ICANN | 52

Singapore

8-12 FEBRUARY 2015

ICANN

Registrar Stakeholder Group

Contractual Compliance | ICANN 52 | 10 February 2015

Registrar Outreach

Contractual Compliance | ICANN 52 | 12 February 2015

ICANN

Agenda

- RAA Lessons Learned Summary & Guidelines

- Process Guidelines & Clarification

- Policy Efforts Update

- Questions and Answers

- Updates since ICANN 51

- Additional RAA Guidelines & Reference

Registrar Agreement
Lessons Learned Summary and Guidelines

RAA Lessons Learned Summary & Guidelines

1 **Whois Accuracy Program Specification**
Distinguishing between verification and validation

2 **Abuse Reports Requirements**
Establishing investigative processes

3 **Domain Renewal Requirements**
Sending timely reminders to registered name holder

4 **General UDRP Issue**
Verifying with UDRP providers and preventing improper transfer

5 **Inter-Registrar Transfer**
Using the correct Forms of Authorization (FOAs)

1. Whois Accuracy Program Specification

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"

  - RNH cannot validate

1. 2013 RAA: Whois Inaccuracy

Section 3.7.8 and Whois Accuracy Program Specification

- Registrars are required to take reasonable steps to investigate and correct Whois data inaccuracies

- ICANN requests:

  - Correspondence with RNH, including headers and details about when and how communications occurred

  - Validation and verification under Whois Accuracy Program Specification

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

1. 2013 RAA: WAPS Validation

Whois Accuracy Program Specification (WAPS)

- <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

1. 2013 RAA: WAPS Verification

Whois Accuracy Program Specification (WAPS)

- <u>Verification</u>: to confirm or correct information

  - Affirmative response verification by email: receiving email from registrant email address listed in Whois data

  - Manual verification: phone call contacting RNH may be enough depending on complaint (ICANN requires details of call)

- Absent affirmative response verification within 15 days of trigger:

  - Registrar must manually verify or suspend domain until verification occurs

1. 2013 RAA: WAPS Triggers by Section Number

Whois Accuracy Program Specification (WAPS)

Applicable starting 1 January 2014 or from effective date of 2013 RAA, if after

- 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

1. 2013 RAA: WAPS Timing

Whois Accuracy Program Specification (WAPS)

- Registrars have 15 <u>calendar</u> days after trigger 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

1. 2013 RAA: WAPS and ICANN's Notices

Whois Accuracy Program Specification (WAPS)

- 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

2. Abuse Reports Requirements

⊙ Most common abuse reports are about online pharmaceuticals, malware, viruses and spam

⊙ Examples of out of scope reports:

    ⊙ Registrars on 2009 RAA

    ⊙ Reporter did not contact the registrar before complaining to ICANN

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

2. 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

2. 2013 RAA: Abuse Reports Requirements

Section 3.18.1

VS

Section 3.18.2

- 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 the 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

- 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

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

- ICANN could request the:
  - 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

⊙ Reasons for abuse complaint closure:
  - ⊙ Reasonable and prompt steps to investigate and respond appropriately to the report of abuse (section 3.18.1)
  - ⊙ Review law enforcement report within 24 hours (section 3.18.2)
  - ⊙ Abuse contact info or procedures published on website and in Whois
  - ⊙ Abuse records maintained
  - ⊙ Now monitoring abuse contacts
  - ⊙ Domain suspended/canceled

3. Domain Renewal Requirements

Expired Registration Recovery Policy

- ⊙ Renewal reminders must be sent at required times to RNH

  - ⊙ Approximately 1 month (26-35 days) and 1 week (4-10 days) prior to expiration and within 5 days after expiration

  - ⊙ Required whether registration is on auto-renew

  - ⊙ Must be communicated in a way that does not require an affirmative action to receive the notice

  - ⊙ Can be sent to other email addresses *in addition to* the RNH email address

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

4. General UDRP Issues

Uniform Domain Name Dispute Resolution Policy

- Verify with providers and prevent improper transfer

    - Registrars not responding to verification requests from providers

    - Registrars transferring names during proceedings or instead of implementing Decision

- Complexity of matters involving "mutual jurisdiction"

- Complainants not providing information to registrars to update Whois

Note: UDRP Rule revisions take effect 31 July 2015 (see slide 28)

