

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

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I. Highlights of 2015

Letter from the Vice President of Contractual Compliance

“Put to the test and promote ICANN Contractual Compliance” best describes calendar year 2015 for our team. Simply put, 2015 was another busy year for Contractual Compliance testing the scalability of the team and our ability to continuously improve!

There were approximately 878 new gTLDs delegated and about 600 new ICANN registrars accredited. The Contractual Compliance scope went from 433 gTLDs and 1,460 Registrars in 2014 to approximately 1,169 gTLDs and 2,100 Registrars in 2015. It was a test to the team’s scalability as we continued working towards improving strategic and analytical approach to compliance issues.

The Contractual Compliance team performed over 700 compliance checks of prospective registry operators, including those declaring cross-ownership with registrars or other registries and performed about 725 Registrar related compliance checks related to contract renewal or new contracts. In addition to the increased effort in monitoring and complaints, the impact of the change was also felt in the complexity of issues. The 2015 complaint count increased by 20% from the previous year.

The Three-Year Audit Program completed with an average of 92% compliance across the registrars and registries that were in scope. A new audit effort was launched for the 2013 RAA and another round of new Registry Agreement was completed.

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.

The team continued to improve and increase transparency and accountability. For example, the audit page on ICANN.org was updated to include new information such as the communication templates and the audit program plan guide by contract and globalized by providing the information in eight different languages. Other activities were completed such as: improvements to complaint processing and reporting based on community feedback; an increase in outreach to the contracted parties; and a communication campaign to promote awareness and knowledge of Contractual Compliance.

Please visit the Contractual Compliance page at <https://www.icann.org/resources/pages/compliance-2012-02-25-en> and the ICANN's Portfolio Management System at <https://features.icann.org/plan> to learn more about these activities.

Change is in the air and with change comes a lot of opportunities and learnings. The team and I are committed to our vision "To be a trusted Contractual Compliance service provider" while facing the opportunities ahead.

Sincerely,
Maguy Serad

Letter from the Chief Contract Compliance Officer

In addition to the team's work in monitoring and auditing compliance, enhancing our scalability and improving our strategic and analytical approach to compliance issues, the Contractual Compliance team facilitated dialogue with contracted parties and others in the ICANN community regarding the interpretation and enforcement of our contracts as well as the role that ICANN might play in facilitating voluntary solutions to address problems that are outside the scope of ICANN's responsibilities and remit.

We convened a panel at ICANN 54 to discuss the role that voluntary solutions have played in other industries to address difficult issues and to encourage members of the ICANN community to consider how these activities might serve as a model for voluntary solutions in the domain name industry. We recognize that ICANN cannot be the solution to problems of abuse and illegal activity but we can play a role in partnership with others in the Internet ecosystem.

We remain committed to transparency and accountability, and we look forward to continuing to work to earn the trust of the ICANN multi-stakeholder community.

Sincerely,
Allen R. Grogan

Financial Overview

The Contractual Compliance budget increased by 21.7% to \$4.6M in fiscal year 2016. 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 .6% to \$2.4M.

US Dollars in thousands	FY16 Budget	FY15 Actual	Increase/ (Decrease)		Comments	FY14 Actual
Contractual Compliance Department Budget	\$4,635	\$3,809	\$826	21.7%	Contractual Compliance department operating costs to cover personnel, travel & meetings, professional services and administration. Increase due to additional FTEs, travel and systems improvement projects.	\$3,164
Shared Resources	\$2,430	\$2,416	\$14	0.6%	Support from other departments: IT, meeting logistics, Finance, HR, Admin, etc.	\$2,118
Total Functional View of Contractual Compliance Activities	\$7,064	\$6,225	\$840	13.5%		\$5,282

For detailed information regarding ICANN's fiscal year 2016 budget, go to: <http://www.icann.org/en/about/financials>.

ICANN Meetings and Outreaches

The Contractual Compliance team attended ICANN's 52nd, 53rd and 54th Public Meetings in 2015. The team held the standard three sessions, joined other stakeholder groups, conducted face to face meetings with the registrars and the registry operators and participated in a multitude of sessions and discussions.

