ICANN

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Singapore

# 2013 Registrar Accreditation Agreement FAQs

ICANN Singapore

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Agenda

- 2013 RAA Statistics

- How to Request 2013 RAA and Process Time

- New Website Posting Requirements

- Whois Accuracy + RDDS Specification

- Dealings with Resellers

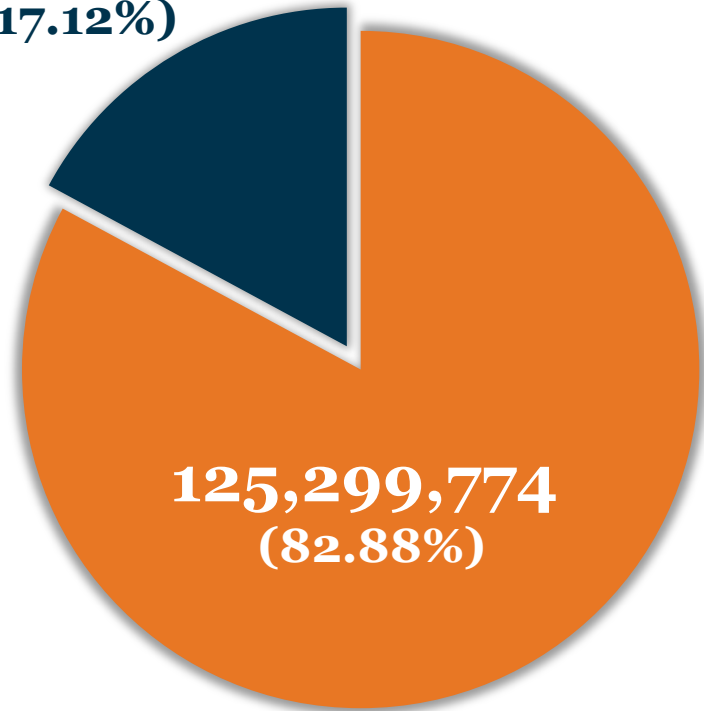- Transfer of Accreditation to Wholly-owned Subsidiaries

- Compliance

- 2013 RAA Statistics

- Adopting the 2013 RAA

2013 RAA Statistics

335
(33.17%)

675
(66.83%)
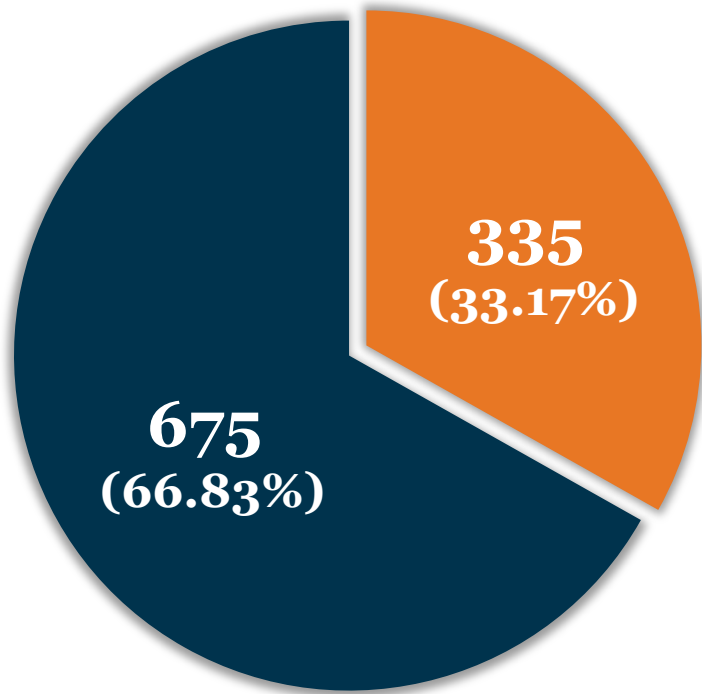
Total Registrar Count – 1008

25,878,274
(17.12%)

125,299,774
(82.88%)

Domains Under Management

2013 RAA ●   2009 RAA ●

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Adopting the 2013 RAA
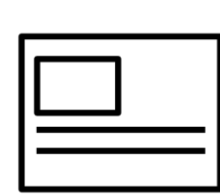
- To request the 2013 RAA, fill out the early adoption form on ICANN website

