Registrar Compliance Program

Contractual Compliance

ICANN

Contractual Compliance Process Guidelines and Clarifications

Informal Resolution Process Guidelines

Notice

- Sent regarding an alleged area of noncompliance
- Proactive compliance monitoring (if above applies)
- Complaint from third party (upon validation)

Note: Subject line will indicate whether Notice or Inquiry

VS

Inquiry

- Information gathering is required
- No known compliance violation
- Proactive compliance monitoring effort (if above applies)

Note: Non-response to Inquiry may result in a Notice

Escalated compliance notices apply to compliance matters that:

- ⊙ Require immediate resolution
- ⊙ Are a repeat of a matter that was claimed to be previously cured
- ⊙ Are grounds for termination (e.g., insolvency, conviction, stability issue)

Informal Resolution Process – Clarifications

- Deadlines are generated on UTC time

- Due dates advance at 00:00 UTC

- Staff processing 5 x 24 across 3 global hubs

  - Notices or inquiries sent on same day may have different deadlines

Informal Resolution Process – Clarifications

NOTE: Early response allows for follow up and collaboration

- ICANN will generally send a follow up for:

    - Insufficient response received before due date and time remains

    - Insufficient response received early and ICANN review/response past due date

    - Extension requested by contracted party by due date (with reason)

    - Clarification requested by contracted party before due date

- ICANN will advance to next phase for:

    - No response from contracted party

    - Insufficient response received near or on due date

Informal Resolution Process – Contacts

ICANN staff uses various contacts in the informal resolution process

- Registrars: 1-2-3 notices sent to designated email contacts depending on complaint type; primary contact is also copied on 3rd notice and sent 3rd notice fax

- Registries: 1-2-3 notices and 3rd notice fax sent to compliance contact; primary contact and legal notice contact also copied on 3rd notice

- Reminder calls are made to contracted parties after 2nd and 3rd notices (if response is insufficient)

  - Primary contact for registrars and compliance contact for registries

  - Telephone numbers are encouraged to be direct lines (rather than general customer service lines), with voicemail

Communicating With ICANN

Tips for communicating with ICANN Contractual Compliance

⊙ Whitelist emails from icann.org

⊙ Check that your mail servers are not blocking emails from ICANN

⊙ Reply to compliance notices ASAP and state what you are doing

  ⊙ Ensure all questions are answered and documents provided

  ⊙ But no later than notice deadline

  ⊙ Early response allows for follow up and collaboration if insufficient

⊙ Do not change the subject lines in any way when responding to compliance notices.

⊙ Make sure response + attachments are less than 4 MB size total. If larger, separate into multiple emails.

RAA Guidelines & Reference

2013 RAA: WHOIS Accuracy Program Specification (WAPS)

Distinguishing verification/validation

- Verify

  - "to confirm or correct accuracy of WHOIS data"

  - Requires contacting and receiving response from RNH

- Validate

  - "to ensure format of WHOIS data is consistent with standards"

  - Validation is conducted by registrar, not RNH

2013 RAA: WAPS Validation

- ⊙ <u>Validation</u>: ensure data is present and formatting is consistent with standards

  - ⊙ "Standards" includes RFC 5322 (email), ITU-T E. 164 (telephone), UPU postal or S42 addressing templates (postal addresses) or equivalents for country or territory

    - ⊙ Not websites or map applications (unless they rely on standards)

    - ⊙ Not something obtained from RNH

- ⊙ ICANN request registrars to specify the standards used for validation and validation results

2013 RAA: WAPS Verification

- Verification: to confirm or correct information

  - Affirmative response verification by email:
    - Receive email from registrant email address listed in WHOIS data, or
    - Returning a unique code in a manner designated by the registrar

  - Affirmative response verification by telephone:
    - Calling or sending an SMS to the Registered Name Holder's telephone number providing a unique code that must be returned in a manner designated by the registrar, or
    - Calling the Registered Name Holder's telephone number and requiring the Registered Name Holder to provide a unique code that was sent to the Registered Name Holder via web, email or postal mail.

