Internet Corporation for Assigned Names & Numbers
Contractual Compliance Update
January – March 2015

2015 Quarterly Report

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

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General Update

ICANN's 52nd Public Meeting in Singapore, 9 – 12 February 2015

Read about the Contractual Compliance ICANN 52 activities and outreach sessions at this link https://www.icann.org/resources/compliance/outreach

Systems Update

In the first quarter of 2015, the Contractual Compliance system efforts focused on additional automation to improve processing and capture additional closure reason codes. A sample list of enhancements is provided below:

(1) Automate sending anonymous complaints by masking reporter information when requested;
(2) Clarify and simplify wording in the communication templates;
(3) Include ticket IDs and standardize subject headings for closure notices;
(4) Provide auto confirmation email to all responses received by ICANN between 1st Inquiry/Notice and the closure notice;
(5) Ensure automated closure notices are sent to the proper registrar contact(s);
(6) Provide registrars with a weekly report of open (and recently closed) tickets; and
(7) Add a closure reason code to account for a complaint closed due to "ICANN issue".

Monthly Dashboard

ICANN updated the Contractual Compliance Monthly Dashboard to include reporting on the number of complaints that were closed upon receipt and did not require a 1st Inquiry or Notice to be sent to a registrar or a registry operator. For

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[1] This update is provided for information purposes only. Please do not rely on the information contained within this update to make conclusions or business decisions.

example, in February 2015, the Whois Inaccuracy complaint type had a total of 1901 complaints; of those, ICANN closed 1004 complaints that did not require a 1st Inquiry or Notice to be sent to the registrar. A complaint may be closed before a 1st Inquiry or Notice is sent to the registrar or registry because, among other things, the complaint is either not valid, or it has been determined that the registrar or registry already addressed the issue. Please refer to the ICANN 52 Contractual Compliance Update for closure reasons at this link https://www.icann.org/resources/compliance/outreach.

Please visit https://features.icann.org/compliance/dashboard/010215/report for the monthly dashboard.

Regional News

This past quarter, ICANN Contractual Compliance participated in several events in Europe, Middle East and Africa, and one event in the Asia Pacific region.

On 27 January 2015, ICANN hosted a webinar for the ICANN-accredited registrars in Europe, Middle East and Africa. The focus was on ICANN policy changes for 2015 as it relates to Inter-Registrar Transfer Policy, Additional Whois Information Policy and Uniform Domain-Name Dispute Resolution Policy.

On 18 March 2015, ICANN's Contractual Compliance team attended the Africa Focus webinar on the ICANN Accreditation Process organized by ICANN's Global Stakeholder Engagement (GSE) Africa team. Registrar and Registry Services conducted an outreach session and answered questions from potential applicants from Africa.

On 26 March 2015, ICANN's Contractual Compliance team met with a Generic Names Supporting Organization (GNSO) Council member representing the Noncommercial Users Constituency (NCUC) to address questions related to the Contractual Compliance Global Model and its implementation across the three hubs.

On 9 April 2015, ICANN's Contractual Compliance team members attended the Asia-Pacific Regional At-Large Organization (APRALO-APAC) Webinar: "What Are IDNs And What Does It Mean To You?" This webinar focused on the efforts currently underway by ICANN to inform and educate stakeholders on the importance and global acceptance of Internationalized Domain Names (IDNs).

Registrar Update

Whois Accuracy Reporting System (ARS)
The Whois ARS is a framework for conducting repeatable assessments of Whois accuracy over time and publicly reporting the findings.

As reported in the Contractual Compliance Update for December 2014, ICANN's Contractual Compliance team began efforts to review and test the data provided from the Whois ARS pilot. This included reviewing over 7000 records identified

as inaccurate by the Whois ARS Pilot, following up with vendors to clarify information in the report, sending notices to impacted registrars and discussions with registrars. On-going feedback is provided to the Whois ARS team to assist with improving the Whois ARS moving forward.

Transfer Emergency Action Contact (TEAC)

Recently, ICANN noticed an increase in TEAC activity. Section 4 of the Inter-Registrar Transfer Policy established the TEAC to help prevent and assist in the unauthorized loss of domain names affecting registrants. Some of the issues were: (1) responding within four hours, although final resolution of the incident may take longer; (2) the TEAC email address and telephone number were the same as the transfer contact; (3) the TEAC was not monitored 24/7 by a human representative; or (4) TEAC responses were not timely and did not provide the requested information to the losing registrar.