5. Inter-Registrar Transfers

Inter-Registrar Transfer Policy

- Registrars must use the standardized Form Of Authorization (Sections 2 and 3 of the IRTP)

    - 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

    - Losing registrar FOA:
      https://www.icann.org/resources/pages/foa-conf-2004-07-12-en

    - FOA must be sent in English (other languages permitted in addition to English version)

Process Guidelines and Clarifications

Informal Resolution Process Guidelines

Notice

VS

Inquiry

- 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

- 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 6 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

 ⦿ 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

Policy Efforts and Updates

Policy and Working Group Efforts

Provide compliance statistical data and trends to guide policy changes and ongoing implementation strategies

- ⊙ Contribute to IRTP parts C and D working group efforts

- ⊙ Support implementation of UDRP Rules revisions

- ⊙ Participate in Thick Whois (registry) implementation and clarifications

- ⊙ Whois ARS pilot

Update to Inter-Registrar Transfer Policy

Part B updates went into effect on 31 January 2015

- Changes to use of "ClientTransferProhibited" EPP status

  - May only be imposed with RNH consent and when included in registration agreement terms

  - Must be removed within 5 days of RNH's initial transfer request

  - Removal cannot be more restrictive to RNH than mechanisms for changing RNH contact/server information

- https://www.icann.org/resources/pages/policy-transfers-2014-07-02-en

Update to UDRP Rules

Implementation for the revisions to the UDRP Rules is 31 July 2015

- ◉ "Lock" defined: measures to prevent modification to the registrant and registrar information by UDRP Respondent

- ◉ Within two business days of request for verification from UDRP Provider:

  - ◉ Registrar must lock domain(s) at issue, confirm lock was applied and provide information requested in verification request to Provider

- ◉ Within three business days of receiving Provider's Decision, registrar must communicate implementation date to Parties, Provider and ICANN

- ◉ Other changes can be found in full redline of revisions at https://www.icann.org/en/system/files/files/udrp-rules-redline-24sep14-en.pdf

Update to Additional Whois Information Policy

15 February 2015 effective date for AWIP updates has been postponed

⊙ Registrars must:

⊙ Only refer to registration statuses in Whois by EPP status codes

⊙ Include a link for each EPP status code in Whois to ICANN webpage explaining each code

⊙ 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 ."

Whois Accuracy Reporting System and Report

Whois Accuracy Pilot Study Report

- Whois Policy Review team recommended creation of Whois ARS, prompting study and pilot

- ICANN reviewed results of report and is using data to process reported inaccuracies

    - Reported inaccuracies will be processed per compliance process and in the compliance system

    - Inaccuracies will be forwarded to registrars as Whois Inaccuracy compliance notices

Update Since ICANN 51

Audit Activities since ICANN 51

- Year-three Audit Program launched in October 2014

  - 316 Registrars originally selected for audit including 5 Registrars rolled over from Year-two

  - 4 Registrars terminated prior to the commencement of the audit

  - 5 "legacy" Registry Operators included in audited

- New Registry Agreement Audit Program launched August 2014; completed December 2014; report published in February 2015

