



Contractual Compliance Webinar

14 August 2014

Webinar Information

Dial-in Numbers: <http://tinyurl.com/kbhryl9>

Conference ID: 645 127 3995

Q&A Session after the presentation:

- Questions submitted to ICANN prior to the webinar given priority
- Questions will be answered as time permits

Recordings & slides available after the webinar:

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

Agenda

- Introduction to Contractual Compliance
- Contractual Compliance Statistics
- Lessons Learned
- Questions & Answers

Contractual Compliance Global Staffing Model

Los Angeles

Full Time Equivalent(s): 15
Open Positions: 1

Singapore

Full Time Equivalent(s): 3
Open Positions: 1

Istanbul

Full Time Equivalent(s): 3
Open Positions: 1

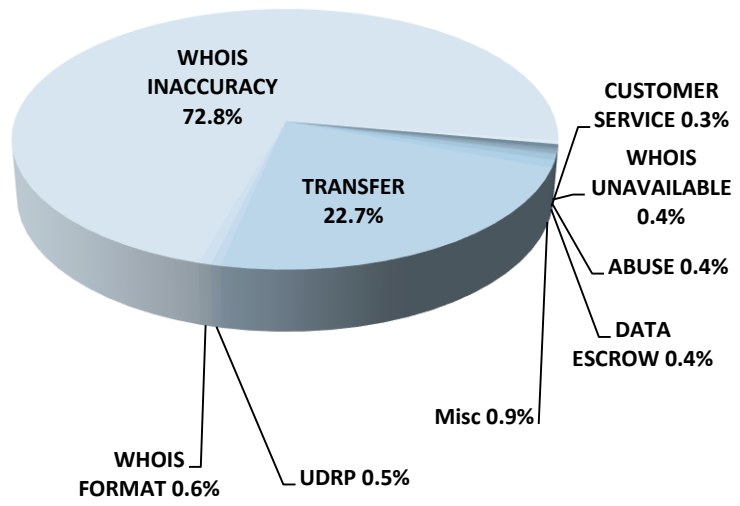
Scalability Through Contractors: 2 Full Time Equivalents Currently

- 21 Staff members strong
- Arabic, English, French, Korean, Mandarin, Russian, Spanish, Turkish and Uzbek
- Link to staff page:
<https://www.icann.org/resources/pages/staff-2012-02-25-en>

Compliance Operations Scorecard – AP Only

Running Balance – March – June 2014

Complaint Distribution



Registrar/Registry TAT – Mar-14 - June-14	(in days)
Avg TAT 1st Notice	11.7
Avg TAT 2nd Notice	6.2
Avg TAT 3rd Notice	28.8
CC Staff TAT – Mar-14 - June-14	
Avg TAT Open-1st Notice	1.3
Avg TAT 2nd WIP	3.9
Avg TAT 3rd WIP	3.2
Avg TAT Received-Closed	13.6

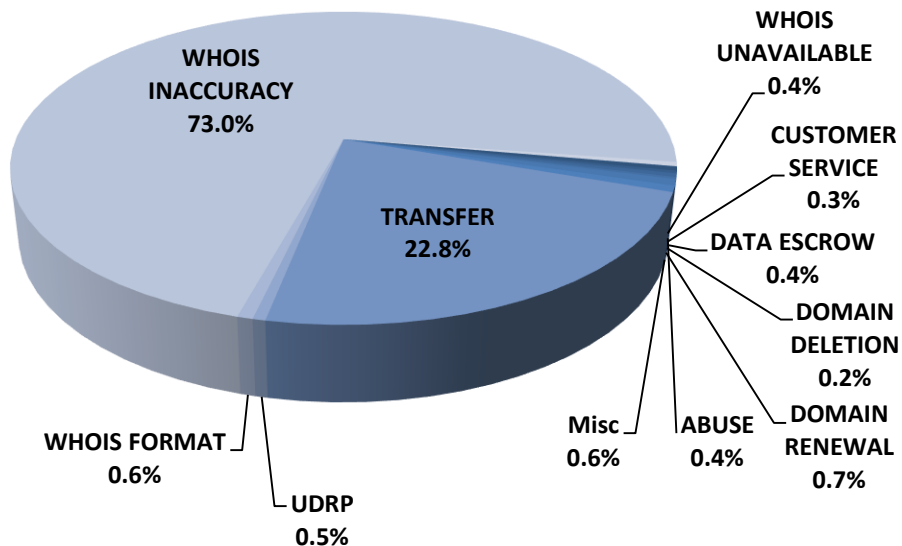
	Monthly Complaints	Sub-total
REGISTRAR	5,586	
REGISTRY	16	
Total New Complaints Received		5,602
Total Prior Months Carryover		3,425
Total Complaints Received		9,027
	Complaints Closed	
Volume Closed Before 1st Notice	1,560	
Volume Closed Before 2nd Notice	3,300	
Volume Closed Before 3rd Notice	719	
Volume Closed Before Enforcement WIP	61	
Volume Closed After Enforcement	9	
Total Closed		5,649
	Complaints Open (Carryover)	
Volume Open Before 1st Notice Sent	759	
Volume Open in 1st Notice Sent	1,857	
Volume Open in 2nd Notice Sent	455	
Volume Open in 3rd Notice Sent	297	
Volume Open After Enforcement All	10	
Total Remaining Open (Carryover)		3,378
Carryover- at end of period	617	617
	Enforcements	
Volume Breach	7	
Volume Termination	0	

