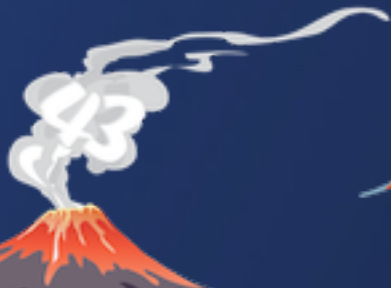


Contractual Compliance

An Overview for ALAC
11 March 2012



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11-16 March 2012

Agenda

- Overview of Submitted Questions
- General Update



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11-16 March 2012

Overview of Submitted Questions

1. How many people work in the Compliance Dept. and how are you organized?
2. “Notices of Breach, Termination and Non-Renewal and Compliance Related Correspondences” section some of the notices have been updated and others have not
 - What about the rest in that section?
3. 177 questions grouped in:
 - Follow-up on BULK submitted complaints
 - Notices of Breach Updates on ICANN.ORG



Q1. Compliance Organization

- 12 members (4 NEW members since ICANN Meeting #42)
- English, French, Arabic, Mandarin, Spanish, Urdu and Hindi
- Organization
 - Head of Compliance (1)
 - Registrar and Registry Compliance (9)
 - Risk and Audit Management (1)
 - Performance Measurement and Reporting (1)



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Q2. COMPLIANCE page updates

- Link to Notices:

<http://www.icann.org/en/resources/compliance/notices>



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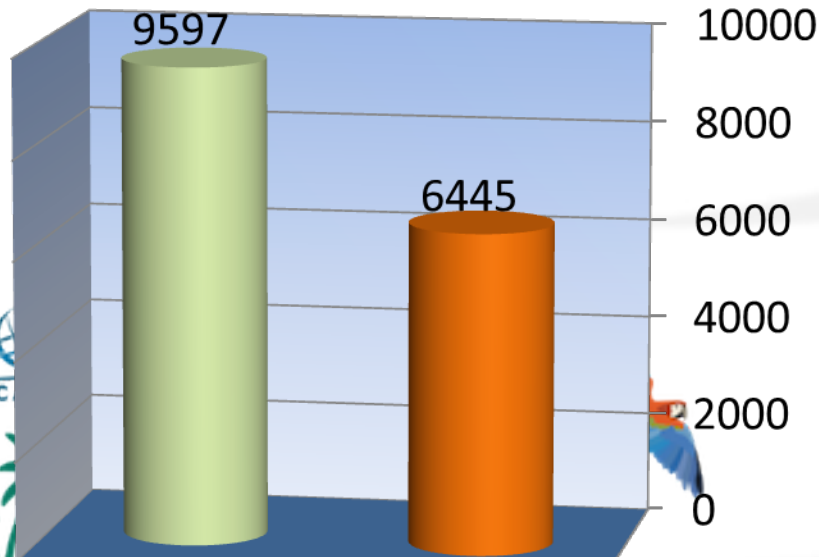
11-16 March 2012