- 2014 Contractual Compliance Annual Report to be published in February 2015
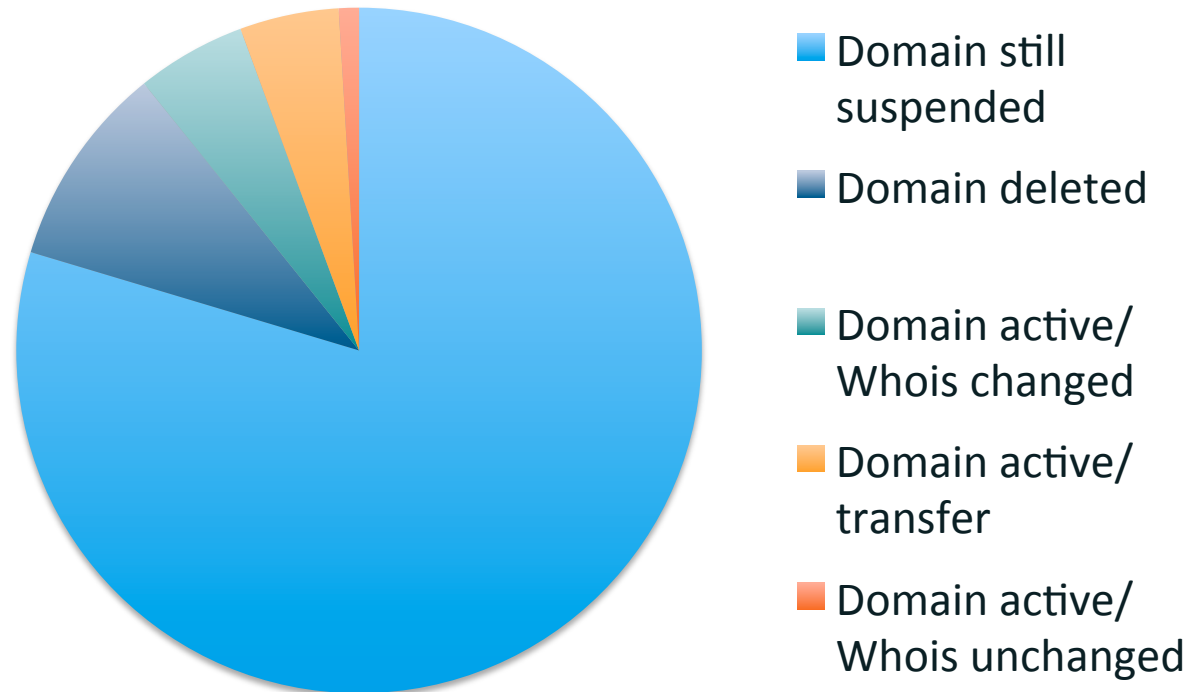
- Reports can be found at:
  https://www.icann.org/resources/pages/compliance-reports-2014-2015-01-30-en

Quality Efforts Update

- **Complaint processing quality assurance** – A quality process to periodically review consistency and accuracy of complaint processing

- **WHOIS Inaccuracy Quality Review** – A quality process to periodically review and confirm compliance for suspended domains related to Whois Inaccuracy complaints

- **Remediation Quality Review** – A quality process to ensure continued compliance after contracted party completes remediation to resolve informal or formal compliance matter

Whois Inaccuracy Quality Review Jan – Dec 2014

- Reviewed Whois Inaccuracy complaints that were closed due to Domain Suspended

- Out of 1798 complaints sampled, found approximately 80% remained suspended

- Number of Whois QR notices sent June 2014 - December 2014 decreased by approximately 60%
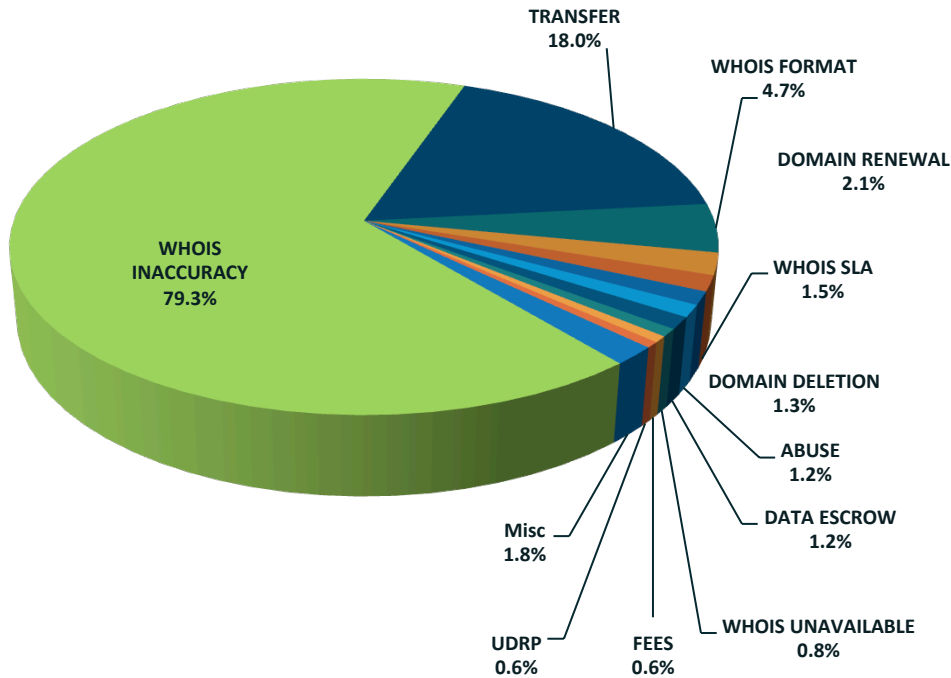
Whois Inaccuracy Quality Review