- Absent affirmative response verification within 15 days of trigger:

  - Registrar must manually verify or suspend domain until verification occurs

2013 RAA: WAPS Triggers by Section Number

- Section 1: validation and verification required for all new registrations, inbound transfers or when the RNH changes

- Section 2: verification and validation required for updated WHOIS data

- Section 4: if registrar has information suggesting WHOIS data is incorrect it must also verify or re-verify email addresses of RNH and account holder

  - WHOIS inaccuracy complaint triggers verification

2013 RAA: WHOIS Inaccuracy Notices and WAPS

- Section 3.7.8: registrars are required to take reasonable steps to investigate and correct WHOIS data inaccuracies

- ICANN requests:

  - Correspondence during investigation, including email headers and investigation details, including when, how, and with whom communication was conducted

  - Validation of any data updated following investigations per Section 2 of WAPS (ICANN requires registrars to specify the standards used for validation and validation results)

  - Verification of RNH email per Section 4 of WAPS

- The obligations to validate, verify and investigate alleged WHOIS inaccuracies under RAA Section 3.7.8 are not interchangeable

2013 RAA: WHOIS Inaccuracy Notices and WAPS

- Registrars have 15 <u>calendar</u> days after trigger event (for ex new registration, in-bound transfer, change to registrant, WHOIS Inaccuracy complaint) to verify/validate, as applicable

  - Multiple triggers within initial period do not add time

- ICANN's 1st compliance notice remains 15 <u>business</u> days

- ICANN asks in 2nd compliance notice why registrars did not suspend or delete registrations within 15 calendar days

- ICANN looking for one of three results to WHOIS inaccuracy complaint:

  - WHOIS updated within 15 days of notifying RNH – registrar provided documentation of validation of updates and verification (including affirmative response or manual verification)

  - No response from RNH within 15 days of notifying RNH – domain suspended until registrar has verified information

  - WHOIS verified as accurate (no change) within 15 days of notifying RNH – registrar provided documentation of verification

- ICANN may also request evidence of WAPS fulfillment under Section 1

2013 RAA: WHOIS Format

WHOIS output format as required by 2013 RAA

⊙ Data fields must be shown in format specified in 2013 RAA, including order of keys

⊙ "Advisory: Clarifications to the Registry Agreement, and the 2013 Registrar Accreditation Agreement regarding applicable Registration Data Directory Service (WHOIS) Specifications" effective 31 January 2016
https://www.icann.org/resources/pages/registry-agreement-raa-rdds-2015-04-27-en

Clarifications include:

⊙ Which fields in the WHOIS output are optional
  ⊙ If no data for optional field, value must be blank or field must not be shown
  ⊙ Value cannot be "N/A" or any other placeholder data such as "00000"
  ⊙ If data exists, key and value with data must be shown

2013 RAA: WHOIS Format

Clarifications continued:

⊙ "Registrar Abuse Contact Email" and "Registrar Abuse Contact Phone" keys may appear immediately before last field instead of following "Registrar IANA ID" key

⊙ The value section of "Reseller" field <u>should</u> be shown, but may be left blank or not shown at all

⊙ If shown, value <u>must</u> be name of organization, in case Reseller for domain is legal entity, natural person name or otherwise

⊙ WHOIS output may show translation of key names in other languages

2013 RAA: WHOIS Format

"Additional WHOIS Information Policy" effective 31 January 2016

- Registrars must:

  - Only refer to registration statuses in WHOIS by EPP status codes

  - Include link for each EPP status code in WHOIS to ICANN webpage explaining each code
    - List of URLs available at https://www.icann.org/resources/pages/epp-status-codes-list-2014-06-18-en

  - Include this message in WHOIS output: "For more information on WHOIS statues, please visit: https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en ."

  - Registrars shall not remove links and message when providing WHOIS services

2013 RAA: Abuse Reports Requirements

Section 3.18 of 2013 RAA

- 3.18.1: anyone worldwide can file valid abuse reports

- 3.18.2: law enforcement, consumer protection, quasi-govt. - No jurisdictional limitation once entity is designated by registrar's local government.

