



ICANN

Contractual Compliance 2014 Annual Report

Internet Corporation for Assigned Names & Numbers



The efforts and energy in 2014 were focused on testing the foundation that was established in 2013 and on the globalization of the ICANN Contractual Compliance function.

A strong foundation is established; enforcing the contracts and policies where applicable, proactively and collaboratively addressing non-compliance issues and most importantly growing and developing the team we have today.

Many thanks to ICANN leaders and stakeholders for your support and trust in us. Mostly, I want to thank the Contractual Compliance Team who is passionate and dedicated to ICANN.

*Looking forward to 2015!
Sincerely,
Maguy Serad*



Late in 2014, I stepped into the role of overseeing Contract Compliance and Consumer Safeguards at ICANN.

We are working to provide greater clarity to contracted parties and to the community on the scope and limitations of ICANN's contractual and enforcement rights, and in areas that are beyond the scope of our contractual rights, to find ways to coordinate and cooperate with others in the community to facilitate consumer protection and safeguards. We are seeking to advance our mission to protect the public interest, while remaining cognizant of ICANN's limited remit and authority.

I look forward to working with the ICANN stakeholders in 2015. I am deeply indebted to the ICANN Compliance Team for their dedication and commitment to excellence, and I am confident they will reach new heights of professional achievement in the coming year.

*Sincerely,
Allen R. Grogan*

Highlights of 2014

Financial Overview

The Contractual Compliance budget increased by 32.1% to US\$4.2M in fiscal year 2015. The funds were allocated for hiring new staff, conducting contractual compliance audits and increased overhead expenses. As a result of the strengthened team and infrastructure at ICANN, support from shared service departments increased by 18.0% to US\$2.5M.

US Dollars in thousands	FY15 Budget	FY14 Actual	Increase/ (Decrease)		Comments
Contractual Compliance Department Budget	\$4,180	\$3,164	\$1,016	32.1%	Contractual Compliance department operating costs to cover personnel, travel & meetings, professional services and administration. Increase due to additional FTEs, travel and systems improvement projects.
Shared Resources	\$2,499	\$2,118	\$381	18.0%	Support from other departments: IT, meeting logistics, Finance, HR, Admin, etc.
Total Functional View of Contractual Compliance Activities	\$6,680	\$5,282	\$1,398	26.5%	

For detailed information regarding ICANN's fiscal year 2015 budget, go to: <http://www.icann.org/en/about/financials>

Globalization

ICANN Contractual Compliance completed its efforts in 2014 to establish a global presence with the addition of the Compliance Team in the Singapore hub office. With presence in Singapore, Istanbul and Los Angeles, the team is engaged to support the regions, provide local responsiveness, ease of coordination with the contracted parties and the stakeholders as needed, and is aware of cultural norms in the regions. For staff information please go to <https://www.icann.org/resources/pages/about-2014-10-10-en>.





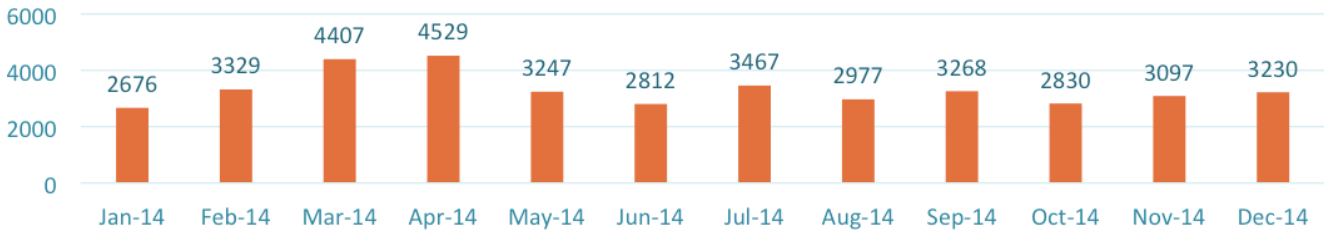
Performance Measurement in 2014

Improved transparency and reporting on Contractual Compliance continued to be the focus in 2014 via an improved web page titled [Reporting & Performance Measurement](https://www.icann.org/resources/compliance-reporting-performance) (<https://www.icann.org/resources/compliance-reporting-performance>) and specifically the addition of [Monthly Dashboard](https://features.icann.org/compliance) (<https://features.icann.org/compliance>) inclusive of Registrar, Registry and staff performance based on the [Informal and Formal Resolution Process](https://www.icann.org/resources/pages/approach-processes-2012-02-25-en) (<https://www.icann.org/resources/pages/approach-processes-2012-02-25-en>)

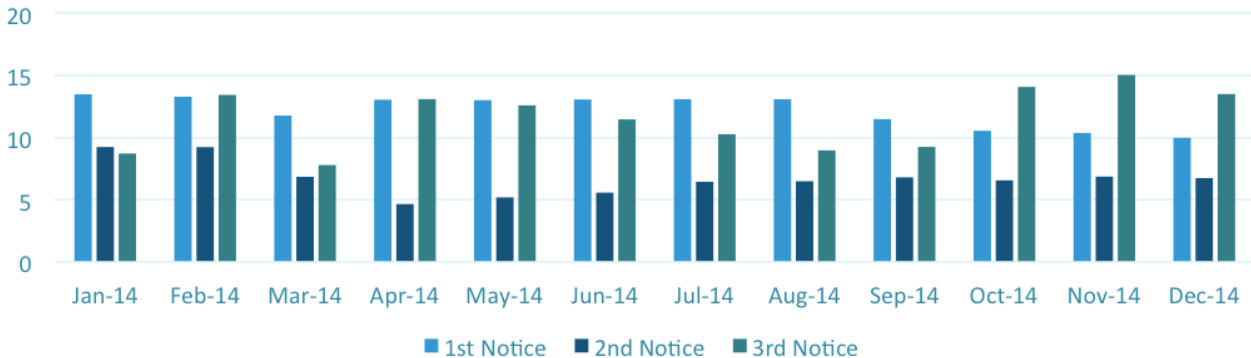
The graphs below are a summary of the 2014 performance and on some of the graphs a comparison to the 2013 performance. Performance measures take into account the volume of complaints, the turn-around time (TAT), which is the average time for a contracted party and ICANN to respond and close a ticket from receipt, ticket closure rate, pulse satisfaction survey and other compliance functions.

