Agenda

- Update Since ICANN 51
- Lessons Learned Summary
- Policy Efforts
- Performance Reporting
- Questions and Answers
Update Since ICANN 51
Year-three Audit Program launched in October 2014

- 316 Registrars originally selected for audit including 5 Registrars rolled over from Year-two
- 4 Registrars terminated prior to the commencement of the audit
- 5 “legacy” Registry Operators included in audited

New Registry Agreement Audit Program launched August 2014; completed December 2014; report published in February 2015

2014 Contractual Compliance Annual Report to be published in February 2015

Reports can be found at: https://www.icann.org/resources/pages/compliance-reports-2014-2015-01-30-en
Complaint processing quality assurance – A quality process to periodically review consistency and accuracy of complaint processing

WHOIS Inaccuracy Quality Review – A quality process to periodically review and confirm compliance for suspended domains related to Whois Inaccuracy complaints

Remediation Quality Review – A quality process to ensure continued compliance after contracted party completes remediation to resolve informal or formal compliance matter
Public Interest Commitments Monitoring Results since ICANN 51

- 264 gTLDs monitored on Specification 11 of the New Registry Agreement
- Any noted deficiencies have been addressed via the informal resolution process
- No PICDRPs have yet been initiated

<table>
<thead>
<tr>
<th>Section 3(a):</th>
<th>Section 3(b):</th>
<th>Section 3(c):</th>
<th>Section 3(d):</th>
<th>Section 4 GAC-1 (as applicable):</th>
<th>Selected Voluntary PICs:</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRA with PIC3(a) Mandatory Provision</td>
<td>Conducting Security Threats Technical Analyses at the time of Inquiry</td>
<td>Registration Policies published on TLD’s website</td>
<td>Generic TLDs not limiting Registrations</td>
<td>RRA with GAC-1 Mandatory Provision</td>
<td>WHOIS Audits Processes with LEA &amp; Govt.</td>
</tr>
</tbody>
</table>

- 99%  
- 96%  
- 98%  
- 100  
- 100  
- 100
## 2013 RAA: Abuse Reports Requirements

### Section 3.18.1

- Registrars must:
  - Take reasonable and prompt steps to investigate and
  - Respond appropriately to ANY reports of abuse

- Reasonable steps may include:
  - Contacting the RNH of the domain(s)

- Appropriately varies depending on the facts and circumstances

- Whois data verification by itself is insufficient

- Court order is not required for registrar to investigate absent a specific local law or regulation provided to ICANN

### Section 3.18.2

- Registrar must have dedicated abuse email and phone number in Whois output

- Reports of Illegal Activity must be reviewed within 24 hours by an individual who is empowered to take necessary and appropriate actions

- Reports can be from any applicable jurisdiction once reporter is designated by registrar’s local government as an authority
Abuse Reports - ICANN Complaint Processing

- ICANN confirms that reporter sent abuse report to registrar abuse contact before sending complaint to registrar

- ICANN could request the:
  - Steps taken to investigate and respond to abuse report
  - Time taken to respond to abuse report
  - Correspondence with complainant and registrant
  - Link to website’s abuse contact email and handling procedure
  - Location of dedicated abuse email and telephone for law-enforcement reports
  - Whois abuse contacts, email and phone

- Examples of steps registrars took to investigate and respond to abuse reports:
  - Contacting registrant
  - Asking for and obtaining evidence or licenses
  - Providing hosting provider info to complainant
  - Performing Whois verification
  - Performing transfer upon request of registrant
  - Suspending domain
Reasons for abuse complaint closure:
- Reasonable and prompt steps to investigate and respond appropriately to the report of abuse (section 3.18.1)
- Review law enforcement report within 24 hours (section 3.18.2)
- Abuse contact info or procedures published on website and in Whois
- Abuse records maintained
- Now monitoring abuse contacts
- Domain suspended/canceled
Lessons Learned Summary
RAA Lessons Learned Summary

1. **Whois Accuracy Program Specification**
   Distinguishing between verification and validation

2. **Abuse Reports Requirements**
   Establishing investigative processes

3. **Domain Renewal Requirements**
   Sending timely reminders to registered name holder

