Contractual Compliance Registrars Outreach

With focus on AP

March 27, 2014

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Agenda

+ Asia Pacific Compliance Metrics

+ General Contractual Compliance Review and Guidelines

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Contractual Compliance - Nov 2013 – Feb 2014 Complaints per Domain Volume

Europe

23.5M	1,184	.005%
169	119	70.4%

N. America

101.7M	4,026	.004%
759	329	43.3%

Asia/A/P

24.6M	3,654	.015%
172	134	77.9%

Latin America

1.2M	62	.005%
24	22	91.7%

Africa

12,944	5	.039%
7	5	71.4%

LEGEND

November 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

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Enforcement Activity - AP

Notice Reasons
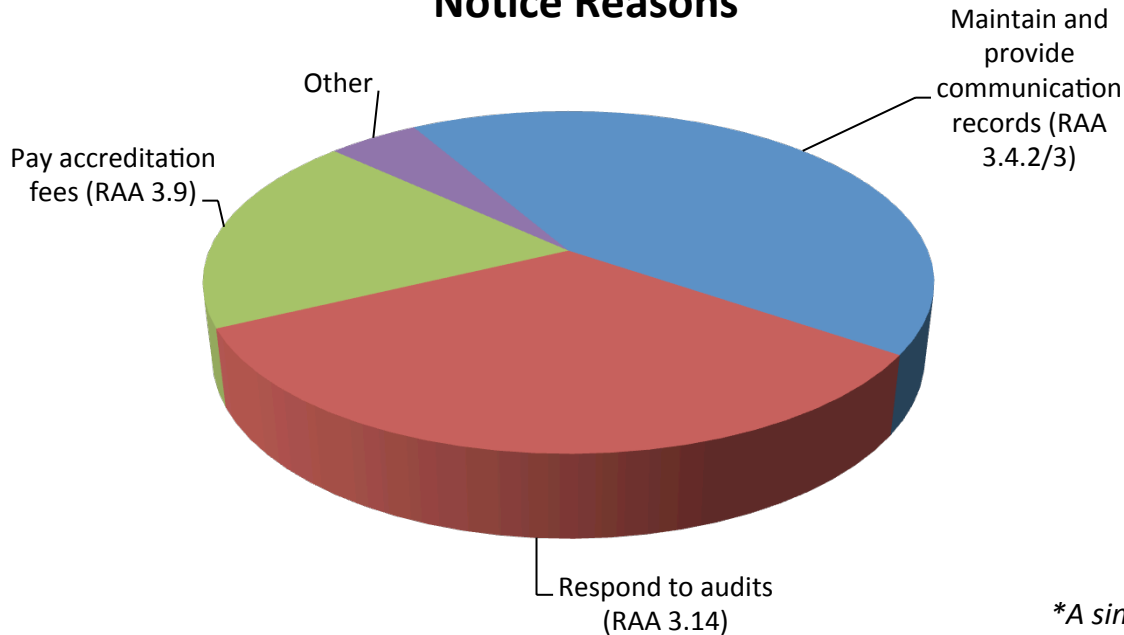
Notices	Qty
Breach	6
Suspension	0
Termination	3

Breach Notice Reason*	Qty
Failure Notice Reasons	21
➢Cured	15
➢Not Cured	6

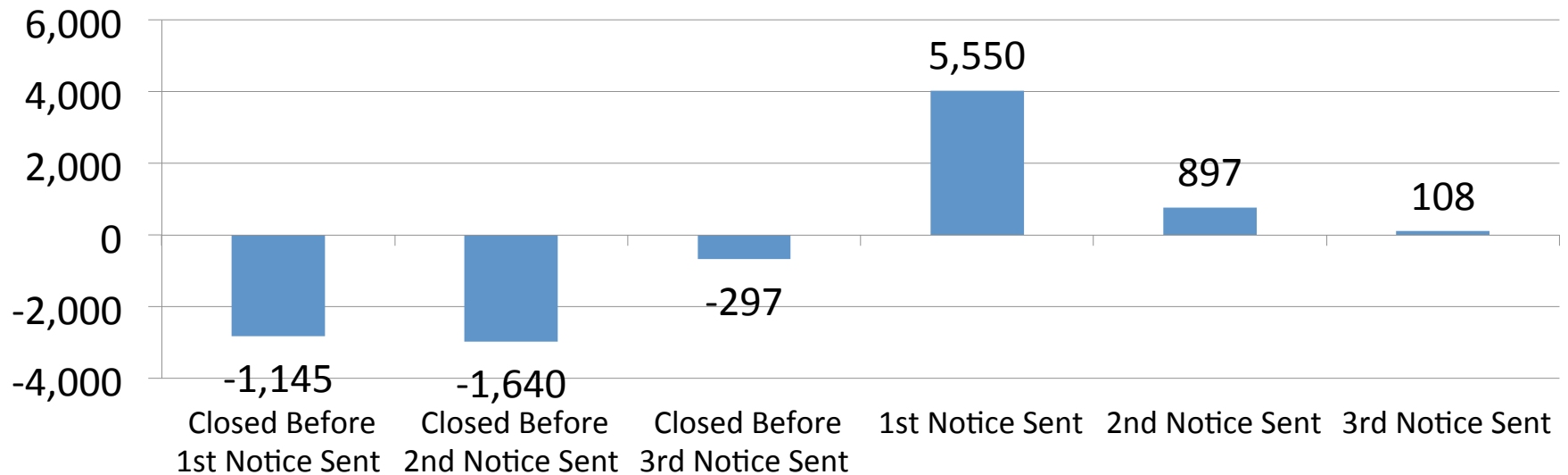*A singe Breach may contain multiple Notice Reasons.*