- Registrar must investigate reports

  - Court order NOT required to investigate

  - Investigative process can vary depending on report

- Home page must link to abuse process and email address (contact form only is not sufficient)

2013 RAA: Abuse Reports Requirements

Section 3.18.1

- Registrars must:
  - Take reasonable and prompt steps to investigate and
  - Respond appropriately to ANY reports of abuse

- Reasonable steps may include:
  - Contacting the RNH of the domain(s)

- "Appropriately" varies depending on facts and circumstances

- WHOIS data verification by itself is insufficient

- Court order is not required for registrar to investigate absent a specific local law or regulation provided to ICANN

VS

Section 3.18.2

- Registrar must have dedicated abuse email and phone number in WHOIS output

- Reports of Illegal Activity must be reviewed within 24 hours by an individual who is empowered to take necessary and appropriate actions

- Reports can be from any applicable jurisdiction once reporter is designated by registrar's local government as an authority

2013 RAA: Abuse Reports Requirements

- Most common abuse reports are about online pharmaceuticals, malware, viruses, spam and IP Infringement.

- Examples of out of scope reports:

    - Registrars on 2009 RAA

    - Reporter did not contact registrar before complaining to ICANN

- ICANN continues to conduct outreach with registrars, abuse reporters and IP rights protection groups

Submission of an Abuse Report

What should a valid report of abuse or illegal activity identify?

1. The reporter and reporter's contact information
2. The specific url(s) alleged to be the source of the abuse
3. The nature of the alleged abuse or illegal activity
4. The relevant law alleged to be violated and the applicable jurisdiction if applicable
5. The evidence or formal determination from court, regulatory authority or law enforcement agency
6. The basis for believing that the registrar is subject to a law or regulation
7. The evidence if the registrar has not responded to an abuse report

Above is an extract from an ICANN blog at this link:
: https://www.icann.org/news/blog/update-on-steps-to-combat-abuse-and-illegal-activity

Abuse Reports - ICANN Complaint Processing

- ICANN confirms reporter sent abuse report to registrar abuse contact before sending complaint to registrar

- ICANN could request:
  - Steps taken to investigate and respond to abuse report
  - Time taken to respond to abuse report
  - Correspondence with complainant and registrant
  - Link to website's abuse contact email and handling procedure
  - Location of dedicated abuse email and telephone for law-enforcement reports
  - WHOIS abuse contacts, email and phone

- Examples of steps registrars took to investigate and respond to abuse reports:
  - Contacting registrant
  - Asking for and obtaining evidence or licenses
  - Providing hosting provider info to complainant
  - Performing WHOIS verification
  - Performing transfer upon request of registrant
  - Suspending domain

Abuse Reports – Resolve Codes

- Abuse contact info published on registrar website
- Added required abuse information in WHOIS output
- Abuse report handling procedures published on registrar website

- Registrar suspended or canceled domain

- Registrar demonstrated that it maintained abuse records

- Registrar responded to abuse report (non-LEA), including:
  - Communicating report to registrant
  - Registrant provides copy of government license
  - Reporter removed from email distribution list (spam complaint)
  - Website content in complaint removed
- Registrar responded to LEA illegal activity reports

- Registrar documented valid non-action, including
  - Registrar previously responded to complaint
  - Invalid abuse complaint

- Registrar now monitoring abuse email address/phone

- Registrar showed email/phone already published

2013 RAA: Privacy/Proxy Services

Section 3.4.1.5 and Specification on Privacy and Proxy Registrations

- <u>Privacy service</u>: shows actual registrant's name, but alternative contact information

- <u>Proxy service</u>: is the registrant and licenses domain to beneficial user

- WHOIS data for these registrations must be reliable and accurate

  - Registrant must be contactable for both privacy and proxy services

- Registrar must verify/validate WHOIS data as required by 2013 RAA

- Underlying WHOIS info must be included in data escrow deposits

2013 RAA: Registrar Information Specification

Section 3.17 and Registrar Information Specification

- Registrars must provide ICANN completed RIS after execution of RAA

- Additional website posting requirements (contact information, officer information and parent entity)