Legend:
- Domain still suspended
- Domain deleted
- Domain active/ Whois changed
- Domain active/ transfer
- Domain active/ Whois unchanged

Performance Reporting

Since ICANN 51

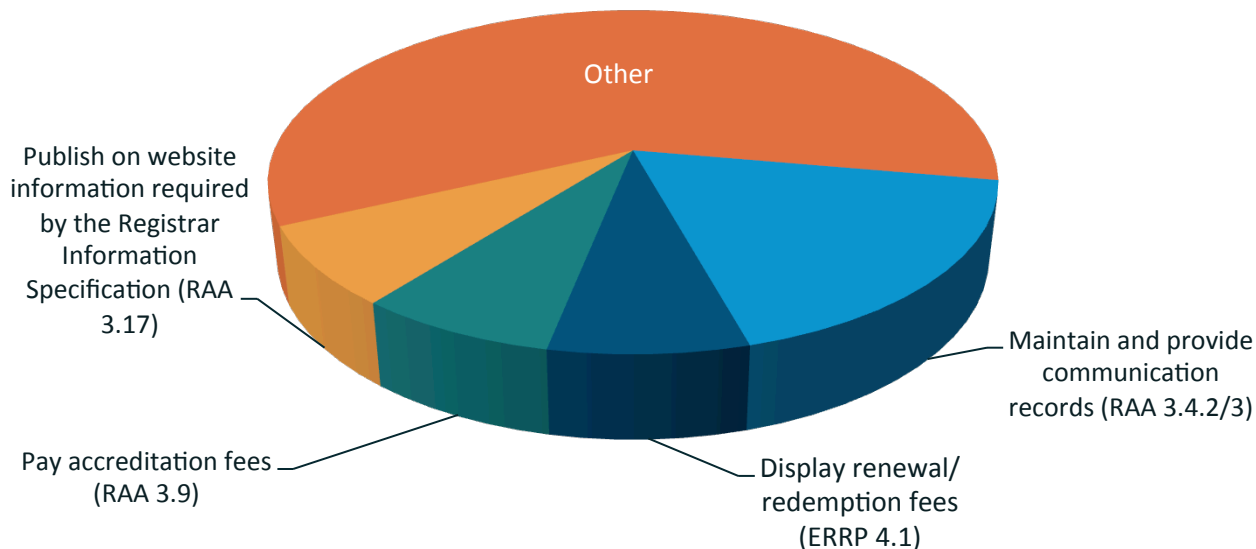# Registrar Complaint Type Volume: (Oct – Dec 2014)

Complaint Distribution

Pie chart showing:
- WHOIS INACCURACY 79.3%
- TRANSFER 18.0%
- WHOIS FORMAT 4.7%
- DOMAIN RENEWAL 2.1%
- WHOIS SLA 1.5%
- DOMAIN DELETION 1.3%
- ABUSE 1.2%
- DATA ESCROW 1.2%
- WHOIS UNAVAILABLE 0.8%
- FEES 0.6%
- UDRP 0.6%
- Misc 1.8%

REGISTRAR Complaints	Quantity
ABUSE	106
CUSTOMER SERVICE	36
DATA ESCROW	106
DNSSEC, IDN, IPV6	16
DOMAIN DELETION	116
DOMAIN RENEWAL	192
FAILURE TO NOTIFY	3
FEES	54
PRIVACY/PROXY	8
REGISTRAR CONTACT	23
REGISTRAR INFO SPEC	18
REGISTRAR OTHER	7
RESELLER AGREEMENT	24
TRANSFER	1647
UDRP	51
WHOIS FORMAT	429
WHOIS INACCURACY	6083
WHOIS QUALITY REVIEW	28
WHOIS SLA	138
Total Complaints Processed	9,157
Total Complaints Closed	7,832

Registrar TAT	(in days)
Avg TAT 1st Notice	10.3
Avg TAT 2nd Notice	6.7
Avg TAT 3rd Notice	14.2

