

Contractual Compliance Report

For the Period of 1–30 June 2025

Jamie Hedlund, Senior Vice President,
Contractual Compliance and U.S. Government Engagement



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OBSERVED TRENDS

- ICANN Contractual Compliance (ICANN Compliance) received more than double the volume of Registrar Abuse complaints (1,068), compared to the average of the prior 12 months (476). This increase was largely driven by a single complainant who submitted a high volume of invalid complaints related to DNS Abuse. These complaints were submitted simultaneously to ICANN Compliance and the sponsoring registrars, without allowing those registrars reasonable time to investigate and act. Most of these domains were subsequently mitigated without ICANN Compliance's intervention. Many involved repeated submissions about the same domain names. ICANN Compliance engaged with this complainant to provide guidance on how to submit actionable complaints moving forward.
- Informal notices sent during June increased to 500, a significant jump from the prior 12-month average of 71. The majority of these were related to monthly reports, which consist of the Per-Registrar Transactions and Registry Functions Activity reports that registry operators (ROs) are required to submit monthly per top-level domain (TLD). The spike in notices was due to an error from one registry service provider (RSP) that supports roughly 550 TLDs but was remediated shortly after the error occurred. It is typical that when a technical issue appears at the RSP level it will impact all TLDs they support because they all function from the same system. This explains the observed spikes for issues such as monthly reports, escrow, and service level agreements.

KEY HIGHLIGHTS FROM JUNE 2025

- Registry audit launched in October 2024 remains ongoing.
- Provided additional input to community policy and working groups.

OVERVIEW OF ACTIVITY

Audit Program

In October 2024, the Contractual Compliance Audit team launched a new registry audit round. The audit focuses on validating registries' compliance with multiple terms of the Registry Agreement (RA) and ICANN policies, including but not limited to, the Domain Name System (DNS) Abuse requirements that became effective on 5 April 2024.

As of the end of June 2025, all registries have submitted responses and documentation in reply to the Request for Information sent on 28 October 2024. ICANN Compliance is following up with some registries to request information that was missing in initial responses; to ask for clarifications on information received; and to direct remediations when noncompliance findings are confirmed.

Contractual Compliance Enforcement

All notices can be found on the [dedicated webpage](#).

Notices of Breach

No new Notices of Breach were issued in June 2025. During this month, ICANN Compliance continued reviewing responses and data related to Notices of Breach issued in prior months, conducting tests, and sending additional requests to the relevant contracted parties.

In June, ICANN Compliance deemed cured the first Notice of Breach issued related to the DNS Abuse mitigation requirements in effect since 5 April 2024. More details of the actions that the RO (.TOP) took to cure the Notice of Breach were explained in a [blog post](#).

Notices of Suspension/Terminations

No Notices of Suspension or Termination were issued in June 2025.

Enforcement Notices Escalated to the ICANN Legal Team (Mediation)

No new escalations to the ICANN Legal team were made in June 2025.

Compliance Matters Related to Registrars and Registry Operators

Compliance received 1,646 new complaints (1,500 against registrars and 146 against ROs, collectively referred to as “contracted parties” or “CPs”) and sent 572 inquiries and notices (collectively referred to as “compliance notifications”) to CPs in June. The 572 figure refers to the number of first, second, and third notifications sent by Compliance and does not account for notifications sent for the purpose of requesting clarification or additional evidence following a CP’s response.

Most notifications sent to registrars addressed obligations related to DNS Abuse and other types of abuse, transfer, and registrar data escrow. Most notifications sent to ROs addressed obligations related to code monthly reports. During June, Compliance closed 1,080 complaints without having to contact a single CP. Examples of complaints closed without contacting a single CP include instances in which the complainant:

- Failed to respond to a request for evidence from the ICANN Contractual Compliance team.
- Complained about a domain registered in a country code top-level domain.
- Submitted a duplicate complaint either before resolution of the original complaint or about an issue that was already resolved at the time the complaint was reviewed.

In all cases, Compliance educated complainants on ICANN’s enforcement authority and provided alternatives where appropriate.

