



Implementation of the Whois Data Reminder Policy (WDRP)

30 November 2004

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Executive Summary

Beginning on 31 October 2003, all ICANN-accredited registrars were obligated to comply with the new "Whois Data Reminder Policy" (WDRP). The WDRP is intended as an additional step to help improve the accuracy of Whois data. This Report on Implementation of the WHOIS Data Reminder Policy (Report) provides a statistical and narrative summary of experiences with the WDRP in terms of implementation status, registrar compliance, problems encountered and impact on the accuracy of Whois data. It uses a variety of means to assess implementation of the WDRP, including results from the "Whois Data Reminder Policy Survey and Compliance Audit" that was sent to all 364 ICANN-accredited registrars in October 2004. It also relies upon interviews with individual registrars, interviews with ICANN constituencies and relevant statistical data.

The assessment indicates that overall compliance appears to be relatively strong, based on a response rate of 70% to the survey. Of those registrars that sent Notices in accordance with the WDRP, at least 80% of them did so in advance of the date required by the policy, i.e., "before passage of the anniversary of the creation date of each registration." The vast majority of registrars that indicated they had not sent WDRP Notices – at least 89% -- did not do so for legitimate reasons. Some indicated that they were not yet operational registrars, that they did not have any domains registered or that their registrations were too new to have anniversary dates. Review of the samples of actual WDRP Notices that ICANN requested from each registrar provided further evidence of compliance.

A number of registrars described positive or negative experiences with the WDRP. Some indicated there were no problems, while others raised concerns or made suggestions for improvements. The most frequently cited problem was that registrars that operate through resellers found it awkward to be contacting registrants directly.

It appears that a number of the WDRP Notices – at least several thousand – have led to changes in registrant data. The fact that there have been a number of changes therefore suggests that the data is becoming more, rather than less, accurate over time.

Feedback from the registrars and ICANN constituencies has suggested ways to improve implementation of the WDRP and foster full compliance. These suggestions will be studied further for possible recommendation to the broader ICANN community.

Introduction

This report summarizes ICANN's experience with implementation of the Whois Data Reminder Policy (WDRP). The WDRP (<http://www.icann.org/registrars/wdrp.htm>) was adopted by ICANN as a consensus policy on 27 March 2003. It is intended to be an additional step towards improving Whois data accuracy. The Policy requires that a registrar present current Whois information to each registrant, at least annually, and remind the registrant that the provision of false data can be grounds for cancellation of a registration. Registrants must review their Whois data and make any necessary corrections.

This Report on Implementation of the WHOIS Data Reminder Policy (Report) is being published in accordance with Amendment 6 to the ICANN/DOC Memorandum of Understanding (MOU) (<http://www.icann.org/general/amend6-1pamou-17sep03.htm>). Section II.C.10 (b) of that amendment to the MOU provides that:

“ICANN shall publish a report no later than November 30, 2004, and annually thereafter, providing statistical and narrative information on the implementation of the ICANN WHOIS Data Reminder Policy. The report shall include statistics on registrar compliance with the policy and information obtained regarding results of the implementation of the WHOIS Data Reminder Policy. The narrative information shall include implementation status, information on problems encountered, and an evaluation of the impact of the WHOIS Data Reminder Policy on improved accuracy of WHOIS data.”

This Report describes the requirements relating to Whois data and the new Policy. It provides statistical and narrative information on implementation status, registrar compliance, problems encountered, and possible impact on Whois accuracy. The report is divided into nine sections:

- I. Whois Requirements
- II. WDRP Requirements
- III. Methodology
- IV. Implementation Status and Discussion of Data
- V. Registrar Compliance
- VI. Extent of Problems

VII. Impact on Accuracy

VIII. Follow-up Actions

IX. Conclusions

A separate report on “Community Experiences with the InterNIC WHOIS Data Problem Reports System” (WDPRS Report) was previously published, in accordance with the MOU, on 31 March 2004

(<http://www.icann.org/whois/WDPRS-report-final.pdf>).

I. Whois Requirements

Whois data for generic Top Level Domains (gTLDs) includes information about the registrant, administrative contact, technical contact, and nameservers associated with each domain name. This information is used for a variety of important purposes, including resolution of technical network issues, identification and verification of online merchants, investigations by consumer protection and law enforcement authorities, enforcement of intellectual property rights, identification of sources of spam e-mail, and determinations of whether a domain name is available for registration. Whois services have been available on the Internet since the early 1980s and continue to be broadly used. According to an online survey of over 3,000 participants (representing businesses, governments, ISPs, registrars, individuals, and non-commercial organizations) conducted by the ICANN Domain Name Supporting Organization in 2001, Internet users broadly consider accurate Whois data to be important and support measures to improve its accuracy

(<http://www.dnso.org/dnso/notes/whoisTF/20020625.TFwhois-report.htm>).

ICANN's contracts with accredited registrars require them to obtain contact information from registrants, to provide it publicly by a Whois service, and to investigate and correct any reported inaccuracies in the contact information for names they sponsor. Several provisions of the ICANN Registrar Accreditation Agreement (RAA) (<http://www.icann.org/registrars/ra-agreement-17may01.htm>) relate to Whois data, including:

3.3.1 At its expense, Registrar shall provide an interactive web page and a port 43 Whois service providing free public query-based access to up-to-date (i.e., updated at least daily) data concerning all active Registered Names sponsored by Registrar for each TLD in which it is accredited. The data accessible shall consist of elements that are designated from time to time according to an ICANN adopted specification or policy. Until ICANN otherwise specifies by means of an ICANN adopted specification or policy,

this data shall consist of the following elements as contained in Registrar's database:

3.3.1.1 The name of the Registered Name;

3.3.1.2 The names of the primary nameserver and secondary nameserver(s) for the Registered Name;

3.3.1.3 The identity of Registrar (which may be provided through Registrar's website);

3.3.1.4 The original creation date of the registration;

3.3.1.5 The expiration date of the registration;

3.3.1.6 The name and postal address of the Registered Name Holder;

3.3.1.7 The name, postal address, e-mail address, voice telephone number, and (where available) fax number of the technical contact for the Registered Name; and

3.3.1.8 The name, postal address, e-mail address, voice telephone number, and (where available) fax number of the administrative contact for the Registered Name.