As a reminder, the standard three sessions are the Contractual Compliance Program Update session held on Wednesdays, the Registrar Outreach session and the Registry Outreach session on Thursdays. The first session brings the different ICANN community members together to engage in the updates and address any questions and concerns directly with the compliance team and most importantly amongst each others. The two Thursday "closed" sessions focus on lessons learned since the last public meeting.

The team also participated in the September GDD Summit and in numerous outreaches in collaboration with the Global Stakeholder Engagement (GSE) and the Global Domains Division (GDD).

Please refer to our outreach page to learn more about the sessions conducted in 2015: <https://www.icann.org/resources/compliance/outreach>

Contractual Compliance Online Learning

In 2015, ICANN launched an initiative to improve knowledge of Contractual Compliance. The initiative consisted of two deliverables. The first deliverable, a video on "Getting to Know Contractual Compliance", explains how ICANN Contractual Compliance can help with domain name registration issues. The

second deliverable, a chart on “What is a Contractual Compliance Complaint”, brings clarity on the complaint scope and key players. The video and the chart are available in eight languages: Arabic, Chinese, English, French, Japanese, Korean, Russian and Spanish.

To promote awareness of this initiative, the ICANN’s communication team launched a campaign during October and December targeting the audience by language, country and domain name holders. The first stage, a social media campaign, focused on driving YouTube and Facebook views. The second stage focused on driving visits to the Contractual Compliance webpage.

Here is a summary of The Contractual Compliance Video package campaign results:

- 116,616 total views;
- 2nd most watched video in ICANN’s history across all platforms (this includes all eight languages).

Please visit the Contractual Compliance website to view them:

<https://www.icann.org/resources/pages/compliance-2012-02-25-en>

Other Improvement and Initiatives

During 2015, the Contractual Compliance team implemented a number of process, communication and system improvements based on community feedback and staff’s suggestions for continuous improvements. The list can be found in Appendix A below.

The monthly dashboard was also improved 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 example, in 2015, ICANN had a total of 48,106 complaints; of those, ICANN closed 20,233 complaints that did not require a 1st Inquiry or Notice to be sent to the registrar. A complaint can be closed before a 1st inquiry or notice is sent to the contracted party because, among other things, the complaint is either not valid, or it has been determined that the contracted party already addressed the issue.

ICANN also implemented metrics to specifically track invalid complaints and compliance notice or inquiry that should not have been forwarded to the contracted parties. These complaints are now labeled, respectively, as “Closed before 1st notice/inquiry” and “ICANN Issues.”

Some of the 2015 ICANN Issues included:

- duplicate notices sent in error
- updated information received from complainants after 1st notices/inquiries were sent

- updated information received from ICANN vendors after 1st notices/inquiries were sent
- updated information received from contracted party that was not previously shared with Contractual Compliance after 1st notices/inquiries were sent.

There were 56 tickets with a resolved code of “ICANN Issue” closed in 2015.

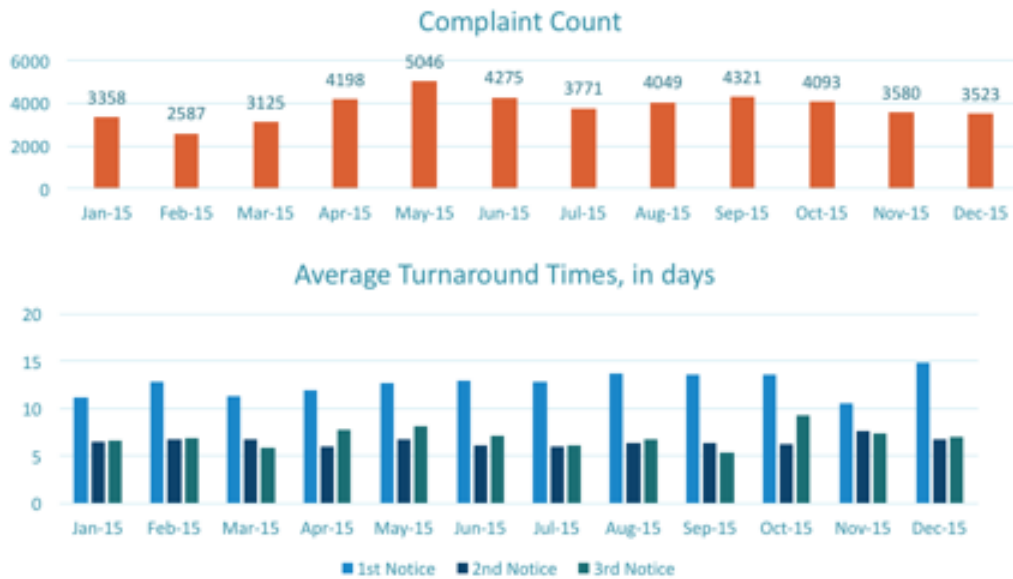
Please visit the Performance Measurement and Reporting page at:
<https://features.icann.org/compliance>.