- Most common issues:

  - Not providing supporting documentation per RIS Section 6 demonstrating good standing

  - Providing incomplete information

  - Not publishing required data on website

2013 RAA: Resellers

Section 3.12

⊙ Resellers cannot cause registrar to breach RAA

⊙ Registrar must use efforts to ensure reseller compliance

⊙ ICANN may review registrar/reseller written agreement

⊙ Resellers may not use ICANN-accredited logo

⊙ Resellers must identify registrar upon request

⊙ Resellers must abide by Privacy/Proxy Specification and Consensus Policies

2013 RAA: Domain Deletion

WHOIS Accuracy Program Specification

⊙ ICANN's review includes check for whether domain was deleted or suspended in cases of registrant's:

    ⊙ Non-response within 15 days of registrar's WHOIS inquiry

    ⊙ Willful provision of inaccurate or unreliable contact information

    ⊙ Willful failure to update information within 7 days of change

⊙ If registrar demonstrates compliance, ICANN will notify complainant to contact registrar regarding reactivation

2013 RAA: Customer Service Handling Process

Section 3.7.11

⊙ ICANN requests could include, for example:

  ⊙ Copy of customer service handling process

  ⊙ Link to customer service handling process on website

  ⊙ Written communications with RNH regarding notification of customer service handling process

2013 RAA: DNSSEC, IPv6 and IDN

Section 3.19 and Additional Registrar Operation Specification

- DNSSEC:

    - Must allow customers to use DNSSEC upon request

    - All requests shall be transmitted to registries using the EPP extensions in RFC 5910 or its successors

- IPv6:

    - If registrar offers nameserver specification by customer, IPv6 must be allowed

- Internationalized Domain Names:

    - Compliance with Additional Registrar Operation Specification

2013 RAA: Bankruptcy, Conviction, Security

Section 3.20

- ⦿ Registrar required to provide ICANN notice of these events

- ⦿ ICANN review could include requesting:

  - ⦿ Proof of bankruptcy proceeding or conviction

  - ⦿ Detailed description of breach (breach itself is not noncompliance)

    - ⦿ How it occurred

    - ⦿ Number of registrants affected

    - ⦿ Any action taken in response

2013 RAA: Registrant Rights and Responsibilities

Sections 3.7.10 and 3.16

- Registrar must publish or provide a link to the Registrants' Benefits and Responsibilities Specification (attached to RAA) on its website (Section 3.7.10)

- Registrar must provide a link to ICANN's registrant educational information (Section 3.16) on its website

- ICANN review could include requests, for example, of:

  - Website URLs

  - Screenshots

2013 RAA: Data Retention Waiver

Data Retention Specification

- Registrars may retain for shorter period or provide fewer records per Data Retention Waiver

  - Waiver is based on legal opinion or government ruling that retention violates applicable law

  - Limited to specific terms and conditions of retention requirements

    - Example: waiver changing post-sponsorship retention period from 2 years to 1 year

- Registrars in same jurisdiction as already-approved registrar may request similar treatment

- ICANN must approve waiver before registrar can deviate from retention obligations

2009/2013 RAA: WHOIS Access

Section 3.3

- Registrars are required to provide public access to contact details for each domain via Port 43 and the web

  - 2013 RAA only: Port 43 WHOIS access is required for "thin" registries only

- 2013 RAA only: additional WHOIS Service Level Agreement (SLA) requirements in Section 2 of the Registration Data Directory Service (WHOIS) Specification

2009/2013 RAA: Other Web Posting Obligations

Some of the other registrar web posting obligations include:

⊙ Publishing valid contact details per Sections below

  ⊙ 2009 RAA Section 3.16
  ⊙ 2013 RAA Section 3.17

⊙ If the ICANN-accredited registrar logo is used, it must conform to the one in the RAA

  ⊙ 2009 RAA Logo License Appendix
  ⊙ 2013 RAA Logo License Specification

2009/2013 RAA: Accreditation Fees

Section 3.9

- ⊙ Registrars are required to pay ICANN yearly and variable accreditation fees.

