Registrar Obligations to Collect, Securely Maintain and Validate Data

ISSUE: A.1.b	Registrar obligations to collect, securely maintain and validate data	
Priority:	RAA Final Report: N/A	
Issue /Request	**LEA:** Registrars and all associated third-party beneficiaries to Registrars are required to collect and securely maintain the following data: **(i)** Source IP address; **(ii)** HTTP Request Headers (a) From (b) Accept (c) AcceptEncoding (d) AcceptLanguage (e) UserAgent (f) Referrer (g) Authorization (h) ChargeTo (i) IfModifiedSince **(iii)** Collect and store the following data from registrants: (a) First Name: (b) Last Name: (c) Email Address: (d) Alternate Email address (e) Company Name: (f) Position: (g) Address 1: (h) Address 2: (i) City: (j) Country: (k) State: (l) Enter State: (m) Zip: (n) Phone Number: (o) Additional Phone: (p) Fax: (q) Alternative Contact First Name: (r) Alternative Contact Last Name: (s) Alternative Contact Email: (t) Alternative Contact Phone: (iv) Collect data on all additional addon services purchased during the registration process. (v) All financial transactions, including, but not limited to credit card, payment information. Each registrar is required to validate the following data upon receipt from a registrant: (1) Technical Data (a) IP addresses used to register domain names. (b) Email Address (i) Verify that registration email address(es) are valid. (2) Billing Data (a) Validate billing data based on the payment card industry (PCI standards), at a minimum, the latest version of the PCI Data Security Standard (DSS). (3) Contact Data (a) Validate data is being provided by a human by using some antiautomatic form submission technology (such as dynamic imaging) to ensure registrations are done by humans. (b) Validate current address WHOIS data and correlate with inhouse fraudulent data for domain contact information and registrant's IP address. (4) Phone Numbers (i) Confirm that point of contact phone numbers are valid using an automated system. (ii) Cross validate the phone number area code with the provided address and credit card billing address	**Source:** LEA original Request to RAA-DT
Notes	Additional information regarding requests: • Not included in LEA Code of Conduct	**Source:**
Discussion Points	**Description**	**Date Discussed**

	ICANN to seek clarification regarding the request, e.g., definition of "all associated third party beneficiaries" and other questions. Will defer discussion until ICANN receives further input from LEA.	18 Nov 2011
	Discussion of LE clarification (request pertains to reseller related info); discussion of reseller actions; discussion of PCI standard applicability; discussion regarding availability and relevance of listed data.	8 Dec 2011
	Discussion of ICANN's request for Registrar Verification of WHOIS Information.	
	Registrars to identify the feasibility of collection/maintenance of points of information identified in LE Request; discussed how to address reseller issue.	20 Dec 2011
	Discussion of maintenance of IP addresses and appropriate times for maintaining them.	17 Jan 2012
	Registrars generally amenable to retaining available data but raised concern about impracticality of maintaining certain log data indefinitely.	23 Jan 2012
		16 May 2012
	Question raised about scope of LE recommendation to collect data related to "add-on services" as some add-on services may be entirely unrelated to domain registrations.	16 May 2012
	Discussion of LE clarification with regard to data maintenance	
	Discussion of LE clarificagtion with regard to validation of data	
Proposed Text	Open	
Status /Outcome	Under Discussion	
Explanati on	Open	
COMMEN TS:	Comments may be submitted using the "Add Comment" feature below.	