

Contractual Compliance Report

For the Period of 1–31 January 2025

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OBSERVED TRENDS

- Relatively high volume of formal notices issued in January: four Notices of Breach and one Notice of Termination. During the prior six months, Compliance issued 12 formal notices. All formal notices are published on this [website](#).
- Average complaint volume held steady. Compliance received 1,124 complaints in January 2025; the average volume over the prior six months is 1,278.
- Of complaints closed in January (988), over 80 percent (831) were closed as outside the scope of ICANN's agreements with registry operators and registrars.
- Compliance sent 245 informal inquiries and notices which exceeds the prior six months average of 187.

KEY HIGHLIGHTS FOR JANUARY 2025

- Compliance issued four Notices of Breach and one Notice of Termination.
- Audit of registries selected for the audit launched in October 2024 is ongoing.
- Continued providing input to community policy and working groups.

OVERVIEW OF ACTIVITY

Audit Program

In October, the Contractual Compliance Audit team launched a new registry audit round. The audit is focused 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 January, all registries have submitted completed responses and documentation in reply to the Request for Information sent 28 October 2024. ICANN Compliance is following up with registries requesting information that was missing in initial responses and asking for clarifications on information received.

Contractual Compliance Enforcement

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

Notices of Breach

On 22 January 2025, ICANN sent four Notices of Breach to the following registrars: [Mixun Ltd](#) (IANA#3960), [Mixun Network Technology Co., Limited](#) (IANA#3967), [Nerd Origins Ltd](#) (IANA#3839), and [Zoo Hosting](#) (IANA#3953). Each registrar had failed to pay ICANN past due fees in violation of Section 3.9 of the Registrar Accreditation Agreement (RAA). The Notices of Breach also included other areas of noncompliance, including the failure to provide a Registration Data Access Protocol (RDAP) Directory Service that implements the most recent version of the RDAP Technical Implementation Guide and RDAP Response Profile, as required by Section 3.3.8 of the RAA and Section 1.2.1 of the Registration Data Directory Services (RDDS) Specification of the RAA (RDDS Specification). Additionally, Zoo Hosting (IANA#3953) failed to provide ICANN with current documentation demonstrating Zoo Hosting is legally established and in good standing. Each registrar had until 12 February 2025 to become compliant and maintain its accreditation with ICANN.

Notices of Suspension/Terminations

On 10 January 2025, ICANN sent a [Notice of Termination](#) to the registrar, Abansys & Hostytec, S. L (IANA#1396), for failure to timely cure the breaches set forth in ICANN's Notice of Breach of RAA dated 16 December 2024.

Enforcement Notices Escalated to the ICANN Legal Team (Mediation)

No new escalations to the ICANN Legal team in January 2025.

Compliance Matters Related to Registrars and Registry Operators

In January, Compliance received 1,124 new complaints (1,050 against registrars and 74 against registry operators (ROs)) (collectively referred to as contracted parties or CPs) and sent 245 inquiries and notices (collectively referred to as compliance notifications) to CPs. The number 245 refers to the first, second, and third compliance notifications and does not account for notifications sent to request 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 registration data inaccuracy. Most notifications sent to ROs addressed obligations related to zone file access and monthly reports. During January, Compliance closed 831 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 ICANN Contractual Compliance's request for evidence.
- 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 January 2025:

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

Enforcement of the Interim Registration Data Policy for gTLDs

In January, Compliance continued processing compliance 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 one new inquiry related to consent to publish nonpublic registration data 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 WHOIS, or privacy, or proxy service data are redactions, or that all non-European data should be displayed.

In January, 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.
- Provide input on contractual requirements for third-party access to nonpublic registration data under current requirements, as it relates to the Registration Data Request Service.

Registration Data Access Protocol (RDAP) Implementation

In January, Compliance continued processing service-related compliance notifications for RDAP. From October 2019 to January 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 14 registrars have not yet uploaded their URLs to the Naming Services portal. In addition, Compliance continued to initiate new compliance cases related to CPs conformance with the RDAP Response Profile and RDAP Technical Service Guide. Compliance recognizes that while there are a small number of registrars that have yet to register an RDAP URL with ICANN indicating implementation was 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 are 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 sunset. 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. Compliance:

- Continued providing input for implementation of the expedited policy development process on the Temporary Specification for gTLD Registration Data Phase 1 recommendations (Registration Data Policy).
- Continued providing input on the Second Security, Stability, and Resiliency Review team recommendations.
- Continued providing contractual compliance-related inputs and clarifications to address the policy development process (PDP) working group's questions during its review of Public Comments for the Initial Report on the Transfer Policy Review Policy Development Process.
- Continued participating in Next Round Base RA Drafting.
- Participated in the ccPDP4 Policy Implementation Assessment.
- Continued providing contractual compliance-related inputs for IDNs EPDP Phase 2
- Participated in IG4.1 Implementation discussions.
- Participated in the Implementation Planning Team for the Privacy and Proxy Services Accreditation Implementation.

Outreach

No outreach activities conducted in January 2024.

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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