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Board Adoption			
			To be filled in
Strategic Priority			
1. WHOIS, in all its aspects, should be a strategic priority, form the basis of staff incentivization (including CEO's) and organizational objectives; Board should create a committee that includes the CEO to be responsible for priority and key actions; issue public updates on progress against targets for all aspects of WHOIS.	WHOIS is deemed to be a strategic focus. Compliance restructured and reports to CEO. ICANN reported that in August, implementation was almost complete.	Most parts of the community have been silent on this. Advocates for At-Large have not been satisfied that the compliance changes are effective and not merely show, supported by the lack of replies to specific queries. [Citation: Garth Bruen, Individual commenter]	There is clearly a focus on long term WHOIS replacement as well as significant ongoing work on addressing the WHOIS-RT's other recommendations. The provisions in the new RAA along with the registry agreement changes which will accelerate the move to this RAA provides a far more robust mechanism to enforce WHOIS policy than was available at the time the WHOIS RT filed their report and this is a significant improvement and a strong indication of the importance given to Whois-related issues.

There have been regular public updates on WHOIS-related issues, but these updates, as those initially provided to the ATRT2, have made it difficult to clearly assess this progress. The |

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			ATRT2 notes that the reports received later in process have been very helpful. How effective all of this will be remains to be seen, but it is encouraging that the WHOIS issue is now receiving significant focus.
Single WHOIS Policy			
2. Board should oversee creation of a single WHOIS policy document, and reference it in agreements with Contracted Parties; clearly document the current gTLD WHOIS policy as set out in the gTLD Registry & Registrar contracts & Consensus Policies and Procedure.	The Board Briefing Document noted the lack of a single policy (the WHOIS RT's conclusion) and said "These presently available conditions and policies should be publicly available from one source." The result, which is deemed to completely satisfy the recommendation, can be viewed at http://www.icann.org/en/resources/registrars/whois-policies-provisions, entitled "Single Webpage for ICANN Whois-Related Policies and Provisions" but is largely a vast set of pointers to various policy documents and contractual terms. While saying that the implementation is complete, Staff acknowledges that the end result does not meet the desired target of having the WHOIS requirements in an understandable form, and says that the forthcoming various WHOIS portals will serve the purpose.	There was no community input other than from the WHOIS RT which considered the result to not meet their original intent.	The ATRT concurs with the WHOIS RT assessment and disagrees with the staff assessment that the Recommendation has been fully implemented. The WHOIS RT and the ATRT2 acknowledges that the task was difficult, but that difficulty for staff is multiplied many times for less knowledgeable users who are attempting to understand WHOIS policy. The ATRT2 also notes that the requirement to "clearly document" the current policy in a form that could be understandable to users and at the same time have sufficient specificity and detail

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			to be usable as a contract amendment may not be achievable in a single document. The future WHOIS portals should go a long way to addressing the user aspect of the recommendation, but the delay in meeting this need has been excessive.
Outreach			
3. ICANN should ensure that WHOIS policy issues are accompanied by cross community outreach, including outreach to the communities outside of ICANN with a specific interest in the issues, and an ongoing program for consumer awareness.	Planning is complete and the recommendation was implemented by creation of a detailed communications plan to raise awareness about WHOIS policy issues beyond the ICANN community and to raise consumer awareness related to WHOIS. The plan leverages the regional and industry connections of ICANN staff and regional vice presidents to promote WHOIS awareness through speaking engagements, events, newsletters and blogs. Tools including slide decks, talking points and fact sheets have been developed for their use. A key component of the communications plan is leverage program milestones to generate news media attention and social media chatter. An example of how this works has to do with Communications' work on the recommendations of	There was no community input.	The new RAA has triggered much discussion and education related to the improved WHOIS terms in the agreement. It is less clear to what extent communications has improved outside of contracted parties and ICANN meeting participants.