Performance Measurement in 2015

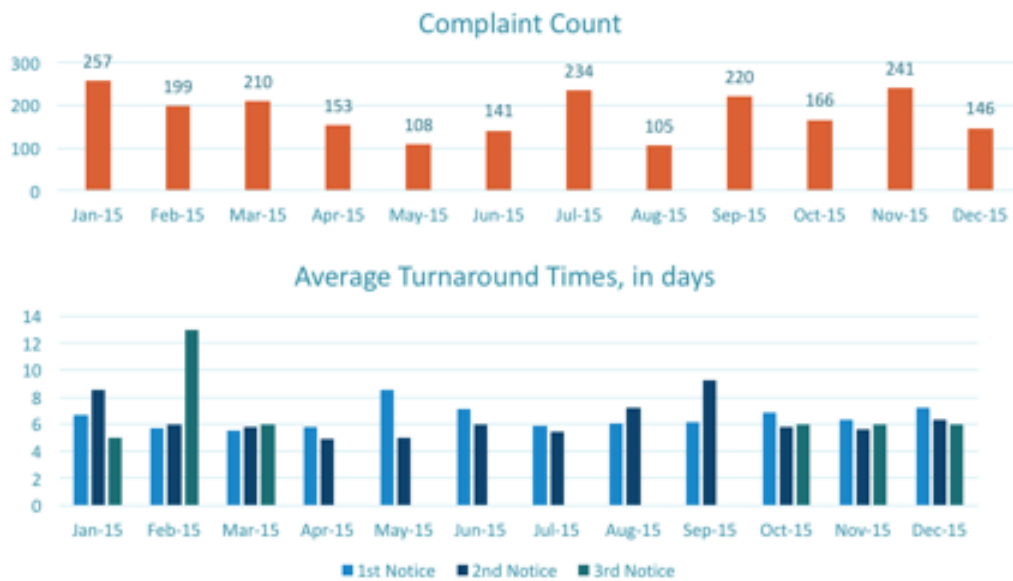
The graphs below are a summary of the 2015 performance and on some of the graphs a comparison to the 2014 performance. Performance measures take into account the volume of complaints, the turn-around time (TAT), which is the average time for a contracted party and ICANN to respond and close a ticket from receipt, closure rate, customer satisfaction and other compliance functions.

Please refer to the ICANN Contractual Compliance Performance Reports page at this link <https://features.icann.org/compliance>. It provides information to the community on compliance activities through the monthly dashboards and reports for a rolling 13-month period.

