At-Large: Understanding Compliance in ICANN

ICANN Contractual Compliance

ICANN 64
13 March 2019
Agenda

- Overview of session
- Introduction to ICANN Contractual Compliance
- Common complaint scenarios
- ICANN Contractual Compliance performance reports
- Questions and answers
Introduction to ICANN
Contractual Compliance
ICANN Contractual Compliance

- Role of ICANN Contractual Compliance
  - Plays important part in implementation of community policies
  - These policies, and other DNS-related provisions, are incorporated into ICANN’s agreements with registries and registrars
  - By enforcing these agreements, Contractual Compliance:
    - Upholds community policies and preserves DNS stability and security
    - Contributes to credibility and legitimacy of ICANN’s multi-stakeholder model
Common Complaint Scenarios
Q1: Complaint claims telephone numbers in WHOIS for North American based company are redacted.

a) Compliance issue
b) Not a Compliance issue
c) Depends

Likely not a compliance issue. Temporary Specification for gTLD Registration Data, Appendix A, Section 3, permits registrars that are not required to redact information to optionally do so if it is technically infeasible to treat data that is required to be redacted differently than data that is not required to be redacted.
Q2: Complainant emailed Registrant email address in WHOIS and received no response.

a) Compliance issue
b) Not a Compliance issue
c) Depends

Not a compliance issue. Registrants are not required to respond to emails and non-response does not necessarily indicate the email address is inaccurate. Evidence of a rejected email address required to start the Compliance process with a registrar for inaccurate WHOIS.
Q3: Domain name holder complaints about problems transferring domain name to different web hosting company

a) Compliance issue
b) Not a Compliance issue
c) Depends

Not a compliance issue. Only inter-registrar transfers are within scope of the Transfer Policy. Non-contracted parties, including web hosting and other service providers, are out of the contractual authority of ICANN.
Q4: Complainant’s domain name registration was transferred to different registrar after unauthorized access to control panel.

a) Compliance issue
b) Not a Compliance issue
c) Depends

 Likely not a compliance issue. Domain name hijacking and return of a domain name to a complainant are outside of ICANN’s contractual authority. However, ICANN Contractual Compliance will review whether the transfer was conducted according to Transfer Policy and Temporary Specification for gTLD Registration Data. Complaints regarding unauthorized access to control panel or email hijacking should be addressed with law enforcement.
Q5: Domain name holder is trying renew domain name but reseller is not responding.

a) Compliance issue
b) Not a Compliance issue
c) Depends

Likely a compliance issue. Registrars are accountable for their resellers’ actions that are within scope of the ICANN agreements and policies. The domain name holder can also try contacting the registrar directly.
Compliance Reporting

- Performance reports and input are published at https://features.icann.org/compliance

- Other reports and blogs are published at https://www.icann.org/resources/pages/compliance-reports-2018

- Compliance Outreach activities https://www.icann.org/resources/compliance/outreach
ICANN Contractual Compliance Performance Reports

Performance measurement provides metrics to the community on compliance activities through the dashboard and additional reports related to operational data, regional data and complaint specific data. The reports measure EFFICIENCY and EFFECTIVENESS as defined below.

Efficiency is defined as "doing things right" and measures process cycle time, response time, backlog, staffing utilization among other measures.

Effectiveness is defined as "doing the right things" and measures include the number and categorization of people serviced, the accomplishments aka enforcement criteria and resolution, quality of service via the complaint satisfaction survey at the closure of every ticket.

Metrics and Dashboards

Current and previous years

Contractual Compliance Metrics for a rolling 13-month period

- Percentage of Registrars with Complaints by Region & Country
- Percentage of Registries with Complaints by Region & Country
- Complaints per Notification Cycle by Region
- Informal Complaints by Region
- Formal Complaints by Type & Region
- Formal Notices (Enforcement)
- Complaint Count by TLD Round & Region
- Domain Count by gTLD per Region
- Domain Count Trends by gTLD
- Domain Count by Registrar

Complaint Count
January 2018 - January 2019

Registrar Informal: 37,975
Registry Informal: 1,043
Formal: 50

% of Registrars with Complaints by ICANN Region
Contractual Compliance Performance Reports

Contractual Compliance Performance Measurement

Performance metrics provide information to the community on compliance activities through dashboards and reports.

Monthly dashboards present data on the complaint volume, the process volume and turn-around times. For more details, read our guide to the monthly dashboard reports. ICANN increased the level of granularity reported in the monthly dashboards. For details read the Additional Information on the Subject Matter of Complaints guide.

Quarterly Reports provide Contractual Compliance data for each quarter beginning January 2017. For more details, read our ICANN Contractual Compliance Quarterly Metrics Explanation.

Annual Reports are intended to provide a calendar year view into the compliance landscape. See individual reports for descriptions.


2018 Monthly Dashboards

JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC

2018 Quarterly Reports

Q1 (JAN-MAR)  Q2 (APR-JUN)  Q3 (JUL-SEP)  Q4 (OCT-DEC)

2018 Annual Reports

- Enforcement Reasons for Registrars and Registries
  This report presents data about the Formal Resolution Process broken out by enforcement reason.