3.7.7 Registrar shall require all Registered Name Holders to enter into an electronic or paper registration agreement with Registrar including at least the following provisions:

3.7.7.1 The Registered Name Holder shall provide to Registrar accurate and reliable contact details and promptly correct and update them during the term of the Registered Name registration, including: the full name, postal address, e-mail address, voice telephone number, and fax number if available of the Registered Name Holder; name of authorized person for contact purposes in the case of an Registered Name Holder that is an organization, association, or corporation; and the data elements listed in Subsections 3.3.1.2, 3.3.1.7 and 3.3.1.8.

3.7.7.2 A Registered Name Holder's willful provision of inaccurate or unreliable information, its willful failure promptly to update information provided to Registrar, or its failure to respond for over fifteen calendar days to inquiries by Registrar concerning the

accuracy of contact details associated with the Registered Name Holder's registration shall constitute a material breach of the Registered Name Holder-registrar contract and be a basis for cancellation of the Registered Name registration.

3.7.7.3 Any Registered Name Holder that intends to license use of a domain name to a third party is nonetheless the Registered Name Holder of record and is responsible for providing its own full contact information and for providing and updating accurate technical and administrative contact information adequate to facilitate timely resolution of any problems that arise in connection with the Registered Name. A Registered Name Holder licensing use of a Registered Name according to this provision shall accept liability for harm caused by wrongful use of the Registered Name, unless it promptly discloses the identity of the licensee to a party providing the Registered Name Holder reasonable evidence of actionable harm.

3.7.8 Registrar shall abide by any specifications or policies established according to Section 4 requiring reasonable and commercially practicable (a) verification, at the time of registration, of contact information associated with a Registered Name sponsored by Registrar or (b) periodic re-verification of such information (emphasis added). Registrar shall, upon notification by any person of an inaccuracy in the contact information associated with a Registered Name sponsored by Registrar, take reasonable steps to investigate that claimed inaccuracy. In the event Registrar learns of inaccurate contact information associated with a Registered Name it sponsors, it shall take reasonable steps to correct that inaccuracy.

Based on the above provisions of the RAA, a registrar must:

- Require each registrant to submit (and keep updated) accurate contact details (3.7.7.1);
- Provide both a web-based and Port 43 Whois service providing access to complete contact information for all TLDs covered under the RAA (3.3.1);
- Require registrants to agree that willfully submitting inaccurate contact details (or failing to respond within 15 days to an inquiry regarding accuracy) shall be a basis for cancellation of the registration (3.7.7.2);
- Take reasonable steps to investigate and correct the contact details in response to any reported inaccuracy (3.7.8); and
- Comply with any consensus policies adopted by ICANN (4.1).

ICANN had taken several steps prior to adoption of the WDRP to improve the accuracy of Whois data. These steps include:

- On 10 May 2002, ICANN reminded registrars of the importance of understanding their obligations regarding the accuracy of Whois data in a “Registrar Advisory Concerning Whois Data Accuracy” (<http://www.icann.org/announcements/advisory-10may02.htm>).
- On 3 September 2002, ICANN took additional steps to improve the accuracy of Whois data, see Announcement on Steps to Improve Whois Data Accuracy (<http://www.icann.org/announcements/announcement-03sep02.htm>). ICANN developed a system for receiving and tracking complaints about inaccurate or incomplete Whois data. As noted above, the first annual report on the “Whois Data Problem Reports System” was published on 31 March 2004. That report described several meaningful changes to the WDPRS that will improve its efficacy
- On 3 April 2003, shortly after adopting the WDRP, ICANN issued a “Registrar Advisory Concerning the ‘15-day Period’ in Whois Accuracy Requirements” (<http://www.icann.org/announcements/advisory-03apr03.htm3>). That advisory provided guidance on a registrar’s right to cancel a registration.

II. WDRP Requirements

The WDRP was adopted as a consensus policy on 27 March 2003 by ICANN’s Board of Directors in [resolution 03.41](#) by a 13-1-0 vote. All ICANN-accredited registrars must comply with the WDRP with respect to registrations they sponsor in all top-level domains for which they are accredited.

The WRDP was one of [four policies](#) concerning Whois issues that the Generic Names Supporting Organization (GNSO) Council recommended be established as consensus policies. The GNSO Council and Board votes were based on the [Final Report of the GNSO Council's Whois Task Force on Whois Data Accuracy and Bulk Access](#) (GNSO Whois Report). That report documented [the extent of agreement and disagreement among impacted groups](#), the [outreach process](#) used to seek to achieve adequate representation of the views of groups that were likely to be impacted, and the [nature and intensity of reasoned support and opposition to the proposed policy](#). The GNSO Whois Report was posted on the ICANN web site on 11 March 2003, with a call for public comment. [Various public comments](#) were received and considered by the Board. The report was discussed at the [ICANN Public Forum session held in Rio de Janeiro on 26 March 2003](#), prior to its adoption by the Board the following day.

On 16 June 2003, ICANN provided notice of adoption of the Policy to all registrars and posted the “Whois Data Reminder Policy” (<http://www.icann.org/registrars/wdrp.htm>) (a copy of the Policy is contained in Appendix A). All registrars were required to come into compliance with the WDRP by a specific "Compliance Date." The Compliance Date for registrars

accredited before 16 June 2003 was 31 October 2003. The Compliance Date for registrars accredited since 16 June 2003 is the effective date of their accreditation agreements.

Beginning with its Compliance Date, each registrar must provide, before the passage of the anniversary of the creation date of each registration under its sponsorship, a WDRP Notice (also called a “Reminder Notice”) to the registrant. The following chart provides three examples of when a Notice is due:

Table 1 - Compliance Date (31 October 2003)

Domain Name	Creation Date	WDRP Notice Required No Later Than
example.com	14 October 1995	14 October 2004 (and by 14 October of every year thereafter)
example.net	12 November 1997	12 November 2003 (and by 12 November of every year thereafter)
example.org	25 June 2003	25 June 2004 (and by 25 June of every year thereafter)

Each WDRP Notice must include a copy of the data elements contained in the registrar's database for that registration (as specified in [RAA subsection 3.3.1](#)). The WDRP Notice must also include a statement reminding the registrant that under the terms of its RAA, [the provision of false Whois information can be grounds for cancellation of a domain name registration](#).¹

A WDRP Notice can be presented via web, fax, postal mail, e-mail, or other appropriate means. It can be presented in one or more languages, including at least the language of the registration agreement. The Notice may be presented to the registrant either directly or through the administrative contact for each registration.