Complaint Count & Turnaround Time (TAT) Trending - Registrar



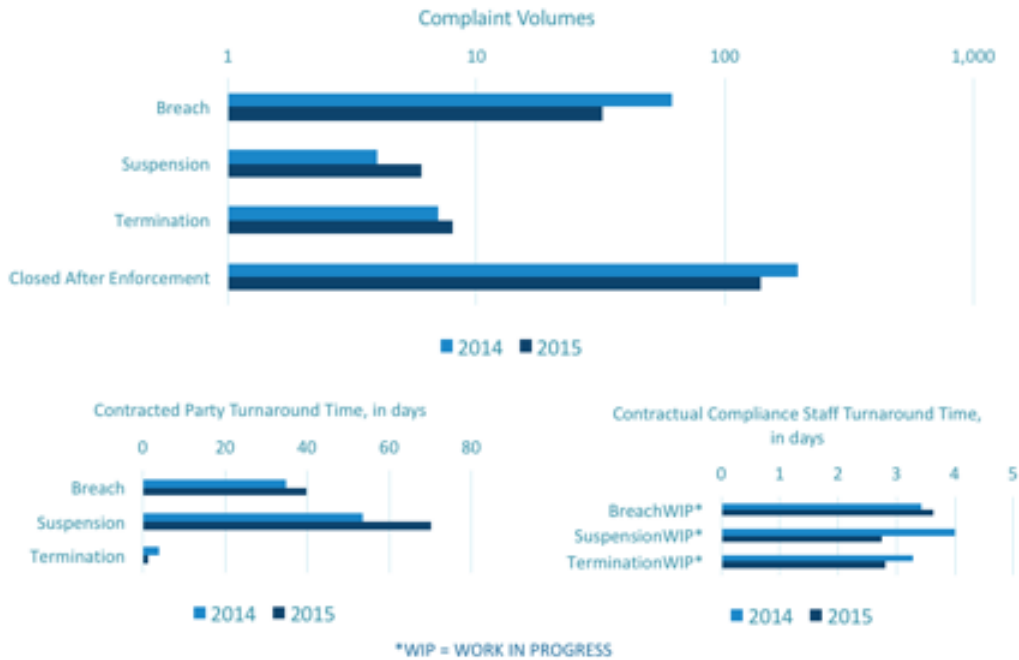
Complaint Count & Turnaround Time (TAT) Trending - Registry



Informal Notice Statistics – Year 2014 / 2015

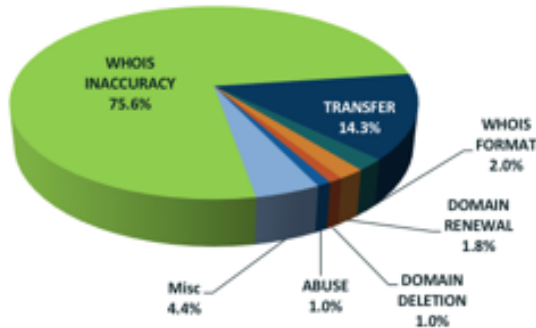


Formal Notice Statistics – Year 2014 / 2015



Registrar Complaint Type Volume – Year 2015

Complaint Distribution



Average Registrar Turnaround Time	(in days)
1st Notice	12.7
2nd Notice	6.5
3rd Notice	6.7

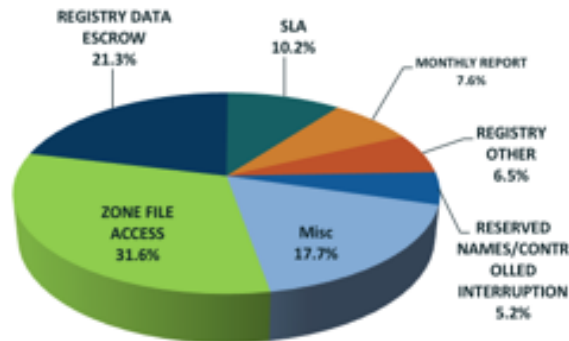
Formal Notices	#
Volume Breach	32
Volume Non-Renewal	0
Volume Suspension	6
Volume Termination	8

Disclaimer: Due to rounding, percentages may not always appear to add up to 100%.