Abuse Report Handling Requirements

During the first quarter of 2015, the Contractual Compliance team has continued to engage in discussions with registrars and various community constituencies regarding the abuse report handling requirements under Section 3.18 of the 2013 Registrar Accreditation Agreement, including at ICANN 52 and during one-on-one sessions with these parties. Please refer to the ICANN 52 Contractual Compliance Update, slides 7-9, for details on these requirements.

Registry Update

Annual Certification Update

A Registry Operator, or Registry Related Party (as defined in Specification 9 of the registry agreement) that also operates as a provider of registrar or registrar-reseller services, must submit an annual certification of compliance with Specification 9 by 20 January of each calendar year. Likewise, registries with dot Brand status (Specification 13), and those to which ICANN granted an exemption to the code of conduct, must submit annual certifications attesting their continued meeting of the requirements for either status granted.

ICANN checked that the registries that should have submitted certifications did so, and that the certifications submitted complied with the minimum requirements.

Common deficiencies noted, among others, were the following: (1) the signatory of the annual certification not being an executive officer of the Registry operator; and (2) failing to make the required submission under the premise that it is only due if the gTLD is delegated into the root zone. ICANN reminds the stakeholders that the obligations of the Code of Conduct arise upon signing the registry agreement.

Abuse Contact Monitoring Effort

ICANN continued its proactive monitoring of the abuse contact information that

registries under the New Registry Agreement must publish on their websites. By doing so, ICANN ensures that end-users, including but not limited to law enforcement agencies, find a point of contact to report malicious activities in the TLDs.

During this quarter, ICANN reviewed the websites of 64 top-level domains that started the Claims Period between 1 January 2015 and 31 March 2015. The number of non-compliance inquiries or notices to registries was lower than in the previous round of monitoring. Some of the deficiencies noted were the following: not displaying the required information at all, missing primary contact, or missing mailing address for abuse reports. ICANN is collaborating with the registries to remediate the non-compliance found.

Public Interest Commitment Dispute Resolution Standing Panel Update
To support ICANN's plans to expand the Standing Panel responsible for administering the Public Interest Commitment Dispute Resolution Procedure (PICDRP), the Contractual Compliance team collaborated with the Registry Services team during the interview and selection process. The candidates' diversity in geographic and cultural representation as well as experience was considered in completing the selection and composition of the Panel. More than 10 candidates were interviewed over the span of three weeks.

Audit Program Update

New Registry Agreement Audit Update

The New Registry Agreement audit program was launched in 2014. This was the first audit conducted for this agreement. Based on feedback received from the audited registry operators and comments brought up during ICANN 52, ICANN modified some of the questions in the audit request and implemented audit report improvements. ICANN plans to use the New Registry Agreement audit program published at this link https://www.icann.org/resources/pages/audits-2012-02-25-en in 2015.

The next round of the New Registry Agreement audit was initiated on 23 March 2015. A pre-audit notification was sent to all Registry Operators on 9 March 2015. Eleven Registry Operators were selected. Factors impacting the audit selections are based on three criteria: (1) Number of registered domains per TLD; (2) Includes International Domain Names, Sunrise, Trade Mark Claims and General availability TLDs; and (3) Includes gTLDs with voluntary Public Interest Commitments. Two outreach sessions were conducted on 25 March 2015 for the selected TLDs. The outreach presentation can be found at this link https://www.icann.org/resources/compliance/outreach.

Year Three of the Three-Year Audit Program

The Year Three Audit program is in-progress; see timeline below. All audited parties are actively cooperating with the Contractual Compliance team. Some already received audit reports that do not require any follow-up; the rest are providing additional documentation, taking corrective action or developing a remediation plan to address a deficiency. Four registrars received Notices of Breach due to irresponsiveness to the audit request, as reported in the Contractual Compliance Update for December 2014. Two took action to become compliant and two were terminated.