Enforcement Notice Reasons	%
Maintain and provide communication records (RAA 3.4.2/3)	42.9%
Respond to audits (RAA 3.14)	33.3%
Pay accreditation fees (RAA 3.9)	19.0%
Other	4.8%

Complaints per Notification Cycle - AP
Nov 2013 – Feb 2014

Closure Rate 61%

Complaint Summary	Nov - Feb Total Complaints Processed	Nov - Feb Complaints Closed	Nov - Feb Complaints Remaining Open	Complaints Remaining Open After Oct 31
	5,119	3,135	1,984	679

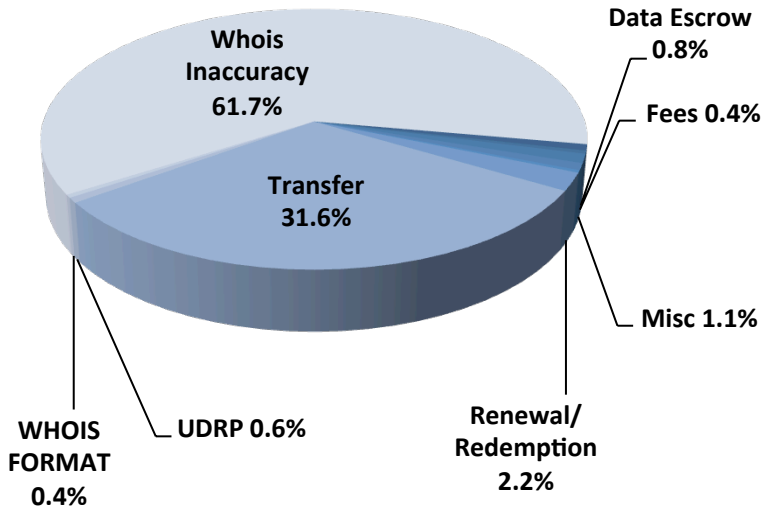**22% complaints closed before sending to Registrar**

Compliance Scorecard – AP Only
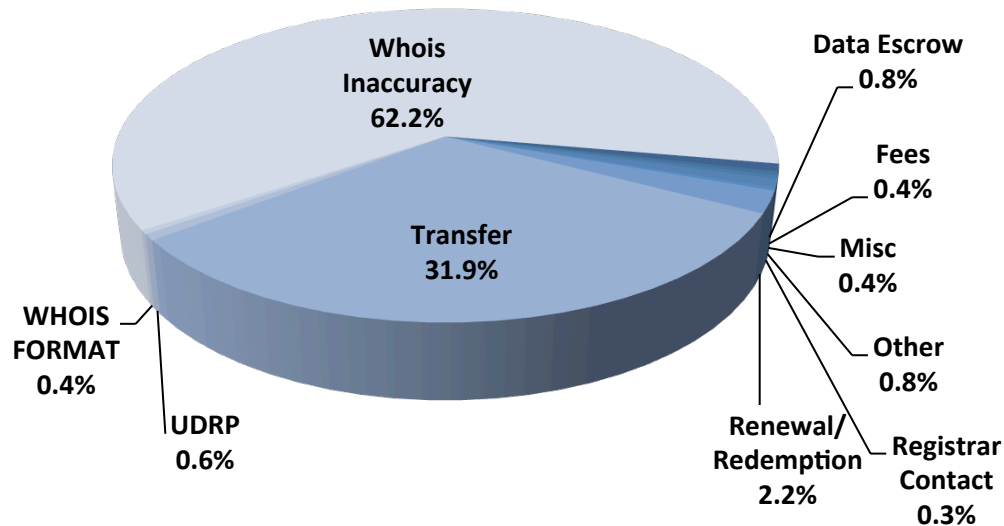# Nov 2013 – Feb 2014

Complaint Distribution

Pie chart labels:
- Whois Inaccuracy 61.7%
- Transfer 31.6%
- Data Escrow 0.8%
- Fees 0.4%
- Misc 1.1%
- Renewal/Redemption 2.2%
- UDRP 0.6%
- WHOIS FORMAT 0.4%

	Monthly Complaints	Sub-total
REGISTRAR	3,654	
REGISTRY	28	
Total New Complaints Received		**3,682**
Total Prior Months Carryover		**1,437**
Total Complaints Received		**5,119**
	Complaints Closed	
Volume Closed Before 1st Notice	1,145	
Volume Closed Before 2nd Notice	1,640	
Volume Closed Before 3rd Notice	297	
Volume Closed Before Enforcement WIP	39	
Volume Closed After Enforcement	14	
Total Closed		**3,135**
	Complaints Open (Carryover)	
Volume Open Before 1st Notice Sent	612	
Volume Open in 1st Notice Sent	1,160	
Volume Open in 2nd Notice Sent	163	
Volume Open in 3rd Notice Sent	41	
Volume Open After Enforcement All	8	
Total Remaining Open (Carryover)		**1,984**
Carryover- at end of period	1,686	**1,686**
	Enforcements	
Volume Breach	6	
Volume Termination	3	

Registrar/Registry TAT - Nov-13 - Feb-14	(in days)
Avg TAT 1st Notice	12.3
Avg TAT 2nd Notice	8.6
Avg TAT 3rd Notice	10.4
CC Staff TAT - Nov-13 - Feb-14	
Avg TAT Open-1st Notice	1.7
Avg TAT 2nd WIP	2.3
Avg TAT 3rd WIP	7.6
Avg TAT Received-Closed	10.4

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Complaint Types and Phases - AP
Nov 2013 – Feb 2014

Complaint Distribution

Registrar TAT	(in days)
Avg TAT 1st Notice	12.3
Avg TAT 2nd Notice	8.6
Avg TAT 3rd Notice	10.4

