



ICANN Registry Request Service

Ticket ID: V9O6P-4D1B1

Registry Name: RegistryPro, LTD

gTLD: .pro

Status: Pending Completeness

Status Date: 2012-07-18 06:39:44

Print Date: 2012-07-25 10:53:22

Proposed Service

Name of Proposed Service:

Anti-Abuse Policy

Technical description of Proposed Service:

Abusive uses of domain names, such as phishing, spamming, and distribution of malware, are a problem across the Internet. These behaviors are increasingly perpetrated by professional criminals who use technically and socially sophisticated means to victimize the public and misuse Internet resources.

This policy, to be adopted pursuant to Section 3.10.2 of the .PRO Registry Registrar Agreement, is designed to benefit registrants, registrars, and end-users of .PRO domain names across the Internet. It will more explicitly define illegal and abusive practices with respect to .PRO domain names, and will set expectations regarding the mitigation of these issues.

This policy is identical to the Anti-Abuse Policy implemented by Afiliias for the .INFO registry on 31 July 2008 after a thorough review in accordance with the Registry Services Evaluation Policy and process.
<<http://www.icann.org/en/resources/registries/rsep/afiliias-to-icann-06aug08-en.pdf>>

The proposed policy is as follows:

.PRO Anti-Abuse Domain Use Policy

The following policy ("Anti-Abuse Policy") is announced pursuant to section 3.10.2 of the .PRO Registry Registrar Agreement ("RRA") in effect between RegistryPro and each of its Registrars, and is effective upon thirty days' notice by RegistryPro to Registrars.

Abusive use(s) of .PRO domain names should not be tolerated. The nature of such abuses creates security and stability issues for the registry, registrars, and registrants, as well as for users of the Internet in general. RegistryPro's definition of abusive use of a domain includes, without limitation, the following:

o Illegal or fraudulent actions;

o Spam: The use of electronic messaging systems to send unsolicited bulk messages. The term applies to email spam and similar abuses such as instant messaging spam, mobile messaging spam, and the spamming of Web sites and Internet forums;



ICANN Registry Request Service

Ticket ID: V9O6P-4D1B1

Registry Name: RegistryPro, LTD

gTLD: .pro

Status: Pending Completeness

Status Date: 2012-07-18 06:39:44

Print Date: 2012-07-25 10:53:22

- o Phishing: The use of counterfeit Web pages that are designed to trick recipients into divulging sensitive data such as personally identifying information, usernames, passwords, or financial data;*
- o Pharming: The redirecting of unknowing users to fraudulent sites or services, typically through, but not limited to, DNS hijacking or poisoning;*
- o Willful distribution of malware: The dissemination of software designed to infiltrate or damage a computer system without the owner's informed consent. Examples include, without limitation, computer viruses, worms, keyloggers, and Trojan horses.*
- o Malicious fast-flux hosting: Use of fast-flux techniques with a botnet to disguise the location of web sites or other Internet services, or to avoid detection and mitigation efforts, or to host illegal activities.*
- o Botnet command and control: Services run on a domain name that are used to control a collection of compromised computers or "zombies," or to direct distributed denial-of-service attacks (DDoS attacks);*
- o Distribution of child pornography; and*
- o Illegal Access to Other Computers or Networks: Illegally accessing computers, accounts, or networks belonging to another party, or attempting to penetrate security measures of another individual's system (often known as "hacking"). Also, any activity that might be used as a precursor to an attempted system penetration (e.g., port scan, stealth scan, or other information gathering activity).*

Pursuant to Exhibit E (VIII. Reservation) of the .PRO Registry Registrar Agreement, RegistryPro reserves the right to deny, cancel, modify or transfer any registration that it deems necessary, in its discretion; (1) to protect the integrity and stability of the registry; (2) to comply with any applicable laws, government rules or requirements, requests of law enforcement, in compliance with any dispute resolution process; (3) to avoid any liability, civil or criminal, on the part of RegistryPro, as well as its affiliates, subsidiaries, officers, directors, and employees; (4) for violations of this Agreement and its Exhibits; or (5) to correct mistakes made by RegistryPro or any Registrar in connection with a domain name registration. RegistryPro also reserves the right to place a domain name on Registry Lock or Registry Hold, as appropriate, during resolution of a dispute.

