2014 ICANN Registry Roadshow
Contractual Compliance Update

Los Angeles: Sep 10, 2014
Tokyo: Sep 25, 2014
Istanbul: Nov 20, 2014
Question

- Where in the world is ICANN’s Contractual Compliance team present?
  - Los Angeles, Singapore, Istanbul
- How many languages does the Contractual Compliance staffs speak?
  - 9. Arabic, English, French, Korean, Mandarin, Russian, Spanish, Turkish and Uzbek
- What has been the #1 type of complaint from July 2013 to July 2014?
  - Data Escrow
Agenda

- Contractual Compliance Registry Scope
- Contractual Compliance Approach and Process
- Registry Performance Measurement
- Guidelines on Obligations
- Lessons Learned
- New Registry Agreement Audit
Thank You

Please send general questions:
To: Compliance@icann.org
Subject line: ICANN Roadshow – Los Angeles
Contractual Compliance Registry Scope

- The Registry Agreement and applicable Consensus Policies
- The Dispute Resolution Procedures
  - Public Interest Commitments
  - Community Registration Restrictions
  - Trademark Post-Delegation
  - Uniform Rapid Suspension
- The Sunrise Processes
- The Claims Services Processes
- The Audit is limited to the representations and warranties in Article 1, and the covenants in Article 2
Application Process

- Post-Delegation Procedures: PICs/TMPD, RR, URS
- RPM Access Fees
- Continued Operations Instrument
- Reserved Names
- Block Name-Collision SLD Names
- Code of Conduct
- Abuse Contact Data
- Registration Restriction Policies
- Audit: 1.3 Representations & Warranties
- Audit: 2.2 Consensus Policies
- Audit: 2.17 Additional Public Interest Commitments; Specification 11

Delegation

- Data Escrow
- Monthly Report
- Transfer Bulk WHOIS
- Transfer Zone File to ICANN & EBERO
- Fixed & Variable Fees
- SLA
- WHOIS Publication of Data
- Zone File Access to End Users
- Audit: 2.3 Data Escrow
- Audit: 2.4 Monthly Report
- Audit: 2.5 Publication of Registration Data (Whois); Specification 4
- Audit: 2.7 Registry Interoperability and Continuity; specification 6
- Audit: 1.5 IPv6; Specification 6
- Audit: 2.19 Community – Based TLDs Obligations of Registry Operator to TLD Community; Specification 12
- Audit: Specification 13 .BRAND TLD PROVISIONS; 5.1 (ii)

TM Claims Period

- RA Signed
- Sunrise
- EBERO
- Only TM Holder registers
- No Allocation/earmarking before Sunrise registrations
- Sunrise Policies aligned with RPMs
- Audit: 2.8 Protection of Legal Rights of Third Parties (TMCH) Claims Period; Specification 7
- Audit: 2.14 Registry Code of Conduct; Specification 9 Parts A, D, E

TOP

Contractual Compliance
Registry Scope

- Claims Notice Posted
- Ry validations
- Audit: 2.8 Protection of Legal Rights of Third Parties (TMCH) Claims Period; Specification 7
- LORDN to TMDB
Contractual Compliance Approach and Process (Fact-based Decisions)

INFORMAL RESOLUTION
(Prevention Stage)

1. 1st Inquiry or Notice
   Email

2. 2nd Inquiry or Notice
   Email
   Phone call

3. Final Inquiry or Notice
   Email
   Phone call
   Fax

FORMAL RESOLUTION
(Enforcement Stage)

1. Breach Notice

   Suspension (Rr)
   Termination
   Non-renewal

Check other non-compliance

Good Standing

NOT in Good Standing

Publish on website

* For registry enforcement mechanisms outside of Compliance process, please refer to relevant registry agreement
Complaint Management Guidelines

Registry receives an inquiry or a notice...now what?