Enforcements	
Volume Breach	6
Volume Termination	3

REGISTRAR Complaints

Type	Quantity
ABUSE CONTACT DATA	1
CUSTOMER SERVICE	1
Data Escrow	28
Fees	14
Other	31
Registrar Contact	11
REGISTRAR INFO SPEC	3
Renewal/Redemption	82
Transfer	1,165
UDRP	23
WHOIS FORMAT	14
Whois Inaccuracy	2,272
Whois Unavailable	9
Total Complaints Processed	**3,654**
Total Complaints Closed	**3,120**

Complaint Types and Phases - AP
Nov 2013 – Feb 2014

Complaint Distribution
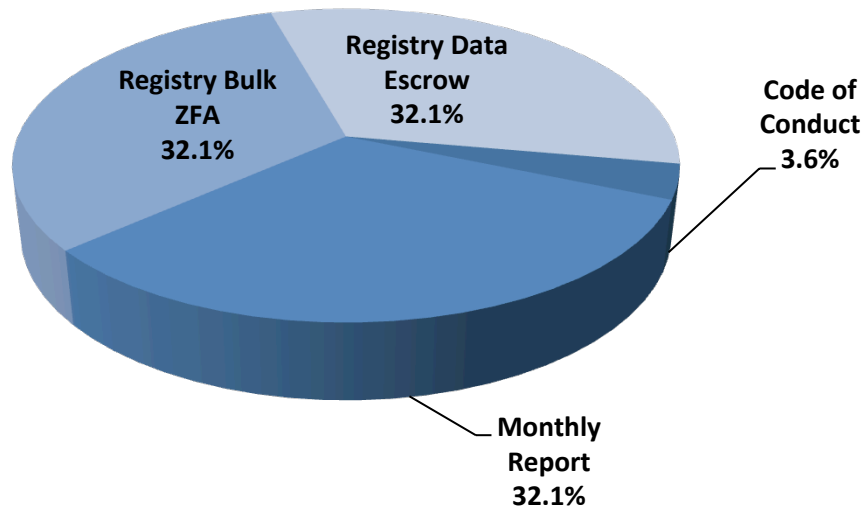
| REGISTRY Complaints	
Type	Quantity
Code of Conduct	1
Monthly Report	9
Registry Bulk ZFA	9
Registry Data Escrow	9
Total Complaints Processed	28
Total Complaints Closed	15

Registry TAT	(in days)
Avg TAT 1st Notice	4.8
Avg TAT 2nd Notice	n/a
Avg TAT 3rd Notice	n/a

Enforcements	
Volume Breach	0
Volume Termination	0

Domain Name Life Cycle

http://archive.icann.org/en/registrars/gtld-lifecycle.jpg
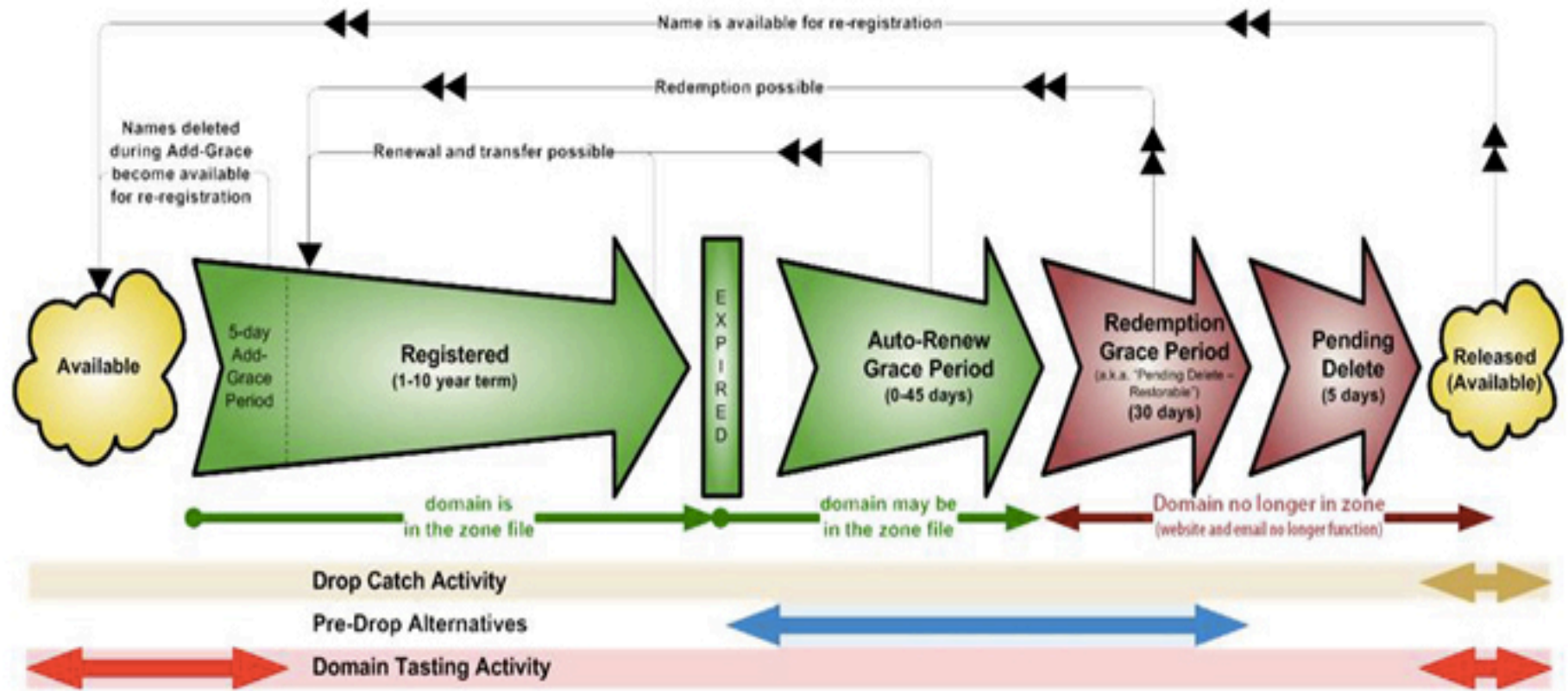
Agreement & Domain Name Life Cycle