- ⊙ ICANN requests could include, for example:

    - ⊙ Immediate payment (no extensions for past due fees)

    - ⊙ Reply to compliance notice upon payment

    - ⊙ Emailing/CC to accounting@icann.org upon payment

- ⊙ Ensure reply with credit card authorization form does not exceed 4 MB size https://www.icann.org/en/system/files/files/credit.pdf

Sections 3.4.2 and 3.4.3

- Registrars are:

  - Required to maintain and provide registration data and records of written communications

  - Responsible for maintaining data and documents and providing them to ICANN regardless of the business model (reseller)

<u>Note:</u> not responding to ICANN compliance notices is commonly a violation of these requirements

2009/2013 RAA: Registration Agreement

Section 3.7.7

⊙ Agreement should include all provisions of Section 3.7.7:

  ⊙ The same or equivalent language provided in Sections 3.7.1.1-12 must be included in registration agreements

⊙ Agreement must be with a person or legal entity other than the registrar unless the registrar is using the domain for Registrar Services

2009/2013 RAA: Registrar Contact Data

2009 RAA Section 5.11 and 2013 RAA Section 7.6

- ⊙ Registrars must have a point of contact where compliance communications, notices and enforcement are sent

  - ⊙ Keep contact information in ICANN's Registrar Database (RADAR) up to date

  - ⊙ To update Primary Contact, follow the instructions located here: https://www.icann.org/resources/pages/registrar-contact-updates-2015-09-22-en

  - ⊙ Send contact data questions to radaradmin@icann.org

Data Escrow Obligations

Terms, Format and Schedule

- Registrar Data Escrow Specification
  https://www.icann.org/en/system/files/files/rde-specs-09nov07-en.pdf

- Data escrow format requirements are applicable to all registrars
  - Match domain's public WHOIS - format and content
  - Include privacy/proxy service customer information as required by 2013 RAA

- Deposit schedule will vary depending on registrar's quarterly gTLD transaction volume as determined by ICANN (but no less than weekly)

- Registrars may elect to escrow data with ICANN's designated escrow agent (Iron Mountain) or an ICANN-approved Third Party Provider (TPP)

- Seven data escrow providers now approved:
  https://www.icann.org/resources/pages/registrar-data-escrow-2015-12-01-en

Data Escrow Obligations (continued)

Common errors with data escrow deposits

- ⊙ Data in deposit does not match WHOIS lookup or port 43 WHOIS blocked

- ⊙ 2013 RAA: deposit must contain P/P and underlying customer data

- ⊙ Incomplete header row (missing ICANN required fields)

- ⊙ Deposit file is empty or only contains a header row

- ⊙ Deposit file name is incorrect

- ⊙ Handle file (if required) is missing from the deposit

- ⊙ Not comma de-limited

- ⊙ Full file and Handle file contains no header row

Domain Renewal Requirements

Sending timely reminders to registered name holder - ERRP

- ⊙ Renewal reminders must be sent at required times to registered name holder (RNH)

  - ⊙ Approximately 1 month (26-35 days) and 1 week (4-10 days) prior to expiration and within 5 days after expiration
  - ⊙ Required even if registration is on auto-renew
  - ⊙ Must be communicated at least in language of registration agreement, and in a way not requiring affirmative action to receive notice
  - ⊙ Can be sent to other email addresses *in addition to* RNH email address
  - ⊙ Can be sent at other intervals *in addition* to those prescribed by ERRP

- ⊙ For at least last eight consecutive days after expiration that registration is renewable, DNS resolution path must be interrupted

  - ⊙ If traffic is re-directed to a parking page, it must say name expired and include renewal instructions
  - ⊙ If RAE renews name, DNS resolution path must be restored as soon as commercially reasonable

Domain Renewal Requirements (continued)