Q3. WHOIS Inaccuracy Complaints

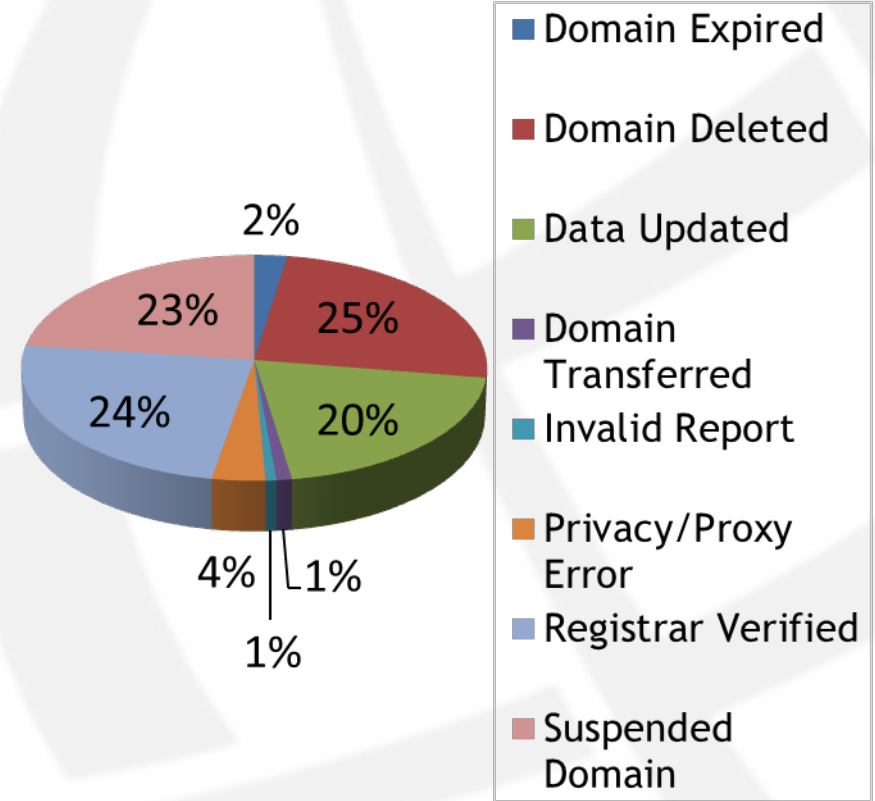
Note: Filed in T2
Closed based on the process not T2