Record Retention – Life of Domain name + 3 years (2 years for 2013 RAA)

1-10 years

0–45 days

30 days

5 days

Registration

Registrar Obligations Related To:
Registration agreement
Account Information
Commands to Registry
Whois

Registrar Obligations Related To:
Inter Registrar Transfer (IRTP)
Whois Accuracy
Expired Domain Deletion (EDDP)
Expired Registration Recovery (ERRP)
Whois Updates
Commands to Registry
Potential Events:
Transfer Dispute Resolution (TDRP)
Ownership Disputes and UDRP

Expiration

Delete

Auto-Renew

Pending Delete

Redemption Grace Period (RGP) Pending Delete Restorable

Registrar Contact Data

Point of contact with registrar and where compliance communications, notices and enforcement are sent

- Keep the contact information in ICANN's Registrar Database (RADAR) up-to-date

To change/update Primary Contact
Download and complete the primary contact update form http://www.icann.org/en/registrars/primary-contact-update-form-en.pdf and fax it to ICANN at +1-310-823-8649.

For questions regarding contact data, please contact registrar@icann.org.

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Registrar Web Posting Obligations
Section 3.16 (2009 RAA); Section 3.17 (2013 RAA)

- Provide valid contact details including e-mail and mailing addresses

- Provide a link to ICANN's Registrant Educational Materials at: http://www.icann.org/en/resources/registrars/registrant-rights-responsibilities

- Use the ICANN-accredited registrar logo

- 2013 RAA: Additional requirements in Section 3.17 & Registrar Information Specification

Registrar Data Escrow (RDE)
Section 3.6

- Registrars with registered names are required to deposit registration data into escrow

- ICANN monitors the data deposits to ensure that they:

  - Are made on schedule (daily/weekly)

  - Correspond to each registrar's requirements (full deposit only vs. full and incremental deposits)

  - Are valid in format and completeness

- Manual data escrow audits are performed upon request

Most typical Errors

- Data in deposit does not match Whois lookup
- Whois lookup blocked
- Incomplete header row (missing ICANN required fields)
- Deposit file is empty or only contains a header row
- Deposit file name is incorrect
- Handle file (if required) is missing from the deposit
- Not comma de-limited
- Full file and Handle file contains no header row

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How To Avoid Common Errors

Before you send your first deposit (in either a ZIP/TAR file), **VERIFY** its contents.

- Ensure it complies with the <u>ICANN RDE Specification</u>

- Periodically **CHECK** your deposits

- If you receive a 'Fail Audit' inquiry from ICANN, work with ICANN and Iron Mountain to resolve the issue ASAP

ICANN Consensus Policies

1. Uniform Domain Name Dispute Resolution Policy

- A fast, cost effective mechanism to resolve cybersquatting claims
- Neither registrar nor ICANN are parties to proceedings
- ICANN's role is to ensure registrars implement UDRP decisions

2. WHOIS Data Reminder Policy

- Intended to improve WHOIS accuracy
- Registrars' obligation is to send an annual reminder to registrants

3. Inter-Registrar Transfer Policy

- To provide domain portability and better consumer choice

4. WHOIS Marketing Restriction Policy

- Registrars to provide third party bulk-access to WHOIS under an agreement and set maximum annual fees chargeable by registrars at $10,000
- Prohibit use of WHOIS data for certain marketing purposes

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ICANN Consensus Policies

5. Restored Names Accuracy Policy

Requires registrars to place "Registrar Hold" status on a domain name until the registrant has provided updated and accurate Whois information under certain circumstances

6. Expired Domain Deletion Policy

Requires registrars to delete domain names if registrants do not consent to renewal after 2nd renewal reminder, barring extenuating circumstances requires registrars to post on their websites renewal fees and policy

7. Registry Services Evaluation Policy

Process and criteria for evaluating new registry services proposed by a registry operator

8. Add Grace Period Limits Policy (AGP)

Intended to curb domain tasting; Registry & registrar process.

9. Expired Registration Recovery Policy

Ensures that renewal and redemption of registrations are uniformly   available in prescribed circumstances; Registry & registrar obligation.

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ICANN CONSENSUS POLICIES
Inter Registrar Transfer Policy

Registrars must:

- Provide Auth-Info codes within 5 days of request, or

- Provide means for registrants to retrieve Auth-Info codes from control panel

- Receive FOA from Transfer Contact (<u>registrant or admin contact</u>), when acting as gaining registrar

- Provide means for registrants to unlock domains, or

- Unlock domain within 5 days of request

ICANN CONSENSUS POLICIES
Expired Domain Deletion Policy (EDDP)

Registrar is required to:

- Send at least 2 renewal reminders prior to the expiration of a domain name

- Inform registrants of the policy

- Publish the domain auto-renewal and deletion policy

- Post fees for recovering domains in Redemption Grace Period

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ICANN CONSENSUS POLICIES
Expired Registration Recovery Policy (ERRP)

- Purpose
  - Establish minimum communication requirements for registrars
  - Make renewal and redemption of registrations uniformly available in prescribed circumstances
  - Align registrant expectations with registrar practices
- Link: http://www.icann.org/en/resources/registrars/consensus-policies/errp

ICANN CONSENSUS POLICIES
Expired Registration Recovery Policy (ERRP)

Communication Requirements

- Specific times for sending renewal notices (1 month and 1 week prior to expiration).