Common errors with renewals

- ◉ Failure to send renewal reminders at required intervals

- ◉ Failure to timely disrupt DNS

- ◉ Reseller failing to send renewal reminders on behalf of registrars

- ◉ Sending renewal reminders to incorrect contact

- ◉ Registrar not specifying date/time zone notice was sent (time zone differential) when providing records to ICANN

Transfer Policy Requirements

Transfer of registrations between registrars

- ◉ Registrars must use standardized Form Of Authorization (Sections I.A.2 and I.A.3 of the Transfer Policy)
  - ◉ Gaining registrar FOA:https://www.icann.org/resources/pages/foa-auth-2004-07-12-en
    - ◉ Affirmative response required from Transfer Contact before sending command to registry
    - ◉ Shall expire after 60 days from FOA being issued (unless registrar provides automatic renewal and registrant expressly agrees), if domain expires before transfer is completed, if COR or the inter-registrar transfer is completed. If expired, transfer must be re-authorized via new FOA
    - ◉ Can be confirmed via electronic signature, email address or telephone number matching the Transfer Contact email or phone number
  - ◉ Losing registrar FOA: https://www.icann.org/resources/pages/foa-registrar-transfer-confirmation-2016-06-01-en
  - ◉ FOA must be in English; additional languages are permitted

Transfer Policy Requirements (continued)

◉ AuthInfo code must be used to identify RNH only, be unique to each domain, and records may be requested to demonstrate compliance

◉ Registrars must deny a transfer request:

  ◉ Notification of pending UDRP, URS or TDRP proceedings
  ◉ Receipt of court order by court of competent jurisdiction
  ◉ Due to 60-day lock following a Change of Registrant (COR) (unless the Prior Registrant opted-out the of lock prior to the COR request)

Transfer Policy Requirements (continued)

Common errors with transfers

⊙ Failure to provide AuthInfo Code within 5 days of request or provide facilities for registrant to obtain AuthInfo Code

⊙ Failure to remove "ClientTransferProhibited" within 5 days of request or provide facilities for registrar to remove the lock

⊙ Sending Form of Authorization (FOA) to non-Transfer Contact

⊙ FOA not complying with standard FOA

Transfer Policy Requirements (continued)

Inter-Registrant transfers/Change of Registrant (COR)

⊙ To complete any Material Change to the Registrant Name, Registrant Organization, Registrant email address and Admin email address (if there is no Registrant email address), registrars must:

- ⊙ Obtain express consent from both Prior Registrant and New Registrant (or Designated Agents) through secure mechanism
- ⊙ Process COR within one day of receiving consent
- ⊙ Notify both Registrants of COR per policy
- ⊙ Impose 60-day inter-registrar transfer lock following COR
  - ⊙ Registrants may opt out of lock prior to any COR request

⊙ Material Change is a non-typographical correction

Transfer Policy Requirements (continued)

Inter-Registrant transfers/Change of Registrant (COR)- Lessons Learned

- ⊙ Opt-out of 60-day inter-registrar lock following CoR
  - ⊙ Not mandatory
  - ⊙ May be granted prior to CoR completion
  - ⊙ May not be granted once CoR is completed and lock implemented

- ⊙ Registrars may use additional contact information on file to obtain confirmation from the Prior Registrant and are not limited to the public Whois data in cases, for example, where the email address in the Whois is not valid

- ⊙ 60-day lock may be implemented via methods other than clientTransferProhibited EPP status code

- ⊙ Secure mechanism for CoR is not defined, however some examples are in the Transfer Policy notes.

Transfer Policy Requirements (continued)

Inter-Registrant transfers/Change of Registrant (COR)- Lessons Learned (continued)

- Designated Agent must explicitly be authorized by Registrant to approve a CoR on Registrant's behalf.

