BC Members Call on RAA

Thursday, May , 2nd 2013

11 am EST

Public Comment page is here.   The proposed final RAA is here. Initial comments due 13-May

Outline:

1. Privacy/Proxy Specification (link)

There is no Service level specified for timing and methods to relay communications and reveal data to complainant.

2. Whois

Maintain bulk access to Whois (port 43)

"Willful provision of inaccurate or unreliable whois information" as basis to suspend a registration (3.7.7.2)

If Registrant data isn't validated in 15 days, should registrations be suspended during manual validation?

Should same accuracy requirement apply to Account Holder data as well?

3. Enforcement of Registrant Rights (link), in particular:

"You shall not be subject to false advertising or deceptive practices by your Registrar or though any proxy or privacy services made available by your Registrar. This includes deceptive notices, hidden fees, and any practices that are illegal under the consumer protection law of your residence."

Do we need additional clarity in order to enforce Registrar obligations?   Proposed RAA says:

RAA 3.7.10   Registrar shall publish on its website(s) and/or provide a link to the Registrants' Rights and Responsibilities Specification attached hereto <u>and shall not take any action inconsistent with the corresponding provisions of this Agreement</u> or applicable law.

Note: during the Beijing meeting, ICANN attorney Samantha Eisner told the BC that Public comment would be particularly valuable in these areas:

Registrant rights & responsibilities. This was drafted by registrars.

Validation of registrant data (registrant <u>and</u> account holder?)

Penalties for inaccurate data

Registrars want to drop Port 43 access for thick registries

Unilateral amendment by ICANN.