- 3rd renewal notice required after 5 days (if no renewal and name is not deleted by Registrar).

- Renewal notices must be provided in the language of the registration agreement.

- Renewal notices must be communicated in a manner that does not require affirmative action to receive the notice.

ICANN CONSENSUS POLICIES
Expired Registration Recovery Policy (ERRP)

Communication Requirements (cont.)

- Renewal, post expiration renewal and redemption/restore fees must be clearly displayed on registrar's website and a link included in the registration agreement

- Registrars must ensure fees are displayed on resellers' websites

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ICANN CONSENSUS POLICIES
Expired Registration Recovery Policy (ERRP)

Renewal and Redemption

Renewal Requirements:

- Beginning at the time of expiration until the time the registrar deletes the domain name, the registrant must be permitted by the registrar to renew the expired registration.

- Registrars may delete registrations any time after exp.

- DNS Resolution Interruption Periods in the ERRP

  - Registrar deletion 0-8 days after expiration – registrar must interrupt the resolution path upon expiration

  - Registrar deletion 8 or more days after expiration – last 8 consecutive days after expiration, registrar must interrupt the resolution path

ICANN CONSENSUS POLICIES
Expired Registration Recovery Policy (ERRP)

Renewal and Redemption (Cont.)

Redemption Requirements:

- Registries must offer a Redemption Grace Period of 30 days immediately following the deletion of a registration, during which time the deleted registration may be restored at the request of the registrant by the registrar that deleted it.

ICANN CONSENSUS POLICIES
Uniform Domain Name Dispute Resolution Policy (UDRP)

Registrar must provide the following when responding to an ICANN inquiry regarding a UDRP matter:

- The correspondence in which they communicated to ICANN, the service provider and the parties

- The date for the implementation of the Decision & findings of the complaint

- The steps taken to address the complaint

- Link to UDRP providers – http://www.icann.org/en/help/dndr/udrp/providers

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UDRP Procedural Issues

- Registrar not responding to verification requests from service providers

- Complexity of matters involving "Mutual Jurisdiction"

- Complainants not providing information for registrars to update Whois

Registration Data & Records
Sections 3.4.2 & 3.4.3

Registrars are:

- Required to maintain and provide registration data and records of written communications

- Registrars are responsible for maintaining data and documents and providing them to ICANN regardless of the business model (reseller)

Examples of records

- Time stamped log of the execution of the Registration Agreement (per domain), or a paper copy

- Communications with the Registered Name Holder related to:
  - Auth-Info codes
  - FOAs
  - Renewal Reminders
  - WDRP Notices

- In electronic form, records of the accounts of all Registered Name Holders with Registrar, including dates and amounts of all payments and refunds

Registration Agreement

- Agreements should include all of the provisions required by Section 3.7.7 of the RAA -

  - <u>To be in compliance</u>: Must include the same or equivalent language in Sections 3.7.7.1 – 3.7.7.12 of the RAA.

<u>Note</u>: 3.7.7 Registrar shall require all Registered Name Holders to enter into an electronic or paper registration agreement with Registrar including at least the following provisions …

Whois Access
Section 3.3

Access –

- All ICANN-accredited registrars are required to provide public access to contact details for each domain name via the web and Port 43
- Additional Whois Service Level Agreement (SLA) in [2013 RAA](#)

Whois Inaccuracy
Section 3.7.8 (and 2013 RAA Whois Accuracy Program Specification)

- Registrars are required to take reasonable steps to investigate and correct Whois data inaccuracy claims

- To validate ICANN requests:
  - The **correspondence with the registrant,** including dates and times and means of inquiries (To/From), telephone number, e-mail addresses, and postal addresses used
  - Verification/validation under [Whois Accuracy Program Specification](#) of 2013 RAA
  - 2 Parallel Validation/Verification tracks for Whois inaccuracy

Whois Inaccuracy

ICANN's end goal is to obtain a fact-based response from the registrar that supports their actions to address the complaint.

Some fact based acceptable responses:
- A statement from the registrar stating that the updated data is accurate, because the domain is owned by the registrar itself.
- Whois changes showing that the domain has actually been suspended or cancelled.
- For registrant changes of Whois data or when registrants confirm that the information is accurate, ICANN requests copies of the communications (email or phone log) containing the DATE/TIME/TO/FROM fields.
- Other information available to registrar to confirm or correct the Whois data.

Whois Inaccuracy

Not acceptable:

- 'Still attempting to verify'.
- 'Registrant confirmed accurate' but no communications provided.
- Copy of communication provided, but not showing who it was sent to and from.
- 'Data updated' but Whois unchanged.
- Domain not suspended after 15 calendar days as required by 2013 RAA

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Common Registrar Issues

Whois Inaccuracy (2013 RAA)- 2 Mandatory Parallel Tracks

1. Per Section 4 of WHOIS Accuracy Specification

- Receipt of Notice starts 15-calendar day timeline.

- Registrar must verify or re-verify email address of the Registered Name Holder ("RNH") and if different, the Account Holder ("AH").

- Registrar must demonstrate an affirmative response from the RNH to verify.

- If Registrar does not receive affirmative response from the RNH within 15 days, the domain must be suspended or the registrar must provide proof of manual verification.

- If Registrar does not receive affirmative response from AH, must provide proof of manual verification. Suspension not required.