9,597 WHOIS Inaccuracy Complaints

■ Closed ■ Filed



6,445 Closed Based On



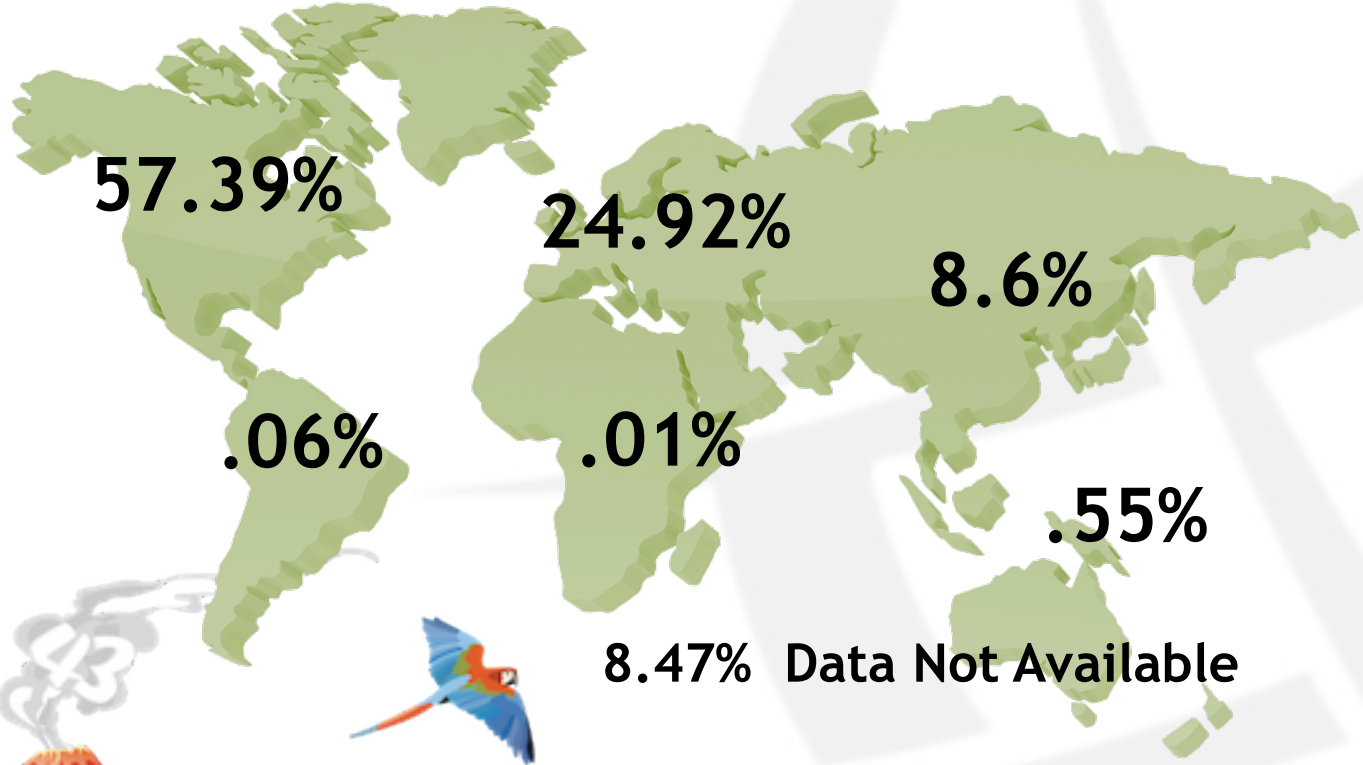
9,597 complaints

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WHOIS Inaccuracy Demographics - T2

Complaints by Registrar Location



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9,597 complaints

Q3. WHOIS Access (Port 43)

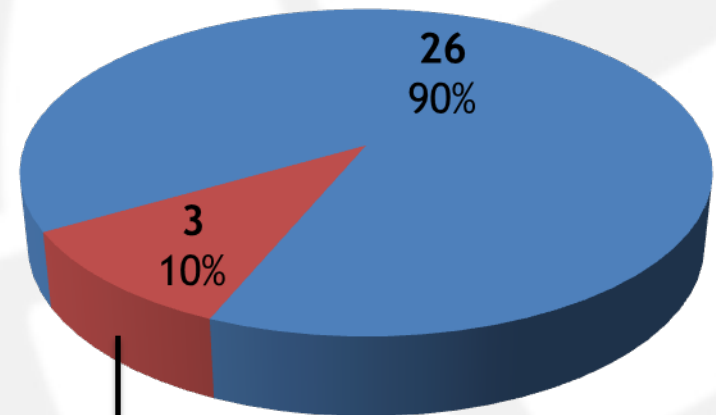
Oct 2011 - Feb 2012

- **Monitor** WHOIS Access server availability
- WHOIS Servers **queried daily**
- Manually review cases of registrars that appear to have issues prior to taking compliance action
- Follow-up with registrars with access issues per process

Resolution	Count
Resolved By Registrar before notification	7
Resolved during Prevention	19
In Prevention process	3
Total	29

