Agenda

- Welcome
- Brief Update from Contractual Compliance Since 2018 GDD Summit
- Responses from Contractual Compliance to Temporary Specification Questions from Registrar Stakeholder Group
Update Since 2018 GDD Summit

Highlight of activities since May 2018

- Continue to work on enhancements to reporting
- September 2017 Round Registrar Audit Report published
- Registry audit in progress
- Support policy efforts and review teams
- GDPR preparation activities
  - Temporary Specification
  - ICANN org (internal) GDPR compliance efforts
Email received on 7 June 2018 related to Temporary Specification

1. Has Compliance received complaints specific to GDPR (e.g., complaints about requests for access to redacted WHOIS)?
2. Is compliance proactively monitoring registrar compliance with the Temporary Policy? If so, how?
3. Have any of Compliance’s processes changed as a result of the GDPR?
4. Has Compliance defined new complaint types as a result of the Temporary Policy? If so, what constitutes a valid complaint?
5. How are WHOIS Inaccuracy complaints handled if WHOIS is not available as a result of GDPR?
6. How will transfer complaints be handled now that the gaining registrar FOA may not be sent as part of the transfer process?
Responses to Registrar Stakeholder Group Compliance Sub Group Questions related to Temporary Specification
Email received on 7 June 2018 related to Temporary Specification

1. Has Compliance received complaints specific to GDPR (e.g., complaints about requests for access to redacted WHOIS)?
   - Contractual Compliance has not received complaints specific to denial of access to non-public registration data
   - Most complaints received to date are regarding changes to registration data (e.g., data is perceived as missing)

2. Is compliance proactively monitoring registrar compliance with the Temporary Policy? If so, how?
   - Temporary Specification compliance is reviewed and addressed, as applicable, during processing of third party complaints
Questions from Registrar Compliance Sub Group

Email received on 7 June 2018 related to Temporary Specification

3. Have any of Compliance’s processes changed as a result of the GDPR?
   - Contractual Compliance has adjusted review of complaints to account for changes in registration data
   - Inquiries used where registration data is redacted
   - Requesting different/additional information where necessary to understand situation (e.g., request for non-public WHOIS)

4. Has Compliance defined new complaint types as a result of the Temporary Policy? If so, what constitutes a valid complaint?
   - No new complaint type; complaints continue to be received and processed from existing web form submissions
Questions from Registrar Compliance Sub Group

Email received on 7 June 2018 related to Temporary Specification

5. How are WHOIS Inaccuracy complaints handled if WHOIS is not available as a result of GDPR?
   - WHOIS Inaccuracy complaint review has been adjusted to account for registration data changes (details on following slides)
   - For any complaint review that requires non-public registration data, ICANN requests specific data from contracted party

6. How will transfer complaints be handled now that the gaining registrar FOA may not be sent as part of the transfer process?
   - Transfer complaint review has been adjusted to account for Temporary Specification Appendix G changes
   - NOTE: Updated approach is noted in red on following slide
There are various requirements under the Transfer policy related to inter-registrar transfers and change of registrant:
- Appendix G of Temporary Specification adds new requirements.
- If determined in scope of RAA and Transfer Policy, complaint will be forwarded to registrar for review.
- ICANN’s requests for information and records from registrar are driven by contractual and policy requirements, content of complaint and available information:
  - Copies of correspondence between registrar/reseller and reporter/registrant.
  - If applicable, non-public registration data for relevant fields.
  - Reason for denial of transfer or change of registrant.
  - Gaining registrar to confirm access to registration data; if no access: FOA is not requested; will not ask for Change of Registrant; will ask for WHOIS Accuracy Program Specification validation/verification confirmation.
- Additional follow up with reporter and registrar as needed.
Questions & Answers

Send compliance questions
To: compliance@icann.org
Subject line: ICANN 62 Registrar Outreach Session

The ICANN 62 presentations are available at:

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

- The ICANN 62 Schedule page at this link https://schedule.icann.org/