- As instructed by ICANN's Board of Directors, ICANN will not enforce CoR relating to lifting privacy or proxy protected domains while this matter is reviewed by ICANN.
  - ICANN notes some registrars are still implementing CoR processes when privacy and proxy services are lifted

Transfer Policy Requirements (continued)

Transfer Policy effective 1 December 2016 - Compliance Impact

New scenarios within contractual scope:

- Change of Registrant (COR) request within same registrar
- COR request and inter-registrar transfer request
- COR within one registrar and subsequent transfer to a different registrar
- Transfer from one registrar to another and subsequent COR

- Additional information and records ICANN may request to determine compliance:
  - Records relating to communication and acceptance of COR (including dates/times)
  - Records relating to the denial/non-applicability of COR
  - Details regarding secure mechanism for approval of COR
  - Consent by Registrant to use Designated Agent
  - Evidence that the Registrant was offered the opt-out option, if applicable

Transfer Policy Requirements (continued)

Compliance Impact following the changes effective 1 December 2016 (continued)

⊙ Evidence that the Registrant was informed in the terms prescribed by the Policy
⊙ WHOIS information before and after COR
⊙ Reauthorization of expired FOA
⊙ Details regarding telephone FOA confirmation (date, time, telephone numbers and specific person)
⊙ New Losing Registrar's FOA (see
https://www.icann.org/resources/pages/foa-registrar-transfer-confirmation-2016-06-01-en)

UDRP Rules

Updated UDRP Rules effective 31 July 2015

⊙ Within two business days of request for verification from UDRP Provider:
  - ⊙ Registrar must lock domain(s), confirm lock and provide information requested in verification request to Provider
  - ⊙ Lock must be removed within one business day of registrar being notified that proceeding has been withdrawn or dismissed
  - ⊙ Lock means registrant cannot update WHOIS or transfer domain (domain must still resolve)
⊙ Within three business days of receiving Provider's Decision, registrar must communicate implementation date to Parties, Provider and ICANN
⊙ For cases settled between parties outside UDRP cases
  - ⊙ Provider to inform Registrar of suspension and outcome of settlement
  - ⊙ Registrar shall remove lock within two business days of being notified by Provider
⊙ Presentation for UDRP Rules webinar at:
  https://www.icann.org/en/system/files/files/udrp-rules-30sep14-en.pdf

UDRP Rule Requirements

Lock and Verification requirements UDRP Rule 4(b)

⊙ Within two business days of receiving Provider's verification request, registrar shall provide information requested in verification request and confirm Lock of domain has been applied

⊙ Lock is set of measures registrar applies to domain, which prevents any modification to registrant and registrar information by Respondent, but does not affect resolution or renewal of domain

⊙ Expedited processing of UDRP Lock complaints:

  ⊙ Complaints are submitted by UDRP providers

  ⊙ One calendar day notice deadline

UDRP Rule Requirements (continued)

Common errors with UDRP Rules

⊙ Failure to timely respond to verification requests from UDRP Providers

⊙ Failure to lock domain subject to UDRP

⊙ Allowing domain to expire or be deleted during UDRP dispute without providing Complainant option to renew or restore under same commercial terms as Registrant

⊙ Failure to timely implement UDRP Decision

⊙ Failure to communicate UDRP Decision and implementation date to all parties (including ICANN)

Compliance Certificate Requirements

When to submit and what fields to complete

⦿ Annually complete and return to ICANN within twenty days following end of each calendar year

⦿ Certificate certifying compliance with terms and conditions of 2013 RAA

⦿ Must be executed by president, chief executive officer, chief financial officer or chief operating officer (or their equivalents)

⦿ Calendar year should be entered at top of form for year which compliance is being certified (for form submitted by 20 January 2017, the year certified will be 2016)

⦿ Format is specified in 2013 RAA and at https://www.icann.org/resources/pages/registrar-compliance-certificate-2015-12-09-en

2009/2013 RAA Links

1 **2013 RAA**
https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en

2 **2009/2013 RAA redline**
https://www.icann.org/en/system/files/files/approved-with-specs-21may09-redline-27jun13-en.pdf

3 **2013 RAA FAQ (includes links to four webinars)**
https://www.icann.org/resources/pages/faqs-2013-11-26-en