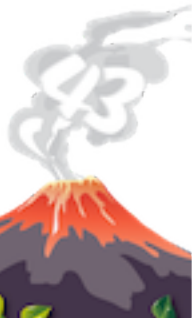
Status of 29 Detected Port 43 Issues

■ Resolved ■ Under Review



- 1 - Rate Limit
- 1 - Intermittent Service
- 1 - Unresolved Outage
(In Compliance Process)

29 complaints



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Q3. WHOIS Access (Port 43)

Oct 2011 - Feb 2012

Potential Reasons for Registrar WHOIS Server Query Failure:

- Registrar WHOIS Server Rate-Limiting
- Insufficient Output/Missing Required WHOIS Data Fields
- WHOIS Server Attacks
- Other Issues Contacting WHOIS Servers
- Query Failure for Unknown Reason



29 complaints

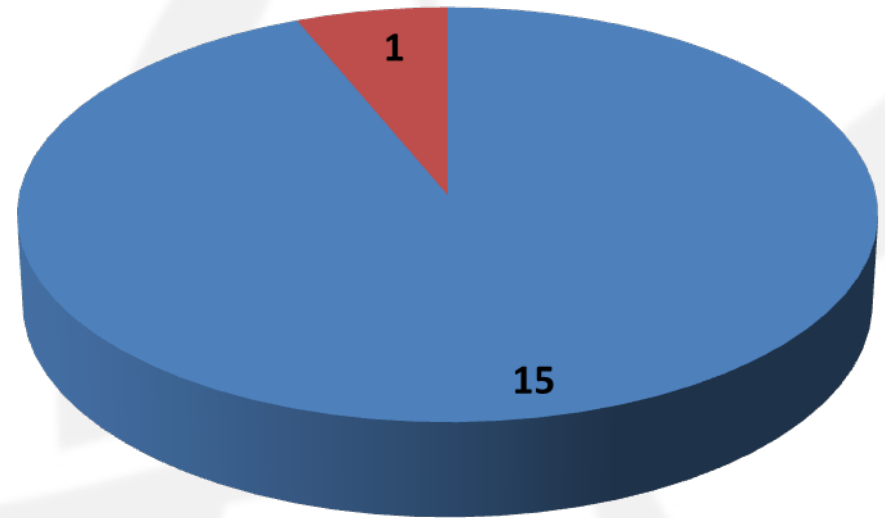
11-16 March 2012

Q3. UDRP Monitoring - Oct 2011 – Feb 2012

Outcome of Compliance Intervention

*Compliance received 16 complaints of registrars failing to implement UDRP decisions**