Type	Quantity	Closed before 1 st Inquiry / Notice
ABUSE	438	267
CEO CERTIFICATION	34	1
CUSTOMER SERVICE	167	147
DATA ESCROW	427	0
DNSSEC, IDN, IPV6	17	16
DOMAIN DELETION	441	425
DOMAIN RENEWAL	818	391
FAILURE TO NOTIFY	17	16
FEES	88	14
PRIVACY/PROXY	35	29
REGISTRAR CONTACT	122	59
REGISTRAR INFO SPEC	135	75
REGISTRAR OTHER	54	13
RESELLER AGREEMENT	11	0
TRANSFER	6,558	3,754
UDRP	210	132
WHOIS FORMAT	905	703
WHOIS INACCURACY	34,740	13,014
WHOIS QUALITY REVIEW	45	0
WHOIS SLA	356	361
WHOIS UNAVAILABLE	308	146
Total Complaints Processed = 45,926		
Total Complaints Closed = 46,040		
Total Closed before 1st Inquiry / Notice = 19,563		

Registry Complaint Type Volume – Year 2015

Complaint Distribution



Average Registry Turnaround Time	(in days)
1st Notice	6.3
2nd Notice	6.7
3rd Notice	8.2

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

Disclaimer: Due to rounding, percentages may not always appear to add up to 100%.

Type	Quantity	Closed before 1 st Inquiry / Notice
ABUSE CONTACT DATA	61	39
BANKRUPTCY	0	2
BIRDA	45	1
BULK ZFA	27	1
CLAIMS SERVICES	4	4
CODE OF CONDUCT	64	16
MISCONDUCT	1	0
MONTHLY REPORT	165	3
PIC	20	19
REGISTRY DATA ESCROW	465	147
REGISTRY FEES	80	2
REGISTRY OTHER	142	71
RESERVED NAMES/CONTROLLED INTERRUPTION	113	61
RR-DRP	25	26
SLA	222	80
SUNRISE	30	10
URS	27	21
WILDCARD PROHIBITION	1	1
ZONE FILE ACCESS	688	166
Total Complaints Processed = 2,180		
Total Complaints Closed = 2,115		
Total Closed before 1st Inquiry / Notice = 670		

Formal Notice Activity – Year 2015

Notices	Qty
Breach	32
Suspension	6
Termination	8

Breach Notice Reason*	Qty*
Failure Notice Reasons	166
• Cured	124
• Not Cured	42

Summary of the Formal Notice Reasons	Frequency
Pay accreditation fees (RAA 3.9)	10.2 %
Maintain and provide communication records (RAA 3.4.2/3)	9.6 %
Display renewal/redemption fees (ERRP 4.1)	7.2 %
Display correct ICANN Logo on website (RAA Logo License Appendix)	6.0 %
Provide Whois Services (RAA 3.3.1)	6.0 %
Publish on website email address for abuse reports (RAA 3.18.1)	4.8 %
Maintain and provide records related to abuse reports (RAA 3.18.3)	4.2 %
Publish on website description of procedures for the receipt and tracking of abuse reports (RAA 3.18.3)	4.2 %
Provide domain name data in the specified response format (RAA-RDDS 1.4)	4.2 %
Publish on website name and position of officers (RAA 3.17 and RIS)	4.2 %
Publish on website auto-renew and deletion policy (RAA 3.7.5.5)	3.6 %
Display methods used to deliver pre- and post-expiration notifications (ERRP 4.2)	3.6 %
Other -** Appendix B	31.9 %

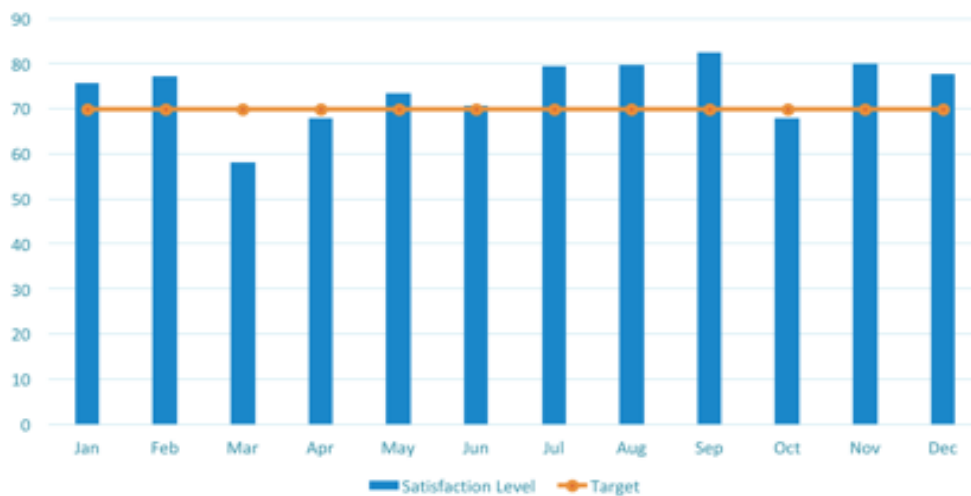
*A single Breach may contain multiple Notices Reasons.