Complaint Count & Turn Around Time (TAT) Trending - Registrar

Complaint Count

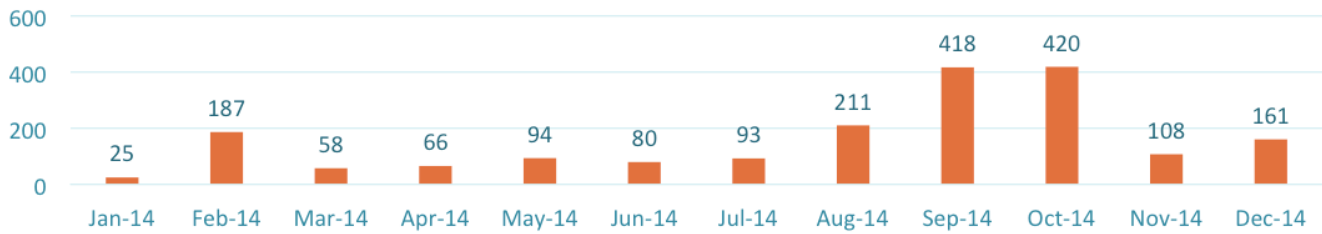


Average Turnaround Times, in days

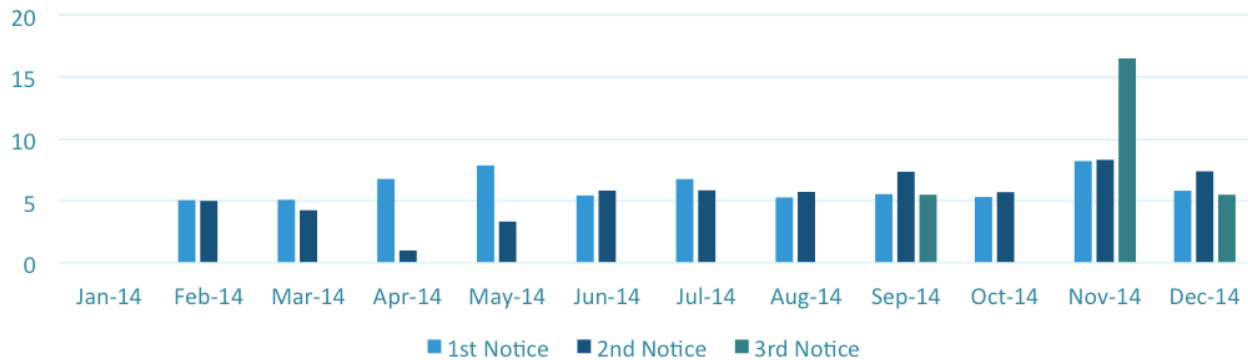


Complaint Count & Turn Around Time (TAT) Trending - Registry

Complaint Count

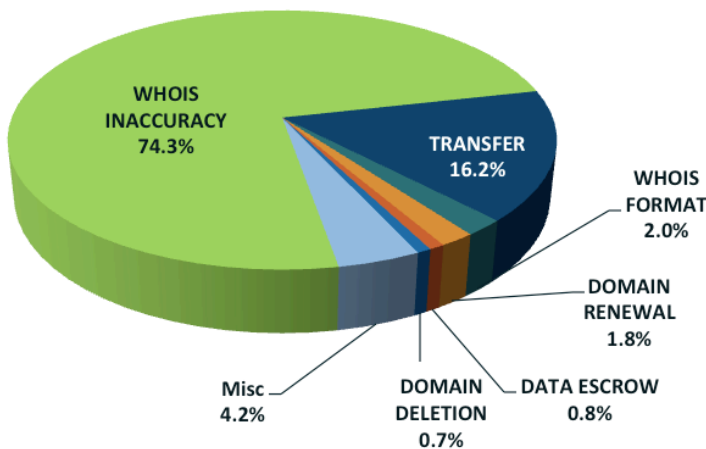


Average Turnaround Times, in days



Registrar Complaint Volume & Distribution – Year 2014

Complaint Distribution



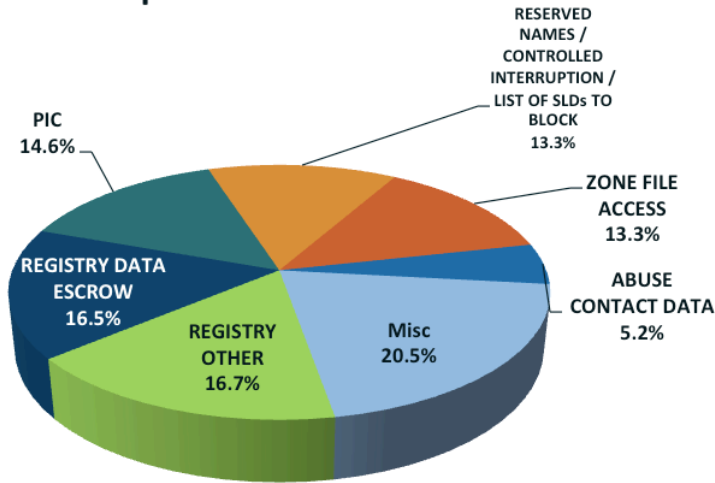
REGISTRAR Complaints	Quantity
ABUSE	271
CEO CERTIFICATION	10
CUSTOMER SERVICE	118
DATA ESCROW	313
DNSSEC, IDN, IPV6	24
DOMAIN DELETION	286
DOMAIN RENEWAL	708
FAILURE TO NOTIFY	54
FEES	110
PRIVACY/PROXY	31
REGISTRAR CONTACT	113
REGISTRAR INFO SPEC	67
REGISTRAR OTHER	89
RESELLER AGREEMENT	40
TRANSFER	6,477
UNIFORM DOMAIN NAME DISPUTE RESOLUTION POLICY	226
WHOIS FORMAT	809
WHOIS INACCURACY	29,609
WHOIS QUALITY REVIEW	86
WHOIS SERVICE LEVEL AGREEMENT	177
WHOIS UNAVAILABLE	248
Total Complaints Processed	39,869
Total Complaints Closed	37,457

Average Registrar Turnaround Time	(in days)