**Filed through the UDRP Implementation Application*



- DOMAIN NAME TRANSFERRED TO COMPLAINANT
- DETERMINED RESPONDENT CHALLENGED COMPLAINT DECISION IN COURT PURSUANT TO UDRP PARAGRAPH 4.K.

205 processed via Customer Service 221 complaints

Q3. Registrar Website Obligations

- *Registrars accredited under the 2001 and 2009 RAAs that sponsor active names must provide an interactive web page to data on sponsored names. They can subcontract this obligation, but remain fully responsible for fulfilling the obligation.*
- *Registrars accredited under the 2009 RAA are required to provide valid contact details on their website including e-mail and mailing addresses.*



Agenda

- Overview of Submitted Questions
- General Update



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11-16 March 2012

Contractual Compliance Model

Culture of Compliance

1. Bottom-up
2. Multi-stakeholder

**FORMAL
RESOLUTION**

**INFORMAL
RESOLUTION**
Inquiries & Warnings

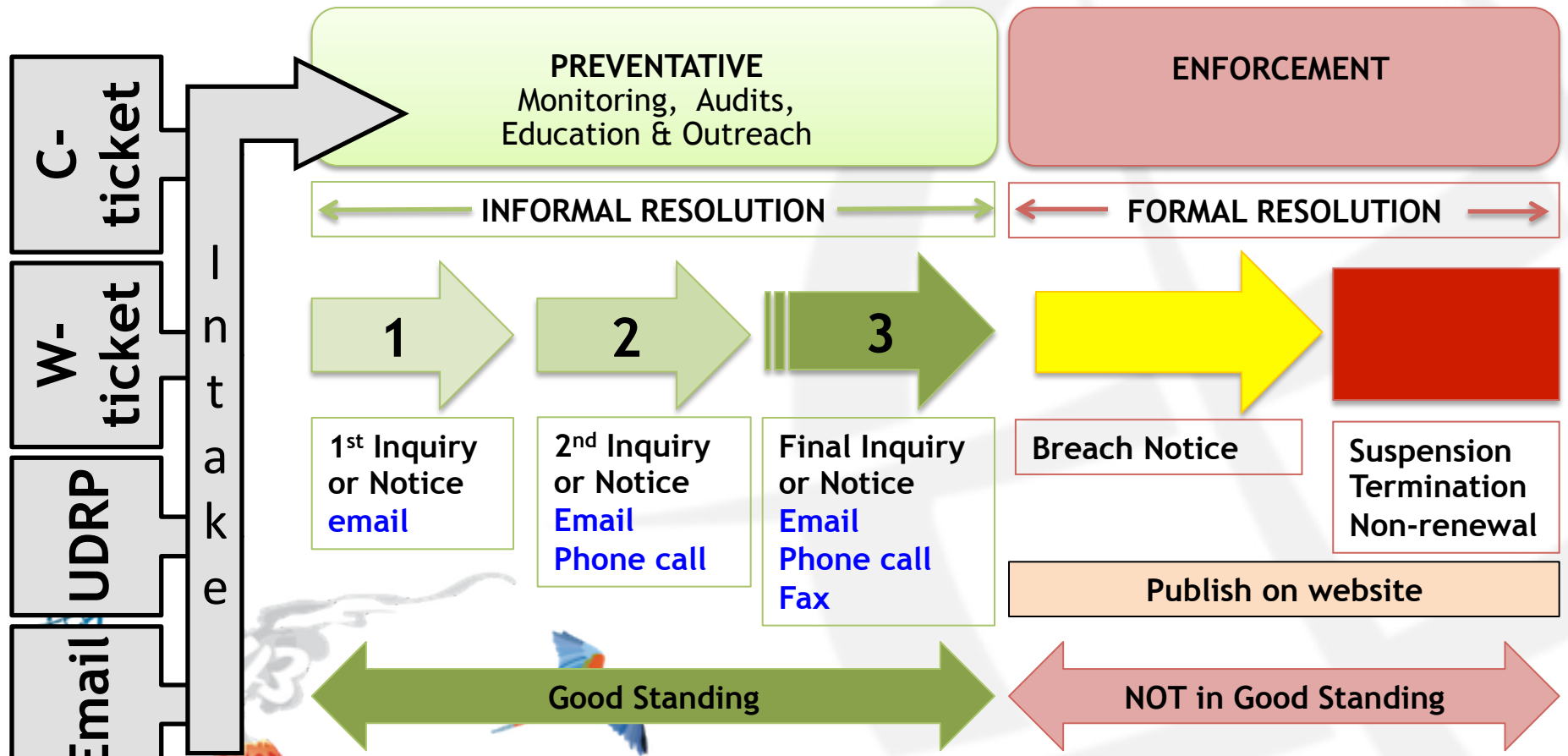
PREVENTATIVE ACTIVITIES
Monitor, Audit,
Education & Outreach