4. **General UDRP Issue**
   Verifying with UDRP providers and preventing improper transfer

5. **Inter-Registrar Transfer**
   Using the correct Forms of Authorization (FOAs)
RA Lessons Learned Summary

1. Code of Conduct Annual Certifications
   Clarifications on who submits and what to submit

2. Abuse Contact Data
   Required elements to be published

3. Zone File Access Requirements (CZDS)
   Reasons for denial of access

4. Controlled Interruption
   Complying with Name Collision Assessment Letter(s)

5. Improper Allocation / Earmarking
   Allocating domain names before Sunrise registrations
Policy Efforts and Updates
Policy and Working Group Efforts

Provide compliance statistical data and trends to guide policy changes and ongoing implementation strategies

- Contribute to IRTP parts C and D working group efforts
- Support implementation of UDRP Rules revisions
- Participate in Thick Whois (registry) implementation and clarifications
- Whois ARS pilot
Policy and Working Group Efforts

Actively contributing to the following Working Groups

- Public Interest Commitments Security Framework
- Registration Data Directory Service (Advisory on Whois Clarifications)
Registrar Complaint Type Volume: (Oct – Dec 2014)

### Complaint Distribution

- **WHOIS INACCURACY**: 79.3%
- **TRANSFER**: 18.0%
- **WHOIS FORMAT**: 4.7%
- **DOMAIN RENEWAL**: 2.1%
- **WHOIS SLA**: 1.5%
- **DOMAIN DELETION**: 1.3%
- **ABUSE**: 1.2%
- **DATA ESCROW**: 1.2%
- **WHOIS UNAVAILABLE**: 0.8%
- **FEES**: 0.6%
- **WHOIS UNAVAILABLE**: 0.6%
- **UDRP**: 0.6%
- **Misc**: 1.8%

### Formal Notices

- **Volume Breach**: 14
- **Volume Non-Renewal**: 0
- **Volume Suspension**: 1
- **Volume Termination**: 2

### Registrar TAT (in days)

- Avg TAT 1st Notice: 10.3
- Avg TAT 2nd Notice: 6.7
- Avg TAT 3rd Notice: 14.2

### REGISTRAR Complaints

<table>
<thead>
<tr>
<th>REGISTRAR Complaints</th>
<th>Quantity</th>
</tr>
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<tbody>
<tr>
<td>ABUSE</td>
<td>106</td>
</tr>
<tr>
<td>CUSTOMER SERVICE</td>
<td>36</td>
</tr>
<tr>
<td>DATA ESCROW</td>
<td>106</td>
</tr>
<tr>
<td>DNSSEC, IDN, IPV6</td>
<td>16</td>
</tr>
<tr>
<td>DOMAIN DELETION</td>
<td>116</td>
</tr>
<tr>
<td>DOMAIN RENEWAL</td>
<td>192</td>
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<tr>
<td>FAILURE TO NOTIFY</td>
<td>3</td>
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<tr>
<td>FEES</td>
<td>54</td>
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<tr>
<td>PRIVACY/PROXY</td>
<td>8</td>
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<tr>
<td>REGISTRAR CONTACT</td>
<td>23</td>
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<tr>
<td>REGISTRAR INFO SPEC</td>
<td>18</td>
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<tr>
<td>REGISTRAR OTHER</td>
<td>7</td>
</tr>
<tr>
<td>RESELLER AGREEMENT</td>
<td>24</td>
</tr>
<tr>
<td>TRANSFER</td>
<td>1647</td>
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<tr>
<td>UDRP</td>
<td>51</td>
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<tr>
<td>WHOIS FORMAT</td>
<td>429</td>
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<tr>
<td>WHOIS INACCURACY</td>
<td>6083</td>
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<tr>
<td>WHOIS QUALITY REVIEW</td>
<td>28</td>
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<tr>
<td>WHOIS SLA</td>
<td>138</td>
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<tr>
<td>Total Complaints Processed</td>
<td>9,157</td>
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<tr>
<td>Total Complaints Closed</td>
<td>7,832</td>
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Registrar Formal Notice Activity: (Oct – Dec 2014)