Year Three Audit Program Milestone Dates											
Pre-Audit Notification	**RFI Notification Phase**				**Audit Phase**		**Reporting Phase**		**Remediation Phase**		
	RFI - 1st Notice	**RFI - 2nd Notice**	**RFI - 3rd Notice**	**RFI - 3rd Notice**	**Start**	**End**	**Start**	**End**	**Start**	**End**	
06-Oct-14	10/20/2014 *Outreach session(s): 21 and 22 Oct 2014	11-Nov-14	18-Nov-14	24-Nov-14	01-Dec-14	06-Mar-15	09-Mar-14	23-Mar-15	09-Mar-15	29-May-15	

Complaints Handling and Enforcement Summary

## Registrar - Volume Received Current Quarter | Jan-Mar 2015

Complaint Distribution
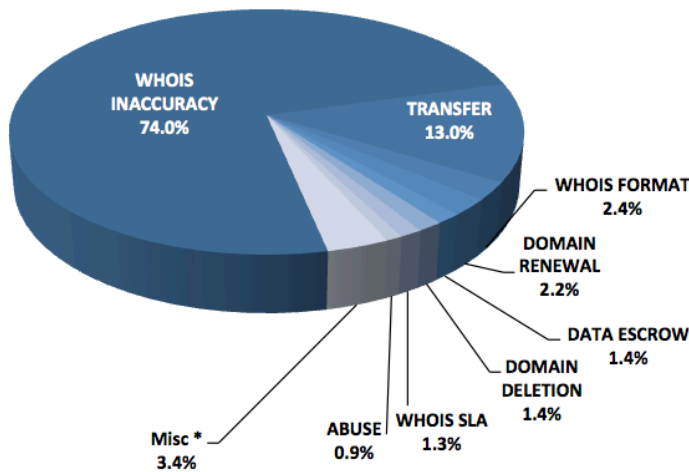
Complaints	
Type	**Quantity**
ABUSE	83
CEO CERTIFICATION	33
CUSTOMER SERVICE	33
DATA ESCROW	128
DNSSEC, IDN, IPV6	4
DOMAIN DELETION	127
DOMAIN RENEWAL	203
FAILURE TO NOTIFY	4
FEES	42
PRIVACY/PROXY	5
REGISTRAR CONTACT	19
REGISTRAR INFO SPEC	30
REGISTRAR OTHER	22
RESELLER AGREEMENT	6
TRANSFER	1,198
UDRP	45
WHOIS FORMAT	221
WHOIS INACCURACY	6,813
WHOIS QUALITY REVIEW	7
WHOIS SLA	117
WHOIS UNAVAILABLE	67
Total Complaints Processed	9,207
Total Complaints Closed	10,017

Registry - Volume Received Current Quarter | Jan-Mar 2015

Complaint Distribution
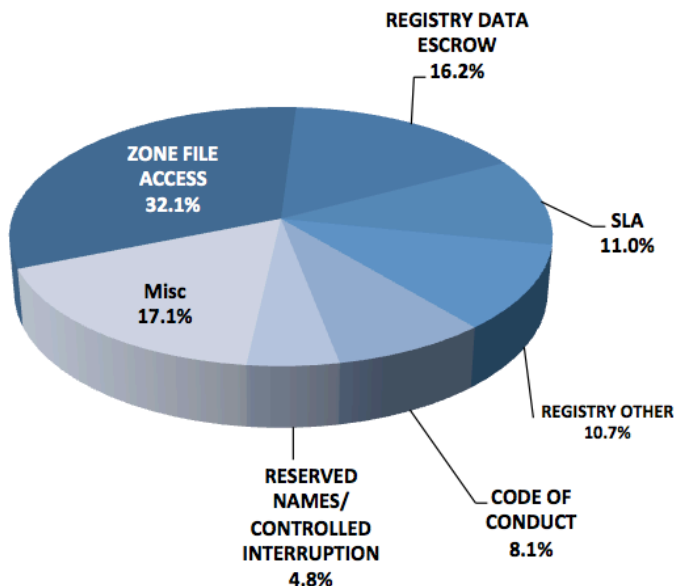
Complaints	
Type	**Quantity**
ABUSE CONTACT DATA	9
BRDA	13
BULK ZFA	14
CODE OF CONDUCT	54
MONTHLY REPORT	21
PIC	4
REGISTRY DATA ESCROW	108
REGISTRY FEES	30
REGISTRY OTHER	71
RESERVED NAMES/CONTROLLED INTERRUPTION	32
RR-DRP	7
SLA	73
SUNRISE	5
URS	11
Total Complaints Processed	666
Total Complaints Closed	695