- Process:
  - Submit Form
  - ICANN acknowledges receipt
  - ICANN runs preliminary compliance check
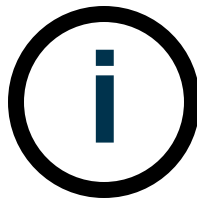 - If approved, ICANN sends Registrar Information Specification and 2013 RAA to the Registrar via DocuSign

New Requirements: Registrars' Websites

Website Requirements

- Provide links to the following:

  - 3.7.10 Registrants' Benefits and Responsibilities Specification

    - https://www.icann.org/en/resources/registrars/registrant-rights/benefits

  - 3.16 Link to Registrant Educational Information

    - https://www.icann.org/en/resources/registrars/registrant-rights/educational

Website Requirements (cont.)

- ## 3.17 Registrar Information Specification

  - Defines items that a Registrar must publish on its website:

    - Item 7. Correspondence Address for the Registrar

      - Must be able to accept notice of legal process

    - Item 11. If the location or address of Registrar's principal place of business is different from the address provided in 7, provide details including address, phone number, fax number and email address.

    - Item 17. Full name, contact information and position of all officers of the Registrar

    - Item 22. The ultimate parent entity of Registrar (if applicable)

Website Requirements (cont.)

- **3.18.1 Abuse Contact**
  - Publish an email address to receive such reports on the homepage of Registrar's website
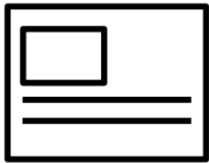
- **3.18.3 Tracking Abuse**
  - Supply a description of registrar's procedures for the receipt, handling and tracking of abuse reports

✦ Whois Accuracy

✦ RDDS (Whois)
Specification

Whois Accuracy Specification

- Required as of 1 January 2014

- Requires validation and verification of registrant and account holder data

- Deletion or suspension of registrations now explicitly required in cases of:
  - Willful provision of inaccurate / unreliable data (RAA 3.7.7.2)
  - Willful failure to update data promptly (RAA 3.7.7.2)
  - Failure to respond to registrar data accuracy inquiry within 15 days (Section 4 of Whois Accuracy Spec)

Whois Validation

- Registrant and account holder "validation" required within 15 days of:
  - Registration
  - Transfer
  - Registrant or account holder data change
    - Required fields must be filled (RAA 3.3.1)
    - Email addresses format specified (RFC 5322)
    - Telephone numbers format specified (ITU-T E.164)
    - Postal addresses format specified (UPU S42)
    - Cross-field validation (not required until mutual agreement between ICANN and WG) (Transition Addendum)

Whois Verification

- Registrant & account holder "verification" required:

    o Within 15 days of registration, transfer, or registrant or account holder data change, email address or telephone number verification is required (1(f) of Whois Accuracy Spec)

    o Within 15 days of bounce or other evidence of inaccuracy – email verification required (4 of Whois Accuracy Spec)

- Verification process requires affirmative response

    o Non-response by registrant requires either manual verification by registrar or suspension

    o Non-response by account holder requires registrar to perform manual verification only

Whois Accuracy Specification Exceptions

- Verification / validation not required if:
  - Previously performed by registrar on identical data
  - Registrar has no reason to believe the data has become inaccurate or invalid
    - Example: Whois inaccuracy complaint or email bounce back

+ # Whois Accuracy Examples

Example 1: Updated Postal Address

- Registered Name Holder updates its postal address

- Registrar must:

  - Validate that the postal address is the proper format (Section 1(d) of Whois Accuracy Spec)

- Registrar is not required to:

  - Re-verify the email address or the telephone number (Section 1(f))

Example 2: Updated Email Address

- Registered Name Holder updates its email address

- Registrar must:

  o Validate that the email address is the proper format (Section 1(d) of Whois Accuracy Spec)

  o Verify the email address if registrar previously verified the email address pursuant to 1(f)(i). If registrar verified this registered name holder through a telephone number 1(f)(ii), registrar does not have to verify the email address. (unless reason to believe it is inaccurate)

Example 3: Updated Telephone Number

- Registered Name Holder updates its telephone number

- Registrar must:
  - Validate that the telephone number is the proper format (Section 1(c) of Whois Accuracy Spec)
  - Verify the telephone number if registrar verified tel. numbers pursuant to 1(f)(ii). If registrar verified this registered name holder through an email address 1(f)(i), registrar does not have to verify the telephone number.