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	the Expert Working Group on 25 June. A news release was distributed to ICANN's media list and resulted in more than 25 news articles in publications including IT Avisen, ComputerWorld, TechEye, DomainIncite. Articles appeared in Dutch, English, French, Italian, Norwegian and Russian. Roughly 190 tweets appeared related to the ComputerWorld article alone. Similar efforts are planned for upcoming milestones such as the launch of the portal. A number of additional activities related to implementation for new WHOIS obligations under the 2013 RAA was implemented, as well as additional Registrar outreach activities (August 2013, Los Angeles and Xiamen), etc. The Communications team is following the Communications Plan to generate news media attention whenever other WHOIS related milestones are reached. For example, the launch of the various WHOIS portals (educational and Search) will be accompanied by outreach as detailed in the Communications Plan. This recommendation was also implemented through the work to create the information portal to become the single source of information and data on WHOIS and the development of a blueprint for a new model of delivery data directory services		

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	that will be sent to GNSO Council for further policy development.		
Compliance			
4. ICANN should ensure that its compliance function is managed in accordance with best practice principles, including full transparency on resourcing and structure; provide annual reports; appoint a senior executive whose sole responsibility would be to oversee and manage ICANN's compliance function (reporting to Board Committee); provide all necessary resources to manage and scale compliance team's activities.	1) People - grow staff in skills and expertise and number; Increase staff to 15 FTEs and contractors based on projects; Compliance led by VP reporting to CEO (100% complete) 2) Processes - build, communicate, implement and publish operational processes (100%) 3) Systems - consolidate and automate the fragmented tools (100% for WHOIS; 50% for the full consolidation of other systems) 4) Communication (100%) -Annual Report redesigned and published in 6 UN languages to provide data on budget and across all areas -Monthly Updates published in 6 UN languages 5) Performance Measurement - Metrics published on MyICANN (100%) 6) Audit Program launched (Year one 80% complete)	Relatively little explicit community input was received. Representatives of At-Large expressed concern over the ability of Compliance to address the Whois issue effectively. However, there is a pervasive concern within much of the ICANN community that there are still significant problems with Contractual Compliance, and they may not be in a position to effectively enforce contracts with relation to the New gTLD Program.	The designation of the head of Compliance as a Vice-President reporting to the CEO, although not as strong as what the RT recommended is a step in the right direction. Full transparency on resourcing and structure has not been achieved. It is unclear what the exact approved and funded staffing levels are, not what the plans are for these being achieved (according to Compliance staff lists, the number of staff members has declined recently, so it is apparent that the approved head-count has

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			not been achieved). Monthly Contractual Compliance reports are not sufficiently clear as to create a clear understanding, but those reports are evolving based on community feedback. Monthly updates and annual Contractual Compliance reports, although they provide a lot of data, lack clarity and numbers at times have not tallied in any understandable way. Usage of such terms as "Prevention Complaint Volume" to describe the number of complaints received is at best confusing and at worst deceptive. These negatives notwithstanding, there does appear to be improvement in the quantity and quality of information being made available by Contractual Compliance.
Data Accuracy			
5. ICANN should ensure that the requirements for accurate WHOIS	Staff is developing **a WHOIS Information Portal** to	There was no community input.	Although staff reports much work being done, little has

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data are widely and proactively communicated, including to current and prospective Registrants, and should use all means available to progress WHOIS accuracy, including any internationalized WHOIS data, as an organizational objective.	• Provide historical record of WHOIS • Consolidate WHOIS policy documentation • Provide mechanisms to teach people how to use WHOIS • Provide mechanisms for people to submit complaints as they relate to WHOIS data • Direct people to the appropriate channels to become engaged in the community on WHOIS related topics • Educate registrants on WHOIS, their rights and responsibilities • Provide a Knowledge Center where key WHOIS related documents can be located The Expert Working Group has developed a blueprint for a new model for delivery data directory services that will be sent to the GNSO Council for further policy development. (100% complete).		been seen by the community, so it is hard to evaluate just how effective it is. Classing the EWG work as complete based on a draft report that is in the midst of a comment period and has been subject to much community discussion, not all positive, is far too optimistic. The Registrant Rights and Responsibilities document referred to as being complete is the one that is now called Registrant Benefits and Responsibilities, terminology that has caused some user representatives to significantly downgrade its importance. The planned WHOIS Portal, once online (October 2013) should address at least some of the communications needs. There are not yet any standards or specifications with respect to

