

[Registrars would like to thank ICANN and staff for their time as we commence review of the terms and conditions of the WHOIS Accuracy Program Specification of the 2013 RAA.](#)

[Our proposed revisions are set forth below. However, as we commence this review, we ask ICANN and staff to keep in mind the goal of universal acceptance. If we are to have universal acceptance of TLDs and IDNs, increased pressures on validation / verification might work against the goal of greater internationalization of the namespace, at least in the short term.](#)

[As discussions move toward enabling registrants to enter WHOIS data in their own script / language, it is foreseeable that many may want to use an IDN email address. If we are to support and encourage universal acceptance, there will need to be some relaxation of the rules to account for universal acceptance issues in internationalized email addresses and contact data.](#)

WHOIS ACCURACY PROGRAM SPECIFICATION (Revised)

Registrar shall implement and comply with the requirements set forth in this Specification, as well as any commercially practical updates to this Specification that are developed by ICANN and the Registrar Stakeholder Group during the Term of the Registrar Accreditation Agreement.

1. Except as provided for in Section 3 below, within fifteen (15) days of ~~(1) the registration of a Registered Name sponsored by Registrar, (2) the transfer of the sponsorship of a Registered Name to Registrar, or (3) any change in the Registered Name Holder with respect to any Registered Name sponsored by Registrar,~~ Registrar will, with respect to both Whois information and the corresponding customer account holder contact information related to such Registered Name:
 - a. Validate the presence of data for all fields required under Subsection 3.3.1 of the Agreement ~~in a proper format for the applicable country or territory.~~
 - b. Validate that all email addresses are in the proper format according to RFC 5322 (or its successors).
 - c. Validate that telephone numbers are in the proper format according to the ITU-T E.164 notation for international telephone numbers (or its equivalents or successors).
 - d. Validate that postal addresses are in a proper format for the applicable country or territory as defined in UPU Postal addressing format templates, the S42 address templates (as they may be updated) or other standard formats ~~published by a third-party.~~
 - e. ~~Validate that all postal address fields are consistent across fields (for example: street exists in city, city exists in state/province, city matches postal code) where such information is technically and commercially feasible for the applicable country or territory.~~
 - f. Verify:
 1. the email address of the Registered Name Holder (and, if different, the Account Holder) ~~by sending an email requiring an affirmative response through a tool-based authentication method such as providing a unique code that must be returned in a manner designated by the Registrar,~~ or
 2. the telephone number of the Registered Name Holder (and, if different, the Account Holder) ~~by either (A) 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 (B) 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.~~

In either case, if Registrar does not receive an affirmative response from the Registered Name Holder ~~within forty-five (45) days,~~ Registrar shall either ~~verify the applicable contact information (i.e., email or telephone number) manually~~ or suspend the registration, until such time as Registrar has verified the applicable contact information. If Registrar does not receive an affirmative response from the Account Holder, Registrar shall verify the applicable contact

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Commented [A1]: As discussed in Singapore, transfer is the most harmful part and not really the target of LEAs. We should be able to remove this part.

Commented [A2]: We will probably not get this, however we may get something out of it, such as changing „any change“ to „any substantial change“.

Commented [A3]: Duplicates Number 4.

Commented [A4]: Trying to get them to consider non-UPU formatting sources

Commented [A5]: We can try...

Commented [A6]: Allow different verification routes. This is too specific.

Commented [A7]: We still don't know what this means.

Commented [A8]: Any other options short of suspension?

information manually, but is not required to suspend any registration.

2. Except as provided in Section 3 below, within fifteen (15) calendar days after receiving any [substantial](#) changes to contact information in Whois or the corresponding customer account contact information related to any Registered Name sponsored by Registrar (whether or not Registrar was previously required to perform the validation and verification requirements set forth in this Specification in respect of such Registered Name), Registrar will validate and, to the extent required by Section 1, verify the changed fields in the manner specified in Section 1 above. If Registrar does not receive an affirmative response from the Registered Name Holder providing the required verification [within forty-five \(45\) days](#), Registrar shall [either verify the applicable contact information \(i.e., email or telephone number\) manually or suspend the registration](#), until such time as Registrar has verified the applicable contact information. If Registrar does not receive an affirmative response from the Account Holder, Registrar shall verify the applicable contact information manually, but is not required to suspend any registration.
3. Except as set forth in paragraph 4 below, Registrar is not required to perform the above validation and verification procedures in Section 1(a) through 1(f) above, if Registrar has already successfully completed the validation and verification procedures on the identical contact information and is not in possession of facts or knowledge of circumstances that suggest that the information is no longer valid.
4. If Registrar has any [substantiated](#) information suggesting that the contact information specified in Section 1(a) through 1(f) above is incorrect (such as Registrar receiving a bounced email notification or non-delivery notification message in connection with compliance with ICANN's Whois Data Reminder Policy or otherwise) for any Registered Name sponsored by Registrar (whether or not Registrar was previously required to perform the validation and verification requirements set forth in this Specification in respect of such Registered Name), Registrar must verify or re-verify, as applicable, the [email address\(es\) as described in Section 1.f incorrect information \(for example by requiring an affirmative response to a Whois Data Reminder Policy notice\)](#). If, within ~~fifteen~~[forty-five \(45\)](#) calendar days after receiving any such information, Registrar does not receive an affirmative response from the Registered Name Holder providing the required verification, Registrar shall either [verify the applicable contact information \(i.e., email or telephone number\) manually or suspend the registration](#), until such time as Registrar has verified the applicable contact information. If, within ~~fifteen~~[forty-five \(45\)](#) calendar days after receiving any such information, Registrar does not receive an affirmative response from the customer paying for the Registered Name, if applicable, providing the required verification, Registrar shall verify the applicable contact information manually, but is not required to suspend any registration.
5. Upon the occurrence of a Registered Name Holder's willful provision of inaccurate or unreliable WHOIS information, its willful failure promptly to update information provided to Registrar, or its failure to respond for over fifteen (15) calendar days to [substantiated](#) inquiries by Registrar concerning the accuracy of contact details associated with the Registered Name Holder's registration, Registrar shall either terminate or suspend the Registered Name Holder's Registered Name or place such registration on clientHold and clientTransferProhibited, until such time as Registrar has validated the information provided by the Registered Name Holder.
6. The terms and conditions of this Specification shall be reviewed by ICANN in consultation with the Registrar Stakeholder Group on or about ~~the first each~~ anniversary of the date that the form of this Agreement is first executed by a registrar, [but no more than once per twelve calendar months](#).
- ~~6.7.~~ [Registrars are permitted to engage third parties \(e.g. Resellers\) to deliver these services, but recognize that they, as the signatory to the RAA, are ultimately responsible for ensuring compliance with these requirements.](#)
- ~~7.8.~~ Nothing within this Specification shall be deemed to require Registrar to perform verification or validation of any customer account holder information where the customer account holder does not have any Registered Names under sponsorship of Registrar.

Commented [A9]: Same as above.

Commented [A10]: This would force complainants to provide evidence of their claims, thereby reducing the number of inaccuracy complaints that would trigger re-verification. I would see this as a reasonable ask.

Commented [A11]: This will be a hard push, but possible. Why should we verify the email address if the telephone number was incorrectly formatted?

Commented [A12]: This example does nothing.

Commented [A13]: This is a huge source of "False Positives." As such, We should be pushing for something else in this situation. e.g. Flag the name in WHOIS.

Commented [A14]: Lets make this a recurring thing.