Registrars [must maintain](#) either copies of each WDRP Notice or an electronic database documenting the date and time, and the content, of each WDRP Notice sent under this policy. Registrars are required to [make these records available](#)

¹ As noted above, section 3.7.7.2 of the RAA provides that a registrant's “willful provision of inaccurate or unreliable information, its willful failure promptly to update information provided to Registrar, or its failure to respond for over fifteen calendar days to inquiries by Registrar concerning the accuracy of contact details associated with the . . . registration shall constitute a material breach of the [agreement] . . . and be a basis for cancellation” of the domain name.

[for inspection by ICANN](#) in accordance with the RAA.² ICANN will consider proper notification to have been given for a registration if the registrar can show that a WDRP Notice meeting the requirements described above was given at any time in the year before each anniversary of the registration's creation date. A [Model WDRP Notice](#) was posted along with the Policy and is contained at the end of Appendix A to this Report.

III. Methodology

This Report uses a variety of means to assess WDRP efficacy, including implementation status, registrar compliance, problems encountered and impact on the accuracy of Whois data. These means include a survey, interviews with individual registrars and ICANN constituencies, and relevant statistical data. Significant data was obtained through the “*Whois Data Reminder Policy Survey and Compliance Audit*” that was sent to all 364 ICANN-accredited registrars.

The *survey* was designed to elicit important information about registrar implementation of and compliance with the WDRP. The questions posed covered:

- The size of the registrar;
- The percentage of registrations for which WDRP Notices had been sent;
- The method of transmitting the Notices;
- The percent of WDRP Notices that were undeliverable;
- The language(s) in which the WDRP Notices were sent;
- When the WDRP Notices were sent;
- The percent of WDRP Notices that led to changes in registrant data; and
- The fields that were most frequently changed.

The last question in the survey invited registrars to use a free text box to describe any problems they had encountered during implementation, and to provide any suggestions for improving the WDRP or the accuracy of Whois data generally. Registrars were also asked to provide a sample copy of an actual WDRP Notice to ICANN for review for compliance with the WDRP requirements. A copy of the survey is contained in Appendix B.

Interviews were conducted with registrars that indicated they would be willing to assist in this manner. Interviews were also conducted with key ICANN constituencies to determine whether they had any feedback on WDRP implementation. The constituencies surveyed were ICANN's Intellectual Property

² Section 3.4.2 of the RAA provides that “[d]uring the Term of this Agreement and for three years thereafter, Registrar shall make these records available for inspection and copying by ICANN upon reasonable notice. ICANN shall not disclose the content of such records except as expressly permitted by an ICANN specification or policy.”

Constituency, Commercial and Business Constituency, and At-Large Advisory Committee (ALAC). Questions posed to these constituencies included:

- Whether their members had received WDRP Notices for all relevant registrations;
- How easy it was to respond to such Notices;
- What, if any, problems were encountered; and
- Whether they perceive any change in the accuracy of Whois data since implementation of the WDRP.

Data on the Whois Data Problem Reports System was examined for indications of whether the accuracy of Whois data was generally improving.

IV. Implementation Status and Discussion of Data

Compliance with the WDRP is a current requirement for all 364 ICANN-accredited registrars. The Compliance Date for implementation of the WDRP for registrars accredited before 16 June 2003 was 31 October 2003. The Compliance Date for registrars accredited since 16 June 2003 is the effective date of their accreditation agreements.

All registrars are required to provide each registrant with a WDRP Notice that contains its Whois data before the anniversary of the creation date of each registration. All registrations more than one year old should therefore have already been the subject of a WDRP Notice. Newer registrations would not have to be the subject of a Notice until just before the one-year anniversary of their creation date.

A total of 254 registrars (70% of all ICANN-accredited registrars) responded to the "Whois Data Reminder Policy Survey and Compliance Audit." The 254 registrars that responded include ten of the 15 largest registrars, which together sponsor more than 23.3 million domain names. Nineteen additional registrars that responded each have more than 100,000 names under sponsorship. An additional 38 registrars each have between 10,000 and 100,000 names under sponsorship. Sixteen more registrars each have between 1,000 and 9,999 names under sponsorship, while 171 registrars indicated that they each sponsor less than 1,000 names. The table below illustrates the size of the registrars responding to the survey, and what percentage of each category they constitute:

Table 2 – Responding Registrar Size

Size	# of Respondents	Percent Responding (per category)
More than 1,000,000	6	67%
Between 1,000,000 and 100,000	23	68%
Between 10,000 and 99,999	38	61%
Between 1,000 and 9,999	16	37%
Fewer than 1,000	171	78%
Total	254	70%

About half of the registrars that responded indicated that they were newly accredited and therefore not yet required to send out WDRP Notices. (If, for example, a registrar was accredited on 1 July 2004 and accepted its first registrations the following day, the deadline for sending out WDRP Notices for those registrations would be before 2 July 2005.) There were 127 registrars that indicated in the free-text box that they were newly accredited, and either did not yet have any registrations, or had registrations that had not yet reached their one-year anniversary date. An additional nine registrars indicated in the free-text box that “[n]o WDRP Notices have yet been sent,” without further explanation. Further examination has confirmed that these nine respondents are registrars newly accredited within the past year. These numbers are consistent with the number of registrars that marked the survey response boxes for “No WDRP Notices have yet been sent.”

Although a 70% response rate to an unsolicited survey is high, ICANN is concerned by those registrars that did not respond. It plans to contact them to determine whether the lack of a response indicates non-compliance or whether they failed to receive the survey.³

The survey asked registrars what percentage of registrants had been sent WDRP Notices.⁴ Of the 254 registrars that responded to the survey, there were 110 that had sent Notices and were able to determine the number of them. If the total number of respondents is reduced by those registrars that do not yet have to send WDRP Notices, the number represents 93% of those responding.

³ It is possible that some registrars never received the survey, perhaps because the contact information they had submitted was out of date or the messages were lost in spam filters. If the contact information was correct, it could be that the person was not available during the time period for response. It is also possible that some registrars simply ignored the survey, perhaps because they were newly accredited and thought – erroneously – that they did not need to complete it.

⁴ See Question 2, Appendix B.

