Contractual Compliance Registrar/Registry Update

Audit Program

Presented by Jack Khawaja

CC Risk & Audit Management

September, 2012

For Call In #: http://www.adigo.com/icann/
Conference ID: 4164798

Topics of Discussion:

- Current State

- Future State

- Goal of Audit Program

- Overall Approach

- Audit Scope and Provisions

- Audit Plan

- Audit Sampling

- Questions?

Current Audit State

Audits delivered to-date are focused in the following areas of:

- Whois Access Audit

- Whois Data Reminder Policy (WDRP) Audit

- Registrar Website Audit

- Inter Registrar Transfer Policy (IRTP) Audit

Future Audit State

Audits will be delivered based on audit strategy, methodology, and approach:

- Three-Year Audit Plan
- Audit Scope focused on agreements and policies
- Standard Operating Process and Procedure
- Sampling Methodology
- Additional Follow Up Reviews When Necessary

Goal of the Audit Program

To allow ICANN to properly manage, audit, and remediate deficiencies of all contracted parties to ensure alignment and compliance with their contractual obligations.

Overall Approach

- To conduct an audit of contracted parties in a well defined methodology, process and timeline
- To review audit results and request further evidence to cure deficiencies discovered
- To identify and action non-compliant contracted parties, while overseeing remediation efforts
- To enforce additional compliance activities of various contracts when issues are not resolved

Audit Scope

- The contract (agreement) and consensus policies
- ICANN accredited registrars with 2001 and 2009 RAA
- ICANN registries with 2001 Registry Agreement(s)
- Scope will expand to include new gTLD

Provisions Under Consideration

Provision	RAA
2.2	Registrar's use of ICANN's trademark. (optional for a Registrar to use the Logo)
3.10	Insurance
3.12	Reseller agreement (mandatory provisions)
3.13	Registrar training
3.16	Registrar contact details on registrar's website
5.11	Update contact information in RADAR
3.12.5 and 3.15	Registrant rights and responsibilities
3.3.1 to 3.3.5	Whois
3.4.2	WDRP-Maintenance of registration data for 3 years after termination
3.7.4	Reasonable assurance of payment
3.7.5.2	Domain name renewal w/out consent from registrant
3.7.5.3 to 3.7.5.6	EDDP-Domain name renewal, provision of applicable information to registrants
3.7.7	Registration agreement w/ registrants (mandatory provisions)
3.7.8	Whois data verifications
5.3.3	Provide ICANN with list of directors and officers

Provision	Registry
3.1.a.i	Implement temporary policies or specs to preserve security and stability/
3.1.b	Implement consensus policies
3.1.c.i	Data escrow
3.1.c.ii	Personal data
3.1.c.iii	Bulk zone file access
3.1.c.iv	Monthly Reporting
3.1.c.v	Whois
3.1.d.i	Reserved TLD strings