Common Registrar Issues

Whois Inaccuracy (2013 RAA) – continued

2. Per RAA Section 3.7.8/Section 5 of WHOIS Accuracy Specification

- Registrar sends inquiry to RNH- starts 15-calendar day timeline.
- ICANN looking for three results
    - 1. WHOIS updated (within 15 days of inquiry sent to RNH)
        - Registrar provides validation (and verified updates, including affirmative responses if previously verified email or phone was updated).
    - 2. No Response from RNH within 15 calendar days- Domain suspended/terminated until Registrar has validated information
    - 3. Registrar verified WHOIS information correct (within 15 days of inquiry sent to RNH) and Registrar has provided documentation of verification

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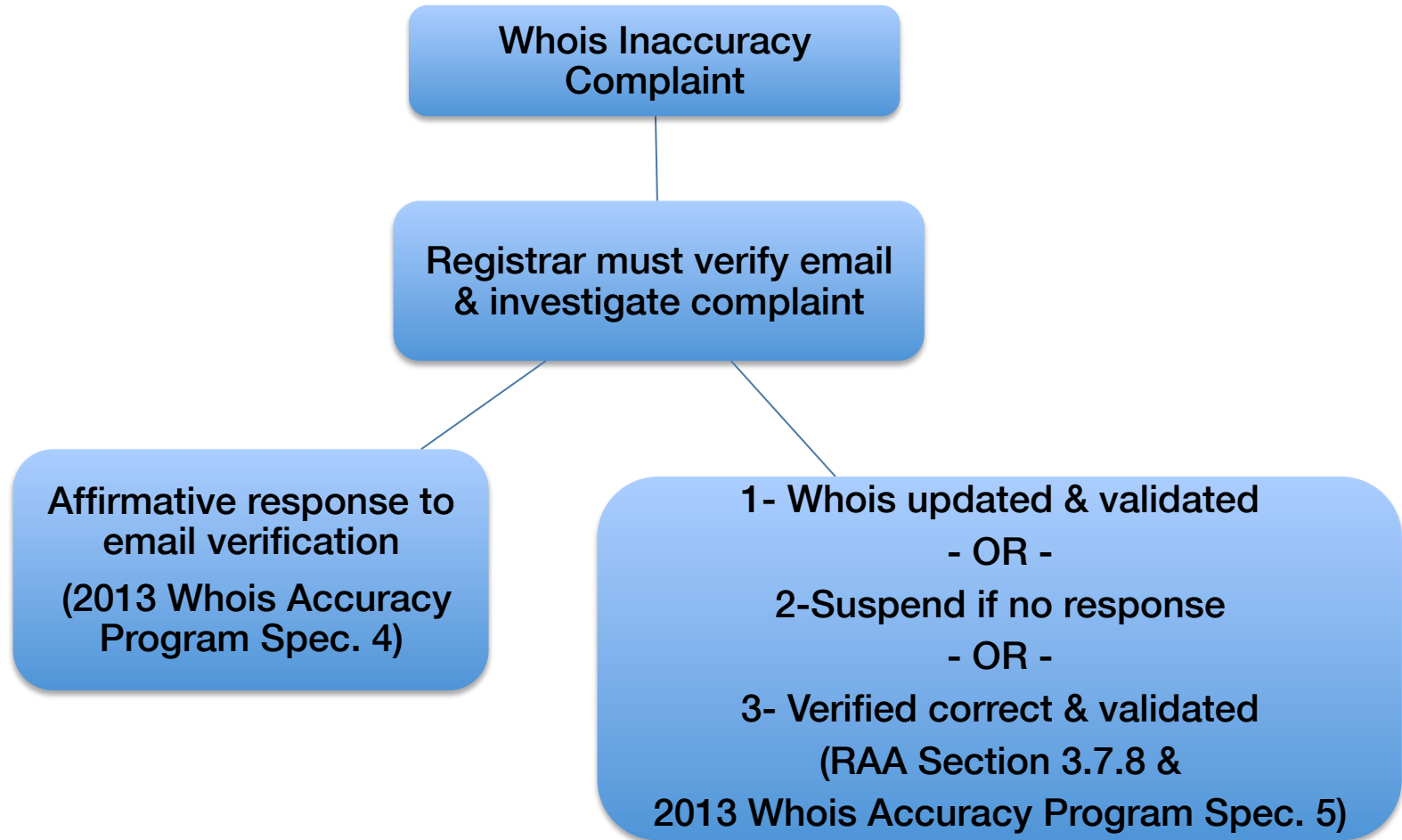Singapore
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Common Registrar Issues

Whois Inaccuracy (2013 RAA) – continued

- Beginning with the second notice, ICANN will inquire why registrars did not suspend or delete registrations. The 1st notice response deadline will remain 15 business days.

Whois Inaccuracy Example
2013 RAA

```
                    ┌──────────────────────────┐
                    │   Whois Inaccuracy       │
                    │   Complaint              │
                    └──────────────────────────┘
                                │
                    ┌──────────────────────────┐
                    │  Registrar must verify   │
                    │  email & investigate     │
                    │  complaint               │
                    └──────────────────────────┘
                       │                    │
        ┌──────────────────────┐   ┌──────────────────────────────────┐
        │ Affirmative response │   │ 1- Whois updated & validated      │
        │ to email verification│   │          - OR -                   │
        │                      │   │ 2-Suspend if no response          │
        │ (2013 Whois Accuracy │   │          - OR -                   │
        │ Program Spec. 4)     │   │ 3- Verified correct & validated   │
        └──────────────────────┘   │ (RAA Section 3.7.8 &              │
                                    │ 2013 Whois Accuracy Program Spec. 5)│
                                    └──────────────────────────────────┘
```