All reports of abuse should be sent to abuse@registry.pro

Consultation

Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?:

See below.

a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?:



ICANN Registry Request Service

Ticket ID: V9O6P-4D1B1

Registry Name: RegistryPro, LTD

gTLD: .pro

Status: Pending Completeness

Status Date: 2012-07-18 06:39:44

Print Date: 2012-07-25 10:53:22

Not applicable.

b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?:

This Anti-Abuse Policy was developed in 2008 by Afilius for the .INFO registry through an extensive process of consultation with registrars, described below.

For over six months, Afilius worked cooperatively with the staff of more than 35 .INFO registrars with regard to issues surrounding abusive uses of .INFO domain names. Those 35 registrars at the time sponsored more than 85% of the domains under management in the .INFO registry. This program evaluated practices for reporting and mitigating abusive domain names. The process included in-depth conversations with the compliance staff at several large registrars in order to understand their anti-abuse policies and processes, since those registrars deal with abuse issues on a regular basis. (Some of the registrars spoken with were GoDaddy, MarkMonitor, MelbourneIT, Tucows, and DirectI/PublicDomainRegistry.com.) The outreach efforts resulted in the 35 registrars suspending more than 50,000 .INFO domains that were being used for abusive purposes.

Afilius found that registrar practices, response capabilities and response times vary widely. While a few of the registrars with which were consulted maintained dedicated, staffed abuse desks, most did not. While many registrars were very cooperative in pursuing the goals of this program, a few were less so, and some were unresponsive.

On June 20, 2008 Afilius e-mailed the first draft of the policy to all accredited .INFO registrars.

As a part of the ICANN Meeting in Paris in June 2008, Afilius presented salient aspects of the proposed policy to the Registrar Constituency. Members from the Registrar Constituency provided feedback on the proposed policy. Based on this consultation with the Registrar Constituency members, Afilius revised its proposed policy to remove from its definition of abusive uses the section titled "Other abusive behaviors", which had drawn comments regarding breadth of scope, as well as removing a sentence regarding breach.

c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?:

Afilius consulted with several eminent outside Internet security experts, who advised on emerging threats and best practices. For instance, for over six months, Afilius had conversations with John Klensin (a computer science consultant for Internet issues), David M. Piscitello (Vice-President, Core Competence) and Steve Crocker (Chair, ICANN Board of Directors). Afilius incorporated comments and/or modifications suggested by these individuals into this policy.



ICANN Registry Request Service

Ticket ID: V9O6P-4D1B1

Registry Name: RegistryPro, LTD

gTLD: .pro

Status: Pending Completeness

Status Date: 2012-07-18 06:39:44

Print Date: 2012-07-25 10:53:22

In addition, Afiliias is a member of the steering committee of the Anti-Phishing Working Group (APWG), and has consulted with a number of its members regarding anti-abuse issues and mitigation practices. The APWG is the global pan-industrial and law enforcement association focused on eliminating fraud and identity theft that result from phishing, pharming, and e-mail spoofing of all types. The APWG also focuses on policy-related issues associated with the Domain Name System (DNS) to examine abuses of the DNS that may require remediation. Afiliias staff co-authored two major APWG research papers. One was the most comprehensive study to date of how domain names are being used for phishing, and the techniques that phishers are using to register and abuse domain names. This data-intensive, fact-based study provided a number of detection and mitigation strategies for the domain name industry. <http://www.apwg.org/reports/APWG_GlobalPhishingSurvey2007.pdf> The other paper studied whether there was a relationship between phishing and domain tasting. That report was created to advise ICANN's GNSO and was referenced in the "GNSO Final Report on Domain Tasting."