Formal Notices	#
Volume Breach	14
Volume Non-Renewal	0
Volume Suspension	1
Volume Termination	2

Registrar Formal Notice Activity: (Oct – Dec 2014)

Notice Reasons

Other

Publish on website information required by the Registrar Information Specification (RAA 3.17)

Maintain and provide communication records (RAA 3.4.2/3)

Pay accreditation fees (RAA 3.9)

Display renewal/ redemption fees (ERRP 4.1)

Notices	Qty
Breach	14
Non-Renewal	0
Suspension	1
Termination	2

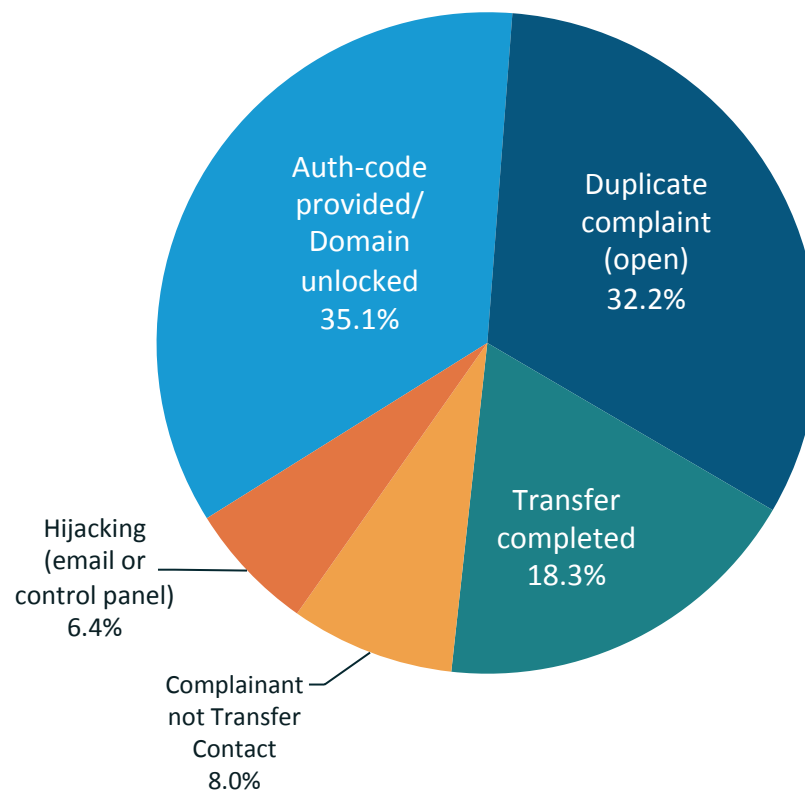| Breach Notice Reason*	Qty*
Failure Notice Reasons	114
• Cured	45
• Not Cured	69

Formal Notice Reasons	Percent
Maintain and provide communication records (RAA 3.4.2/3)	18
Display renewal/redemption fees (ERRP 4.1)	7
Pay accreditation fees (RAA 3.9)	7
Publish on website information required by the Registrar Information Specification (RAA 3.17)	7
Other	60

Registrar Complaint Types & Top Closure Reasons: (Oct – Dec 2014)

Whois Inaccuracy: Closure Reasons

- Domain suspended or canceled 37.1%
- Complainant's own domain name 23.6%
- Duplicate complaint (open) 14.6%
- Domain not registered 13.8%
- Known Privacy/Proxy service 10.8%
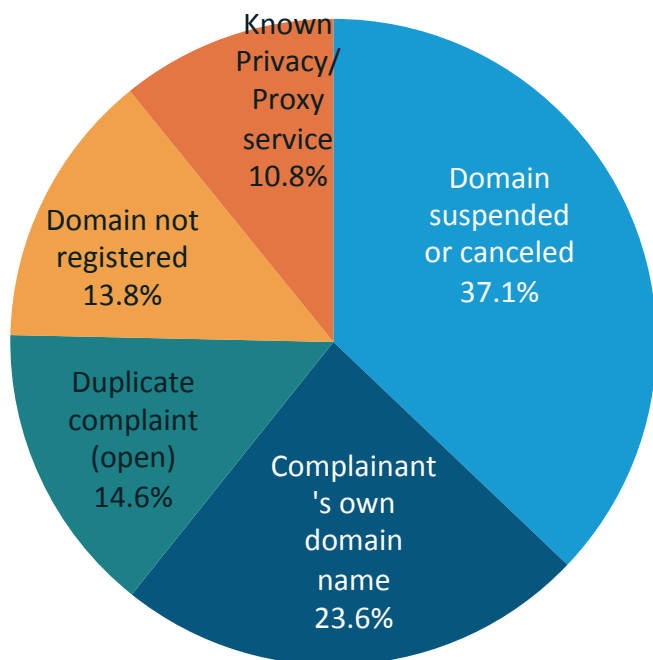
Transfer: Closure Reasons