1st Notice	12.2
2nd Notice	6.7
3rd Notice	11.5

Formal Notices	#
Volume Breach	61
Volume Non-Renewal	1
Volume Suspension	4
Volume Termination	7

Registry Complaint Volume & Distribution – Year 2014

Complaint Distribution

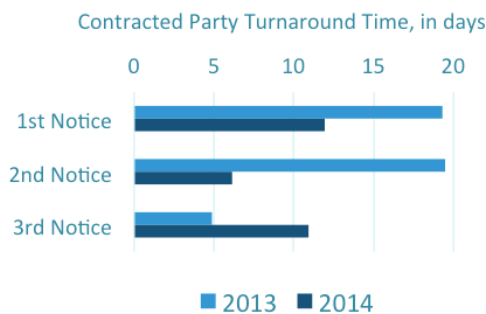
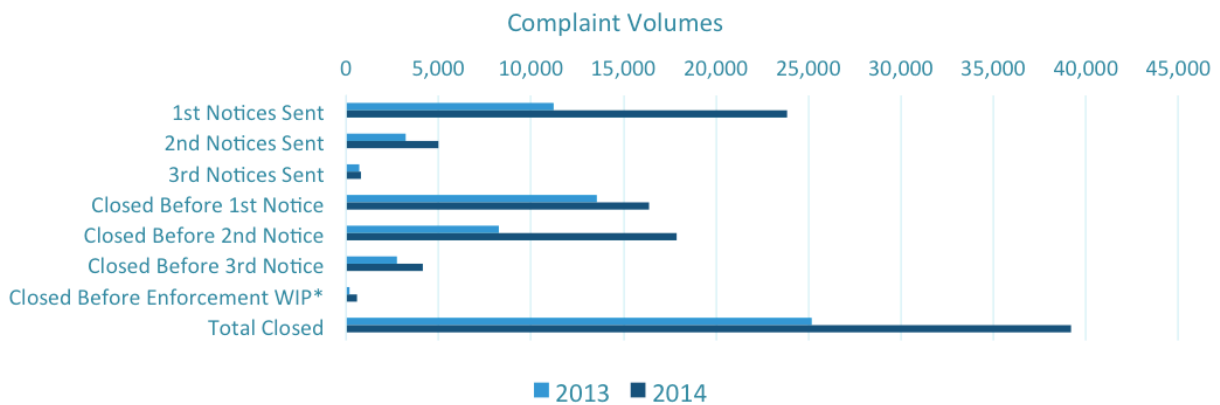


REGISTRY Complaints	Quantity
ABUSE CONTACT DATA	100
BANKRUPTCY	2
BULK ZONE FILE ACCESS	55
CLAIMS SERVICES	12
CODE OF CONDUCT	33
CONTINUED OPERATIONS INSTRUMENT	1
MISCONDUCT	1
MONTHLY REPORT	87
PUBLIC INTEREST COMMITMENT (PIC)	280
REGISTRATION DATA DIRECTORY SERVICES	30
REGISTRY DATA ESCROW	317
REGISTRY FEES	20
REGISTRY OTHER	322
RESERVED NAMES/CONTROLLED INTERRUPTION/LIST OF SLDs TO BLOCK	256
REGISTRY RESTRICTIO - DISPUTE RESOLUTION PROCEDURE (DRP)	54
Service Level Agreement	54
SUNRISE	23
TRADEMARK POST-DELEGATION -DRP	1
UNIFORM RAPID SUSPENSION SYSTEM	19
WILDCARD PROHIBITION	2
ZONE FILE ACCESS	255
Total Complaints Processed	1,921
Total Complaints Closed	1,741

Average Registry Turnaround Time	(in days)
1st Notice	6.1
2nd Notice	5.4
3rd Notice	9.2