• **Please RESPOND** directly to the email
• DO NOT edit subject line
• Attachments should not be greater than 4MB
• Attachment file formats .pdf,.doc(x), .txt
# Complaints per Domain Volume

<table>
<thead>
<tr>
<th>Region</th>
<th>Domain Volume/Million</th>
<th># Complaints</th>
<th>% Complaints per Domain Volume</th>
</tr>
</thead>
<tbody>
<tr>
<td>N. America</td>
<td>103.8M</td>
<td>15,089</td>
<td>.015%</td>
</tr>
<tr>
<td></td>
<td>868</td>
<td>397</td>
<td>45.7%</td>
</tr>
<tr>
<td></td>
<td>226</td>
<td>92</td>
<td>40.7%</td>
</tr>
<tr>
<td>Africa</td>
<td>18,652</td>
<td>15</td>
<td>.080%</td>
</tr>
<tr>
<td></td>
<td>8</td>
<td>6</td>
<td>75.0%</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Europe</td>
<td>24.0M</td>
<td>3,884</td>
<td>.016%</td>
</tr>
<tr>
<td></td>
<td>174</td>
<td>126</td>
<td>72.4%</td>
</tr>
<tr>
<td></td>
<td>135</td>
<td>46</td>
<td>34.1%</td>
</tr>
<tr>
<td>Asia/A/P</td>
<td>25.0M</td>
<td>4,699</td>
<td>.019%</td>
</tr>
<tr>
<td></td>
<td>190</td>
<td>144</td>
<td>75.8%</td>
</tr>
<tr>
<td></td>
<td>65</td>
<td>17</td>
<td>26.2%</td>
</tr>
</tbody>
</table>

**Notes:**
- "# registrars per region" data may contain some obsolete registrars but is retained for reporting history.
- "# of registries per region" includes legacy TLD's and new gTLD's.
Contractual Compliance July 2013 – July 2014
Registry Complaint Types – North America

Complaint Distribution

<table>
<thead>
<tr>
<th>REGISTRY Complaints</th>
<th>Qty</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABUSE CONTACT DATA</td>
<td>1</td>
</tr>
<tr>
<td>BULK ZFA</td>
<td>5</td>
</tr>
<tr>
<td>CLAIMS SERVICES</td>
<td>1</td>
</tr>
<tr>
<td>CODE OF CONDUCT</td>
<td>5</td>
</tr>
<tr>
<td>MONTHLY REPORT</td>
<td>2</td>
</tr>
<tr>
<td>PIC-DRP</td>
<td>1</td>
</tr>
<tr>
<td>REGISTRY DATA ESCROW</td>
<td>87</td>
</tr>
<tr>
<td>REGISTRY OTHER</td>
<td>11</td>
</tr>
<tr>
<td>RESERVED/SLD NAMES</td>
<td>10</td>
</tr>
<tr>
<td>RR-DRP</td>
<td>12</td>
</tr>
<tr>
<td>SUNRISE</td>
<td>14</td>
</tr>
<tr>
<td>URS</td>
<td>4</td>
</tr>
<tr>
<td>WILDCARD PROHIBITION</td>
<td>1</td>
</tr>
<tr>
<td>Total New Complaints Processed</td>
<td>154</td>
</tr>
<tr>
<td>Total Complaints Closed</td>
<td>77</td>
</tr>
</tbody>
</table>

Registry TAT (in days)
- Avg TAT 1st Notice: 5.3
- Avg TAT 2nd Notice: 6.0
- Avg TAT 3rd Notice: n/a

Enforcements
- Volume Breach: 0
- Volume Termination: 0
Contractual Compliance  July 2013 – July 2014
Registry Complaint Types - APAC

Complaint Distribution

<table>
<thead>
<tr>
<th>REGISTRY Complaints</th>
<th>Qty</th>
</tr>
</thead>
<tbody>
<tr>
<td>BULK ZFA</td>
<td>9</td>
</tr>
<tr>
<td>CODE OF CONDUCT</td>
<td>5</td>
</tr>
<tr>
<td>MONTHLY REPORT</td>
<td>12</td>
</tr>
<tr>
<td>REGISTRY DATA ESCROW</td>
<td>16</td>
</tr>
<tr>
<td>REGISTRY OTHER</td>
<td>4</td>
</tr>
<tr>
<td>RESERVED/SLD NAMES</td>
<td>2</td>
</tr>
<tr>
<td>RR-DRP</td>
<td>2</td>
</tr>
<tr>
<td>SUNRISE</td>
<td>1</td>
</tr>
<tr>
<td>URS</td>
<td>1</td>
</tr>
<tr>
<td>ZONE FILE ACCESS</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total New Complaints Processed</strong></td>
<td><strong>54</strong></td>
</tr>
<tr>
<td><strong>Total Complaints Closed</strong></td>
<td><strong>42</strong></td>
</tr>
</tbody>
</table>

