Table of Contents

- General Update
- Contractual Compliance Initiatives and Improvements
- Audit Program Update
- Complaints Handling and Enforcement Summary

General Update

In October 2015, ICANN Contractual Compliance participated in ICANN’s 54th Public Meeting in Dublin, Ireland. The presentations can be found on the outreach page at: https://www.icann.org/resources/compliance/outreach.

Contractual Compliance Initiatives and Improvements

System Update

During this period, the Contractual Compliance complaint processing system improvements included:

1. Additional template and closure code modifications in an effort to bring clarity on the complaint resolution.
2. Compliance system updates to allow for the WHOIS Accuracy Reporting System (ARS) import utility to create compliance tickets based on the updated WHOIS ARS report format.
3. Template automation to reduce manual efforts by staff.

Participation in ICANN Policy Development Process

The team continued to participate in a variety of ICANN policy efforts, including the Privacy & Proxy Services Accreditation Issues (PPSAI) Working Group, Inter-Registrar Transfer Policy (IRTP) Parts C and D, the Translation and Transliteration of Contact Information PDP Working Group, the Protection of IGO and INGO Identifiers in all gTLDs, Rights Protection Mechanisms Review and New gTLD Subsequent Procedures.

Registrar Update

WHOIS Quality Review (WHOIS QR) Update

The Contractual Compliance team resumed WHOIS quality review monitoring efforts. The

---

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.
team reviewed WHOIS inaccuracy complaints to ensure continued compliance with contractual obligations, which resulted in one notice of breach.

WHOIS Accuracy Reporting System (ARS) Update
The Contractual Compliance team supported Phases One and Two of the WHOIS ARS efforts during this period. As previously reported, Phase One tested syntactical conformity for WHOIS data. The team reviewed the results from Phase One, and where appropriate, forwarded to registrars to resolve the WHOIS inaccuracy and/or the WHOIS format issues.

Phase Two tested operability. The team helped review the results and draft the report for Phase Two, which can be found at this link: https://www.icann.org/news/announcement-2015-12-23-en. Complaints from the Phase Two results are anticipated in early 2016. WHOIS ARS metrics for Phases One and Two will be reported in the monthly dashboard found at this link: https://features.icann.org/compliance.

Registry Update

Service Level Agreement (SLA) Communication Process
Contractual Compliance continued to collaborate with other ICANN departments and registry operators to develop a process for communicating SLA monitoring alerts to registry operators. A series of alerts will be automatically generated by ICANN’s Technical Services monitoring platform for SLA violations. It will also serve as the basis for automated technical alerts and semi-automated compliance notices sent to registry operators, based on the various registry contacts provided in the Global Domains Division (GDD) Portal. Implementation of the alerts and notifications will occur at a future date in 2016, to be determined.

New Registry Agreement Compliance Monitoring Efforts
As the calendar year 2015 drew to a close, Contractual Compliance prepared to again monitor registry operator’s compliance with 1) the required annual certifications that are due 20 January 2016 and 2) the policy and contractual implementations that are effective 31 January 2016 related to the Additional WHOIS Information Policy (see https://www.icann.org/resources/pages/policy-awip-2014-07-02-en) and the Clarifications to the Registry Agreement and the 2013 Registrar Accreditation Agreement (RAA) regarding applicable Registration Data Directory Service (WHOIS) Specifications (see https://www.icann.org/resources/pages/registry-agreement-raa-rdds-2015-04-27-en).

Audit Program Update

Registrar Accreditation Agreement (RAA) Audit Program Update

The 2013 RAA audit round (launched on 14 September 2015) is now in the audit phase. As of 30 December 2015, the audit team has reviewed over 5,700 documents in ten languages received from 22 countries. The review is still underway. The initial audit reports will be issued to the contracted parties early February 2016.

APAC Region - Audit Outreach

Contractual Compliance conducted audit webinars on 30 November 2015. The webinars were targeted at APAC registries and registrars. Approximately 80 participants from the Asia Pacific region attended the webinars, with attendees from countries such as Australia, China
and Vietnam. It was an opportunity for the contracted parties to learn more about the compliance audit program, address common audit questions and learn about the structure of the audit report. On 1 and 2 December 2015, APAC contracted parties also took the opportunity to have one-on-one meetings with the audit team to ask more detailed questions regarding the audit program and processes.
Complaints Handling and Enforcement Summary

The table below shows the complaint volume as complaints advance through the overall contractual compliance Informal & Formal processes.

### Complaint Volume per Notification Cycle
**October – December 2015**

- **Volume Current Quarter** = tickets submitted in current quarter
- **Volume Closed before 1st Inquiry / Notice Sent** = number tickets closed before 1st Inquiry / Notice was sent in current quarter
- **Volume 1st Inquiry / Notice Sent** = number tickets where 1st Inquiry / Notice was sent in current quarter
- **Volume 2nd Inquiry / Notice Sent** = number tickets where 2nd Inquiry / Notice was sent in current quarter
- **Volume 3rd Inquiry / Notice Sent** = number tickets where 3rd Inquiry / Notice was sent in current quarter
- **Volume Enforcement** = number enforcements notices sent in current quarter
- **Volume Closed** = number tickets closed in current quarter