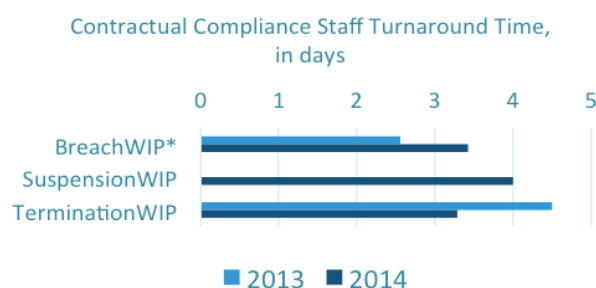
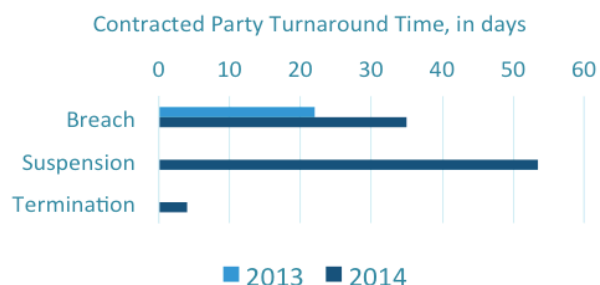
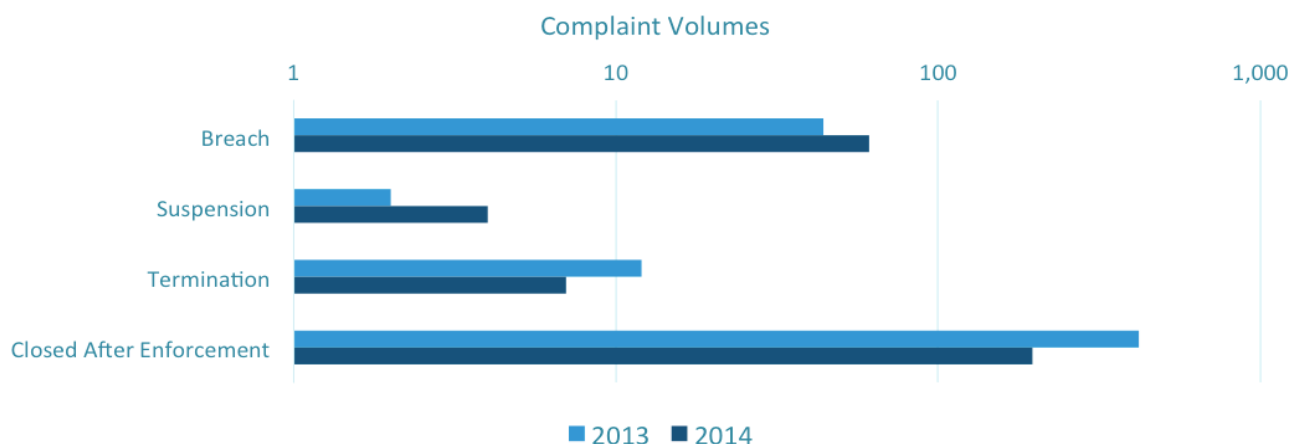
Formal Notices	#
Volume Breach	0
Volume Non-Renewal	0
Volume Suspension	0
Volume Termination	0

Informal Notice Statistics – Year 2013 / 2014



*WIP = WORK IN PROGRESS

Formal Notice Statistics – Year 2013 / 2014



*WIP = WORK IN PROGRESS

Below chart provides a summary of the reasons for the 61 breach notices. A breach notice may contain multiple reasons.

Formal Notice Reasons	Percent
Maintain and provide communication records (RAA 3.4.2/3)	15 %
Pay accreditation fees (RAA 3.9)	11 %
Display renewal/redemption fees (ERRP 4.1)	10 %
Display methods used to deliver pre- and post-expiration notifications (ERRP 4.2)	8 %
Take reasonable steps to investigate claimed WHOIS inaccuracies (RAA 3.7.8)	5 %
Other * (Appendix B)	51 %

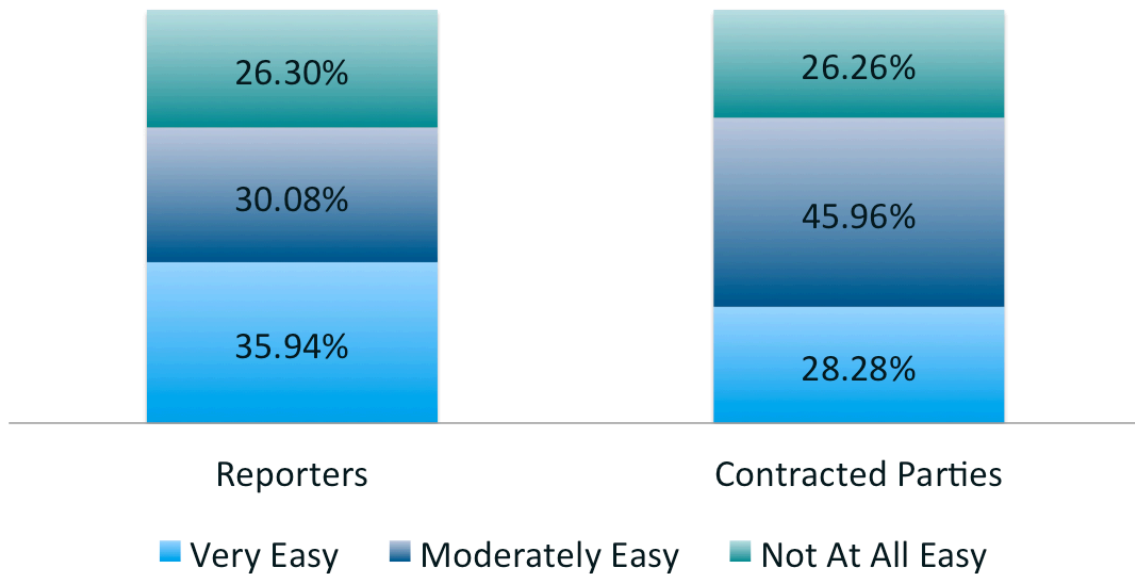
* Please refer to Appendix B for a detailed list of formal notice reasons in the "Other" category.

Every closure email to a reporter and to a contracted party includes a link to participate in a continuous feedback **pulse survey** with five questions.

Below are the results of the overall experience during 2014.

Pulse Survey Results 2014

Overall, how do you rate the complaint experience?