Registry TAT (in days)

<table>
<thead>
<tr>
<th>Registry TAT</th>
<th>(in days)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Avg TAT 1st Notice</td>
<td>6.2</td>
</tr>
<tr>
<td>Avg TAT 2nd Notice</td>
<td>4.1</td>
</tr>
<tr>
<td>Avg TAT 3rd Notice</td>
<td>n/a</td>
</tr>
</tbody>
</table>

Enforcements

<table>
<thead>
<tr>
<th>Enforcements</th>
<th>Qty</th>
</tr>
</thead>
<tbody>
<tr>
<td>Volume Breach</td>
<td>0</td>
</tr>
<tr>
<td>Volume Termination</td>
<td>0</td>
</tr>
</tbody>
</table>
Contractual Compliance July 2013 – July 2014
Registry Complaint Types - EMEA

Complaint Distribution

Registry TAT (in days)
- Avg TAT 1st Notice: 5.0
- Avg TAT 2nd Notice: 4.4
- Avg TAT 3rd Notice: n/a

Enforcements
- Volume Breach: 0
- Volume Termination: 0

<table>
<thead>
<tr>
<th>REGISTRY Complaints</th>
<th>Qty</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABUSE CONTACT DATA</td>
<td>1</td>
</tr>
<tr>
<td>BULK ZFA</td>
<td>21</td>
</tr>
<tr>
<td>CODE OF CONDUCT</td>
<td>11</td>
</tr>
<tr>
<td>MONTHLY REPORT</td>
<td>15</td>
</tr>
<tr>
<td>PIC-DRP</td>
<td>1</td>
</tr>
<tr>
<td>REGISTRY DATA ESCROW</td>
<td>23</td>
</tr>
<tr>
<td>REGISTRY OTHER</td>
<td>12</td>
</tr>
<tr>
<td>RESERVED/SLD NAMES</td>
<td>5</td>
</tr>
<tr>
<td>RR-DRP</td>
<td>3</td>
</tr>
<tr>
<td>SUNRISE</td>
<td>1</td>
</tr>
<tr>
<td>ZONE FILE ACCESS</td>
<td>3</td>
</tr>
</tbody>
</table>

- Total New Complaints Processed: 96
- Total Complaints Closed: 62
In the event of a conflict between anything in this presentation and the Registry Agreement, the Registry Agreement prevails.
Selected Obligations Due Upon Signing of Registry Agreement

- Comply with Temporary & Consensus Policies, as applicable (Spec 1)
- Reserve Special Domain Names (Spec 5)
- Meet Interoperability/Continuity Standards (Spec 6)
- Implement Rights Protection Mechanisms (Spec 7)
- Maintain Continued Operations Instrument (Spec 8)
- Comply with Code of Conduct (Spec 9)
- Comply with Public Interest Commitments (Spec 11)
- Implement Community Registration Policies, as applicable (Spec 12)
Selected Obligations Due Upon Delegation

- Pay Registry-Fees (Article 6)
- Ensure Escrow Agent delivers daily verification notifications (Spec 2) & Registry notifies ICANN
- Submit Monthly Reports (Spec 3)
- Operate a WHOIS service & web-based RDDS per Spec 4
- Grant access to ICANN of daily Zone File (Spec 4, Section 2.3)
- Grant access to ICANN of weekly Thin Registration Data (Spec 4, S. 3)
- Maintain Registry Performance (Spec 10)
Comply with Temporary & Consensus Policies

- Consensus Policies are developed by the community and adopted by the ICANN Board
- Temporary Policies are Board-established specifications or policies necessary to maintain the stability or security of Registrar or Registry Services, the DNS or the Internet
Meet Reserved Names Requirements

Article 2.6 & Specification 5 of the Registry Agreement

- For Registry Operations
- Other Requirements
  - Two-character labels at the second level (unless otherwise approved by ICANN)
  - Names on the list of Inter-governmental organizations (IGO), at the second level
  - Names on the list of International Olympic Committee, International Red Cross & Red Crescent, at the second level
  - Country and Territory names at all levels (and IDN variants as applicable)
Meet Registry Interoperability & Continuity Specifications