Annual Self-assessment
Industry Best Practice



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Overall Compliance Process



Inform & Support Policy Development

- IRTP Part B Working Group
 - Provide compliance data
 - Propose/draft/comment policy change
- Fake Renewal Notices Drafting Team
 - Respond to questions
 - Provide feedback and recommend other options
- GNSO's Response to RAP WG recommendation



Registry Compliance & Locations

Registry operators reported 100% compliance regarding:

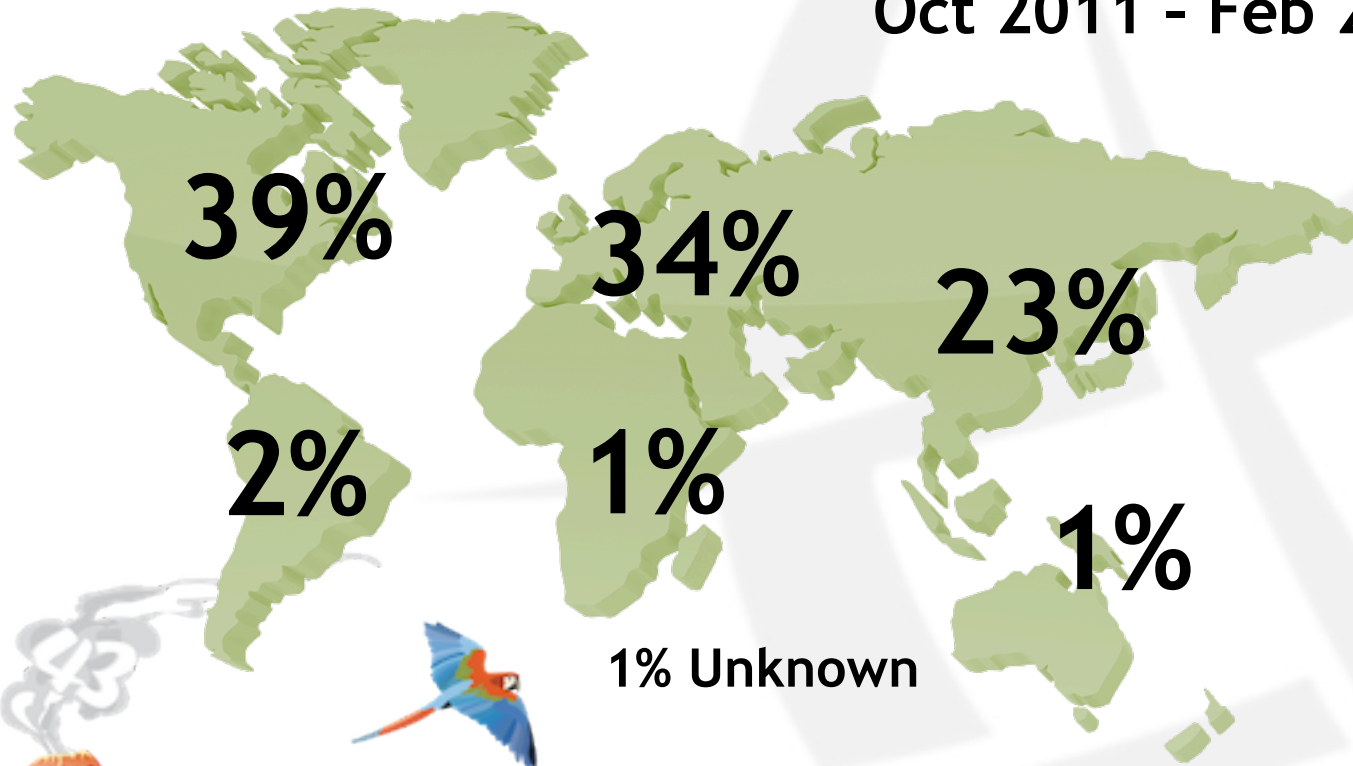
- ✓ DNS Availability
- ✓ WHOIS Availability
- ✓ Equal registrar access to the Shared Registration System