Three Year Audit Plan

Each Registry and Registrar agreement will be randomly selected for audit over a three-year period.
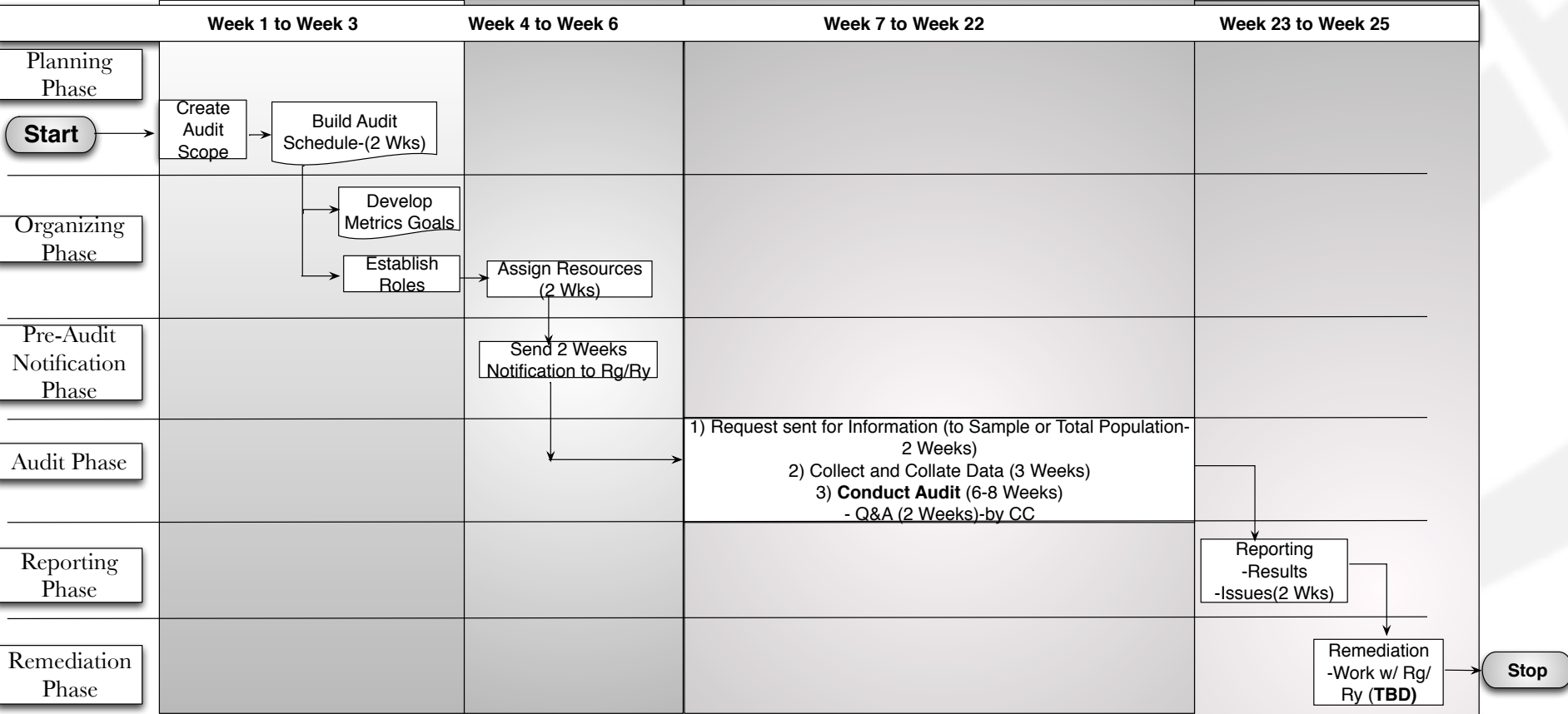
- Year one, 1/3rd of Registry and Registrar Agreements
- Year two, another 1/3rd from the remaining list
- Year three, the remaining 1/3rd of all contracted parties

- New gTLD Registries and other new agreements will roll into the audit plan

Note: Registrars and Registries may be subject to additional audit(s) based on circumstances or considerations.

Audit Process

	Week 1 to Week 3	Week 4 to Week 6	Week 7 to Week 22	Week 23 to Week 25
Planning Phase	**Start** → Create Audit Scope → Build Audit Schedule-(2 Wks)			
Organizing Phase	Develop Metrics Goals / Establish Roles	Assign Resources (2 Wks)		
Pre-Audit Notification Phase		Send 2 Weeks Notification to Rg/Ry		
Audit Phase			1) Request sent for Information (to Sample or Total Population- 2 Weeks) 2) Collect and Collate Data (3 Weeks) 3) **Conduct Audit** (6-8 Weeks) - Q&A (2 Weeks)-by CC	
Reporting Phase				Reporting -Results -Issues(2 Wks)
Remediation Phase				Remediation -Work w/ Rg/ Ry (**TBD)** → **Stop**

10

Three Year Audit Plan Schedule

OVERALL AUDIT PHASES	From	To	2012		2013			
			Nov.	Dec.	Jan.	Feb.	March	April
Planning Phase - Audit Scope - Audit Schedule	10-Aug-12	30-Oct-12						
Organizing Phase - Metric Goals - Roles and Resouces	15-Oct-12	30-Oct-12						
Pre-Audit Notification - Notification to All Parties	1-Nov-12	5-Nov-12	███					
Audit Phase - Request for Information (RFI) - Audit - Follow up questions	5-Nov-12	15-Mar-13		███	███	███	███	███
Reporting Phase - Reporting Audit Results	1-Apr-13	26-Apr-13						███
Remediation Phase - Assist in Remediation Efforts (if needed)	1-May-13	5-Jun-13						

Summary

- Audit strategy, timeline
- Standard communication
- Consistent process and methodology
- Standard documentation and reporting

<u>Note:</u> ICANN will leverage the services of a global audit firm to execute this audit plan.

Thank you