Complaint Volume per Notification Cycle
January - March 2015
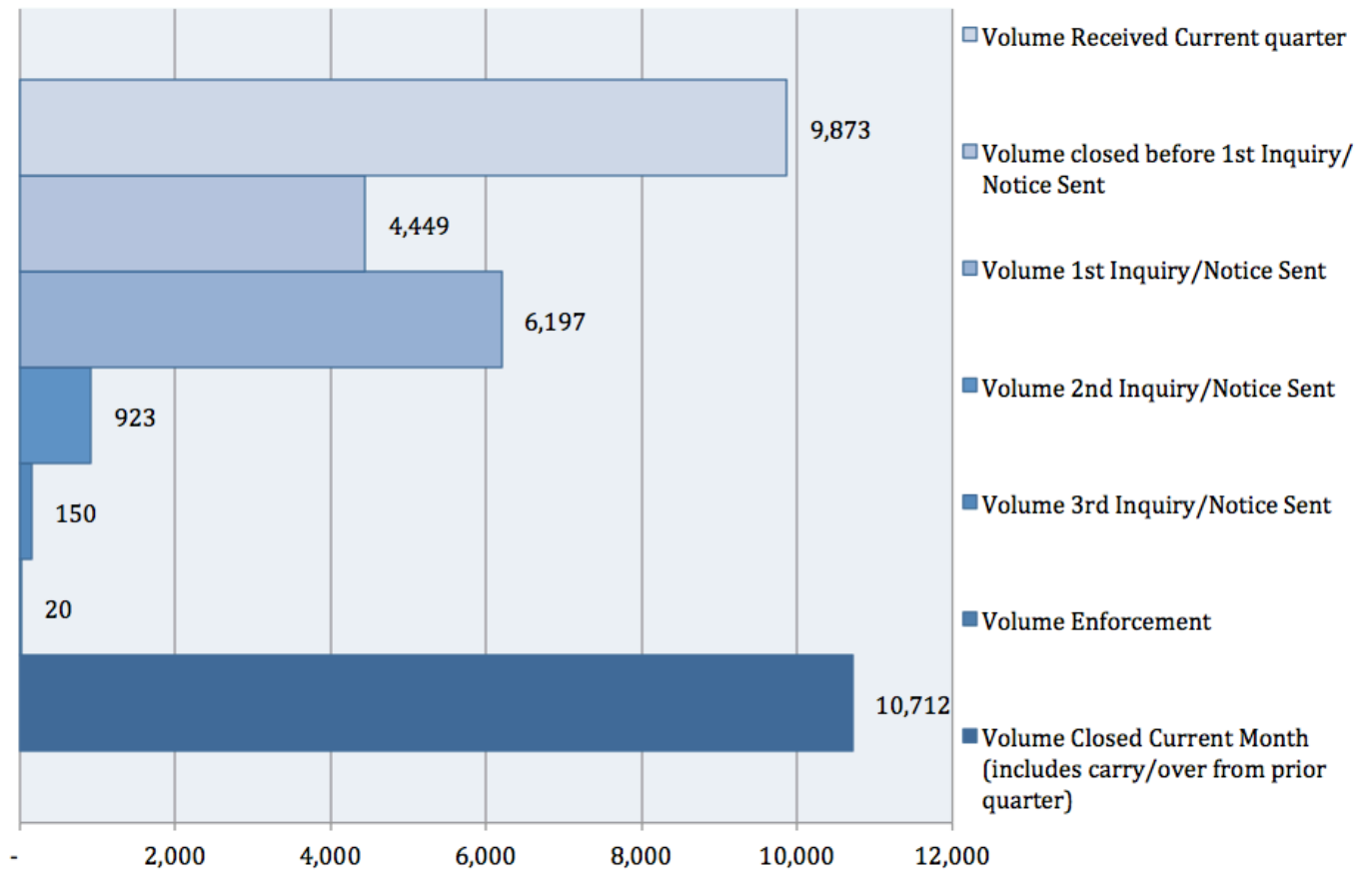
- **Volume Received Current Quarter** = tickets submitted in current quarter
- **Volume Closed before 1st Inquiry / Notice Sent** = number tickets closed before 1st Inquiry / Notice was sent in current quarter
- **Volume 1st Inquiry / Notice Sent** = number tickets where 1st Inquiry / Notice was sent in current quarter
- **Volume 2nd Inquiry / Notice Sent** = number tickets where 2nd Inquiry / Notice was sent in current quarter
- **Volume 3rd Inquiry / Notice Sent** = number tickets where 3rd Inquiry / Notice was sent in current quarter
- **Volume Enforcement** = number enforcements notices sent in current quarter
- **Volume Closed** = number tickets closed in current quarter