- Auth-code provided/Domain unlocked 35.1%
- Duplicate complaint (open) 32.2%
- Transfer completed 18.3%
- Complainant not Transfer Contact 8.0%
- Hijacking (email or control panel) 6.4%

Registrar Complaint Types & Top Closure Reasons: (Oct – Dec 2014)

Domain Renewal: Closure Reasons

- Duplicate complaint (closed) 10.0%
- Private dispute 7.5%
- Registrar compliant 42.5%
- Customer service not in RAA 20.0%
- Duplicate complaint (open) 20.0%
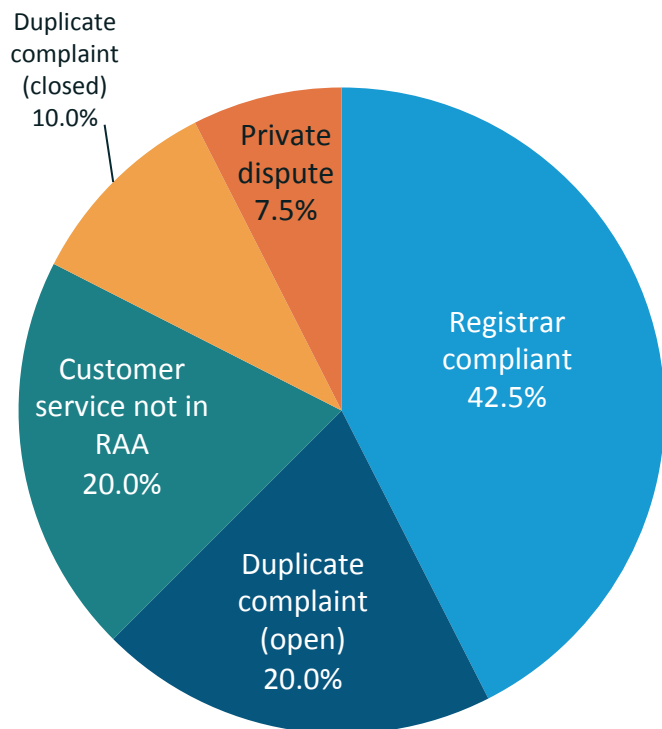
Whois Format: Closure Reasons

- Format compliant at submission 34.4%
- Duplicate complaint (closed) 29.1%
- Duplicate complaint (open) 19.8%
- Rr corrected format 14.1%
- Customer service not in RAA 2.6%
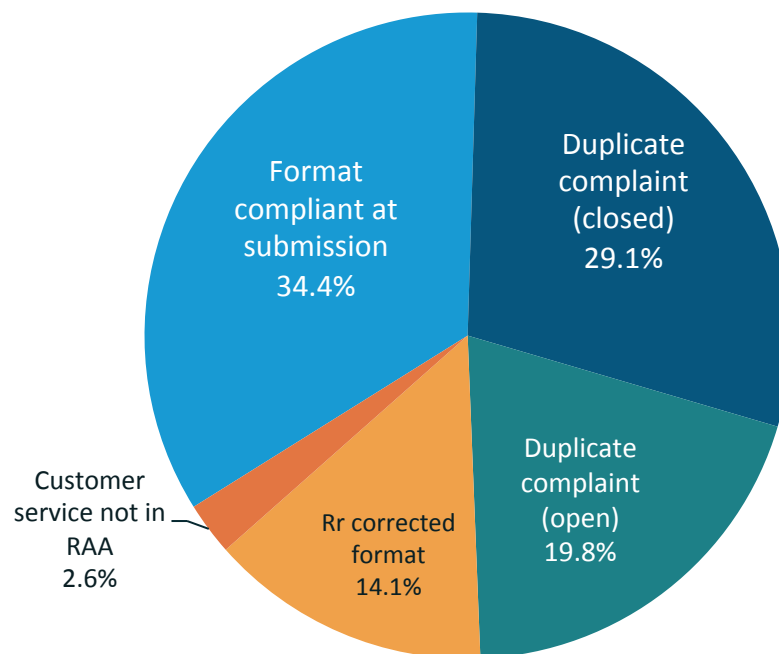
Registrar Complaint Types & Top Closure Reasons: (Oct – Dec 2014)