TAT = Turn-around time
WIP = Work in progress

Complaint Types and Phases - AP

Mar 2014 - June 2014

Complaint Distribution



Registrar TAT	(in days)
Avg TAT 1st Notice	11.8
Avg TAT 2nd Notice	6.3
Avg TAT 3rd Notice	28.8

Enforcements	
Volume Breach	7
Volume Termination	0

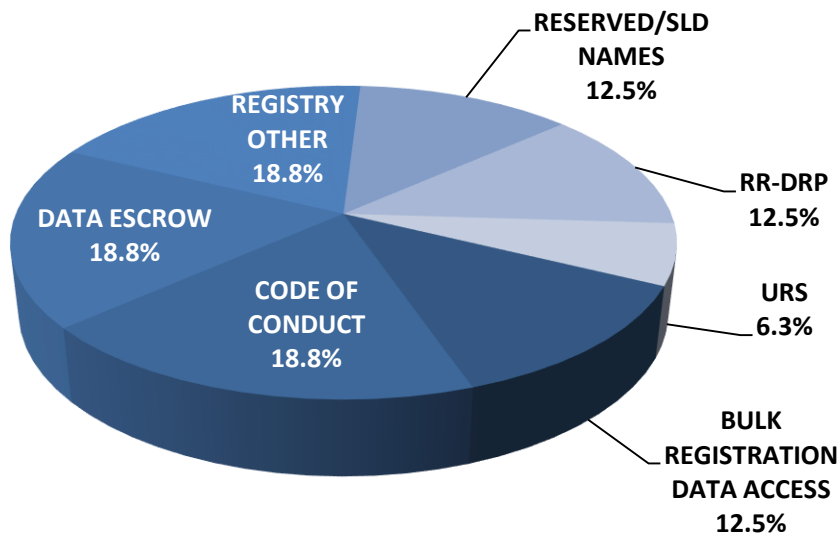
REGISTRAR Complaints

Type	Quantity
ABUSE	24
CEO CERTIFICATION	3
CUSTOMER SERVICE	15
DATA ESCROW	20
DNSSEC, IDN, IPV6	1
DOMAIN DELETION	11
DOMAIN RENEWAL FEES	37
PRIVACY/PROXY	9
REGISTRAR CONTACT	6
REGISTRAR INFO SPEC	3
REGISTRAR OTHER	4
TRANSFER	3
UDRP	1273
WHOIS FORMAT	29
WHOIS INACCURACY	36
WHOIS QUALITY REVIEW	4080
WHOIS SLA	4
WHOIS UNAVAILABLE	3
WHOIS UNAVAILABLE	25
Total Complaints	5,586
Total Complaints Closed	5,623

Complaint Types and Phases - AP

Mar 2014 - June 2014

Complaint Distribution



REGISTRY Complaints

Type	Quantity
BULK REGISTRATION DATA ACCESS	2
CODE OF CONDUCT	3
DATA ESCROW	3
REGISTRY OTHER	3
RESERVED/SLD NAMES	2
RR-DRP	2
URS	1
Total Complaints Processed	16
Total Complaints Closed	26

Registry TAT	(in days)
Avg TAT 1st Notice	6.6
Avg TAT 2nd Notice	3.3
Avg TAT 3rd Notice	n/a

Enforcements	
Volume Breach	0
Volume Termination	0

Lessons Learned:

- Communicating with ICANN
- **Registrar** –
 - Whois Accuracy: **Verification & Validation**
 - Transfers: **Form Of Authorization (FOA) and process**
 - Renewals: **Renewal notices**
- **Registry** –
 - Zone File Access: **Delayed response / Invalid denial**
 - Monthly Reports: **Transactions and activity reports are required**
 - Data Escrow: **Registry operator's notification to ICANN**

Communicating with ICANN

- Whitelist emails from ICANN.org
- Check if your mail servers are blocking emails from ICANN Contractual Compliance
- Reply to Compliance notices ASAP. Let Compliance know what you are doing
- Do not change the subject line in any way when responding to compliance notices
- Please make sure attachments are less than 4MB