SENT DATE	DUE DATE	REGISTRAR	NOTICE TYPE	STATUS	FAILURE NOTICE BASIS
			ENFORCEMENT ACTIVITY for JAN - MAR 2015		
5-Mar-15	26-Mar-15	Mister Name SARL	Breach	Cure Period Extended Until 7 April 2015	Escrow registration data (RAA 3.6)
					Provide Whois Services (RAA 3.3.1)
					Pay accreditation fees (RAA 3.9)
11-Mar-15	1-Apr-15	Verelink, Inc.	Breach	Breaches cured	Pay accreditation fees (RAA 3.9)
17-Mar-15	7-Apr-15	Shanghai Oweb Network Co., Ltd	Breach		Pay accreditation fees (RAA 3.9)
					Provide domain name data in the specified response format (RAA-RDDS 1.4)
					Display link to ICANN's Registrant Educational Information (RAA 3.16)
					Publish on website name and position of officers (RAA 3.17 and RIS)
					Publish on website email address for abuse reports (RAA 3.18.1)
					Publish on website description of procedures for the receipt and tracking of abuse reports (RAA 3.18.3)
					Publish on website link to Registrants' Benefits and Responsibilities Specification (RAA 3.7.10)
					Provide a policy consistent with the requirements of 2.1 of the ERRP
					Display renewal/redemption fees (ERRP 4.1)
					Display correct ICANN Logo on website (RAA Logo License Appendix)
17-Mar-15	7-Apr-15	OpenTLD B.V.	Breach		Complete and provide Compliance Certificate (RAA 3.15)
					Display correct ICANN Logo on website (RAA Logo License Appendix)
					Escrow registration data (RAA 3.6)
					Pay accreditation fees (RAA 3.9)
20-Mar-15		Identify.com Web Services LLC	Termination	*Effective: 17 April 2015*	Cure any RAA breach within 15 working days (RAA 5.3.4)
30-Mar-15	20-Apr-15	Everyones Internet, Ltd. dba SoftLayer	Breach		Maintain and provide communication records (RAA 3.4.2/3)
					Link to ICANN's registrant rights and responsibilities website (RAA 3.15)
					Display renewal/redemption fees (ERRP 4.1)
					Display methods used to deliver pre- and post-expiration notifications (ERRP 4.2)
5-Feb-15	26-Feb-15	DropLabel.com, Inc.	Breach	Cure Period Extended Until 18 March 2015; Cure Period Extended Until 1 April 2015	Escrow registration data (RAA 3.6)
					Maintain and provide information required by the Registrar Information Specification (RAA 3.17)
					Publish on website name and position of officers (RAA 3.17 and RIS)
					Publish on website email address for abuse reports (RAA 3.18.1)