In addition to the above metrics, ICANN has the performance metrics and targets below that are focused on reporter and contracted parties' compliance with their obligations. The metrics are also driven by the list of projects that are published at this link: <https://features.icann.org/plan>.

In the metric below:

- The Reporter customer satisfaction survey measures the reporters overall experience of submitting a complaint to ICANN;
- The registrar and registry audit results are captured through [The Three -Year Audit program](#)
- The key performance indicators for Registrar Data Escrow Compliance, Registrar Compliance and Registry (new gTLD's) compliance are measured by numbers of third notices (informal phase) and formal notices (enforcement phase) received;
- The compliance closure rate is measured by number of closed complaints against number of complaints processed over the indicated period of time.

For more information on the initiatives and improvements in the Contractual Compliance area and system improvements, please refer to Appendix A below.

Contractual Compliance Performance Measurement Reporting

Metric	Target	Time
Reporter Customer Satisfaction Survey	≥70%	<p>74.5% Singapore 2014 72.0% London 2014 62.0% Los Angeles 2014</p>
Registrar Audit Results	≥95%	<p>97 Year 1 - 2012 98.8 Year 2 - 2013</p>
Registry Audit Results	≥95%	<p>100 Year 1 - 2012 100 Year 2 - 2013</p>
Registrar Data Escrow Compliance	≥95%	<p>97.9 96.8 97.7 95.8 96.6 95.8 94.6 95.6 96.8 95.7 97.3</p> <p>Jan-14 Feb-14 Mar-14 Apr-14 May-14 Jun-14 Jul-14 Aug-14 Sep-14 Oct-14 Nov-14</p>
Overall Registrar Compliance	≥95%	<p>98.1 96.8 97 96.2 96.3 96.8 96.5 94.7 97 96.9 95.6 97.9</p> <p>Jan-14 Feb-14 Mar-14 Apr-14 May-14 Jun-14 Jul-14 Aug-14 Sep-14 Oct-14 Nov-14 Dec-14</p>
Overall Registry Compliance	≥95%	<p>0 100 99 100 100 100 100 100 100 98.4 98.5 99.5</p> <p>Jan-14 Feb-14 Mar-14 Apr-14 May-14 Jun-14 Jul-14 Aug-14 Sep-14 Oct-14 Nov-14 Dec-14</p>
Compliance Closure Rate	≥55%	<p>60 63 60 65 64 53 65 68 75 68 63 58</p> <p>Jan-14 Feb-14 Mar-14 Apr-14 May-14 Jun-14 Jul-14 Aug-14 Sep-14 Oct-14 Nov-14 Dec-14</p>

2014 Registrar Contractual Compliance Summary

2013 Registrar Accreditation Agreement Outreach Activities

In 2014, Contractual Compliance implemented a number of changes regarding the 2013 RAA. In addition to the new and updated Learn More content and Complaint Forms on ICANN.ORG, the team finalized internal procedures, staff training, and completed system enhancements to process twelve new 2013 RAA-related complaint types. Below is a list of the implementation regarding the 2013 RAA:

- Reseller Agreement (Section 3.12)
- CEO Certification (Section 3.15)
- Registrar Information Specification (Section 3.17 and Registrar Information Specification)
- WHOIS Format (Registration Data Directory Service (WHOIS) Specification)
- WHOIS SLA (Section 2.2 of Registration Data Directory Service (WHOIS) Specification)
- Failure to Display Trademark Notice Trademark Clearinghouse Rights Protection Mechanism Requirements
- Abuse (Section 3.18)
- Customer Services Handling Process (Section 3.7.11)
- Failure to Support DNSSEC, IDNs, and IPV6 (Section 3.19 & Additional Registrar Operation Specification)
- Privacy/Proxy Registration Program (Section 3.4.1.5 and Specification on Privacy and Proxy Registrations)
- Domain Not in DNS for Non-Response to WHOIS inquiry (WHOIS Accuracy Program Specification)

WHOIS Inaccuracy Turn-Around Time and Quality Process Improvements

To improve the WHOIS Inaccuracy process turn-around time, ICANN automated additional system validation. As a result, ICANN removed the requirement for WHOIS inaccuracy complaints to be confirmed by the reporter via an email response. The elimination of this step reduced the complaint processing turn-around time by five business days.

To improve the WHOIS quality processing, ICANN launched a Whois Quality Review (QR) of previously closed Whois inaccuracy complaints to ensure continued compliance with the requirements of the RAA.

Anonymous Complaint Submission

In most cases, a reporter may choose to submit a complaint anonymously (including contracted parties). The reporter should select the anonymous option on the complaint form or register the request for anonymity in the comment box. In 2014, ICANN added these instructions to all Contractual Compliance complaint forms. Certain complaints, such as domain transfer or renewal, do not have an anonymous option due to the nature of the complaint.



False Advertising or Deceptive Practices

ICANN experienced an increase of complaints regarding alleged false advertising or deceptive practices by registrars. The Registrants' Benefits and Responsibilities included in the 2013 RAA protects registrants from such practices, including hidden fees and practices that are illegal under the consumer protection laws of the registrant's residence. The registrars collaborated and mitigated these alleged non-compliance issues.

Most common issues during 2014

Listed below were the most common issues addressed by ICANN with regards to registrar compliance:

1. WHOIS inaccuracy:

- Registrars processing WHOIS inaccuracy complaints under 2009 RAA requirements rather than 2013 RAA requirements.
- Registrars failing to verify or validate WHOIS information as required by the Whois Accuracy Program Specification of the 2013 RAA.
- Registrars asking their resellers to confirm the accuracy of the WHOIS information of domain names regarding which ICANN received complaints, rather than providing confirmation from the registrant.
- Registrars failing to provide supporting documentation for updated or changed WHOIS information.