Specification 6 of the Registry Agreement

- Standards Compliance
  - DNS, EPP, DNSSEC, IDN, IPv6
- Registry Services & Wildcard Prohibition
- Business Continuity Plan & Annual Testing
- Abuse Mitigation - Contact Data & Malicious Use of Orphan Glue Records
- Initial & Renewal Registrations
- Name Collision Occurrence Management
Name Collision, Controlled Interruption (CI)

- Obligations for gTLDs delegated on or after 18 Aug 2014
  - No activation of names (other than nic.tld) for 90 days after delegation
  - The gTLD chooses when to start CI
  - Implement CI per Section 1 of Name-Collision Occurrence Assessment (the “Assessment”)
- Obligations for gTLDs delegated before 18 Aug 2014 and names activated other than nic.tld
  - The gTLD chooses when to start CI; in the meantime, block the SLDs in the Alternate path to Delegation (APD) List
  - Once CI starts, implement it per Section II of the Assessment
  - After the CI period ends, may release APD List per Section II (c) of the Assessment
Name Collision, Controlled Interruption (CI)
Requirements

- Obligations for gTLDs delegated on or after 18 Aug 2014 and no names activated, other than .nic
  - The gTLD chooses when to start CI
  - Choose whether to follow Section I or II of the Assessment
  - Implement CI per the chosen section of the Assessment
Meet TMCH Rights Protection Mechanisms (RPM) Requirements

Specification 7 of the Registry Agreement

• Comply with Trademark Clearinghouse Rights Protection Mechanisms Requirements

• Comply with all dispute resolution procedures

  • **Uniform Rapid Suspension**
    • lock of domain name within 24 hours of notice by URS provider; perform the actions required upon notification of a URS decision

  • **Registry Restriction Procedure and Trademark-Post Delegation Procedure**
    • Perform the remedial actions if the Reporter prevails in the dispute
Registration Restriction Dispute Resolution Procedure Requirements

Specification 7 of the Registry Agreement

- Comply with community registration policies per Article 2.19 and Specification 12
- ICANN conducts a preliminary review of the complaint to ensure that it is complete, has a claim of non-compliance with at least one registration restriction, and that the reporter is in good standing.
- If the report passes the initial review, the complaint is sent to the Registry Operator; if the dispute remains unsettled the Reporter may then file a complaint with an approved Service Provider
Uniform Rapid Suspension Requirements

 Specification 7 of the Registry Agreement

• Registry must lock a domain name in dispute under URS within 24 hours of receipt of Notice of Lock from URS Provider
  • If URS Provider submits complaint to ICANN, 1-2-3 expedited notices (24 hours each) to registry operator

• Registry must perform the steps in section 10.2 of URS procedure upon receipt of an URS Determination in favor of the complainant
  • ICANN enforces upon report by Complainant that prevailed
Maintain Continued Operations Instrument (COI)

Specification 8 of the Registry Agreement

- COI must be in effect for 6 years from effective date of RA
- No amendment without ICANN approval
- If COI is terminated or not renewed, required to obtain replacement COI
Meet Code of Conduct Requirements

Specification 9 of the Registry Agreement

- Provide registrars equal access to registry services
- No front-running
- Requirements for registries with cross-ownership
  - Must prevent unauthorized disclosures of Personal Data by the affiliated registrar
  - By 20 January 2015: Code of conduct certification by TLD Executive & Results of Review
  - Separate legal entities & Separate accounting books
Meet Public Interest Commitments Requirements

Specification 11 of the Registry Agreement

• Comply with mandatory and voluntary (as applicable) commitments

• ICANN conducts a preliminary review of the complaint to ensure that it is complete, has a claim of non-compliance with at least one commitment, and that the reporter is in good standing

• Registry and Reporter have 30 days to resolve dispute; if unsettled ICANN investigates or defer to Standing Panel

• Standing panel has 15 days to return a Decision to ICANN

• If Reporter prevails ICANN sends notice of breach to registry operator and it has 30 days to cure
Implement Community Registration Policies

Specification 12 of the Registry Agreement

- Criteria for eligibility to register names
- Methods for validating Community eligibility
- Required to be a member of the specified Community
- Procedures for resolution of disputes concerning compliance with TLD registration policies
Pay Registry-Level Fees

