

Thank You

Please send general questions:

To: Compliance@icann.org

Subject line: **ICANN50 Compliance Registry
Outreach Session**

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