2. Abuse:

- Registrars not taking reasonable and prompt steps to respond appropriately to reports of abuse, which at a minimum should be to forward valid complaints to the registrants and communicate back to the complaining party.
- The 2013 RAA does not require registrars to suspend every domain subject to a valid abuse complaint
- Law enforcement may submit complaints against registrars outside of their jurisdiction under Section 3.18.1 of the 2013 RAA
- Abuse complaints against registrars under the 2009 RAA (which does not have requirements regarding abuse complaints).

3. Transfers, Inter-Registrar Transfer Policy (IRTP):

- Losing registrars providing the AuthInfo-Code to contacts other than the Registered Name Holder.
- Losing registrars not sending the Form Of Authorization labeled "Confirmation of Registrar Transfer Request" or sending it to contacts other than the Registered Name Holder.
- Registrars using a Form of Authorization that does not comply with the IRTP.
- Registrars requiring Registered Name Holders to take additional steps to request AuthInfo codes for transfer that are more stringent than those required to change nameserver information.



4. Renewal/Redemption, Expired Domain Deletion Policy (EDDP), Expired Registration Recovery Policy (ERRP):

- Registrars that rely on their resellers to send the renewal notifications on their behalf and do not ensure that the notifications are actually sent and copies are maintained.
- Registrars not complying with the web posting obligations provided by the ERRP.
- Registrars not disrupting the DNS resolution path prior to deletion as required by the ERRP.
- Registrars that change the Registrant at Expiration's (RAE) name to their own subsidiaries or resellers on the date of expiration of the domain names, without providing the RAE clear information regarding their terms of service concerning expiration and renewals.

5. Uniform Domain Name Dispute Resolution Policy (UDRP):

- Registrars not cooperating with the UDRP providers by responding to the verification requests sent to them when UDRP proceedings are commenced.
- Registrars not maintaining the status quo of the domain names involved in the proceedings, allowing them to be transferred to other registrars or registrants.

6. Other related domain registration issues:

- Registrars failing to maintain records as required by the RAA and not ensuring that resellers maintain them and can provide them upon request.
- Registrars not able to provide ICANN with copies of communications they claim were sent to their registrants.

Participation in ICANN Policy Development Process

The Contractual Compliance team actively participated in the ICANN Policy Development Process in 2014. Participation varied from reviewing or recommending proposed contract amendments to providing comments on proposed contract language regarding the enforceability of the proposed language or implementation proposals. Some of the projects are:

- Translation and Transliteration of Contact Information PDP Working Group
- Thick Whois Transition Project Team
GNSO International Governmental Organizations and International Non-Governmental Organizations (IGO-INGO) Access to Curative Rights Protection Mechanisms Working Group
- GNSO Implementation Review Team (IRT) Locking of a Domain Name subject to Uniform Domain-Name Dispute-Resolution Policy
- Inter-Registrar Transfer Policy Part D Working Group
- Inter-Registrar Transfer Policy Part C Implementation Group
- Whois Accuracy Reporting System
- Global Domains Division - Consensus Policy Implementation Framework

2014 Registry Contractual Compliance Summary

Pre-2012 gTLD's

In general, and based on reported data in monthly reports throughout 2014, gTLDs launched before the 2012 round were meeting their service level agreements. See <https://www.icann.org/resources/pages/reports-2014-03-04-en>. The volume of internal complaints issued to these registry operators were insignificant in numbers, compared to the post-2012 gTLDs, and mostly for failing to submit in due time the monthly reports.

Post-2012 gTLDs

The year 2014 saw an increase in monitoring activities for Contractual Compliance, from twenty-two gTLDs delegated in January of 2014 to four hundred and eighty-one by the end of the year 2014. Overall, contractual compliance was maintained above 95% per New Registry Audit Program as shown in the Contractual Compliance Performance Summary above.

ICANN Proactive Monitoring on the Public Interest Commitments

In 2014, ICANN launched a proactive effort to assess the registry operators' readiness regarding compliance with Public Interest Commitments. Inquiries were sent to the gTLD registries that started or were set to start the General Availability period by 1 October 2014. The total number of gTLDs covered in the proactive monitoring was 264. The results were as follows:

- Percent of gTLDs with language in the Registry-Registrar Agreement per Section 3(a) of Specification 11 = 99%
- Percent of gTLDs conducting security threats analyses per Section 3(b) of Specification 11 = 96%
- Percent of gTLDs with registration policies on websites per Section 3(c) of Specification 11 = 98%
- Percent of gTLDs not limiting registrations per Section 3(d) of Specification 11 = 99%

The deficiencies noted in the proactive monitoring have been addressed via the informal resolution process in collaboration with contracted parties. The remaining deficiencies will be addressed once the gTLD Registries remediation plan is completed.

In addition to above effort, ICANN launched several proactive monitoring efforts to ensure Registry Operator' readiness and compliance in the following obligations:

- Data Escrow Deposits (Specification 2)
- Monthly Reports (Specification 3)
- Registration Data Directory Services (Specification 4)
- Daily Transfer of Zone Files (Specification 4)
- Weekly Transfer of Thin Data (Specification 4)
- Publication of Abuse Contact Data by Registries (Specification 6)
- IPv6 Obligation (Specification 6)
- Controlled Interruption under the name –collision assessments (Specification 6)
- Sunrise and Claims Services (Specification 7)
- Performance Specifications (Specification 10)

The Registry Operators collaborated and proactively addressed the identified noted deficiencies.



Most Common Contractual Compliance Issues During 2014

1. Daily Data Escrow Deposits

- Registry Operators not making the initial deposit in a timely manner.
- Data Escrow Agent failing to send daily notifications of escrow deposits to ICANN.
- Registry Operators failing to send daily notifications of escrow deposit to ICANN.