New Requirements: RDDS ("Whois") Specification

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New Whois Requirements

- Requirements in RDDS Specification

- Additional Whois fields required

- Uniform Whois query and output formats

- EPP status values required exclusively

- SLA for Whois service (Section 2.2 of RDDS Spec)

- IPv6 accessibility required

- Port 43 Whois only required for "thin" registries (RAA 3.3.1)
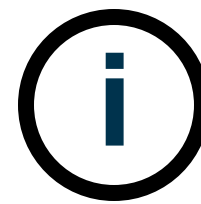
New Whois Fields
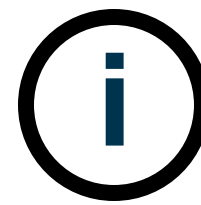
- ## As of 1 January 2014

  - Registry Domain ID
  - Registrar Abuse Contact Email
  - Registrar Abuse Contact Phone
  - Domain Status
  - Registry Registrant ID
  - Registrant Phone
  - Registrant Phone Ext

  - Registrant Fax
  - Registrant Fax Ext
  - Registrant Email
  - Registry Admin ID
  - Registry Tech ID
  - DNSSEC
  - Last update of WHOIS database

Output Field Details

- Registry Domain ID
  - Does not change for length of registration

- Registrar Abuse Contact Email and Phone
  - Registrar discretion, separate from LEA contact in RAA 3.18.2

- Domain Status – EPP status codes

- IDs: Registry Registrant, Registry Admin, Registry Tech
  - May be left blank if not available from registry

- DNSSEC:
  - Two options:
    - DNSSEC: signedDelegation
    - DNSSEC: unsigned

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- Relationship with Resellers

- Compliance Certificate

- Transfer of Accreditation to Wholly-owned Subsidiary

How Registrars Can "Ensure"

- Examples:
    - Include all of reseller obligations in the agreement between your registrar and its resellers and attach consequences for contract non-compliance

    - Implement monitoring processes whereby your registrar periodically looks at its resellers' websites to ensure compliance with certain RAA obligations (such as website posting requirements)

    - Include annual reporting requirements in the agreement between your registrar and its resellers that would require resellers to provide evidence that they are in compliance with RAA obligations

Compliance Certificate

- Section 3.15 of RAA

  o Registrar shall complete and deliver to ICANN within twenty (20) days following the end of each calendar year, a certificate executed by the president, chief executive officer, chief financial officer or chief operating officer (or their equivalents) of Registrar certifying compliance with the terms and conditions of this Agreement.

- Form is Compliance Certificate (Table of Contents – 11)

Transfer of Accreditation to Wholly-owned Subsidiary

- Section 7.3.1 of RAA

- Required documentation:
  - Documentation proving that the transferee entity is, in fact, a wholly-owned subsidiary of the ICANN-accredited registrar.
  - A letter, on company letterhead, from the ICANN-accredited registrar (the transferor) acknowledging that it would like to transfer its accreditation to the transferee
  - A letter, on company letterhead, from the transferee, acknowledging that it assumes and will be responsible for all the existing obligations and liabilities of the Transferer
  - Primary Contact Update (if applicable)

✦ Compliance

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WHOIS Inaccuracy Verification & Validation Summary

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

o The domain must be suspended or the registrar must provide proof of manual verification.

o 1st notice response deadline will remain 15 business days.

o Beginning with the second notice, ICANN will inquire why registrars did not suspend or delete registrations.