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			internationalized WHOIS data, and thus little communication or progress in this respect.
6. ICANN should take appropriate measures to reduce the number of WHOIS registrations that fall into the accuracy groups "Substantial Failure and Full Failure" (as defined by the NORC Data Accuracy Study, 2009/10) by 50% within 12 months and by 50% again over the following 12 months.	To address this recommendation, the Board directed the CEO to: 1) proactively identify potentially inaccurate gTLD data registration information in gTLD registry and registrar services, explore using automated tools, and forward potentially inaccurate records to gTLD registrars for action; and 2) publicly report on the resulting actions to encourage improved accuracy. On further probing, the ATRT2 was told: ICANN has completed (but not fully documented) a preliminary assessment of implementing a statistical analysis program following the methodology used in the NORC study. As previously discussed the study calls for phone validation, which is costly to operationalize and we are looking at competitive analysis to find the best rate for this option. In parallel, we are looking at alternative means of verifying and validating WHOIS sample data. To accomplish this we are discussing the issue with businesses and experts in identity verification, but have yet to identify a methodology that will	No community input other than At-Large expressing doubt that there is any movement in this area.	It would appear that there is progress being made, although extracting that information has been difficult. Despite initial reports to the ATRT2 that the NORC methodology might not be implemented due to the cost of phone validation, current reports indicate that it will be (perhaps with some modification). Automated tools are also being developed to aid in uncovering non-compliant WHOIS data. There is also some question as to whether the annual 50% reduction target is achievable. It is unclear when all of this work will culminate in starting to look at and improve WHOIS

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7. ICANN shall produce and publish an accuracy report focused on measured reduction in WHOIS registrations that fall into the accuracy groups "Substantial Failure and Full Failure" on an annual basis.	yield acceptable results. Staff is developing a WHOIS Accuracy Sampling and Reporting System using the methodology of the NORC Study To accomplish the requested analysis, Staff's work is focusing on: 1. Statistical methodology 2. Access to WHOIS records 3. Parser to automate contact data extraction 4. Automated address verification 5. Call center to call all sampled records.		accuracy, but it appears that instead of a reduction of 50% in 12 months, we may have the ability to set a baseline some time into the second year after Board action on the WHOIS RT recommendations. Any discussion about annual reports is premature at this point.
8. ICANN should ensure that there is a clear, unambiguous and enforceable chain of contractual agreements with registries, registrars, and registrants to require the provision and maintenance of accurate WHOIS data; agreements should ensure that clear, enforceable and graduated sanctions apply to registries, registrars and registrants that do not comply with its WHOIS policies; sanctions should include de-registration and/or deaccreditation in cases of serious or serial noncompliance.	Staff went through an extensive internal process to identify areas to improve the registry and registrar agreements. The outcome of this effort led to the additional negotiation topics for the RAA negotiations and the new gTLD Registry Agreements. ICANN received resistance from the contracted parties during negotiations resulted in language that differed from original proposals. Added in August, 2013: New 2013 RAA includes additional enforcement provisions and sanctions applicable to registrars, registrants, and resellers with regards to WHOIS. New gTLD Registry Agreements include enhanced	There was little direct input to the ATRT on this. However there has been general agreement that the new RAA gives ICANN a far better ability to enforce WHOIS policy than has previously been available.	With respect to WHOIS enforceability, the terms in the new RAA are orders of magnitude better than those in previous RAAs, and the RAA combined with terms in new and renewed gTLD agreements, will hopefully move most or all registrars to the 2013 RAA within a year or two. That being said, it is unfortunate that ICANN had to lower its goals in such a critical area (ICANN had wanted verification of both

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	WHOIS obligations Renewals of existing GTLDs to include enhanced WHOIS obligations.		phone numbers and e-mail addresses, but the RAA required only one of the two to be verified). It should be noted that in many cases, WHOIS inaccuracy is associated with transient domain names and the solution under the current regime is to simply delete the name, a situation that will not be alleviated until sufficient WHOIS validation is done at or immediately after registration time.
9. Board should ensure that the Compliance Team develop metrics to track the impact of the annual WHOIS Data Reminder Policy (WDRP) notices to registrants; metrics should be used to as per (1) above, the Board will initiate a policy on the purpose of the gTLD WHOIS service, and this will help drive the principles behind privacy/proxy develop and publish performance targets, to improve data accuracy over time; if this is	The issue was understood as WHOIS RT believed that there was a need to establish a baseline in order to track whether Staff's implementation of the WHOIS RT recommendations will lead to the desired improvement in WHOIS accuracy. In addition, there is a need for ICANN to collect and provide visibility into whether accuracy rates are improving over time. ICANN considered that no further action required here per board direction as it relates to the impact of the annual WHOIS Data Reminder Policy. The WRT recommendation as stated is not feasible.	There was no community input.	The Board's Resolution addressing the WHOIS Review Team Recommendations questioned whether this recommendation was actually implementable, a possibility that the WHOIS RT foresaw, and the ATRT2 concurs. Alternative approaches to achieving the intended result of this recommendation are being pursued.