Of these 110 registrars, 83 (75%) respondents indicated that more than 50% of their registrants had been sent WDRP Notices. Thirteen (12%) of these registrars indicated that they sent Notices to between 10% and 50% of their registrations, whereas 4 (4%) of them indicated that Notices had been sent to between 1% and 10% of their registrants. Ten (9%) of these registrars indicated that they had sent WDRP Notices to less than 1% of their registrants.⁵

Another 138 (54%) registrars indicated that “No WDRP Notices had yet been sent.” Another six (2%) registrars indicated that they could not readily determine the requested information. Of the 138 registrars that said no WDRP Notices had yet been sent, only seven (4%) of them have been accredited for more than one year. One of these seven registrars indicated that it is set to send Notices in December 2004. A second registrar stated that it did not sponsor any names. ICANN is investigating further the remaining five (4%) members of this group to determine if there are compliance issues.

Email proved to be the most popular way for registrars to send the required WDRP Notices.⁶ Eighty-nine (80%) of the registrars sending Notices relied on email, while only 20 (18%) used the web and only one (1%) used postal mail.

A large number of the WDRP Notices that were sent appear to have been delivered successfully.⁷ Twenty-five (40%) of the 63 registrars that sent Notices and tracked their bounce rate indicated that less than 1% were undeliverable. Another 21 (33%) of these registrars experienced a bounce rate of between 1% and 10%. An additional 12 (19%) registrars had a bounce rate of between 10% and 50%. Only five (8%) registrars experienced a bounce rate of more than 50%.⁸ Additionally, 48 (43%) of registrars that sent Notices were “unable to readily determine” how many of them were undeliverable. Fortunately, only two of these 48 registrars are among the 15 largest.

Of the 111 respondents that indicated they had sent WDRP Notices in response to Question 6 of the survey, 78 (70%) did so primarily before the anniversary of each creation date, 11 (10%) did so on the anniversary date, and 3 (3%) did so

⁵ It should be noted that this statistic does not necessarily reflect non-compliance. A registrar accredited just over a year ago, for instance, might have few registrations that have reached their one-year anniversary. Such registrars would therefore only be responsible for sending Reminder Notices to those few registrants.

⁶ See Question 3, Appendix B.

⁷ See Question 4, Appendix B.

⁸ This bounce rate is of some concern because several of these five are established registrars. This group does not, however, include any of the 15 largest registrars, ten of which participated in the survey.

after the date.⁹ Nineteen registrars (17%) were unable to readily determine when their Notices were sent.

Of the 111 respondents that had sent WDRP Notices, 33 (30%) of them indicated that less than 1% of their customers changed their Whois data, 9 (8%) indicated that between 1% and 10% of their registrants modified their data, and 3 (3%) indicated that between 10 and 50% of their registrants changed their data.¹⁰

None of these respondents had more than half of its customers change their data. Sixty-six (59%) of these 111 respondents indicated that they could not readily determine if the Notices had led to changes in registrant data.¹¹

Anecdotally, one registrar commented that its response reflects only “those cases where the registrant involved us in correcting the information and does not reflect changes made on-line, as we do not track the reasons for updates to domain data.” It appears that well more than half the registrars do not track when or why changes occur, and the Notices may have led to more changes than indicated by the survey responses. Obviously, it is not possible to simply measure the total number of Whois changes over a period of time and attribute them to the WDRP Policy. There are clearly changes that take place that are unrelated to WDRP Notices. There is, as in many cases, a limit to what numbers can signify.

For the 31 registrars that were able to determine not only that their registrants’ data was changed, but which fields were modified, 18 (58%) found that it was most frequently information for the administrative contact.¹² Twelve (39%) registrars found that the field most frequently modified was information about the registered name holder. Only one (3%) registrar found that information for the technical contact was the category most often changed.

The WDRP Notices were most often sent in the English language.¹³ Of the respondents that indicated they had sent Notices, 90 registrars (80%) used

⁹ See Question 6, Appendix B.

¹⁰ See Question 7, Appendix B.

¹¹ The number of modifications resulting from Reminder Notices does not necessarily yield helpful information about the accuracy of Whois data. A low number of changes might suggest that Whois data is already generally accurate. But it may also mean that registrants are not actually checking their data or, if they are checking, that they prefer to maintain it, whether accurate or not. A high number of modifications, on the other hand, could suggest that Whois data is becoming more accurate because it is more likely that a registrant would correct inaccurate data rather than falsify accurate data. See discussion on Impact on Accuracy, *infra*.

¹² See Question 8, Appendix B.

¹³ See Question 5, Appendix B.

English. Ten (9%) registrars used more than one language, and several registrars each used German, Chinese, French, Japanese, Korean or Spanish.

The following Table summarizes the percent of (i) notices sent, (ii) notices undeliverable, and (iii) changes made in data:

Table 3 – Other Survey Results

Question	Less than 1%	Between 1 and 10%	Between 10% and 50%	More than 50%
Notices sent	9%	4%	12%	75%
Notices undeliverable	40%	33%	19%	8%
Changes made in data	30%	8%	3%	0% ¹⁴

V. Registrar Compliance

The extent of compliance with the WDRP is assessed on the basis of two sources: the survey responses and the actual WDRP Notices that were provided to ICANN along with the survey.

The registrar response rate to the survey was 70%, which is considered excellent for a web-based survey. Of the 93% of responding registrars that sent WDRP Notices and were required to do so, 70% of those did so “before passage of the anniversary of the creation date of each registration,” in compliance with the Policy. Another 10% of this group sent the Notices on the anniversary date. An additional 3% of this group sent the Notices after the anniversary date, although that is not in full compliance with the Policy. In addition, 17% of the registrars in this group were unable to readily determine when their Notices were sent.

There were 143 registrars that stated they did not send WDRP Notices, which represents 56% of all respondents. At least 89% of this group indicated that they were not operational, that they did not have domains registered, or that their registrations were too new to have anniversary dates. While these respondents – which represent the vast majority of the group – did not send out Notices, their answers are consistent with compliance with the WDRP. The survey indicated that 11% of respondents in this group – 16 registrars -- did not indicate a reason why they failed to send out Notices. Further investigation is under way by ICANN’s Registrar Liaison department to determine whether these 16 registrars are newly accredited and do not yet have anniversary dates subject to the WDRP, or older registrars that neglected to send out the required Notices.

¹⁴ The survey indicated that 59% of registrars could not determine whether their Reminder Notices led to changes in registrant data.