### Notice Reasons

- **Maintain and provide communication records (RAA 3.4.2/3)**
- **Display renewal/redemption fees (ERRP 4.1)**
- **Pay accreditation fees (RAA 3.9)**
- **Publish on website information required by the Registrar Information Specification (RAA 3.17)**
- **Other**

### Formal Notice Reasons

<table>
<thead>
<tr>
<th>Reason</th>
<th>Percent</th>
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<tbody>
<tr>
<td>Maintain and provide communication records (RAA 3.4.2/3)</td>
<td>18</td>
</tr>
<tr>
<td>Display renewal/redemption fees (ERRP 4.1)</td>
<td>7</td>
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<tr>
<td>Pay accreditation fees (RAA 3.9)</td>
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<tr>
<td>Publish on website information required by the Registrar Information Specification (RAA 3.17)</td>
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<tr>
<td>Other</td>
<td>60</td>
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### Breach Notice Reason*

<table>
<thead>
<tr>
<th>Reason</th>
<th>Qty*</th>
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<tbody>
<tr>
<td>Failure Notice Reasons</td>
<td>114</td>
</tr>
<tr>
<td>• Cured</td>
<td>45</td>
</tr>
<tr>
<td>• Not Cured</td>
<td>69</td>
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<table>
<thead>
<tr>
<th>Notices</th>
<th>Qty</th>
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<tbody>
<tr>
<td>Breach</td>
<td>14</td>
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<tr>
<td>Non-Renewal</td>
<td>0</td>
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<tr>
<td>Suspension</td>
<td>1</td>
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<tr>
<td>Termination</td>
<td>2</td>
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</table>
Registry Complaint Type Volume: (Oct – Dec 2014)

### Complaint Distribution

- **Registry Other**: 26.6%
- **Registry Data Escrow**: 17.8%
- **Zone File Access**: 15.6%
- **Reserved Names/Controlled Interruption**: 10.1%
- **Abuse Contact Data**: 6.5%
- **SLA**: 5.8%
- **RDDS**: 4.3%
- **Registry Fees**: 2.9%
- **Misc**: 10.4%

### Formal Notices

- **Volume Breach**: 0
- **Volume Non-Renewal**: 0
- **Volume Suspension**: 0
- **Volume Termination**: 0

### Registry TAT (in days)

- Avg TAT 1st Notice: 6.4
- Avg TAT 2nd Notice: 7.1
- Avg TAT 3rd Notice: 11.0

### REGISTRY Complaints

<table>
<thead>
<tr>
<th>Complaint Type</th>
<th>Qty</th>
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</thead>
<tbody>
<tr>
<td>Abuse Contact Data</td>
<td>45</td>
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<tr>
<td>Bankruptcy</td>
<td>2</td>
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<tr>
<td>Bulk ZFA</td>
<td>7</td>
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<tr>
<td>Claims Services</td>
<td>4</td>
</tr>
<tr>
<td>Code of Conduct</td>
<td>2</td>
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<tr>
<td>COI</td>
<td>1</td>
</tr>
<tr>
<td>Misconduct</td>
<td>1</td>
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<tr>
<td>Monthly Report</td>
<td>9</td>
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<tr>
<td>PIC</td>
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<td>PIC-DRP</td>
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<td>RDDS</td>
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<td>Registry Data Escrow</td>
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<tr>
<td>Registry Fees</td>
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<tr>
<td>Registry Other</td>
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<tr>
<td>Reserved Names/Controlled Interruption</td>
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<tr>
<td>RR-DRP</td>
<td>18</td>
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<tr>
<td>SLA</td>
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<tr>
<td>Sunrise</td>
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<td>URS</td>
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<tr>
<td>Zone File Access</td>
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<td>Total Complaints Processed</td>
<td>689</td>
</tr>
<tr>
<td>Total Complaints Closed</td>
<td>914</td>
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Total Complaints Processed: 689

Total Complaints Closed: 914
Questions & Answers

Send compliance questions
To: compliance@icann.org
Subject line: ICANN 52 Compliance Update Session