2013 RAA 12 New Complaint Types

Reseller Agreement Section 3.12	**Abuse** Section 3.18
CEO Certification Section 3.15	**Customer Service Handling Process** Section 3.7.11
Registrar Information Specification Section 3.17 and Registrar Information Specification	**Failure to Support DNSSEC, IDNs, and IPv6** Section 3.19 & Additional Registrar Operation Specification
Whois Format Registration Data Directory Service (Whois) Specification	**Privacy/Proxy Registration Program** Section 3.4.1.5 and Specification on Privacy and Proxy Registrations
Whois SLA Section 2.2 of Registration Data Directory Service (Whois) Specification	**Domain Not in DNS for Non-response to Whois inquiry** Whois Accuracy Program Specification
Failure to Display Trademark Notice Trademark Clearinghouse Rights Protection Mechanism Requirements	**Failure to Notify ICANN of Bankruptcy, Conviction or Security Breach** Section 3.20

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2013 RAA: Changes to Whois Inaccuracy

- Per Whois Accuracy Program Specification and Registration Data Directory Service (Whois) Specification

- <u>Additional</u> data that ICANN could request (examples):

  - Proof of validation at time of registration

  - Proof of verification of email address or telephone number

- <u>Additional</u> areas ICANN of review could include requests for:

  - Proof of manual verification or domain termination, suspension or registrar hold

  - 2 Parallel Verification/Validation Tracks

2013 RAA: Whois SLA

- Per Section 2.2 of Registration Data Directory Service (Whois) Specification

- ICANN review could include, for example, requests for:

  - Records and data

- ICANN further remediation review could include, for example, requests for:

  - Root Cause Analysis

  - Short-term corrective action

  - Long-term preventative action

2013 RAA: Whois Format

- Per Registration Data Directory Service (Whois Specification)

- Registrars required to match sample format in 2013 RAA

- ICANN review could include:
    - Review Whois format as part of other complaints
    - Check for required format and new fields
- 5 most common Whois formatting problems identified by ICANN:
    1. Extra fields/wording (e.g., links to registrar's website, sales information)
    2. Legal disclaimer before Registrant information
    3. Fields out of order
    4. Required fields missing
    5. Incorrect spacing (e.g., extra blank lines between fields or more than one space after the colon)

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2013 RAA: Changes to Registrant Rights and Responsibilities

- Per Registrants' Benefits and Responsibilities
- Must be linked to off of Registrar website
- Registrar must also provide links to Registrant Educational Materials
- ICANN review could include requests for items such as:
  - Screenshots
  - Website URLs

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2013 RAA: CEO Certification

- Per Section 3.15

- ICANN review could include:

  - Certification submitted in a timely manner

  - Certification meets RAA requirements

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2013 RAA: Registrar Information Specification

- Per Section 3.17 and Registrar Information Specification

- ICANN may check the website link for:
    - Correspondence Address for Registrar
    - If Principal Place of Business is Different Address, Telephone, Fax, Email
    - Full Name, Contact Information, and Position of All Officers
    - Ultimate Parent Entity of Registrar

- ICANN may request:
    - Proof of publication within 20 days of change
    - Website URLs
    - Screenshots

2013 RAA: Resellers

- Per Section 3.12
- ICANN may review:
  - Registrar/reseller written agreement
  - Resellers not allowed to use ICANN-accredited logo
  - Resellers must identify registrar upon request
  - Abide by Privacy/Proxy Specification (and Consensus Policies)
  - Resellers cannot cause registrar to breach RAA
  - Registrar must use efforts to ensure reseller compliance

2013 RAA: Domain Not in DNS for Non-Response to Whois Inquiry

- Per Whois Accuracy Program Specification
- ICANN review could include validation that domain was deleted/suspended, for example, in cases of:
  - Non-response within 15 days for Whois inquiry
  - Willful provision of inaccurate or unreliable contact information
  - Willful failure to update information within 7 days of change
- If registrar demonstrates compliance, ICANN will notify complainant to contact registrar directly regarding reactivation.

2013 RAA: Abuse Reports

- Per Section 3.18
- ICANN review could include, for example, validation of:
  - Abuse contact email is on the website
  - That registrar publishes on the website a description of the procedures for the receipt, handling, and tracking of abuse reports
  - Registrar took reasonable and prompt steps to investigate and respond to reports
  - 24/7 abuse point of contact's dedicated email & phone
  - Review within 24 hours of well-founded reports of illegal activity
  - Maintain abuse reports and responses for 2 years (or as permitted by applicable law)

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2013 RAA: Customer Service Handling Process

- Per Section 3.7.11
- ICANN requests could include, for example:
    - Copy of customer service handling process
    - Link to customer service handling process on website
    - Written communications with Registered Name Holder regarding notification of customer service handling process

2013 RAA: Support DNSSEC, IDNs, and IPv6

- Per Section 3.19 and Additional Registrar Operation Specification

- ICANN requests could include, for example:

  - Communications with customers and/or registries

  - Records and Policies

- DNSSEC-specific request:

  - All such requests shall be transmitted to registries using the EPP extensions specified in RFC 5910 or its successors.