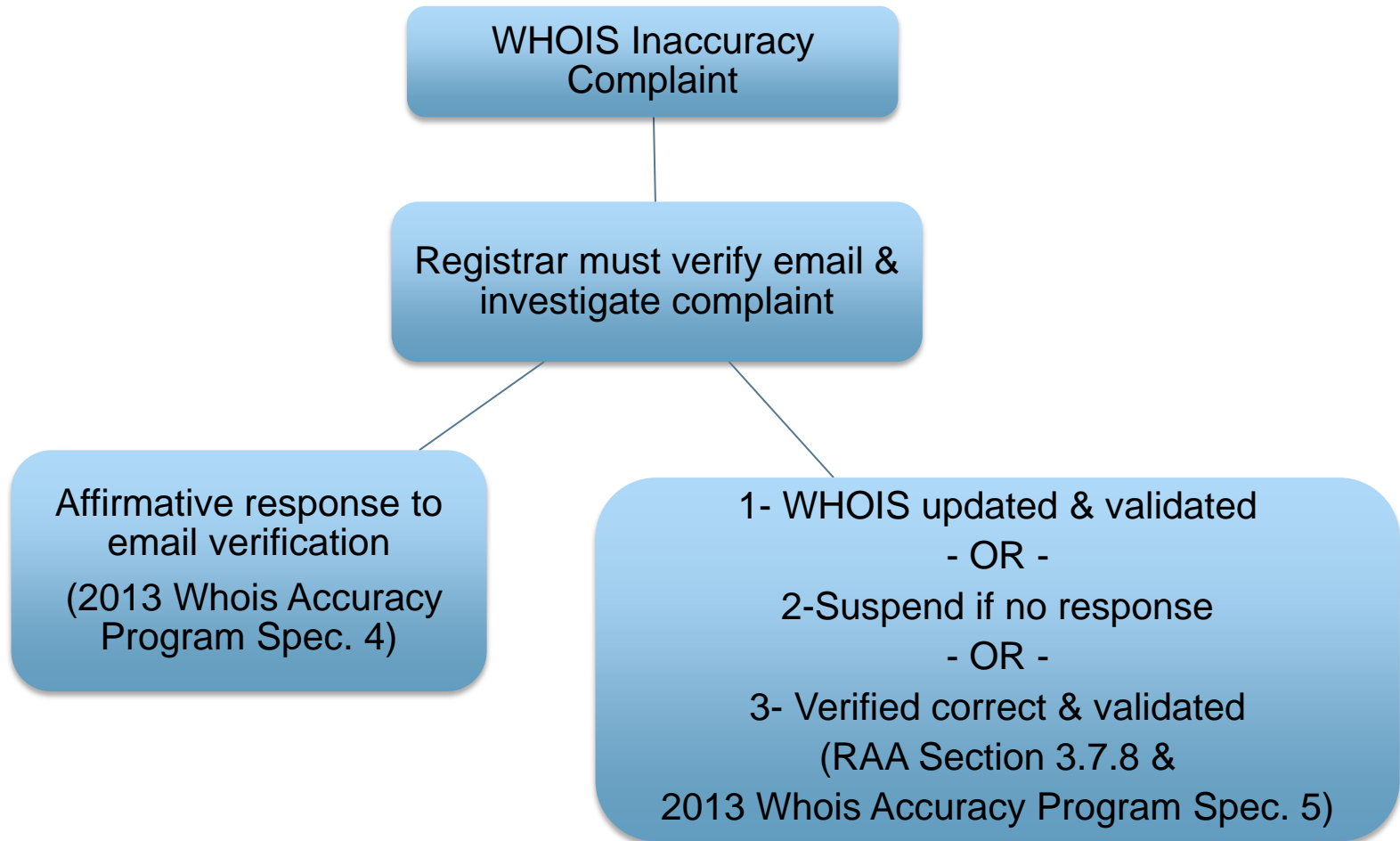o 2 concurrent parallel tracks (next 2 slides)

Whois Inaccuracy

- ## Section 3.7.8 RAA & 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

Whois Inaccuracy Requirements

- Section 4 of WHOIS Accuracy Specification

  o Receipt of Notice starts 15-calendar day timeline.

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

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

  o 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.

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

Whois Inaccuracy Example 2013 RAA

WHOIS Inaccuracy Complaint

Registrar must verify email & investigate complaint

Affirmative response to email verification

(2013 Whois Accuracy Program Spec. 4)

1- WHOIS updated & validated
- OR -
2- Suspend if no response
- OR -
3- Verified correct & validated
(RAA Section 3.7.8 &
2013 Whois Accuracy Program Spec. 5)

Abuse Reports Requirements

- ## Section 3.18 of the 2013 RAA

  - Registrars must take reasonable and prompt steps to investigate and respond appropriately to any reports of abuse

  - Law enforcement reports: can be from any applicable jurisdiction

  - Registrars must include abuse email & phone number in Whois output

  - Abuse email address must be conspicuously on website, and cannot be a web form

  - Registrars cannot require a court order to investigate reports of abuse, unless they inform ICANN of a specific local law or regulation

Question & Answer Session

✦ You can submit further questions to RAAquestions@icann.org

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