- **Volume Closed Current Quarter** (includes carry/over from prior Quarter)
**Registrar - Volume Current Quarter**

### Complaint Distribution

- **WHOIS INACCURACY**: 74.2%
- **TRANSFER**: 15.4%
- **WHOIS FORMAT**: 2.6%
- **DOMAIN RENEWAL**: 1.7%
- **ABUSE**: 1.1%
- **DOMAIN DELETION**: 0.9%
- **WHOIS UNAVAILABLE**: 0.9%
- **DATA ESCROW**: 0.7%
- **Misc**: 2.5%

**Total Complaints Processed**: 11,196

**Total Complaints Closed**: 10,794

**Total Closed before 1st Inquiry / Notice**: 4,617

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

---

**Registry - Volume Current Quarter**

### Complaint Distribution

- **ZONE FILE ACCESS**: 22.8%
- **DATA ESCROW**: 41.2%
- **Misc**: 8.0%
- **SLA**: 13.7%
- **REGISTRY OTHER**: 3.1%
- **ABUSE CONTACT DATA**: 3.3%
- **MONTHLY REPORT**: 8.0%

**Total Complaints Processed**: 553

**Total Complaints Closed**: 528

**Total Closed before 1st Inquiry / Notice**: 248

_Disclaimer: Due to rounding, percentages may not always appear to add up to 100%._
## ENFORCEMENT ACTIVITY for December

<table>
<thead>
<tr>
<th>SENT DATE</th>
<th>DUE DATE</th>
<th>REGISTRAR</th>
<th>NOTICE TYPE</th>
<th>STATUS</th>
<th>FAILURE NOTICE BASIS</th>
</tr>
</thead>
<tbody>
<tr>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
<td>NONE</td>
</tr>
</tbody>
</table>

## ENFORCEMENT ACTIVITIES from PRIOR MONTHS

<table>
<thead>
<tr>
<th>SENT DATE</th>
<th>DUE DATE</th>
<th>REGISTRAR</th>
<th>NOTICE TYPE</th>
<th>STATUS</th>
<th>FAILURE NOTICE BASIS</th>
</tr>
</thead>
<tbody>
<tr>
<td>24-Sep-15</td>
<td>15-Oct-15</td>
<td>Gesloten Domain N.V.</td>
<td>Breach</td>
<td>Data and Documents Under Review by ICANN; Cure Period Extended Until 16 November 2015; Cure Period Extended Until 3 December 2015; Cure Period Extended Until 17 December 2015</td>
<td>Provide Whois Services (RAA 3.3.1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Publish on website name and position of officers (RAA 3.17/RIS 17)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Publish on website email address for abuse reports (RAA 3.18.1)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Publish on website description of procedures for the receipt and tracking of abuse reports (RAA 3.18.3)</td>
</tr>
</tbody>
</table>

| 30-Oct-15 | 20-Nov-15| Hosteur SARL | Breach | Data and Documents Under Review by ICANN; Cure Period Extended Until 2 December 2015; Data and Documents Under Review by ICANN; Cure Period Extended Until 16 December 2015; Cure Period Extended Until 7 January 2016 | Maintain and provide communication records (RAA 3.4.2/3) |
|           |          |             |         |        | Validate and verify Whois contact information (RAA/WAPS 1, 2, 4) |
|           |          |             |         |        | Provide domain name data in the specified response format (RAA-RDDS 1.4) |
|           |          |             |         |        | Display correct ICANN Logo on website (RAA Logo License Appendix) |
|           |          |             |         |        | Pay accreditation fees (RAA 3.9) |

| 9-Nov-15  | 30-Nov-15| 35 Technology Co., Ltd. | Breach | Data and Documents Under Review by ICANN; Cure Period Extended Until 30 December 2015 | Maintain and provide communication records (RAA 3.4.2/3) |
|           |          |             |         |        | Validate and verify Whois contact information (RAA/WAPS 1, 2, 4) |
|           |          |             |         |        | Publish on website name and position of officers (RAA 3.17 and RIS) |
|           |          |             |         |        | Display renewal/redemption fees (ERRP 4.1) |
|           |          |             |         |        | Display correct ICANN Logo on website (RAA Logo License Appendix) |
|           |          |             |         |        | Pay accreditation fees (RAA 3.9) |

| 16-Nov-15 | 7-Dec-15 | Registration Technologies, Inc. | Breach | Breaches Cured | Maintain and provide communication records (RAA 3.4.2/3) |
|           |          |             |         |        | Allow RNH to transfer domain name (IRTP 1) or provide valid reason for denial (IRTP 3) |
|           |          |             |         |        | Provide domain name data in the specified response format (RAA-RDDS 1.4) |
|           |          |             |         |        | Pay on website email address for abuse reports (RAA 3.18.1) |
|           |          |             |         |        | Pay on website description of procedures for the receipt and tracking of abuse reports (RAA 3.18.3) |
Please refer to [https://features.icann.org/compliance](https://features.icann.org/compliance) for up-to-date information.

<table>
<thead>
<tr>
<th>Date</th>
<th>Entity</th>
<th>Action</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>24-Nov-15</td>
<td>Premium Registrations Sweden AB</td>
<td>Termination</td>
<td>Cure any RAA breach within 15 working days (5.3.4 RAA)</td>
</tr>
</tbody>
</table>