Although 70% is an excellent response rate for a web-based survey, it means that 30%, or 110 registrars, failed to respond. The survey and an explanatory letter were e-mailed on 21 October 2004, with a requested response date of 28 October 2004. On 29 October 2004 a follow-up e-mail containing the survey was sent to those registrars that had not responded, urging them to demonstrate their compliance with the WDRP before 3 November 2004. This letter informed registrars that they cannot be considered to be in compliance with the WDRP if they do not respond. The letter also reminded registrars that they could be “subject to enforcement measures designed to ensure they comply with the WDRP.”

Those registrars that have not yet responded will be contacted again by email – and also by telephone – to determine why they did not respond and to assess their compliance with the WDRP.

Registrars were asked not only to respond to the survey questions, but also to send an actual copy of a WDRP Notice to ICANN for review. As noted above, each WDRP Notice is to contain: (i) a copy of the data elements listed in Section 3.3.1 of the RAA and (ii) a statement reminding the registrant that the provision of false Whois information can be grounds for cancellation of a domain name registration. Section 3.3.1 requires the following data elements: name of the Registered Name; names of the primary nameserver and secondary nameserver(s) for the Registered Name; identity of Registrar; original creation date of the registration; expiration date of the registration; name and postal address of the Registered Name Holder; name, postal address, e-mail address, voice telephone number, and (where available) fax number of the technical contact for the Registered Name; and name, postal address, e-mail address, voice telephone number, and (where available) fax number of the administrative contact for the Registered Name.

There were 48 registrars that followed the instructions to provide an actual sample of a WDRP Notice. This step was helpful in terms of verifying the compliance that had been indicated in the survey responses. The samples were examined to determine whether they complied with the WDRP requirements for the Notices stated above, including providing the registrant with the current Whois data by actual text or a link. Of the 48 samples, there were 45 (94%) that reflected compliance with the requirements. There were 3 (6%) Notices that did not appear to comply with the requirement to remind registrants that the provision of false Whois information can be grounds for cancellation of a domain name registration. ICANN is following up with these registrars.

Overall compliance appears to be relatively strong, based on the response rate to the survey. Of those registrars that sent WDRP Notices in accordance with the WDRP, 80% of them did so “before passage of the anniversary of the creation date of each registration.”

The vast majority -- at least 89% -- of registrars that indicated they had not sent WDRP Notices stated a legitimate reason. Some indicated that they were not operational, while others stated that they did not have any domains registered or that their registrations were too new to have anniversary dates.

Review of the samples of actual WDRP Notices that ICANN requested from each registrar provided further evidence of compliance.

VI. Extent of Problems

Registrars that responded to the survey had the option to provide a description of any problems encountered. There were 43 registrars that took advantage of the opportunity to provide substantive comment¹⁵ on the WDRP. Some indicated there were no problems, while others raised concerns or made suggestions for improvements. Highlights of these survey responses are provided below.

No Problems

Nearly a dozen registrars volunteered that there were no problems with implementation. One commented that the "WDRP was quite simple to implement." A second registrar said that the "WDRP function was already built into our registrar API server. So we did not encounter any problems in implementation of the Whois Data Reminder Policy." Another noted that there were:

[n]o problems other than customers worried that they would lose their domain names as a result of the notification. After re-assurances the customers were fine. There were no issues implementing the WDRP. As is likely the case with most registrars, ours is a fully automated system. Notices are sent 30 days before the anniversary and all Notices are copied to us so that we have an electronic record of the full text of each WDRP e-mail. The domain's record includes a timestamp for the e-mail, as well.

Another registrar noted that the "management of bounced e-mails was less straightforward: in this case we foresaw to send a notice by means of fax or land mail. We [also] had to deal with some issues on a marketing level for those customers who have a Reseller-account." Another indicated that it had used essentially the same process as the WDRP mandates, before it was developed. One registrar noted that its most accurate contact information is contained in its internal accounting system. It wrote that "[w]e have been fairly successful in keeping this data up to date as registrants who are interested in keeping their domain keep their billing information accurate." Another registrar echoed the

¹⁵ A number of comments were helpful but not substantive. Many registrars, for example, used the free-text box to indicate that they were a "[n]ew registrar" and therefore had "[n]o domains registered."

value of accurate Whois records, noting that it spends “a lot of time ensuring that our records are accurate and would appreciate if all registrars were upheld to the same standards.”

Reseller Concerns

Comments by a number of registrars reflected concern about the application of the WDRP to resellers. One registrar operating through a reseller channel noted that “bypassing the reseller does present a challenge as it may be confusing to registrants and considered undesired by resellers.” The registrar decided that such a step was “necessary in order to ensure full compliance with the WDRP.” It therefore decided to send the required Notices by e-mail, co-branded with the reseller, 180 days before the anniversary date. Another registrar echoed the need for registrars and resellers to work cooperatively on implementing WDRP. It noted that because “changes are made through the reseller website where they are used to manage their names,” there should “be a way where a Registrar will perform the WDRP in cooperation with his reseller and even in multiple languages within the same message.”

Another registrar that operates through resellers indicated that it had experienced problems with implementation and suggested another way to get the information. It mentioned:

. . . very negative feedback from our resellers regarding our WDRP mails which directly address Registrants, as we are forced to show the current Registrar of Record. Resellers accuse us of interfering with their end-customer relationship, with single resellers even considering changing to another registrar who does not comply [with] the WDRP policy. In this respect, we believe the current WDRP to interfere with our business in a very negative way, impose a major competitive disadvantage on us if we continue to comply with WDRP.

This registrar further noted that “a significant number of Registrants [are] extremely uncomfortable with [our] WDRP mails, assuming various kinds of fraud connected to WDRP mails, such as some other person is [trying to hijack] or steal their domain name, or somebody is trying to [find] their personal data in order to use it for SPAM mails.” The registrar also observed that some registrants “believe the WDRP mail to be SPAM and send very aggressive replies ordering us to stop sending mails immediately.” It concluded with “serious doubts if the current WDRP policy is the right means [to] assure current whois data.” The registrar therefore suggested instead a policy whereby it asks only its direct customers (whether resellers or registrants) to ensure correct Whois data as part of its regular communications with them, at least once a year. If the update did not occur, then the registrar would send a reminder notice. If the update still did not occur within a reasonable period of time, the registrar

would contact a reseller's customer directly. One large registrar indicated another solution on its sample WDRP Notice, where it provided all registrants with the information required by the WDRP, but then instructed those who purchased their domains through resellers to contact them to make changes.