Whois SLA: Closure Reasons

Duplicate complaint (open) 86.6%

Rr compliant at submission 2.7%

Invalid TLD 2.7%

Invalid Rr 2.7%

Customer service not in RAA 5.4%
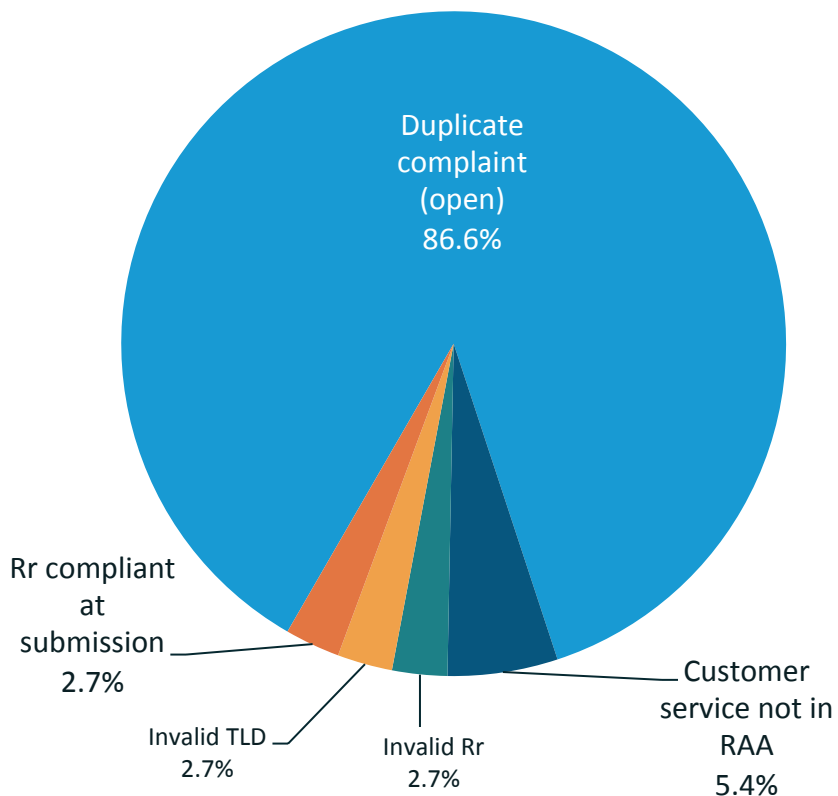
Domain Deletion: Closure Reasons