Afiliias consulted with law enforcement, including agents from the U.S. Federal Bureau of Investigation who are responsible for investigating cybercrime. Afiliias also engaged in collaborative dialog with representative individuals from within the business, intellectual property, and non-commercial communities.

d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?:

As a registry operator, RegistryPro does not usually have contact with the registrants of .PRO domains, since such contact is traditionally conducted through their registrars.

Afiliias, during the formulation of this Anti-Abuse Policy for .INFO, received input from victims of cyber-crime and mitigation experts who represent them. They included frequent targets of phishing and malware.

e. Who would endorse the introduction of this service? What were the nature and content of these consultations?:

Numerous registrars have stated that registry efforts help them discover domain name abuse and thereby protect end users and registrants. Registrars told Afiliias that abuse cases cost them hundreds to thousands of dollars each when customer service and credit-card chargeback costs are factored in. Registrars in that situation generally are interested in avoiding those problems by using intelligence supplied by the registry.

Afiliias received thanks for its efforts from personnel at major online companies such as Microsoft, international banks, Google, and PayPal. Those companies and their end-users bear much of the brunt of online crime that leverages domain names. Law enforcement personnel asked Afiliias to mitigate domain name use and welcomed proactive outreach efforts.



ICANN Registry Request Service

Ticket ID: V9O6P-4D1B1
Registry Name: RegistryPro, LTD
gTLD: .pro
Status: Pending Completeness
Status Date: 2012-07-18 06:39:44
Print Date: 2012-07-25 10:53:22

The Anti-Phishing Working Group is generally encouraging registry operators to adopt anti-abuse programs. In summary, business, intellectual property, the registry, registrars, law enforcement, and end users will benefit from the new policy. While RegistryPro cannot attest here that the above parties formally "endorse" this submission, we believe that the proposal is a welcome and constructive step forward to addressing pressing problems.

f. Who would object the introduction of this service? What were(or would be) the nature and content of these consultations?:

Parties who use domain names for abusive or illegal purposes, and parties who sell services to such abusers, may object to the new policy.

Some registrars may be concerned that the new policy will create more work from them. We do not believe that the new policy will substantially affect the way we have worked with most registrars. Our continuing approach is to work with and through our registrars in a collaborative fashion. We do expect registrars to respond to and follow up on our abuse reports. We believe that registrars share our view that organizations that are part of the infrastructure of the Internet (including registries, registrars, hosting providers, and ISPs) should all take reasonable steps to protect against online abuse and crime, in order to fulfill their obligations to protect the stability and security of the Internet.

Timeline

Please describe the timeline for implementation of the proposed new registry service:

In accordance with the provisions of Section 3.10.2 of the .PRO RRA, the policy will take effect upon thirty (30) days notice to the .PRO registrars.

Business Description

Describe how the Proposed Service will be offered:

The policy will be implemented according to its terms, as detailed above.

Describe quality assurance plan or testing of Proposed Service:

We intend to apply this policy only after careful scrutiny of each case, and a review of the supporting evidence for abusive



ICANN Registry Request Service

Ticket ID: V9O6P-4D1B1

Registry Name: RegistryPro, LTD

gTLD: .pro

Status: Pending Completeness

Status Date: 2012-07-18 06:39:44

Print Date: 2012-07-25 10:53:22

practices. Specifically, requests for action from registrars will be accompanied by supporting documentation which demonstrates the need for expedited action to be taken by the registrar. This approach conforms to industry best-practices regarding the ability of potentially affected registrars to provide relevant information prior to an enforcement action.

Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.:

RegistryPro is not aware of any relevant RFC or directly relevant White Papers.

Contractual Provisions

List the relevant contractual provisions impacted by the Proposed Service:

The Policy will be adopted pursuant to section 3.10.2 of the .PRO RRA.