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unfeasible, Board should ensure that an alternative, effective policy is developed and implemented that achieves the objective of improving data quality, in a measurable way.	(The policy only requires registrars to send the reminder in a specific form including specific information. The policy does not require registrars to track changes directly resulting from the reminder. ICANN incorporated the WHOIS Data Reminder Policy (WHOIS accuracy) in the Audit Program. As in the past, Registrars must, at least once a year, send a reminder to Registered Name Holders reminding them to verify/update WHOIS data – ICANN to validate that the reminder notices sent and stating consequences for inaccurate WHOIS data. Implementation of this recommendation involved (1) Staff seeking amendments to the RAA and the Registry Agreements to enhance the contractual framework for WHOIS, (2) the creation of the Expert Working Group to create a new policy framework to better address the inadequacies of the current contractual framework; (3) Staff to initiate a process to create an accreditation program for privacy/proxy providers, and work with the GNSO to develop a policy framework for these services, and (2) establishment of the online portal and proactive monitoring to be able to establish some metrics on accuracy over time.		The ATRT agrees that the EWG strategic initiative is a reasonable path forward in addressing the intent of the Recommendation.
Data Access – Privacy and Proxy Services			
10. ICANN should initiate processes to regulate and oversee	As reported by the Staff in August 2013:	There was no community input.	The process of regulating and overseeing privacy and proxy

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privacy and proxy service providers; processes should be developed in consultation with all interested stakeholders and note relevant GNSO studies; a possible approach to achieving this would be to establish an accreditation system for all proxy/privacy service providers, and consider the merits (if any) of establishing or maintaining a distinction between privacy and proxy services; goal is to provide clear, consistent and enforceable requirements for the operation of these services consistent with national laws, and to strike an appropriate balance between stakeholders with competing but legitimate interests -- including privacy, data protection, law enforcement, the industry around law enforcement and the human rights community. A list of objectives for regulation is provided for consideration, including: labeling WHOIS entries made by a privacy or proxy service; providing full WHOIS contact details for the privacy/proxy service provider; adopting agreed	• Adopted 2013 Registrar Accreditation Agreement includes many new obligations related to privacy/proxy providers, and commits ICANN to create a privacy/proxy accreditation program • GNSO PDP to be commenced shortly to examine policy issues related to privacy/proxy services • Staff Implementation work to develop the operational aspects of the Privacy/Proxy Accreditation Program to be conducted in parallel with GNSO PDP. Most of deliverables are expected by end 2013 – first half of 2014.		services after being ignored for many years is a complex and lengthy one. The new RAA addresses some issues and a forthcoming GNSO PDP should complete the process. That PDP may have a difficult time in bridging the privacy needs of end-users with the needs of both law enforcement and trademark owners, but the fact that the discussions will be starting is promising. New policies are not likely to be in place before 2015. The ultimate result of the EWG and its follow-on PDP may reduce the need for privacy and proxy services, but they will not disappear completely.

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standardized relay and reveal processes and timeframes; Registrars should disclose their relationship with any proxy/privacy service provider; maintaining dedicated abuse points of contact for each provider; conducting periodic due diligence checks on customer contact information; maintaining the privacy and integrity of registrations in the event that major problems arise with a privacy/proxy provider; and providing clear and unambiguous guidance on the rights and responsibilities of registered name holders, and how those should be managed in the privacy/proxy environment.			
Data Access – Common Interface			
11. It is recommended that the Internic Service is overhauled to provide enhanced usability for consumers, including the display of full registrant data for all gTLD domain names (whether those gTLDs operate thin or thick WHOIS services); operational improvements should include	WHOIS Inaccuracy complaints migrated by the Compliance Dept. and automated ICANN is currently working on a comprehensive WHOIS Portal, with development to occur in two phases to overhaul the Internic service: Phase 1- Launch of WHOIS Informational Portal	There was no community input.	There has been significant progress in replacing the Internic interface with native function on the ICANN web site. The new functionality will includes all aspects of the interface between users and ICANN with respect to

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enhanced promotion of the service to increase user awareness.	Phase 2- Launch of WHOIS Online Search Portal to offer a place where people could initiate a search of global WHOIS records

