

Appendix C

ICM Compliance Reporting System¹

1. ICM Registry will maintain a web-based system (the “Compliance Reporting System” or the “CRS”) for reporting non-compliant registrations and/or registrants operating in a manner that violates IFFOR Policies. IFFOR will facilitate automated referral to the CRS by parties that may receive complaints (e.g., ICM, IFFOR, and ICANN).
2. ICM will publish the CRS performance specifications (i.e., response and processing time) prior to Limited Launch.
3. The CRS will facilitate prompt processing by queuing reports by category (e.g., child abuse images, non-compliance with labeling obligations, abusive registrations, consumer complaints, other).
4. The CRS will automatically forward reports of child abuse images to a designated hotline provider (generally depending upon geography of registrant) with which ICM and/or IFFOR has an established relationship, for handling in accordance with such provider’s procedures. ICM will follow hotline and/or law enforcement direction with respect to these complaints.
5. The CRS will automatically queue reports of abusive registrations and/or requests for “Rapid Takedown” for handling in accordance with the ICM Abusive Registration Policy.
6. The CRS will initiate automated checks of any other non-compliance wherever possible (e.g., failure to label, etc.). If the automated check confirms the reported violation, the system will automatically generate a notice to cure, followed by a re-check to confirm cure and/or for further handling by the ICM Compliance Manager in accordance with the IFFOR Policies regarding registrant disqualification.
7. Reports that are not automatically referred (e.g., to hotlines) or that cannot be confirmed and processed by automated means will be queued for manual review by the Compliance Manager.
8. All reports of non-compliant registrations or IFFOR Policy violations will be date stamped and logged upon receipt. Subsequent processing, including ICM referral, issuance of notice to cure, etc. will be logged.
9. The ICM Compliance Manager will use the CRS to document ICM’s receipt of and response to reports regarding non-compliant registrations and/or registrants operating in a manner that violates IFFOR Policies in accordance with the performance specifications.
10. The IFFOR Ombudsman will conduct quarterly audits for the first year of operations, and at least annually thereafter. ICM’s Compliance Manager and the IFFOR Ombudsman will agree on a written remediation plan where such audits demonstrate material non-compliance with the CRS performance specifications.
11. ICANN may audit the records of the CRS in accordance with the terms of the Registry Agreement.

¹ See attached process flow chart

ICM Compliance Reporting System

Direct Reports of Non-Compliance: Public, Stakeholders, Sponsored Community & Others
Forwarded Reports of Non-Compliance: IFFOR, ICANN & ICM

ICM Compliance Database

Logs: receipt, source, queue assignment, disqualification status, referral/check, recheck & disposition

WWW.COMPLIANCE.XXX
WEB FORM &
ATTACHMENTS

Compliance Reporting System

Child Abuse
Images Queue
Auto Referral

Labeling &
Other Auto
Queues

Abusive
Registration
Queue
Processing per
ICM Abusive
Registration
Policy

Manual
Review
Queue

Instructions
re take down,
etc.

Hotline

ICM Compliance
Manager Review

Auto
Check

Notice to Cure
To Registrant &
Beneficial Registrant

Auto Notice to Cure
To Registrant &
Beneficial Registrant

Auto Re-
Check

Check

Cured

Initiate
Enforcement
per IFFOR Policy

Cured

Initiate
Enforcement
per IFFOR Policy