

Scenarios of Registration Data required by ICANN Contractual Compliance beyond the life of the registration:

Examples on when Compliance may require historical Registration Data beyond the life of registrations under the **Expired Registration Recovery Policy** include:

1. Complaints concerning loss of domain name registrations due to failure of the registrar to send renewal reminder/expiration notifications.
  - Section 2.1 of the ERRP requires registrars to send expiration notifications before and after a domain name expires. To demonstrate compliance, Compliance requires evidence that the registrar sent the notifications to the Registrant within the prescribed timeframes (e.g. system logs or copies of communication, Registrant Name and/or Organization and Registrant Email). Where the registrar has deleted the domain or transferred it to another registrant or registrar, the evidence will include Registration Data beyond the life of the registration.
2. Complaints concerning failure of a registrar to redeem a domain name registration during Redemption Grace Period (RGP) at the request of the Registrant at Expiration (RAE).
  - Section 3.3 of the ERRP requires registrars to permit the RAE to redeem a deleted registration during RGP (i.e. after deletion by the registrar). To demonstrate compliance, Compliance requires evidence that the RAE is able to redeem a domain name during RGP (e.g. Registrant Name and/or Organization and Registrant Email, if needed to determine that the complainant is the RAE entitled to redemption).

Examples on when Compliance may require historical Registration Data beyond the life of registrations under the **Transfer Policy** include:

1. Complaints concerning the unauthorized transfer of a domain name from one registrar to another.
  - Section I.A.5.2 requires registrars provide the Registered Name Holder (RNH) with a unique “AuthInfo” code. To demonstrate the “Losing” Registrar’s compliance (after the domain name was transferred away), Compliance requires evidence that the Losing Registrar provided the unique AuthInfo code to the RNH (e.g. Registrant Name, Registrant Postal Address, Registrant Email and/or Registrant Phone). This may also include Administrative Contact, Account Holder, or third party Personal Data and evidence that the RNH consented to another party receiving the AuthInfo code (often the Terms of Service/Registration Agreement).
  - Sections I.A.3.1-3.4 requires the registrar of record to send a Form of Authorization (FOA) to the RNH. To demonstrate the Losing Registrar’s compliance, Compliance requires evidence that the Losing Registrar sent the FOA to the RNH (e.g. Registrant Name, Registrant Postal Address, Registrant Email and/or Registrant Phone).

2. Complaints concerning the unauthorized Change of Registrant (COR) of a domain name. When these complaints are received after the domain name has transferred to another registrar or expired
  - Section II.A.1.1 of the Transfer Policy defines a COR. To determine whether changes to the Registration Data qualify as a COR, Compliance requires evidence which may include Registration Data of the “Prior Registrant”, including Registrant Name, Organization, Email address and may also include Administrative Contact email, or Registrant mailing address.
  - Section II.A.1.2 of the Transfer Policy defines a Designated Agent as an individual or entity that the Prior and/or New Registrant explicitly authorizes to approve a COR on its behalf. Pursuant to Section II.C.1.2 and II.C.1.4, a registrar may obtain consent to a COR from a Designated Agent. If applicable, compliance requires evidence that the Prior and/or New Registrant explicitly authorized the individual or entity to approve a COR on its behalf which includes Registrant information and Personal Data of the Designated Agent.
  - Section II.C.1.2 and II.C.1.4 of the Transfer Policy states registrars must obtain consent from the New and Prior Registrant to the COR (and if applicable, evidence of consent from a Designated Agent). Compliance requires evidence such consent was received and includes Prior Registrant and New Registrant information (typically name, email address).
  - Section II.C.1.6 of the Transfer Policy requires registrars to send notifications to the Prior and New Registrant before or within one day of the completion of the COR. Compliance requires evidence such notifications were sent and includes Prior Registrant and New Registrant information (typically name, email address).