Article 6.1 of the Registry Agreement

- Fixed and Variable fees
  - Fixed = US$6250/quarter
  - Variable = US$0.25/transaction over 50,000

- Pay fees within 30 calendar days of the issue

- date of ICANN invoice
Meet Data Escrow Requirements

Specification 2 of the Registry Agreement

• Daily deposits by the Registry Operator
  a) Sunday: full deposits to Data Escrow Agent by 23:59 UTC
    • Full deposit consists of the entire set of registry database objects as defined
  b) Monday-Saturday: differential deposits by 23:59 UTC (or a full deposit)
    • Differential deposit includes all registry database objects that have been created, deleted, or updated since the previous full or differential deposit

• Registry Operator must ensure that its Data Escrow Agent send daily status notifications to ICANN per Section 7, Part B

• Registry Operators also sends daily notification of deposit to ICANN per Section 7, Part A

Note: Data Escrow Agent notifies ICANN on a daily basis of a missed, valid or invalid deposit
Meet Monthly Reports Requirements

Specification 3 of the Registry Agreement

- Two reports are required
  - Registry Functions Activity
  - Per Registrar Transaction Report
- The Registry Operator must provide one set per gTLD, using the API described in draft-lozano-icann-registry-interfaces, see Specification 2, Part A, Section 9, reference 5.
Comply with WHOIS Service & RDDS

Specification 4, section 1, of the Registry Agreement

- Operate a WHOIS service and a web-based
- Registration Data Directory Service that meets the requirements stated in Spec 4
- Comply with RDDS guidance for registries by 31 January 2015
Daily Zone File Access Requirements

 Specification 4, Section 2 of the Registry Agreement

• Must provide to ICANN, bulk access to the zone files by 00:00:00 UTC

• Must provide zone data to the end users who request it through the Centralized Zone Data Service
Weekly Access to Thin Registration Data

Specification 4, Section 3 of the Registry Agreement

- Must provide to ICANN, bulk access on the day specified during ONBIR
Main Registry Performance

Specification 10 of the Registry Agreement

• Meet the service level outlined in the Service Level Agreement matrix of Specification 10

• Maintain records for a period of at least one year
## Lessons Learned

### Abuse Contact Data

**Specification 6, Section 4.1 of the RA**
- Provide to ICANN and publish accurate details for reports of malicious conduct in the RA

<table>
<thead>
<tr>
<th>Issue</th>
<th>Many gTLDs are publishing email address, but not making clear that reports can also be sent by regular mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guidance</td>
<td>In any section referencing abuse reports, ensure there is valid email address plus mailing address and primary contact</td>
</tr>
</tbody>
</table>
## Lessons Learned

### Zone File Access Requirements
**Specification 4, Section 2 of the RA**
- Act upon requests for zone file access via CZDS

<table>
<thead>
<tr>
<th>Issue</th>
<th>Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time elapsing for the Registry Operator to respond</td>
<td>Be open and transparent: Establish, publish and adhere to a policy that informs end-users by when they should reasonably expect a response</td>
</tr>
</tbody>
</table>
## Lessons Learned

### Zone File Access Requirements

Specification 4, Section 2.1 - 2.3 of the RA

- Reasons to deny or revoke access to zone files

<table>
<thead>
<tr>
<th>Issue</th>
<th>Guidance</th>
</tr>
</thead>
</table>
| 1. Registry denying access because not yet in sunrise  
  2. Registry denying access until requestor proves lawful purposes | Neither is a valid reason to deny access – Three reasons per RA:  
(i) failure to satisfy credentialing requirements of §2.1.2  
(ii) not providing correct or legitimate credentialing requirements of §2.1.2  
(iii) reasonable belief that requestor will violate terms of §2.1.5 |
Lessons Learned

Trademark Clearinghouse Rights Protection Mechanisms Requirements
Sections 2.1.1 & 2.2.4

- To “Allocate” is to” designate, assign, or otherwise earmark” a Domain Name (DN). Subject to exceptions, a Registry Operator can’t Allocate a DN to a registrant that is not a Sunrise-eligible rights holder prior to the Allocation or registrations of all Sunrise-Registrations.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Improper Allocation/ earmarking before sunrise ends</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guidance</td>
<td>Improper Allocation occurs irrespective of sunrise preemption or whether the earmarking was converted to a registration</td>
</tr>
</tbody>
</table>
New Registry Agreement Audit - Timeline

The scope of the New Registry Agreement audit program includes gTLDs that signed the July 2013 base registry agreement (the “Agreement”) as amended from time to time, including all its Specifications and Public Interest Commitments.