Another registrar that focuses on the wholesale/reseller channel said that it generally sends notifications only to its resellers because it believes that it would be inappropriate to send notifications to registrants that are not direct customers. This registrar also noted that about 15% of its notifications had bounced back, and asked whether ICANN had any advice. A potential solution was suggested independently by another registrar, which noted that it had recently begun sending postcards to registrants for whom it has an undeliverable e-mail address. It is now tracking the effectiveness of these follow-up communications.

Other Issues & Suggestions

A number of registrars described more general problems they had encountered, or provided suggestions that would improve implementation of the WDRP or the accuracy of Whois data generally. One large registrar noted that two challenges were the volume of Notices that had to be sent and the efficacy of spam filters. This registrar spread out notifications by sending them the month before the anniversary month. It noted that, for one of its registrants that has over 200,000 domains but less than five contact persons, it decided to instead send a single WDRP Notice indicating current contact information to ensure that it was up to date. The registrar suggested that it would be preferable to send an e-mail to all contacts registered within the Whois contact database, rather than a blanket notification for each registration. This suggestion would address similar concerns expressed by other registrars that "many customers have complained about getting multiple Notices." One registrar suggested that maybe one WDRP Notice per year per e-mail address should suffice. Another registrar, noting that "[m]any customers have complained about receiving multiple Notices," recommended that one annual notice "per e-mail address on file would be more appropriate with a list of domains in the individual's account, rather than an e-mail per domain."

Another registrar indicated a preference for requiring all registries to operate a "thick Whois" system with standardized output. It also mentioned that it would appreciate more specific guidance on when a registrar is allowed to cancel a registration that contains false Whois data, without incurring liability from an angry customer.

Two registrars commented on the additional cost of complying with the WDRP, with one writing that "the cost associated with supporting the campaign further impacts the razor-thin margin most registrars are making."

Another registrar indicated that one of its biggest problems was customers that did not believe it was the sender of the WDRP Notice, particularly in light of the

“phishing” schemes that have been prevalent. The other problem it found was that about 5% of e-mails came back requesting verification from the sender, which was a waste of resources.

In terms of improving the accuracy of Whois information generally, one registrar recommended that enabling a “[r]egistry itself to have a lock code for inaccurate WHOIS information would help greatly.” Another registrar suggested that “the ‘billing contact information’ field on any given Whois record be administrated or controlled by the registrar.” It reasoned that “[t]his portion of the whois record could easily be stuffed based on the credit card billing information (name, address, card issuer) used to pay for the registration or renewal of any given domain name. Since banks do not usually issue credit cards to people who do not exist, publishing this information would give interested parties one more reliable method to identify a registrant and make it one degree more difficult for a registrant to shirk responsibility for a domain name.” Another registrar said that it did not encounter any problem in implementing the WDRP, but noted that several registrars have already implemented a “Whois lookup hiding service,” and wondered if ICANN was planning to regulate the use of such services with a standard.

Registrars’ feedback ranged from the absence of any problems to several challenges. All of the comments from registrars were helpful in pinpointing specific issues that may need to be addressed to enhance WDRP implementation and compliance. Follow-up interviews with those registrars that volunteered their time echoed the issues described above.

Interviews with members of ICANN’s Intellectual Property Constituency (IPC), Commercial and Business Constituency, and At-Large Advisory Committee did not reveal any serious problems in implementation other than that WDRP Notices have not yet been received for all registrations. The IPC noted that it had found the WDRP to be a relatively positive experience.

VII. Impact on Accuracy

It is difficult to evaluate the impact of the WDRP on improved accuracy with certainty, but some general observations can be made. As ICANN’s Report on “Community Experiences with the InterNIC WHOIS Data Problem Reports System” (WDPRS Report) noted, there are no comprehensive statistics on the overall level of “accuracy” of Whois data. It is therefore difficult to judge with any certainty whether there has been “improvement.”

It appears that a number of WDRP Notices – likely at least several thousand – have already led to changes in registrant data. This would seem to suggest that Whois data is becoming more accurate. While this relatively low number of changes does not indicate that the underlying data is already accurate, any

changes tell us that the data is likely becoming *more* accurate than it was before. It is far more likely that an existing registrant would correct inaccurate data, rather than falsify accurate data. The number of changes therefore suggests that the data is becoming more accurate.

In response to the question whether the accuracy of Whois information had improved, the Intellectual Property Constituency surveyed its members and indicated a mixed reaction. No IPC member, however, indicated that it had gotten worse. The views expressed indicated generally "some improvement" while at the same time that there was obviously room for more.

It is also instructive to look at the number and type of reports being filed under the Whois Data Problem Reports System (WDPRS). ICANN's WDPRS Report filed on 31 March 2004 indicated that the system played a role in the correction of a substantial number of Whois data inaccuracies. At that time, based on the percentages of dispositions reported by registrars, as many as 36% of all Whois inaccuracy reports resulted in correction of data or deletion of a domain name due to a registrant's material breach. Additionally, many or most of the reports in a category called "other" also led to corrections.

ICANN remains concerned about the accuracy of Whois data. The organization's budget for Fiscal Year 2004-05 includes funding for a proactive compliance project for gTLD registrars and registries. As a part of this compliance effort, ICANN is planning to actively sample and test registrar Whois data to develop a statistical model for Whois data accuracy investigations. The additional staff resources that can be funded by the new budget will also afford an opportunity to obtain other accurate and useful statistical data, monitor registrar and registry compliance with Whois service, privacy and accuracy obligations, the Whois Data Problem Reports System and the WDRP.

VIII. Follow-up Actions

Feedback from the registrars and ICANN constituencies has suggested ways in which ICANN might improve implementation of the WDRP and foster full compliance. Steps that will be studied further for possible recommendation to the broader ICANN community include the following:

- Issuing Frequently Asked Questions (FAQs) that would address some of the issues raised by registrars, such as clarifying the obligations of resellers and the conditions under which a registrar has the right to cancel a registration.
- Modifying the WDRP to enable a registrar to send only one notice to a contact point that is identical for all registrations, provided that a list of all the registrant's domain names is also provided.

