

## Recommendations 5-9 - Data Accuracy Subgroup – Follow-up Questions

1. Does the Compliance Team attempt to identify patterns within ARS-detected inaccuracies to enable proactive remediation of underlying causes?

*ICANN Contractual Compliance attempts to identify patterns and systemic issues of noncompliance across all of the complaint types. Please note, the WHOIS Inaccuracy complaints created from the WHOIS Accuracy Reporting System (ARS) are processed in parallel with single and bulk submission of WHOIS Inaccuracy complaints.*

*Please refer to the questions and responses to the Compliance Subgroup on this topic.*

2. If a domain registration is suspended due to a reported or detected WHOIS inaccuracy, can the domain name be un-suspended without the inaccuracy being remediated?

*A registrar may un-suspend a domain name after confirming the existing WHOIS data is accurate. If a registrar suspends a domain name due to a reported or detected WHOIS inaccuracy to be compliant under the Whois Accuracy Program Specification (WAPS), the domain name should not be un-suspended without the inaccuracy being remediated under the terms of the 2013 Registrar Accreditation Agreement (RAA).*

*To address situations where registrars have un-suspended the domain name without correcting the WHOIS data, ICANN Contractual Compliance conduct a proactive monitoring exercise referred to as WHOIS Quality Review (WHOIS QR). The team performs a WHOIS QR of WHOIS Inaccuracy complaints that were previously closed due to suspension of the domain name and identifies situations where the registrar may have un-suspended the domain name without correcting the WHOIS data. The team then follows up with the registrar to get more information.*

3. Does the WHOIS Quality Review (or any other program) audit how often un-suspension without accuracy remediation occurs? If so, for how long after suspension are those follow-up accuracy checks performed?

*WHOIS Quality Reviews are conducted every six months. For the WHOIS Inaccuracy complaints closed in 2017, there were five domain names out of approximately 1,400 that were in scope of the review that should not have been un-suspended by the registrar without further action. Contractual Compliance worked with these registrars to remediate the causes of noncompliance. Metrics regarding the WHOIS Quality Review complaints are reported at <https://features.icann.org/compliance>.*

4. Considering ARS compliance metrics: Why are the percentage of ticketed domains that end up being suspended or cancelled is increasing?

	Cycle 1	Cycle 2	Cycle 3	Cycle 4
Sample records	10,000	12,000	12,000	12,000
Tickets created	2,688	4,001	4,552	4,681
Tickets went to 1st or further notice	1,362	1,524	1,897	1,668
Tickets related domains were suspended or canceled	60.1%	60.6%	65%	72.6%
Tickets led to changing or updating of WHOIS data by registrar	28.2%	25.4%	21.5%	14.9%
Registrars received a Notice of Breach	4	0	0	0
Registrar suspended or terminated	1	0	0	0

*Other than the metrics referenced above (and those which are reported at <https://whois.icann.org/en/whoisars-contractual-compliance-metrics>), ICANN Contractual Compliance has no additional information to suggest why domain names are being suspended or cancelled in response to WHOIS Inaccuracy complaints generated by the WHOIS ARS. The WHOIS Accuracy Program Specification to the 2013 Registrar Accreditation Agreement requires a registrar suspend or cancel a domain name in certain circumstances.*