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

Disclaimer: Due to rounding, percentages may not always appear to add up to 100%.

2015 Overall Customer Satisfaction

What is Your Overall Satisfaction with Our Services?



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II. 2015 Registrar Contractual Compliance Summary

For registrar compliance, 2015 was the second full year of enforcing and monitoring compliance with the 2013 Registrar Accreditation Agreement (RAA). In contrast to 2014, which included substantial outreach with registrars and community members regarding the new areas of compliance, staff training, and system updates, in 2015 the Contractual Compliance team provided greater focus on certain areas, including abuse and changes to WHOIS inaccuracy requirements.

In 2015, the Contractual Compliance team was involved in several WHOIS Accuracy Reporting System (ARS) initiatives. The WHOIS ARS is a framework for conducting repeatable assessments of WHOIS accuracy over time and publicly reporting the findings. The initiatives included completing the WHOIS ARS pilot, and providing feedback and lessons learned to the WHOIS ARS team. Compliance collaborated closely with this team to develop the test criteria for Phase 1 and Phase 2 to ensure alignment with the RAA and ICANN processes. The contractual compliance complaint processing system was updated to improve processing resources for WHOIS inaccuracy complaints to accommodate an influx of complaints from WHOIS ARS and to improve overall performance. The team processed WHOIS ARS complaints into two buckets, WHOIS inaccuracy and WHOIS format. For additional information regarding WHOIS ARS, please see [WHOIS ARS Phase 1 Report: Syntax Accuracy](#). The [Phase 2](#) draft report can be found at this link <https://www.icann.org/news/announcement-2015-12-23-en>.

In 2015, the Contractual Compliance team continued to conduct WHOIS quality review (QR) monitoring efforts. WHOIS QR reviews the previously closed WHOIS inaccuracy complaints to ensure continued compliance with contractual obligations. In 2015, 1,209 WHOIS QR reviews were conducted for the January thru June period of which 32 needed to be resent to the registrar; a 50% drop from last year's follow-up with the registrars. The 2015 WHOIS QR effort resulted in one notice of breach to a registrar for non-compliance.

Participation in ICANN Policy Development Process

The Contractual Compliance team actively participated in multiple registrar-related ICANN Policy Development Process which included the 2013 RAA WHOIS Accuracy Program Specification Review (WAPS), Privacy & Proxy Services Accreditation Issues (PPSAI) Working Group, Inter-Registrar Transfer Policy (IRTP) Parts C and D, Thick WHOIS Implementation, the Additional WHOIS Information Policy and WHOIS Advisory and the Translation and Transliteration of Contact Information PDP Working Group.

Most common issues during 2015

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 to appropriately to reports of abuse, which at a minimum should be to forward valid complaints to the registrants.
- 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.

- Registrars not sending renewal notices to the Registrant or Administrative Contact listed in the public WHOIS .

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.
- Registrars not locking a domain name subject to a UDRP within two business days of receiving a UDRP complaint from a UDRP provider.
- Registrars not providing the information requested within two business days of receiving a verification request from a UDRP provider.

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.

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III. 2015 Registry Contractual Compliance Summary

During 2015, Contractual Compliance kept pace with the continued expansion of the gTLD space, which included the contracting and the delegation of approximately 720 new gTLDs since 1 January 2015 (for approximately 1169 contracted and delegated gTLDs by year's end – see <http://newgtlds.icann.org/en/program-status/delegated-strings>) and the transition of multiple previously delegated gTLDs to new Registry Agreements.