**Goal**: To proactively identify deficiencies and manage the remediation process to ensure compliance with contractual obligations

<table>
<thead>
<tr>
<th>New gTLD Registry Audit</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Pre-Audit Notification</strong></td>
</tr>
<tr>
<td>Pre-Audit Notification</td>
</tr>
</tbody>
</table>

**TOP**
Back Up Slides
## New Registry Agreement Audit – Scope

<table>
<thead>
<tr>
<th>Registration Agreement Articles</th>
<th>Test Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.3 Representations and Warranties. 1.3 (a) ii.</td>
<td>Registry Operator is still in good standing since application process</td>
</tr>
<tr>
<td>2.2 Compliance with Consensus Policies and Temporary Policies</td>
<td>To obtain an assurance that Registry is complying with all Consensus Policies - AGP (Add Grace Policy)</td>
</tr>
<tr>
<td>2.3 Data Escrow; Specification 2; PART B Legal Requirements</td>
<td>Content of the escrow deposits are per the contract</td>
</tr>
<tr>
<td>2.4 Monthly Reporting; Specification 3</td>
<td>To ensure the monthly Per-Registrar Transactions Report accurately represents the number of active domains</td>
</tr>
<tr>
<td>2.5 Publication of Registration Data (Whois); Specification 4</td>
<td>Availability and following Specification 4 (Section 1.4)</td>
</tr>
<tr>
<td>2.6 Reserved Names; Specifications 5</td>
<td>Names that Registry Operators are obligated to reserve are actually reserved</td>
</tr>
<tr>
<td>2.7 Registry Interoperability and Continuity; Spec 6.2.2 Name Collision Occurrence Assessment (Blocked Second Level Domain Names)</td>
<td>Names that Registry Operators are obligated to block are actually blocked</td>
</tr>
<tr>
<td>Registration Agreement Articles</td>
<td>Test Objective</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>2.7 Registry Interoperability and Continuity; Specification 6</td>
<td>Registry Operators have BCP</td>
</tr>
<tr>
<td>2.8 Protection of Legal Rights of Third Parties - (TMCH) Sunrise Period; Specification 7</td>
<td>Domain names registered during sunrise were eligible for registration</td>
</tr>
<tr>
<td>2.8 Protection of Legal Rights of Third Parties (TMCH) Claims Period; Specification 7</td>
<td>During the trademark claims period, Registry performed required validation</td>
</tr>
<tr>
<td>2.14 Registry Code of Conduct; Specification 9 Parts A, D, E</td>
<td>Compliance of the Registry on Code of Conduct</td>
</tr>
<tr>
<td>2.17 Additional Public Interest Commitments; Specification 11</td>
<td>To ensure that Registry Operator complies with its public interest commitments as incorporated into Specification 11 of the Registry Agreement</td>
</tr>
<tr>
<td>2.19 Community- Based TLDs Obligations of Registry Operator to TLD Community; Specification 12</td>
<td>Registry has a written Registration Policy and complied with it when registering with community based TLDs</td>
</tr>
<tr>
<td>Specification 13 . BRAND TLD PROVISIONS; 5.1 (ii)</td>
<td>To confirm that only Registry Operator, its Affiliates, or Trademark Licensees register domain names and control the DNS records associated with domain names at any level in the TLD.</td>
</tr>
</tbody>
</table>
Registry Complaint Trend - Global

![Graph showing trends for different categories: ABUSE CONTACT DATA, BULK ZFA, CLAIMS SERVICES, CODE OF CONDUCT over the months of Mar-14 to Jul-14. The graph highlights the peak in May-14 for BULK ZFA.]
Registry Complaint Trend - Global

- MONTHLY REPORT
- REGISTRY DATA ESCROW
- REGISTRY OTHER
- RESERVED/SLD NAMES

Mar-14 Apr-14 May-14 Jun-14 Jul-14
Registry Complaint Trend - Global

- SLA
- SUNRISE
- URS
- WILDCARD PROHIBITION
- ZONE FILE ACCESS

Chart showing trends from Mar-14 to Jul-14.