2. Zone File Access by Internet Users via the Centralized Zone File Services

- Registry Operators not responding to requests for zone file access.
- Registry Operators denied access for reasons not permitted under the Registry Agreement.

3. Reserved Names, and Name Collision's List of SLDs to Block or Controlled Interruption

- Registry Operators activated names in the List of SLDs to Block (before 18 August 2014).
- Registry Operators not complying with Controlled Interruption (after 18 August 2014) based on a review of the daily zone files.

4. Abuse Contact Data

- Registry Operators not publishing the email address and primary contact for reports by mail.
- Registry Operators not responding in a timely matter.

5. Trademark Clearinghouse Rights Protection Mechanisms Requirements

- Improper allocation of domain names prior to Sunrise allocations.

6. Name Collision Assessment

- TLDs implementing the wrong type of controlled interruption based on delegation date

7. Code of Conduct

- Improperly denying access to registry services and services.

ICANN Outreach Activities in 2014

Public Meetings

At the Singapore, London and Los Angeles ICANN International Meetings in 2014, the Contractual Compliance team joined various stakeholder groups to share an update and address their questions. In addition, the team provided an open general session on Wednesday and continued with two closed-sessions on Thursday with the registrars and the registries. The closed sessions have become a unique opportunity to meet current and newly contracted parties and provide a forum for exchange of information between ICANN and the contracted parties regarding successes, lessons learned, and areas of opportunities.

2014 presented other outreach and webinar opportunities for the team on topics related to New Registry Agreement, the audit program, a Registry Roadshow workshop in partnership with the Registry Services Team and an Asia Pacific Contractual Compliance webinar. Click here for the link to the Outreach Page:

<http://www.icann.org/en/resources/compliance/outreach>

Contractual Compliance Risk and Audit Update

ICANN Three-Year Audit Program for Registrars and Registries

In May 2014, ICANN completed year two of the Three-Year Audit Program with a 98 percent compliance of the sampled population.

In year two, 322 Registrars and six gTLD Registries received a Request for Information notice to participate in the audit. The 322 registrars consisted of 317 randomly selected registrars and five registrars rolled over from year one.

Registrars that have common ownership and operate the same both technically and operationally were allowed to select one Registrar to represent the family group in undergoing the audit. In the year two audit program, 14 family groups emerged from 180 Registrars whereas, in the year one, the figures were 11 family groups from 136 Registrars.

The number of Breach Notices and Terminations remains consistent with the results from year one. A total of 11 Registrars were issued Breach Notices in year two as opposed to 12 Registrars in year one. Two Registrars were terminated and one Registrar decided to voluntarily de-accredit in year two; in comparison, three Registrars were terminated in year one.

OVERALL AUDIT PHASES	2012		2013		2014	
	From	To	From	To	From	To
Planning Phase						
• Audit Scope	May 2012	Aug 2012	Aug 2013	Aug 2013	Aug 2014	Aug 2014
• Audit Schedule						
Organizing Phase						
• Metric Goals	Sep 2012	Oct 2012	Sep 2013	Sep 2013	Sep 2014	Sep 2014
• Roles and Resources						
Pre-Audit Notification						
• Notification to All Parties	Nov 2012	Nov 2012	Oct 2013	Oct 2013	Oct 2014	Oct 2014
Audit Phase						
• Request for Information	Nov 2012	Mar 2013	Dec 2013	Mar 2014	Dec 2014	Mar 2015
• Audit						
• Follow Up Questions						
Reporting Phase						
• Reporting Audit Results	Apr 2013	Apr 2013	Mar 2014	Mar 2014	Mar 2015	Mar 2015
Remediation Phase						
• Manage and Support	May 2013	Jun 2013	Mar 2014	May 2014	Mar 2015	Mar 2015
• Track and Report						

Overall, both the Registrars and the Registries were proactive in remediating issues that were identified as a result of the audit. Please refer to [2013 Contractual Compliance Year Two Audit Program Report](#) for more details.

The Audit Program, consistent in scope and timeline across the three years, consists of six phases with specific milestone dates. Please refer to table below for more details.

Year three Audit Program launched in October 2014; of the 316 Registrars originally slated for audit, four were terminated prior to the commencement of the audit. As a result, 312 Registrars (including five Registrars rolled over from year two) and five Registries were sent the Pre-Audit Notification. During 2015, ICANN will complete the year three audit and report on the results.

Audit statistics: Initial deficiencies – Year 1 vs. Year 2 comparison

The following table summarizes the RAA provisions, which were tested for contractual compliance, consisting of nine test areas against a sample of 25 domains per Registrar and the number of Registrars for which a deficiency was initially noted:

Test Areas	Description	Registrars (Y2)	Registrars (Y1)
3.10	Insurance	38	29
3.12	Reseller agreement (mandatory provisions)	46	47
3.16	Registrar contact details on Registrars website	32	76
3.3.1 to 3.3.5	WHOIS - Port43/Web, Corresponding Data Elements	74	127
3.4.2	Retention of Registration Data	86	105
3.7.5.3 to 3.7.5.6	EDDP-Domain name renewal, provision of applicable information to registrants	11	13
3.7.7	Registration agreement w/ registrants (mandatory provisions)	0	0
4.3.1	Obligation to comply with Consensus Policies	Unique - 122	Unique - 116
5.11	Update Primary Contact Information in RADAR	71	53

ICANN New Registry Agreement Audit Program

In July 2014, ICANN launched the first round of the New Registry Audit Program to test compliance of new gTLDs with the terms of the New Registry Agreement and ICANN Temporary and Consensus Policies. There were 14 “new” gTLD Registries selected for this audit cycle. The New Registry Agreement Audit Program followed the same milestones, methodology and process as established by ICANN in 2013. Please refer to the published report at this link: <https://www.icann.org/resources/pages/compliance-reports-2014-2015-01-30-en>

In summary, the New Registry Agreement Audit completed with a 98% compliance of the sampled population.