Contractual Compliance kicked off the year with a review of registry operator's compliance with the annual certification requirements and publication of abuse contact information and continued to monitor compliance with other obligations of the Registry Agreements through internal monitoring efforts, processing of complaints and monitoring of external sources, such as industry blogs. Third party zone file access complaints and data escrow deposit monitoring were two of the largest volume areas of processing conducted by Contractual Compliance in 2015. See <https://features.icann.org/compliance> for updated Contractual Compliance performance reports.

Most common issues during 2015

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

1. Zone File Access by Third Parties via the Centralized Zone File Service
 - Registry Operators not responding to requests for zone file access.
 - Registry Operators denied access for reasons not permitted under the Registry Agreement.
2. 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.
3. Service Level Agreement
 - Registry Operators not meeting the required service level agreements (SLA) under the Registry Agreement for service availability and performance.
4. Monthly Reporting
 - Registry Operators not submitting the required monthly reports.
 - Registry Operators not submitting monthly reports with the correct format or content.

Participation in ICANN Policy Development Process

In 2015, Contractual Compliance also assisted with multiple cross-functional efforts this year. Some of these efforts included the following: (1) finalizing the members of the Public Interest Commitment Dispute Resolution Standing Panel, which now includes seven members (see <https://www.icann.org/news/announcement-2-2015-06-03-en>); (2) establishing the Continued Operations Instrument (COI) Amendment Service (see <https://www.icann.org/news/announcement-3-2015-09-15-en>) which was announced by ICANN in September 2015; and (3) developing a process for communicating Service Level Agreement monitoring alerts to registry operators.

Additionally, Contractual Compliance participated in multiple registry-related policy efforts and working groups, including Thick WHOIS implementation, the Protection of IGO and INGO Identifiers in all gTLDs, IGO-INGO Access to Curative Rights Protection Mechanisms, Competition, Consumer Trust and Consumer Choice Metrics Reporting, Rights Protection Mechanisms Review and New gTLDs Subsequent Procedures.

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IV. Contractual Compliance Risk and Audit Update

ICANN conducts a regular review of the potential risk(s) of contracted parties' non-compliance with various provisions in the agreements. The review along with the complaints' trends and monitoring of external sources such as industry blogs, are factored in to updates and revisions to the audit program.

ICANN Three-Year Audit Program for Registrars and Registries

In May 2015, ICANN completed year three of the Three-Year Audit Program with a 92 percent compliance of the sampled population.

In year three, 316 Registrars and five legacy gTLD Registries received a Request for Information notice to participate in the audit. The 316 Registrars consisted of the remaining 311 from the original population and five roll over from year two.

Registrars that had common ownership and operated the same both technically and operationally as Registrars audited in previous years were allowed to be waived from the audit. If Registrars not part of a family of previously audited Registrars had common ownership and operated the same both technically and operationally as other Registrars selected for the current audit, they were allowed to select one Registrar to represent that family group in the audit.

In the year three audit program, 180 Registrars were exempted from the audit as they met the above criteria. The same number of Registrars were exempt from the audit in year two for the same criteria.

A total of 14 Registrars were issued Breach Notices in year three as opposed to 11 Registrars in year two. Ten Registrars either self-terminated following breach or were terminated as a result of not responding to breach; in comparison, one Registrar self-terminated following breach and two Registrars were terminated as a result of not responding to breach in year two.

Overall, contracted parties were proactive in remediating issues that were identified as a result of the audit. Please refer to [2014 Contractual Compliance Year Three Audit Program Report](#) for more details.

ICANN Registrar Audit Program

In September 2015, ICANN launched an expanded Registrar Audit Program which focused on obligations required per the 2013 RAA. The initial sample population consisted of five Registrars that received Partially-Remediated Reports in year three of the 'ICANN Three-Year Audit Program for Registrars and Registries' and 62 Registrars selected based on the following criteria:

- Contracted parties who have not been previously audited
- Contracted parties with highest numbers of 3rd Notices per number of domains under management
- Contracted parties who had received Notice of Breach in last 12 months
- Contracted parties with highest number of failed data escrow deposits
- Contracted parties responsiveness to ICANN's requests

Please refer to the following link for more information:

<https://www.icann.org/resources/pages/audits-2012-02-25-en>

ICANN New Registry Audit Program

In July 2015, ICANN completed a second 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 eleven gTLDs selected for this audit cycle. This audit round completed with a full compliance of the sampled population.