- Reporter Category
  This report presents the number of compliance tickets created during the calendar year summarized by Reporter.

- Compliance Approach & Process
### Complaints by Region

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<th>Volume Received</th>
<th>Volume Closed Before 1st Notice</th>
<th>Volume 1st Notice Sent</th>
<th>Volume 2nd Notice Sent</th>
<th>Volume 3rd Notice Sent</th>
<th>Volume Closed</th>
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# Complaints by Complaint Type

## Registrar Informal Complaint Volume by Type: January 2018 - January 2019

### Informal Complaint Volume by Type

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WHOIS Accuracy Reporting System (WHOIS ARS): 15.4%

Whois Inaccuracy: 55.6%

Customer Service: 0.8%

Whois Service Level Agreement: 1.1%

Whois Unavailable: 1.7%

Whois Format: 1.9%

Abuse: 2.4%

Domain Renewal: 2.5%

Domain Deletion: 2.5%

Other: 3.2%

Transfer: 12.9%
Contractual Compliance Reports & Blogs

Contractual Compliance Reports 2018


Annual Report
(Effective January 2019, no further Annual Reports will be published; Please refer to ICANN Annual Report at this page https://www.icann.org/resources/pages/governance/annual-report-en)

Quarterly Report
2018 Contractual Compliance Quarter One Report [PDF, 405 KB]
2018 Contractual Compliance Quarter Two Report [PDF, 296 KB]
(Effective 1 July 2018, no further Quarterly Reports will be published)

Audit Report
2018 March Contractual Compliance New Registry Agreement Audit Report [PDF, 280 KB]

Blogs
March 2018 - Enhancing Transparency in Contractual Compliance Reporting
July 2018 - Enforcing the Temporary Specification
November 2018 - Contractual Compliance: Addressing Domain Name System (DNS) Infrastructure Abuse
Contractual Compliance Outreach Activities | 2018

2018 Events

ICANN 63 Readout Session – 28 November 2018
Contractual Compliance Istanbul team participated at ICANN org readout session in Istanbul and presented Compliance Program Update from ICANN 63. The session was hosted by the IT Law Institute of Bilgi University; about 50 participants, mostly students and young professionals participated in the event. This is the first “physical” readout session held in the Middle East and in Turkey. Readout sessions are held in all regions following each ICANN Public Meeting. These readout sessions contribute to the ongoing engagement efforts and enable broader regional participation in ICANN. ICANN’s Global Stakeholder Engagement team, often in partnership with stakeholders in the region, host these events and use the platform to summarize the relevant topics and discussions that took place during the ICANN Public Meeting.

Nordic Outreach – 21 November 2018
Contractual Compliance Istanbul team conducted Registrar Training for Nordic Registrars and Resellers in Stockholm, Sweden in partnership with Global Domains Division and Global Stakeholder Engagement teams. Topics presented included Enforcing Temporary Specification, Abuse, Uniform Domain Dispute Resolution (UDRP), Transfer Policy and about ICANN’s Contractual Compliance Approach and Process.

Contractual Compliance Registry Audit Outreach Sessions – November 2018
ICANN launched a DNS infrastructure abuse-focused audit for Screenshot TLDs and held two audit
Questions & Answers

Send compliance questions
To: compliance@icann.org
Subject line: ICANN 64 ALAC Compliance

The presentation is available at:

- The ICANN Contractual Compliance outreach page at
  https://www.icann.org/resources/compliance/outreach
Appendix
WHAT IS A CONTRACTUAL COMPLIANCE COMPLAINT?

Key players

Internet Corporation for Assigned Names and Numbers (ICANN)
ICANN helps coordinate the world’s Internet system of unique identifiers. When you type a web address into your browser, the identifiers that ICANN helps coordinate take you to the right place.

Registries and Registrars
You can register a domain name under a gTLD through an ICANN-accredited registrar. Registries keep the master database of all domain names registered in each TLD through contracts with ICANN and registrars.

ICANN Contractual Compliance
Contracts are enforced through ICANN’s Contractual Compliance team. The mission is to preserve the security, stability, and resiliency of the Domain Name System and to promote consumer trust through prevention, enforcement and transparency.

Domain Name Holders
When someone has a complaint about a domain name, registrar, or registry, Contractual Compliance is often the first stop to try and resolve the complaint. Its online complaint filing system is easy to use and most users can expect a resolution within 17 days of filing.

Common complaints handled by ICANN
- Domain name transfer issues related to unauthorized transfers or unsuccessful transfer requests
- Domain name renewal issues related to fees, renewal reminders, or redemptions
- Domain name registration information issues related to incorrect WHOIS data or access to WHOIS data
- Registry codes of conduct issues related to registry violations such as providing more favorable treatment to some registrars

Who can you contact?
- Contact your registry or registrar.
- File a complaint with ICANN’s Contractual Compliance team.
- For some issues, you need to contact law enforcement, legal counsel, consumer protection agencies, or government regulatory authorities.
- Other external resources are listed on ICANN’s Security Awareness Indicator page: go.icann.org/2FoAldZ.
- Learn more about Domain Name System infrastructure abuse like malware, botnet command and control, and phishing: www.icann.org/octo-ssr.

