Contractual Compliance Audit Program Update

• February 2017: Six Weeks in Contractual Compliance and Consumer Safeguards blog marked launch of active role in combatting DNS infrastructure abuse and increased transparency for compliance in light of ICANN Community concerns

• Enhance transparency and granularity of reporting in the monthly, quarterly and annual metrics

• Audit plans updated with expanded questions and testing to address DNS abuse
  • Requests focus on process, procedures and handling of DNS abuse
  • Testing focuses on review of security threat reports

• At launch of audit round, publish list of auditees

• March 2018 ICANN Compliance launched full registry audit using updated plan
  • 20 new gTLDs were in scope of this audit round
  • Audit round completed 1 October 2018
  • Audit Report has been published
November 2018 Audit Program Round

Audit Objective
• To assess Registry Operators’ handling of Domain Name System (DNS) abuse and security threats

Audit Criteria:
• All generic top-level domains (gTLDs)
  • excluding gTLDs which completed the March 2018 Registry Audit round
  • excluding gTLDs subject to the Emergency Back-End Registry Operator (EBERO) Program

Audit Scope:
• gTLDs with Public Interest Commitments in Registry Agreement under Specification 11
• Registration policies that may impact the potential for abusive registrations
• Understand Registry Operators’ DNS abuse handling procedures in absence of required commitments or policies

Note: All questions and requests for data in Request For Information (RFI) require response from Registry Operators.
March 2018 Audit Round Observations

**Good practices**
- Security threats analysis conducted frequently and retention of reports
- Reports included abusive domains identified in publicly available abuse reports
- Evidence of actions taken on abusive domains
  - Inform registrars
  - Domain suspension and deletion
  - Communications provided

**Observations noted:**
- Incomplete analysis and reports
- No standardized / documented abuse handling procedures
- No action taken on some identified threats
Audit phases:
• Pre-audit notification (sent 10 October 2018)
• Outreach webinars (conducted 5-6 November 2018)
• Request for Information (6 November 2018)
• ICANN Review / Audit phase (27 November 2018)
• ICANN Initial Reporting to Registry Operators (December 2018 – February 2019)
• Remediation phase (if required, February – April 2019)
• Final reporting, including published consolidated audit report (May 2019)

Note: During Request for Information and Remediation phases, ICANN follows 1-2-3 notification process (15-5-5 business days). For more information on notification process see: https://www.icann.org/resources/pages/approach-processes-2012-02-25-en
Audit Survey Tools

**Previous Approach**
- Excel file-based Request For Information format
- No clear method for contracted party to indicate completion

**New Approach**
- Web-based Request For Information including file upload capabilities
- Each gTLD will be given a customized link
- Allows auditees to exit and return to continue (content is automatically saved)
- Contracted party can indicate completion
Webinar recordings and audit program information will be available at:

- The ICANN Contractual Compliance outreach page at this link
  https://www.icann.org/resources/compliance/outreach

- The ICANN Contractual Compliance Audit Program at this link
  https://www.icann.org/resources/pages/audits-2012-02-25-en