Please refer to the published report at this link:

<https://www.icann.org/en/system/files/files/contractual-compliance-ra-audit-report-2015-31mar15-en.pdf>.

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Appendix A

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

- Automate sending anonymous complaints by masking reporter information when requested;
- Clarify and simplify wording in the communication templates;
- Include ticket IDs and standardize subject headings for closure notices;
- Provide auto confirmation email to all responses received by ICANN between 1st Inquiry/Notice and the closure notice;
- Ensure automated closure notices are sent to the proper registrar contact(s);
- Provide registrars with a weekly report of open (and recently closed) tickets; and
- Add a closure reason code to account for a complaint closed due to “ICANN issue.”
- Integrate compliance@icann.org into complaint processing system – this integration will improve the tracking, follow-up and follow through for the correspondence received at the compliance@icann.org email address.
- Improve WHOIS lookup for thick WHOIS gTLDs.
- Finalize registrar weekly file of open (and recently closed) tickets – this file will provide visibility to the contracted party of open and recently closed tickets. To request a weekly file please email registrar@icann.org.
- Additional speed/automation improvements – including parsing script optimization and template automation.
- Modified the closure notice to include a brief summary for the closure reason of a complaint in an effort to bring clarity on the resolution
- Updated the Uniform Domain Name Dispute Resolution Policy (UDRP) complaint web form and templates to align with update to Rules for UDRP effective 31 July 2015
- Software update to address a security vulnerability and feature improvements in the system
- Further template and closure code updates based upon ICANN and community feedback
- Updating the compliance system to allow for the WHOIS ARS import utility, to create compliance tickets based on the updated WHOIS ARS report format.
- Increased automation to templates to reduce manual efforts by staff

Appendix B

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

"Other" Formal Notice Reasons
Communicate contact data changes (RAA 5.11)
Display link to ICANN's Registrant Educational Information (RAA 3.16)
Publish on website link to Registrants' Benefits and Responsibilities Specification (RAA 3.7.10)
Escrow registration data (RAA 3.6)
Investigate and respond to abuse reports (RAA 3.18.1)
Link to ICANN's registrant rights & responsibilities website (RAA 3.15)
Cure breaches of the RAA within 21 days (5.5.4 RAA)
Publish on website name and position of officers (RAA 3.17/RIS 17)
Validate and verify Whois contact information (RAA/WAPS 1, 2, 4)
Respond to audits (RAA 3.14)
Take reasonable steps to investigate claimed Whois inaccuracies (RAA 3.7.8)
Provide documents and information to ICANN (RAA 3.15)
Complete and provide Compliance Certificate (RAA 3.15)
Comply with the UDRP (RAA 3.8)
Link to ICANN's registrant rights and responsibilities website (RAA 3.15)
Maintain accurate and current contact information (RIS/RAA 3.17)
Publish on website correspondence address (RAA 3.17/RIS 7)
Cure any RAA breach within 15 working days (5.3.4 RAA)
Maintain and provide information required by the Registrar Information Specification (RAA 3.17)
Publish on website information required by the Registrar Information Specification (RAA 3.17)
Allow RNH to transfer domain name (IRTP 1) or provide valid reason for denial (IRTP 3)
Maintain current commercial general liability insurance (RAA 3.10)
Not engaging in a pattern and practice of trafficking in or use of domain names identical or confusingly similar to a trademark or service mark (RAA 5.5.2.4)
Receiving three Notices of Breach within a twelve-month period (RAA 5.5.6)
Notify ICANN within 30 days of an entity's acquisition of a controlling interest in registrar's stock
Display accurate contact details (RAA 3.16)
Provide a policy consistent with the requirements of 2.1 of the ERRP
Validate and verify Whois contact information (RAA/WAPS 2 & 4)