- IDN-specific request:

  - Compliance with Additional Registrar Operation Specification

2013 RAA: Privacy/Proxy Registration Program

- Per Section 3.4.1.5 and Specification on Privacy and Proxy Registrations

- ICANN review could include requests, for example, of:

  - Website URLs

  - Screenshots

  - Documents and records pertaining to this Specification

2013 RAA: Notify ICANN of Bankruptcy, Conviction or Security Breach

- Per Section 3.20
- ICANN review could include requesting:
  - Proof of bankruptcy proceeding
  - Proof of conviction
  - Detailed description of breach, how it occurred, the number of registrants affected, and any action registrar took in response (breach itself is not grounds for compliance action)
- <u>Note</u>: Disclosure and collaboration with ICANN is a factor when considering escalated compliance action.
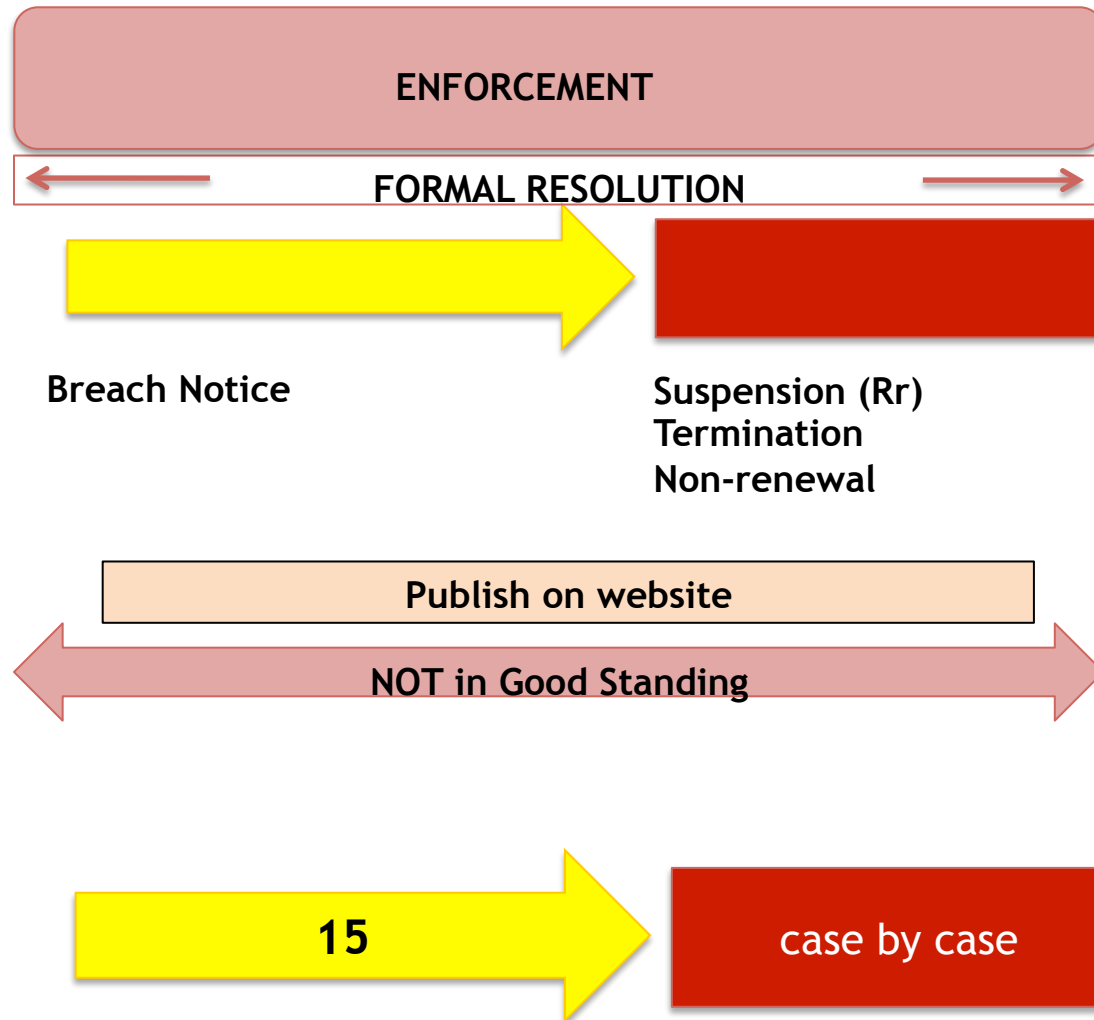
2013 RAA Links

- 2013 RAA:
http://www.icann.org/en/resources/registrars/raa/approved-with-specs-27jun13-en.htm

- 2009/2013 RAA redline:
http://www.icann.org/en/resources/registrars/raa/approved-with-specs-21may09-redline-27jun13-en.pdf

- 2013 RAA FAQ (includes links to materials for 4 webinars)
http://www.icann.org/en/resources/registrars/raa/faqs

Enhanced Enforcement Tools

- Broadened suspension and termination rights:

  - Cybersquatting

  - Misleading information in renewal applications

  - Material breach 3 times within 12 months

  - Conviction of corporation, officer, or board member

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Enforcement Phase

ENFORCEMENT

FORMAL RESOLUTION

Breach Notice

Suspension (Rr)
Termination
Non-renewal

Publish on website

NOT in Good Standing

15

case by case

Registrar Suspension Update

Suspension Criteria (section 2.1 in 2009 RAA)

… suspend a registrar's **ability to create new** registered names or **initiate inbound transfers** of registered names for one or more TLDs for **up to a twelve (12) month**

→ *Additional suspension options in 2013 RAA*

Suspension Duration:

1. X days up to 12 months

2. Suspend until termination

   - Not cured and/or No or little effort

3. Suspend pending cure

   - Work underway to cure and/or Work not completed

[Frequently Asked Questions Link](#)

Suspension Communication

Breach Notice Period
- Monitor progress during breach period
- Heads-up to potential registry operators re a "potential" suspension

Suspension Notice
- Communicate Suspension to registrar
- Communicate Suspension to potential registry operators
- Publish suspension notice

Suspension Period
- Validate with registrar (checkpoint)
- Monitor the registrar's registration activities
- Inform relevant registry ops of next steps

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Additional Resources

- Learn more about ICANN Compliance

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

Thank You

Please send general questions:
To: **Compliance@icann.org**
Subject line: **ICANN49 Registrar Outreach Session**

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