Compliance Monthly Dashboard and Trend Reporting

Click the links below to view the dashboard and reporting trends for June 2025:

- [Contractual Compliance 2025 Monthly Dashboards](#)
- [Contractual Compliance Twelve-Month Trends Reporting](#)

Enforcement of the Interim Registration Data Policy for gTLDs

In June, Compliance continued processing cases related to obligations under the Interim Registration Policy for generic top-level domains (gTLDs) (Interim Policy), Stage 2. Under Stage 2, CPs may continue to implement measures consistent with the Temporary Specification for gTLD Registration Data, implement the Registration Data Policy, or implement elements of both. The Interim Policy establishes requirements for processing registration data, which include publication and redaction of data in the public directories, as well as disclosure of data to third parties.

Compliance sent two new compliance notifications related to the provision of nonpublic data to Uniform Dispute Resolution Policy Providers and continued addressing the previously submitted cases currently under remediation or pending further responses and collaborations. Compliance also continued educating complainants on disclosure requirements for invalid complaints. Examples include when complainants believe registration data, which is redacted per the Interim Policy, is “missing” from the public directories, or privacy or proxy service data are redactions, or that all non-European data should be displayed.

In June, Compliance continued to:

- Contribute to Board Caucus calls concerning data protection and privacy, which includes discussion of issues related to enforcement and implementation of ICANN policies impacted by data protection regulations.
- Provide complaint metrics concerning alleged violations of the Interim Policy and compliance notices or inquiries sent and closed during the month.

Registration Data Access Protocol (RDAP) Implementation

In June, Compliance continued processing service-related compliance notifications for RDAP. From October 2019 through June 2025, Compliance processed notifications with respect to the implementation of the RDAP service and registration of base uniform resource locators (URLs). Current information indicates that all ROs have registered URLs, while five registrars do not have valid URLs registered through IANA.

In addition, Compliance continued to initiate new compliance cases related to CPs conformance with the RDAP Response Profile and RDAP Technical Service Guide. Compliance also initiated new compliance cases related to failure of registrars' RDAP Service Level Requirements, as detected by ICANN's Service Level Agreement Monitoring (SLAM) system. Compliance recognizes that while there are a small number of registrars that have yet to register an RDAP URL with ICANN indicating that implementation has been completed, there are issues related to conformance that exist across a significant number of CPs.

Nevertheless, Compliance continues to collaborate with CPs that have not yet implemented the RDAP or whose RDAP implementation is not in conformance with the requirements, as well as those that have presented remediation measures to become compliant. These CPs have been requested to provide regular updates on their open compliance cases regarding their progress towards remediation.

On 28 January 2025, in accordance with the RDAP amendments to the RAA, and a majority of the RAs, WHOIS service requirements for CPs were sunsetted. ICANN Compliance is aware that some CPs have ceased to operate WHOIS services. Compliance is continuing to monitor and enforce compliance with all RDDS requirements, including RDAP, and WHOIS as to those requirements that may continue to apply.

Policy and Working Group Efforts

Compliance collaborated across the ICANN organization on assessing the multiple recommendations produced by the policy development, implementation, and review teams. Specifically, Compliance:

- Provided input for implementation of the expedited policy development process on the Temporary Specification for gTLD Registration Data Phase 1 recommendations (Registration Data Policy).
- Provided input on the Second Security, Stability, and Resiliency Review team recommendations.
- Participated in New gTLD Program: Next Round Base RA Drafting.
- Participated in the ccPDP4 Policy Implementation Assessment.
- Participated in the Implementation Planning Team for the Privacy and Proxy Services Accreditation Implementation.

Outreach

ICANN Compliance participated in the ICANN83 Policy Forum, held from 9–12 June in Prague, Czech Republic. ICANN Compliance engaged in multiple one-on-one sessions and discussions related, for example, to DNS Abuse and RDAP.

To learn more about ICANN's Contractual Compliance work, please visit:

<https://www.icann.org/resources/pages/compliance-2024-06-28-en>

Notices:

<https://www.icann.org/compliance/notices>

Reports:

<https://www.icann.org/resources/pages/compliance-reports-2021>

Performance Measurement Dashboard:

<https://compliance-reports.icann.org/compliance/dashboard/report-list>



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