Duplicate complaint (open) 45.8%

Domain still in DNS 25.3%

Domain not suspended 12.0%

Requested evidence not provided 12.0%

Invalid TLD 4.8%
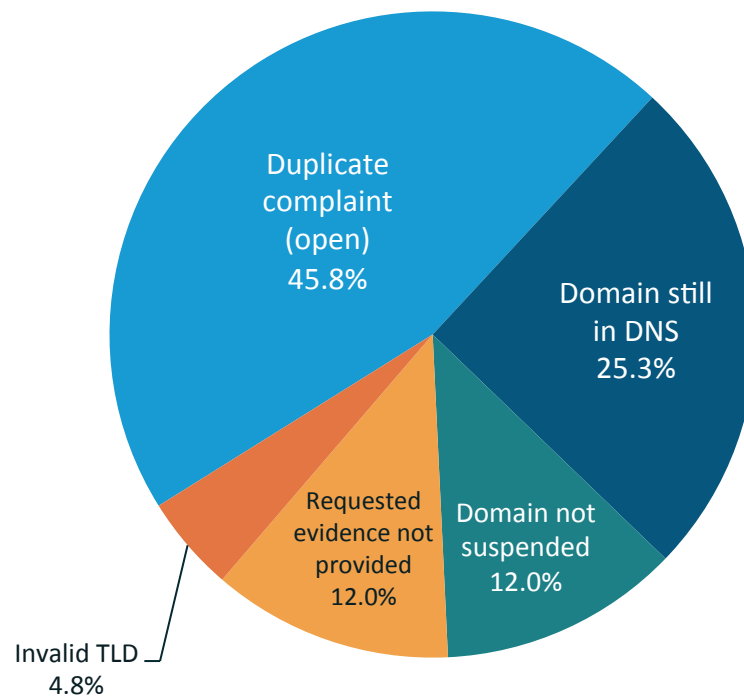
Questions & Answers

Send compliance questions

To: compliance@icann.org
Subject line: ICANN 52 RrSG Session
OR
Subject line: ICANN 52 Registrar Outreach Session

ICANN

Please join us at the following ICANN 52 Sessions:

Wednesday, 11 February 2015 – 9:00 – 10:15 VIP Room
Contractual Compliance Program Update

Thursday, 12 February 2015 - 8:30 – 9:45 VIP Room
Registrar Outreach Session

Additional RAA Guidelines & Reference

–

2013 RAA: Privacy/Proxy Services

Section 3.4.1.5 and Specification on Privacy and Proxy Registrations

- Privacy service: shows actual registrant's name, but alternative contact information

- Proxy service: 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: Whois Format

Registration Data Directory Service (Whois) Specification

Common Whois formatting problems

Whois Format Keys

o Extra fields/wording (e.g., links to registrar's website, sales info)
o Legal disclaimer before RNH info
o Fields out of order
o Required fields missing
o Incorrect spacing (e.g., extra blank lines between fields or more than one space after the colon)
o Not conforming to mappings specified in RFCs in Section 1.5 (e.g., times must be UTC and displayed according to RFCs 5730-5734)

&

Whois Format Values

o Missing Registry Domain ID
o Missing or improperly formatted abuse contact email/phone
o Registry Registrant ID, Admin ID and Tech ID should be blank for "thin" registry TLDs
o DNSSEC must be either "signedDelegation" or "unsigned"
o Missing country code (RFC 5733)
o Registrar requires value for optional key that is inapplicable
  o Leave blank
  o N/A is unacceptable

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

COMPLIANCE CERTIFICATE

Date certificate is signed → _____, 20____

Pursuant to Section 3.15 of Registrar Accreditation Agreement (the "Agreement"), dated _____, ← Date RAA signed
20____, by and between the Internet Corporation for Assigned Names and Numbers, a California non-profit, public benefit corporation ("ICANN"), and [Registrar Name], a [Organization type and jurisdiction] ("Registrar"), the undersigned certifies, in his/her capacity as an officer of the Registrar and not in his/her individual capacity, on behalf of Registrar as follows:

Officer title

The undersigned is the _____ (must be one of the following: Chief Executive Officer, President, Chief Operating Officer, Chief Financial Officer, or the functional equivalent thereof) of Registrar.

Registrar has in place processes and procedures intended to establish, maintain, review, test, and modify registrar policies and procedures reasonably designed to achieve compliance with the Agreement.

To the best of the undersigned's knowledge and belief, Registrar has performed and complied with all covenants, agreements, obligations and conditions contained in the Agreement that are required to be performed or complied with by it for the calendar year 20___. ← Year certificate applies to

The undersigned signs this certificate as of the date indicated under the title.

[REGISTRAR] ← Registrar name

Officer signature

By: _____

Name:

Title:

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 Breach

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 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 including email and mailing addresses

    - ⊙ 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: Data Escrow

Section 3.6

- Registrars with registered domains are required to deposit registration data into escrow

- ICANN monitors the data deposits to ensure that they:

  - Are made on schedule (daily/weekly)

  - Correspond to each registrar's requirements (full deposit only vs. full and incremental deposits)

  - Are valid in format and completeness

- Manual data escrow audits are performed upon request

2009/2013 RAA: Data Escrow – Common Errors

Common errors with registrar data escrow deposits

- Data in deposit does not match Whois lookup

- Whois lookup blocked

- 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

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, download and complete the form at https://www.icann.org/en/system/files/files/primary-contact-update-form-en.pdf and fax it to ICANN at +1.3108238649

  ⦿ Send contact data questions to registrar@icann.org

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