					Maintain and provide records related to abuse reports (RAA 3.18.3)
					Provide Whois Services (RAA 3.3.1)
					Publish on website auto-renew and deletion policy (RAA 3.7.5.5)
					Display renewal/redemption fees (ERRP 4.1)
19-Feb-15	12-Mar-15	Tirupati Domains and Hosting Pvt Ltd.	Breach	Breaches Cured	Pay accreditation fees (RAA 3.9)
24-Feb-15	17-Mar-15	Identify.com Web Services LLC	Breach		Maintain and provide communication records (RAA 3.4.2/3)
					Provide Whois Services (RAA 3.3.1)
					Pay accreditation fees (RAA 3.9)
9-Jan-15	30-Jan-15	Netlynx Inc.	Breach	Data and Documents Under Review by ICANN; Cure Period Extended Until 6 February 2015; Breaches Cured	Investigate and respond to abuse reports (RAA 3.18.1)
					Maintain and provide records related to abuse reports (RAA 3.18.3)
					Maintain and provide communication records (RAA 3.4.2/3)
					Publish on website information required by the Registrar Information Specification (RAA 3.17)
					Display correct ICANN Logo on website (RAA Logo License Appendix)
13-Jan-15	3-Feb-15	ELB Group Inc	Breach	Breaches Cured	Provide domain name data in the specified response format (RAA-RDDS 1.4)
					Publish on website name and position of officers (RAA 3.17 and RIS)
					Publish on website email address for abuse reports (RAA 3.18.1)
					Maintain and provide records related to abuse reports (RAA 3.18.3)
					Publish on website auto-renew and deletion policy (RAA 3.7.5.5)
					Pay accreditation fees (RAA 3.9)
15-Jan-15	6-Feb-15	Visesh Infotecnics Ltd. d/b/a Signdomains.com	Breach	Cure Period Extended Until 23 February 2015; Cure Period Extended Until 18 March 2015; Cure Period Extended Until 30 March 2015	Pay accreditation fees (RAA 3.9)
					Display renewal/redemption fees (ERRP 4.1)
					Display correct ICANN Logo on website (RAA Logo License Appendix)
15-Jan-15		WebZero, Inc.	**Termination**	*Effective: 13 February 2015*	Cure any RAA breach within 15 working days (5.3.4 RAA)
15-Jan-15		Black Ice Domains, Inc.	**Termination**	*Effective: 13 February 2015*	Cure any RAA breach within 15 working days (5.3.4 RAA)
20-Jan-15	10-Feb-15	Net 4 India Limited	Breach	Data and Documents Under Review by ICANN; Cure Period Extended Until 17 February 2015; Cure Period Extended Until 31 March 2015	Provide domain name data in the specified response format (RAA-RDDS 1.4)
					Maintain and provide records related to abuse reports (RAA 3.18.3)
					Display correct ICANN Logo on website (RAA Logo License Appendix)

22-Jan-15	12-Feb-15	Above.com Pty Ltd.	Breach	Breaches Cured	Maintain and provide communication records (RAA 3.4.2/3)
					Investigate and respond to abuse reports (RAA 3.18.1)
					Maintain and provide records related to abuse reports (RAA 3.18.3)
					Publish on website name and position of officers (RAA 3.17 and RIS)
					Display link to ICANN's Registrant Educational Information (RAA 3.16)
22-Jan-15	12-Feb-15	Astutium Limited	Breach	Breach Notice Correction (Past Due Fees Removed); Cure Period Extended Until 1 March 2015; Breaches Cured	Maintain and provide communication records (RAA 3.4.2/3)
					Investigate and respond to abuse reports (RAA 3.18.1)
					Maintain and provide records related to abuse reports (RAA 3.18.3)
					Display correct ICANN Logo on website (RAA Logo License Appendix)
30-Jan-15	20-Feb-15	Domain Jamboree, LLC	Breach	Cure Period Extended Until 27 February 2015; Cure Period Extended Until 24 March 2015; Breaches Cured	Notify ICANN within 30 days of an entity's acquisition of a controlling interest in registrar's stock, assets or business (RAA 5.9.2)
					Communicate contact data changes (RAA 5.11)
					Pay accreditation fees (RAA 3.9)
30-Jan-15	20-Feb-15	Times Internet Limited	Breach	Data and Documents Under Review by ICANN; Cure Period Extended Until 10 March 2015; Data and Documents Under Review by ICANN; Cure Period Extended Until 25 March 2015	Provide Whois Services (RAA 3.3.1)
					Provide domain name data in the specified response format (RAA-RDDS 1.4)
					Publish on website link to Registrants' Benefits and Responsibilities Specification (RAA 3.7.10)
					Publish on website email address for abuse reports (RAA 3.18.1)
					Maintain and provide records related to abuse reports (RAA 3.18.3)
					Pay accreditation fees (RAA 3.9)

Please refer to http://www.icann.org/en/resources/compliance/notices for up-to-date information on enforcement activities.