Appendix A

List of Activities to support Contractual Compliance Initiatives and Improvements with system impact:

1. WHOIS Services: Modification of the WHOIS Service web form to address complaints in the areas:
 - WHOIS format
 - A registrar not meeting the WHOIS Service Level Agreement requirements
 - Improper suspension/deletion of a domain in response to WHOIS verification
2. New Registry Agreement Readiness: Published six new web forms and their related educational materials:
 - Wildcard Prohibition (Domain Redirect)
 - Zone File Access
 - Abuse Contact Data
 - Code of Conduct
 - Reserved and Blocked Second Level Domain Names
 - Claims Services
3. WHOIS Inaccuracy Tool Update
 - Increased the weekly bulk complaint submission limit from 100 to 300 complaints. This increase applies to all approved bulk submitters.
 - Removed the requirement that single submission WHOIS Inaccuracy complaints must be confirmed via email.
4. Closure Code enhancement:
 - Domain Renewal
 - WHOIS Inaccuracy
 - WHOIS Unavailable
 - Transfer
 - UDRP related complaints
5. System enhancement to allow staff to automatically send closure notices for registry complaints.
6. System enhancement to update resolved code across all complaint types to increase the efficiency and improve ICANN's reporting to stakeholders regarding closed complaints
7. Contractual Compliance Monthly Dashboard was launched in September 2014
8. Efforts related to the Consumer, Competition Working Group compliance data – Request to count the number of tickets whose 'closed reason' falls into two categories: Improper Use and Misunderstanding.

Appendix B

List of formal notice reasons in the “Other” category.

Other Formal Notice Reasons
Display link to ICANN’s Registrant Educational Information (RAA 3.16)
Respond to audits (RAA 3.14)
Publish on website information required by the Registrar Information Specification (RAA 3.17)
Publish on website information required by the Registrar Information Specification (RAA 3.17)
Provide Whois Services (RAA 3.3.1)
Provide domain name data in the specified response format (RAA-RDDS 1.4)
Display correct ICANN Logo on website (RAA Logo License Appendix)
Provide AuthInfo code (IRTP 5)
Provide a policy consistent with the requirements of 2.1 of the ERRP
Publish on website email address for abuse reports (RAA 3.18.1)
Communicate contact data changes (RAA 5.11)
Escrow registration data (RAA 3.6)
Allow RNH to transfer domain name (IRTP 1) or provide valid reason for denial (IRTP 3)
Validate and verify Whois contact information (Whois Accuracy Program Specification 2 and 4)
Validate and verify Whois contact information (Whois Accuracy Program Specification 1, 2 and 4)
Link to ICANN's registrant rights & responsibilities website (RAA 3.15)
Suspend or terminate a domain name after RNH failed to respond for over 15 days (Whois Accuracy Program Specification 5)
Allow RNH to transfer domain name (IRTP 1)
Interrupt the DNS resolution path from expiration to deletion (2.2 ERRP)
Publish on website description of procedures for the receipt and tracking of abuse reports (RAA 3.18.3)
Maintain and provide information required by the Registrar Information Specification (RAA 3.17)
Maintain and provide records related to abuse reports (RAA 3.18.3)
Maintain current commercial general liability insurance (RAA 3.10)
Cure any RAA breach within 15 working days (5.3.4 RAA) and Receiving three Notices of Breach within a twelve-month period (2.1 RAA)
Cure breaches of the RAA within 21 days (5.5.4 RAA)

Enforce compliance with registrar-reseller agreement re: provision of Registrar Services (RAA 3.12)
Enforce reseller-registrar agreement to cure and prevent instances of non-compliance (3.12.6 RAA)
Provide email address and telephone number for abuse reports (RDDS Whois Spec 1.4.2)
Provide the RNH with the FOA (IRTP 3)
Ensure reseller's registration agreement includes mandatory provisions and identifies registrar (RAA 3.12.2)
Ensure that resellers do not subject RNHs to deceptive practices (RAA 3.12.7 and RBRS 3)
Publish on website contact information required by the Registrar Information Specification (RAA 3.17)
Enter into a registration agreement with RNH (RAA 3.7.7)
Enter into a registration agreement with RNH that is compliant with RAA and ICANN Consensus Policies
Cure breaches of the RAA within 21 days (RAA 5.5.4)
Publish on website name and position of officers (RAA 3.17 and RIS)
Receiving three Notices of Breach within a twelve-month period (RAA 5.5.6)
Require P/P providers to follow requirements of P/P Specification and abide by published terms and procedures (P/P Specification 2)
Include privacy/proxy customer contact information in Registration Data Escrow deposits ("P/P Specification 2.5)
Review within 24 hours and take actions in response to abuse reports from designated authorities (RAA 3.18.2)
Send renewal reminders to RNH (2.1.1 ERRP)
Send renewal reminders to RNH (2.1.1 ERRP)
Sent renewal reminder notices to RNH (ERRP 2.1)
Delete domain name within 45 days after termination of registration or explain circumstances of renewal (3.7.5.3 RAA)
Investigate and respond to abuse reports (RAA 3.18)
Be in compliance with RAA at the time of renewing Accreditation (RAA 5.4)
Complete and provide Compliance Certificate (RAA 3.15)
Validate and verify Whois contact information (Whois Accuracy Program Specification 2/4)
Validate and verify Whois contact information (Whois Accuracy Program Specification 4)
Verify or re-verify the email addresses of RNHs (RAA - Whois Accuracy Program Specification 4)