What effect, if any, will the Proposed Service have on the reporting of data to ICANN:

None.

What effect, if any, will the Proposed Service have on the Whois?:

None.

Contract Amendments

Please describe or provide the necessary contractual amendments for the proposed service:

The Policy will be adopted pursuant to section 3.10.2 of the .PRO RRA. No amendment to any contract is required.

Benefits of Service

Describe the benefits of the Proposed Service:

The policy has several obvious beneficial effects, including:



ICANN Registry Request Service

Ticket ID: V9O6P-4D1B1

Registry Name: RegistryPro, LTD

gTLD: .pro

Status: Pending Completeness

Status Date: 2012-07-18 06:39:44

Print Date: 2012-07-25 10:53:22

- o It will help domain name registrants. For example, some phishing takes place on compromised or hacked machines, and registrants are usually not be aware that their sites have been altered until they are notified via outreach.*
- o The policy will make it more difficult for criminals to use domain names for illegal purposes.*
- o The policy will help registrars identify problem registrants.*
- o It will benefit end-users by making the Internet a safer and more trustworthy place.*
- o Overall, the policy will allow more abusive domain name uses to be mitigated, and will decrease the up-times of related Web sites.*

Competition

Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain.:

RegistryPro does not believe that the implementation of the policy will have a significant effect on competition.

How would you define the markets in which your proposed Registry Service would compete?:

Not applicable.

What companies/entities provide services or products that are similar in substance or effect to your proposed Registry Service?:

ICANN-accredited registrars are free to craft anti-abuse policies for inclusion in their Registrar-Registrant agreements. Those Registrar-Registrant agreements routinely forbid the illegal use of domain names, and often address many of the specific abusive practices in the registry policy that RegistryPro proposes. Other registries have relevant policies. For example, ICANN's contract with the .BIZ registry operator includes a prohibition against registrants "Using the domain name for the submission of unsolicited bulk e-mail, phishing, pharming or other abusive or fraudulent purposes." <<http://www.icann.org/tlds/agreements/biz/appendix-08-08dec06.htm>>

Please note that the vast majority of domain name-related abuses and crimes are not mitigated by the efforts of law enforcement. Domain and site take-downs are usually accomplished through the efforts of third parties such as the companies being targeted by the criminals, private security companies, ISPs, hosting companies, registrars, registries, and individual users.

In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?:



ICANN Registry Request Service

Ticket ID: V9O6P-4D1B1

Registry Name: RegistryPro, LTD

gTLD: .pro

Status: Pending Completeness

Status Date: 2012-07-18 06:39:44

Print Date: 2012-07-25 10:53:22

RegistryPro does not believe that its proposed service would negatively impair the ability of other companies/entities that provide similar services to compete.

Do you propose to work with a vendor or contractor to provide the proposed Registry Service? If so, what is the name of the vendor/contractor, and describe the nature of the services the vendor/contractor would provide.:

RegistryPro does not anticipate using any vendor or contractor to implement the proposed policy.

Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed Registry Service? If so, please describe the communications.:

See the prior sections of this application regarding consultations with third parties.

Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).:

None.

Security and Stability

Does the proposed service alter the storage and input of Registry Data?:

No.

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems:

RegistryPro anticipates no impact on the throughput, response time, consistency or coherence of responses to Internet servers of end systems.

Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?:

RegistryPro is not aware of any technical concerns regarding the proposed service.



ICANN Registry Request Service

Ticket ID: V9O6P-4D1B1

Registry Name: RegistryPro, LTD

gTLD: .pro

Status: Pending Completeness

Status Date: 2012-07-18 06:39:44

Print Date: 2012-07-25 10:53:22

Other Issues

Are there any Intellectual Property considerations raised by the Proposed Service:

No.

Does the proposed service contain intellectual property exclusive to your gTLD registry?:

No.

List Disclaimers provided to potential customers regarding the Proposed Service:

None.

Any other relevant information to include with this request:

None.