How do you file a complaint?
- Go to: www.icann.org/compliance.
- Click your complaint type, then follow the instructions to file a complaint.
- ICANN works with the registering organization to resolve the issue if it is within the scope of the agreement and policies.
- Complete a customer satisfaction survey to help ICANN continuously improve its customer service.

Visit us at: icann.org/compliance
Email us at: compliance@icann.org
Outreach Update

Contractual Compliance participated in these events since ICANN 63:

- Middle East DNS Forum Outreach in Dubai, UAE (February 2019)
- Registrar/reseller outreach at NamesCon in Las Vegas, Nevada (February 2019)
- ICANN 63 Readout Session in Istanbul, Turkey (November 2018)
- Nordic registrar Outreach in Stockholm, Sweden (November 2018)
- Registry Audit Outreach Sessions via webinar (November 2018)

To learn more, please visit Compliance Outreach page at this link [https://www.icann.org/resources/compliance-reporting-performance](https://www.icann.org/resources/compliance-reporting-performance)
Policy and Working Group Efforts

Actively contributing to Registrar and Registry related policies, Working Groups and Implementation Review Teams

- Expedited Policy Development Process on Temporary Specification for gTLD Registration Data
- RDAP implementation
- Internationalized Domain Name guidelines implementation
- New gTLD Subsequent Procedures
- Competition, Trust and Choice Review
- WHOIS Review Team
- Translation and Transliteration of Contact Information
- Privacy and Proxy Services Accreditation Issues
- Security, Stability and Resiliency Review Team

Note: Reports and input are published at https://features.icann.org/compliance
Common complaints from reporters post Temporary Specification

- Reporter believes registration data is “missing” from public WHOIS
- Reporter believes all non-European data should be displayed
- Reporter wants their registration data to be displayed
- Reporter believes privacy/proxy service data are redactions
- Registry WHOIS output is displayed recursively by registrar
- Email address or web form used for redactions is non-functional
- Registry WHOIS service is not displaying required message in email fields
- Gaining registrar continues to require FOA even when not required

- Large effort in educating reporters regarding Temporary Specification requirements and changes to existing agreements and policies
Temporary Specification (continued)

Temporary Specification related complaint - reporting

- Approximately 716 complaints related to Temporary Specification since 25 May 2018
  - Majority closed after educating reporters on requirements
- Approximately 30 registrars and 5 registries received compliance inquiries/notices
  - Over half completed remediation or are currently remediating
  - Approximately 5 registrars challenged requirements and are continuing to collaborate with ICANN
  - Remainder in process
## Temporary Specification (continued)

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<tr>
<td><strong>Grand Total</strong></td>
<td>41</td>
<td>71</td>
<td>51</td>
<td>46</td>
<td>36</td>
<td>80</td>
<td>70</td>
<td>127</td>
<td>120</td>
<td>74</td>
<td>716</td>
</tr>
</tbody>
</table>
Common WHOIS Complaints

- Incorrect/invalid registration data displayed in WHOIS
- Domain holder challenges
  - Domain suspended or deleted for non-response to registrar or reseller
  - Registrants inability to update registration records
    - No access to control panel
    - Non-response from service provider or reseller
  - Domains registered in name of hosting providers, resellers or former employees of registrant organization
- Incorrect/invalid registrar abuse contact information in WHOIS
Common Transfer Complaints

- Unable to retrieve "AuthInfo" codes or unlock domain via control panel
- Transfer requests by someone other than registrant or Admin contact
- Transfer is between web hosts instead of registrars
- Registrar/reseller denied transfer due to unpaid future registration period or additional fee, such as "Transfer Fee"
- Unresponsive/uncooperative resellers
- Hijacked domain/email accounts and unauthorized transfers
Common Domain Renewal Complaints

- Registrant did not receive renewal reminders due to invalid registrant email
- Registrant not able to renew/restore domain because control panel was inaccessible
- Registrant paid renewal fee, but domain name was not renewed
- Registrar/reseller did not provide information about renewal/redemption fees
- Customer service problems such as failed renewal due to invalid payment methods and billing disputes (out of scope)
- Reseller’s failure to send reminders, inform customer or other issue described above
ICANN’s Limited Contractual Authority

- ICANN does not have ability or contractual authority to:
  - Manage domain name registrations status or data
  - Transfer or return lost domain names
  - Investigate complaints about illegal activity such as domain hijacking or stolen email accounts
  - Address private disputes over domain name registrations
  - Address customer-service related complaints such as:
    - Payment disputes such as credit card failure
    - Issues related to additional services such as special promotions, hosting or email services
    - Technical issues related to nameserver or DNS settings