No complaints received regarding denial of bulk access to zone file
All registries submitted monthly transactions reports



Compliance issues across the globe

16,741 Complaints Received
Oct 2011 - Feb 2012



Please refer to slide 22 for breakdown

Compliance Activities - T2

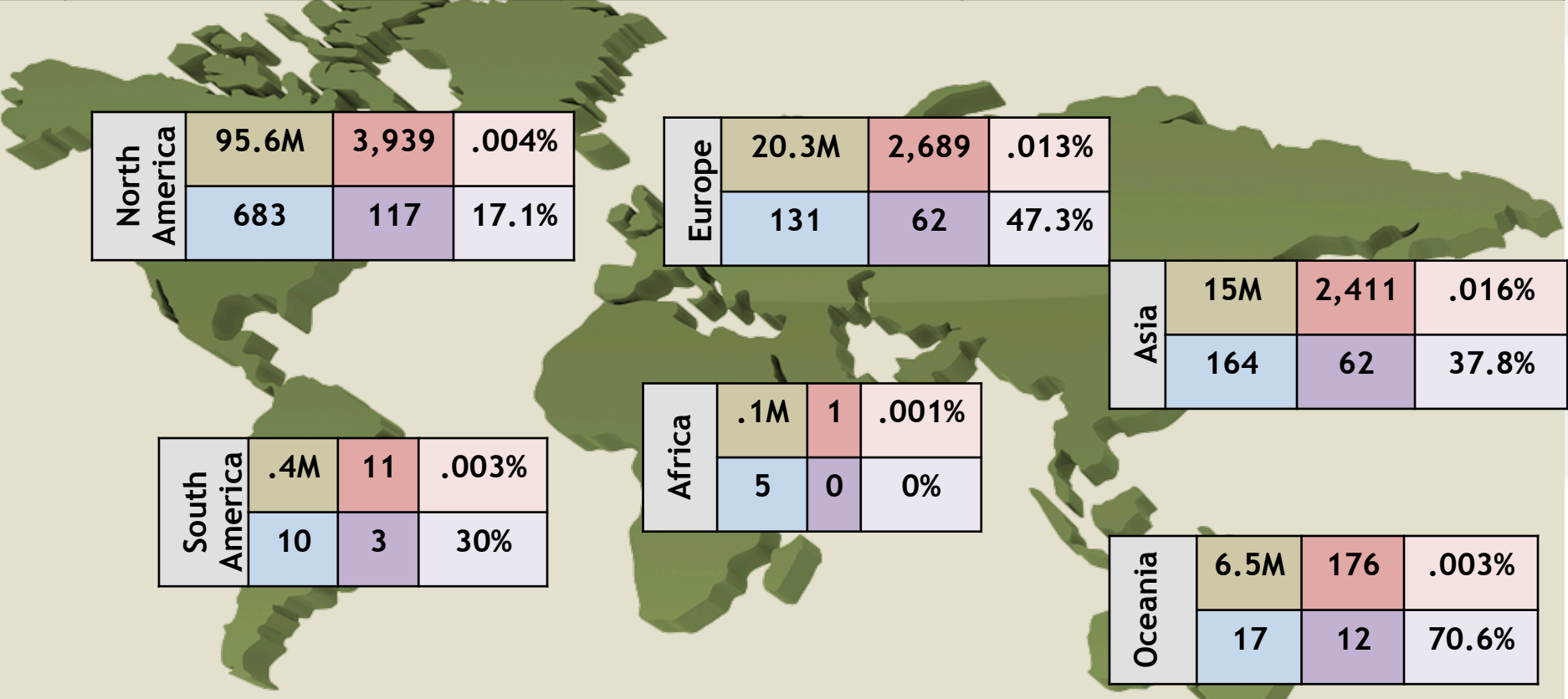
**16,778
Complaints
Received in T2**

Oct 2011 - Feb 2012	All Complaints Received by Type	Quantity
Prevention	Customer Service	4,279
	Data Escrow Audit	420
	Data Escrow Miss	45
	Transfer	2,184
	UDRP	221
	WHOIS Access	29
	WHOIS Inaccuracy	9,597
	Law Enforcement	3
	Total Complaints	16,778
Enforcement	Breach	2
	Suspension	1
	Terminated/Non-Renewal	0



Registrar Demographics - Complaint Volume vs. Domain volume & registrars- T2

LEGEND	Oct 2011 Domain Volume/Million	# Complaints	% Complaints per Domain Volume
	# registrars per region	# registrar w/ Complaints	% Unique registrars with complaints per region



Please refer to slide #25 for explanation

Top 5 Registrars Transfers - T2

Transfers			
Quantity	IANA #	& Registrar Name	Location
454	ICANN INTERNAL USE ONLY Efforts underway on data collection and analysis Objectives: To address “LOW HANGING fruit” To initiate proactive approach to complaints To identify root causes and address them To trend and report back		China
234			China
134			China
98			China
86			United States



Top 10 Registrars

WHOIS complaint volume - T2

Complaint Volume	Domain Volume	IANA	Registrar
1276			
883			
507			
287			
253			
253			
248			
241			
240			
225			

ICANN INTERNAL USE ONLY

Efforts underway on data collection and analysis

Objectives:

- To address “LOW HANGING fruit”**
- To initiate proactive approach to complaints**
- To identify root causes and address them**
- To trend and report back**



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11-16 March 2012

Questions & Feedback

Please send your feedback to
Compliance@icann.org

Subject

[ICANN 43 Costa Rica Compliance Feedback]



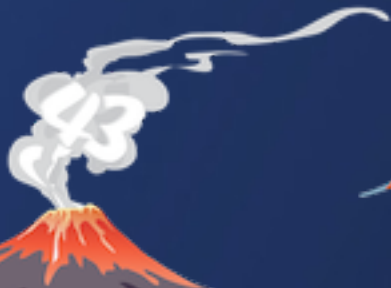
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Thank You



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Appendix



11-16 March 2012

Registrar Demographics - Complaint Volume vs. Domain volume & registrars-T2

- Africa had .1 million domains sponsored by 5 registrars. There were .001% complaints for all Africa domains and zero % of 5 registrars has complaints filed against them.
- Asia had 15 million domains sponsored by 164 registrars. There were .016% complaints for all Asia domains and 37.8% of 164 registrars has complaints filed against them.
- Europe had 20.3 million domains sponsored by 131 registrars. There were .013% complaints for all Europe domains and 47.3% of 131 registrars has complaints filed against them.
- North America had 95.6 million domains sponsored by 683 registrars. There were .004% complaints for all North America domains and 17.1% of 683 registrars has complaints filed against them.
- Oceania had 6.5 million domains sponsored by 17 registrars. There were .003% complaints for all Oceania domains and 70.6% of 17 registrars has complaints filed against them.
- South America had .4 million domains sponsored by 10 registrars. There were .003% complaints for all South America domains and 30% of 10 registrars has complaints filed against them.



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Three-Year Plan

1. **Strengthen program and operation** (Core Operation)
Establish performance measures and improve reporting (Transparency and accountability)