Registrar Lessons Learned

Whois Inaccuracy (Verification)

Verification vs. Validation under 2013 RAA Section 3.7.8 & Whois Accuracy Program Specification

Verification: to confirm or correct information

- Affirmative response verification: receiving email from registrant email address listed in Whois data
- Manual verification: phone call contacting RNH may be enough depending on complaint (ICANN requires time, date, details of call)

Registrar Lessons Learned

Whois Inaccuracy (Validation)

Validation: ensure formatting is consistent with standards

- “Standards” includes RFC 5322 (email), ITU-T E. 164 (telephone), UPU Postal or S42 addressing templates (postal addresses) or equivalents for territory or country
 - Not websites or map applications (unless relying on standards)
 - Not something obtained from the RNH
- The obligations to verify, validate and investigate alleged Whois inaccuracies under RAA Section 3.7.8 are not interchangeable

Registrar Lessons Learned

Transfers

- Registrars shall use the standardized Form Of Authorization per Inter Registrar Transfer Policy(IRTP) Section 2 and 3:
- Gaining registrars
<https://www.icann.org/resources/pages/foa-auth-2004-07-12-en>
- Losing registrars
<https://www.icann.org/resources/pages/foa-conf-2004-07-12-en>

Registrar Lessons Learned

Transfers

- FOA must be sent in English.
- Registrar may choose to send it **also** in another language. Registrar is responsible for the accuracy and completeness of the translation.
- Gaining registrar needs affirmative response from a Transfer Contact to proceed and send the transfer command to the registry.
- The losing registrar does not need affirmative response, and the default action is allowing the transfer to proceed.

Registrar Lessons Learned

Renewals

Obligations of registrars under the Expired Registration Recovery Policy(ERRP):

- Registrar must send 3 renewal reminders when a domain name expires.
 - 1 month prior to expiration
 - 1 week prior to expiration, and
 - within 5 days after expiration
- Fees for renewal or redemption must be displayed on the registrar's website, including a link in the registration agreement.

Registry Lessons Learned

Zone File Access

Specification 4, Section 2 of the Registry Agreement

- Act upon requests for zone file access via CZDS
- **Issue**
 - Registry taking too long to respond
- **Guidance**
 - Be open and transparent:
 - Establish, publish and adhere to a policy that informs end-users by when they should reasonably expect a response

Registry: Lessons Learned

Zone File Access

Specification 4, Section 2.1 - 2.3 of the Registry Agreement

- Reasons to deny or revoke access to zone files
- **Issue**
 - Registry denying access because not yet in sunrise
 - Registry denying access until requestor proves lawful purposes
- **Guidance**
 - Neither is a valid reason to deny access – Three reasons per RA:
 - failure to satisfy credentialing requirements of §2.1.2
 - not providing correct or legitimate credentialing requirements of §2.1.2
 - reasonable belief that requestor will violate terms of §2.1.2

Registry Lessons Learned

Monthly Reports

Specification 3, Section 1 and 2 of the Registry Agreement

- **Issue**

- Registry only sending one report

- **Guidance**

- both reports required (transactions and activity report)

Registry Lessons Learned

Data Escrow

Specification 2 Part A Section 7 of the Registry Agreement

- Daily deposits and two daily notifications to ICANN:
 - one from the Registry Operator; and
 - another from the Escrow Agent
- **Issue**
 - ICANN not receiving the notification corresponding to the Registry Operator
- **Guidance**
 - Ensure both notifications are received daily by ICANN

Resources

- Sign up for ICANN APAC Newsletter by writing to: apachub@icann.org
- Link to Contractual Compliance page: <https://www.icann.org/resources/pages/compliance-2012-02-25-en>
- Sign up for Compliance Newsletter at: <https://www.icann.org/resources/pages/sign-up-2012-02-25-en>
- Send questions to compliance@icann.org

Questions & Answers

Questions will be answered as time permits

- Participants will be limited to 1 question and 1 brief follow up response

Adobe Connect questions

- Send your question via the Chat pod in this format:
“<Question> Type your question”

Phone questions

- Unmute your phone manually or Dial *6 (star six) to mute or unmute the line.

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Post-webinar survey

<https://www.surveymonkey.com/s/8BJ3XKS>

Q&A

Registry Roadshow Workshop

Join us!

ICANN will be holding a three-day, interactive workshop for registries in a city near you! Remote access will be available, but interaction will be limited. We highly recommend onsite participation.



For more information visit
<http://bit.ly/RRWcommunitywiki>

Los Angeles
9-11 September
2014

<http://bit.ly/RYlosangeles>



Tokyo
24-26 September
2014

<http://bit.ly/RYtokyo>

Istanbul
19-21 November
2014

<http://bit.ly/RYistanbul>



Thank you