- Encouraging, if not requiring, registrars that are unable to confirm delivery of a WDRP Notice to follow up by fax or regular mail, and maintain appropriate records.
- Limiting the WDRP to only those registrars that have generated concern about their commitment to ensuring the accuracy of Whois data. Such judgments would be made objectively by reference to the WDPRS data (or to Whois data accuracy investigations, once an appropriate statistical model is developed). Registrars that generate a high rate of “reports per domain name registration under sponsorship” or whose audit raises concerns would be subject to the WDRP, while other registrars would not. Publishing the names of the registrars subject to WDRP would provide a further incentive to improve their record on Whois accuracy.

With the adoption of the WDRP, and streamlined reporting with respect to Whois Data Problem Reports, the accuracy of Whois data may be improving. ICANN will continue to monitor closely both processes and use its additional resources to develop new ways of measuring their impact on accuracy.

IX. Conclusions

This Report on Implementation of the WHOIS Data Reminder Policy (Report) provides a statistical and narrative summary of experiences with the WDRP in terms of implementation status, registrar compliance, problems encountered and impact on the accuracy of Whois data. It uses a variety of means to evaluate implementation of the WDRP, including results from the “Whois Data Reminder Policy Survey and Compliance Audit” that was sent to all 364 ICANN-accredited registrars in October 2004. It also relies upon interviews with individual registrars, interviews with ICANN constituencies and relevant statistical data.

The assessment indicates that overall compliance appears to be relatively strong. Of those registrars that responded and were required to send Notices, 93% did so. Of those registrars that sent WDRP Notices in accordance with the WDRP, 80% of them did so “before passage of the anniversary of the creation date of each registration.” An additional 17% of them indicated that they had sent Notices but were unable to determine exactly when. Over 89% of registrars that indicated they had not sent WDRP Notices failed to do so for legitimate reasons (e.g., being in business for less than a year).

It appears that a number of WDRP Notices – at least several thousand – have led to changes in registrant data. This suggests that Whois data is becoming more accurate over time.

Feedback from the registrars and ICANN constituencies has suggested ways to improve implementation of the WDRP and compliance. A number of these

suggestions will be studied further for possible recommendation to the broader ICANN community.

* * * * *

Postscript: ICANN would like to express its appreciation to the many registrars and other stakeholders that participated in the “Whois Data Reminder Policy Survey and Compliance Audit” or interviews on the subject. The implementation experiences and suggestions they offered constitute an important component of this Report.

Appendix A



Whois Data Reminder Policy

Posted: 16 June 2003

Whois Data Reminder Policy

- At least annually, a registrar must present to the registrant the current Whois information, and remind the registrant that provision of false Whois information can be grounds for cancellation of their domain name registration. Registrants must review their Whois data, and make any corrections.

Notes

Introduction: The Whois Data Reminder Policy (WDRP) was adopted by ICANN as a consensus policy on 27 March 2003. All ICANN-accredited registrars must comply with the WDRP with respect to registrations they sponsor in all top-level domains for which they are accredited. Details of compliance requirements are provided below.

Process by Which the Policy Was Adopted: The WDRP was established as a consensus policy by ICANN Board [resolution 03.41](#), which was adopted by a [13-1-0 vote by ICANN's Board of Directors on 27 March 2003](#). It was one of [four policies](#) concerning Whois issues that the Generic Names Supporting Organization (GNSO) Council, by a [21-3-0 vote on 20 February 2003](#), recommended be established as consensus policies.

The GNSO Council and Board votes were based on the [Final Report of the GNSO Council's Whois Task Force on Whois Data Accuracy and Bulk Access](#). That report documented [the extent of agreement and disagreement among impacted groups](#), the [outreach process](#) used to seek to achieve adequate representation of the views of groups that are likely to be impacted, and the [nature and intensity of reasoned support and opposition to the proposed policy](#).

The report was posted on the ICANN web site on 11 March 2003, with a call for public comment. [Various public comments](#) were received and considered

by the Board, and the report was discussed at the [ICANN Public Forum session held in Rio de Janeiro on 26 March 2003](#).

Pursuant to [Resolution 03.42](#), notice of the adoption of this policy was given to all registrars on 16 June 2003.

Time for Coming into Compliance: As provided in subsections [3.7.8](#), [4.1](#) and [4.4](#) of [the ICANN Registrar Accreditation Agreement](#), all ICANN-accredited registrars must come into compliance with the WDRP by their "Compliance Date", as described in the next two sentences. The Compliance Date for registrars accredited before 16 June 2003 is 31 October 2003. The Compliance Date for registrars accredited after 16 June 2003 is the effective date of their accreditation agreements.

Beginning on its Compliance Date, each registrar must provide, before the passage of the anniversary of the creation date of each registration the registrar sponsors, a WDRP Notice (described below) to the registrant for that registration. By way of example, a registrar with a Compliance Date of 31 October 2003 is required to give a WRDP notice for registrations it sponsors on the following schedule:

Compliance Date is 31 October 2003		
Domain Name	Creation Date	WDRP Notice Required No Later Than
example.com	14 October 1995	14 October 2004 (and by 14 October of every year thereafter)
example.biz	25 June 2003	25 June 2004 (and by 25 June of every year thereafter)
example.info	15 June 2003	15 June 2004 (and by 15 June of every year thereafter)
example.net	12 November 1997	12 November 2003 (and by 12 November of every year thereafter)
example.org	1 January 1993	1 January 2004 (and by 1 January of every year thereafter)

example.example.name	31 December 2002	31 December 2003 (and by 31 December of every year thereafter)
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(Note: WDRP Notices for registrations with creation dates of 29 February may be given no later than 1 March in non-leap years.)

What the WDRP Notice Must Include: Each WDRP notice must include a copy of the data elements listed in [RAA subsection 3.3.1](#) as contained in the registrar's database for each registration, plus a statement reminding the registrant that under the terms of the registration agreement [the provision of false Whois information can be grounds for cancellation of a domain name registration](#).

How, and to Whom, the WDRP Notice May Be Presented: The WDRP Notice can be presented via web, fax, postal mail, e-mail, or other appropriate means. It can be presented in one or more languages, including at least the language of the registration agreement. The Notice may be presented to the registrant either directly or through the administrative contact for each registration.

Documentation Requirements: Registrars [must maintain](#) either copies of each WDRP Notice or an electronic database documenting the date and time, and the content, of each WDRP notice sent under this policy. Registrars shall [make these records available for inspection by ICANN](#) in accordance with the usual terms of the Registrar Accreditation Agreement. ICANN will consider proper notification to have been given for a registration if the registrar can show that a WDRP Notice meeting the requirements stated above was given at any time in the year before each anniversary of the registration's creation date (for anniversary dates on or after the Compliance Date).