Communications Plan to be coordinated with launch of each phase | | Contractual Compliance, and will also include a domain name search capability as part of the forthcoming WHOIS Portal. |
| **Internationalized Domain Names** | | | |
| **12. ICANN should task a working group within six months of publication of this report, to determine appropriate internationalized domain name registration data requirements and evaluate available solutions; at a minimum, the data requirements should apply to all new gTLDs, and the working group should consider ways to encourage consistency of approach across the gTLD and (on a voluntary basis) ccTLD space; working group should report within a year.** | IETF WEIRDS Working Group currently evaluating technical protocols.
Once adopted by the IETF, new gTLD Registry Agreement and New 2013 RAA include commitments to adopt new protocols.
ICANN is also in the process of tasking a team to work on the Internationalized Registration Data (IRD) requirements, the final product will be dependent upon the conclusion of the GNSO PDP on translation/transliteration described in #13 below.

ICANN is commissioning a Study to Evaluate Available Solutions for the Submission and Display of Internationalized Contact Data | Little input is received in writing, however oral discussions on this matter were numerous within the communities affected by the current WHOIS/IRD situation | The implementation of the recommendation is different from what was intended and the deadlines are also far from the initially expected time frame. The current estimate for the IRD to submit its report is June 2014, which the ATRT views as reasonable or perhaps optimistic, given the complexity of the issue, the fact that there is a required linkage to the translation and transliteration PDP (see Recommendation 13) and given that the IRD was just convened in September 2013

Moreover, it is also unfortunate that ICANN has not proposed any interim implementations or best practices for internationalized |

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			registration data, leaving registrar and registries to have to develop these on their own in order to meet RAA requirements to populate WHOIS information.
13. The final data model, including (any) requirements for the translation or transliteration of the registration data, should be incorporated in relevant Registrar & Registry agreements within 6 months of Board adoption of working group's recommendations, or put explicit placeholders in the new gTLD program agreements, & in existing agreements when they come up for renewal.	Issue of Translation/Transliteration is being explored as a policy matter within the GNSO Council . Consensus policy, if produced out of the PDP would become binding upon contracted parties, when adopted by Board This output of this PDP work is required to inform the rest of the IRD related implementation work being supervised by Staff (# 12 – 14). Conclusion of this aspect of the implementation is dependent upon the speed in which the PDP can be completed once the working group is formed. The current completion estimate is 2015.	See as above.	The Issue Report leading to a PDP on translation and transliteration was delivered at the end of January 2013 and the GNSO initiated the PDP in June. The current expectation is that the PDP work will begin in before the end of 2013. Given this, the staff prediction of completion in 2015 is reasonable, but the implication is that IDN TLDs will be in full operation well before there are rules as to how to deal with the associated IDN WHOIS information.
14. Metrics should be developed to maintain and measure the accuracy of the internationalized registration data and corresponding data in ASCII, with clearly defined compliance methods and targets.	IDN WHOIS Records to be proactively identified once the work referenced in #12 and #13 is complete. The current estimate is 2015.	See as above.	Since this recommendation is largely contingent on the two previous ones, it is not surprising that it as yet untouched. The end result, however, is that this recommendation will arguably

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			not even be started when the next WHOIS RT begins (or finishes its work).
Detailed and Comprehensive Plan			
15. ICANN should provide a detailed and comprehensive plan within 3 months after the submission of the Final WHOIS Review Team report that outlines how ICANN will move forward in implementing these recommendations.	ICANN Staff developed and published its proposed plan, which was adopted by the ICANN Board.	No substantial input from the Community, except for the criticism on how the WHOIS RT final report was perceived and evaluated by the Board .	The ATRT acknowledges that ICANN is in the process of implementing the WHOIS RT recommendations and there has been much discussion of specific implementations. However, the appendix of a staff briefing paper linked to in a Board resolution is not an optimal ways to make bring such a plan to the community's attention.
Annual Status Reports			
16. ICANN should provide at least annual written status reports on its progress towards implementing the recommendations of this WHOIS Review Team. The first of these reports should be published one year, at the latest, after ICANN publishes the implementation plan mentioned in recommendation 15, above.	ICANN plans to publish first Annual Report one year after the Board's approval of the WHOIS Review Team Final Report recommendations (Nov.2013).	N/A	Deadline not yet reached at the time of writing.