

2013 RAA Whois Accuracy Program Specification Review

18 March 2015

Staff Comments & Observations

The observations below were primarily provided by ICANN's Compliance team, and are based on their experience in enforcing the 2013 RAA's [Whois Accuracy Program Specification](#) (the "Specification") and on registrar feedback received during the course of compliance inquiries. The "Sections" below refer to the enumerated sections of the Specification unless described otherwise.

Section 1

1. It would be helpful to clarify the difference between "validation" and "verification" or use different terminology. (Apparently the distinction is often lost in translation.)
2. Would it also be helpful to clarify what is intended by "manual verification" in Sections 1, 2, and 4, in order to help to prevent unnecessary suspensions of domain names?
3. We might wish to make explicit that validation & verification are not required upon renewal (absent a change to contact data, etc.). Similarly, we might clarify that data can be validated / verified before registration (to help prevent suspension of new registrations).

Section 2

1. Section 2 requires registrars to revalidate and reverify changed fields. If the registrant does not respond to the verification attempt, the registrar must either manually verify the data or suspend the registration. The section should be more explicit that suspension would also be required if the validation failed.

Section 5

1. This section currently reads: "Upon the occurrence of a Registered Name Holder's willful provision of inaccurate or unreliable WHOIS information, its willful failure promptly to update information provided to Registrar, or its failure to respond for over fifteen (15) calendar days to inquiries by Registrar concerning the accuracy of contact details associated with the Registered Name Holder's registration, Registrar shall either terminate or suspend the Registered Name Holder's Registered Name or place such registration on clientHold and clientTransferProhibited, until such time as Registrar has **validated** the information provided by the Registered Name Holder." We believe **verification** should be required, in addition to validation, where a domain name was suspended due to inaccurate Whois data, since the inaccurate data presumably passed validation checks already.