Model WDRP Notice: In order to assist registrars in preparing the required notice, ICANN has provided the following [Model WDRP Notice](#):

[Sample] Whois Data Reminder

Dear Valued Customer,

This message is a reminder to help you keep the contact data associated with your domain registration up-to-

date. Our records include the following information:

Domain: example.com
Registrar Name: IANA_RESERVED

Registrant:
Name: Internet Assigned Numbers Authority (IANA)
Address: 4676 Admiralty Way, Suite 330
City: Marina del Rey
State/Province: CA
Country: US
Postal Code: 92092

Administrative Contact:
Name: Internet Assigned Numbers Authority (IANA)
Address: 4676 Admiralty Way, Suite 330
City: Marina del Rey
State/Province: CA
Country: US
Postal Code: 92092
Phone: 310-823-9358
Fax: 310-823-8649
Email: res-dom@iana.org

Technical Contact:
Name: Internet Assigned Numbers Authority (IANA)
Address: 4676 Admiralty Way, Suite 330
City: Marina del Rey
State/Province: CA
Country: US
Postal Code: 92092
Phone: 310-823-9358
Fax: 310-823-8649
Email: res-dom@iana.org

Original Creation Date: 11/01/2001
Expiration Date: 11/01/2001

Nameserver Information:
Nameserver: a.iana-servers.net.
Nameserver: b.iana-servers.net.
Nameserver: c.iana-servers.net.

If any of the information above is inaccurate, you must correct it by visiting our website. (If your review indicates

that all of the information above is accurate, you do not need to take any action.) Please remember that under the terms of your registration agreement, the provision of false Whois information can be grounds for cancellation of your domain name registration.

Thank you for your attention.

Best regards,
Your ICANN-Accredited Registrar

Appendix B

Whois Data Reminder Policy Survey and Compliance Audit

Response Date: Thursday, 28 October 2004

Registrar: The ABCDEF Registrar
IANA-ID: 0

Note: Registrar responses to this survey will assist ICANN's efforts to ensure registrar compliance with the Whois Data Reminder Policy (WDRP). The data from this survey also will be aggregated to provide statistical information for a public report describing experiences with the implementation of the WDRP. At this time ICANN has no plans to publish individual registrar responses to this survey and compliance audit.

Instructions:

- Please review the text of the Whois Data Reminder Policy before completing this survey: <<http://www.icann.org/registrars/wdrp.htm>>
- Select one answer for each of the multiple choice questions.
- Use free text to answer question #10.
- Please send a sample copy of the WDRP Notice that was provided to your registrants, either by email to <wdrp-survey@icann.org>, or by fax to +1 310 823 8649.

Please respond by Thursday, 28 October 2004

1. Please indicate how many total names were under your registrar's sponsorship as of 1 January 2004, in all TLDs in which it is accredited by ICANN:

- a. Fewer than 1,000 [171]
- b. Between 1,000 and 9,999 [16]
- c. Between 10,000 and 99,999 [38]
- d. Between 100,000 and 999,999 [23]
- e. 1,000,000 or More [6]

2. For what percentage of all registrations under sponsorship have WDRP Notices been sent during the past year?

- a. Less than 1% [10]
- b. 1% or more, but less than 10% [4]
- c. 10% or more, but less than 50% [13]
- d. 50% or more [83]
- e. Unable to readily determine this information [6]
- f. No WDRP Notices have yet been sent [138]

3. Were the WDRP Notices sent/presented (primarily) by:

- a. Web [20]
- b. Fax [0]
- c. Postal mail [1]
- d. Email [89]
- e. Other [1]
- f. No WDRP Notices have yet been sent [143]

4. What percent, if any, of these WDRP Notices were undeliverable?

- a. Less than 1% [25]
- b. 1% or more, but less than 10% [21]
- c. 10% or more, but less than 50% [12]
- d. 50% or more [5]
- e. Unable to readily determine this information [48]
- f. No WDRP Notices have yet been sent [143]

5. In which language(s) were most WDRP Notices sent?

- a. Arabic [0]
- b. Chinese [2]
- c. English [90]
- d. French [2]
- e. German [3]
- f. Italian [0]

- g. Japanese [2]
- h. Korean [2]
- i. Portuguese [0]
- j. Russian [0]
- k. Spanish [1]
- l. Other [0]
- m. More than one language [10]
- n. No WDRP Notices have yet been sent [142]

6. When were the WDRP Notices sent in relation to the anniversary of the creation date of each registration?

- a. Primarily before the anniversary of the creation date [78]
- b. Primarily on the anniversary of the creation date [11]
- c. Primarily after the anniversary of the creation date [3]
- d. Unable to readily determine this information [19]
- e. No WDRP Notices have yet been sent [143]

7. Of the WDRP Notices sent successfully, what percentage led to changes in registrant data?

- a. Less than 1% [33]
- b. 1% or more, but less than 10% [9]
- c. 10% or more, but less than 50% [3]
- d. 50% or more [0]
- e. Unable to readily determine this information [66]
- f. No WDRP Notices have yet been sent [143]

8. Which field was changed most frequently following a WDRP Notice?

- a. Name or postal address of registered name holder [12]
- b. Name, postal address, email address, or telephone number of technical contact [1]
- c. Name, postal address, email address, or telephone number of admin contact [18]

- d. Unable to readily determine this information [80]
- e. No WDRP Notices have yet been sent [143]

9. Of the WDRP Notices sent successfully, what percentage of registrants made subsequent changes to their Whois data?

- a. Less than 1% [26]
- b. 1% or more, but less than 10% [5]
- c. 10% or more, but less than 50% [6]
- d. 50% or more [1]
- e. Unable to readily determine this information [73]
- f. No WDRP Notices have yet been sent [143]

10. Did you encounter any problems in implementation of the Whois Data Reminder Policy? Do you have any suggestions for how to improve the WDRP, or the accuracy of Whois data generally? (Please also indicate if you would be interested in participating in a brief interview to assist ICANN in preparing its public report on WDRP - if so, please include your name, email address, telephone number, and convenient times when you could be reached.)



THANK YOU VERY MUCH FOR YOUR PROMPT RESPONSE

Please remember to send a sample copy of the WDRP Notice that was provided to your registrants, either by email to <wdrp-survey@icann.org>, or by fax to +1 310 823 8649.