

Registrar WHOIS Validation Group | Across Field Address Validation (AFAV) Abstract

The Registrar WHOIS Validation Group (“Registrar Group”) consisted only of representatives of ICANN-accredited Registrars. The Registrar Group is charged with identifying, specifying and approving (by a minimum of two-thirds (2/3) vote), an appropriate set of tools to enable registrars to complete the across field address validation specified in Section 1(e) of the [WHOIS Accuracy Program Specification of the 2013 Registrar Accreditation Agreement](#).

Only Registrar Group members are eligible to cast a vote. ICANN-accredited registrars, or a group of Affiliated Registrars, have only one vote.

The Registrar Group has operated over four phases beginning in May of 2013. This report provides a summary of activities for Phases One, Two and Three (timeline attached as Appendix).

The Registrar Group has formally met ten times and conducted extensive discussion online via the rr-whois-wg@ICANN.org listserv - [Archive](#).

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Phase One

Phase One ran from 19 May 2013 to 25 July 2013. During this phase, the Registrar Group met four (4) times and contemporaneously conducted an in-depth discussion as to the Registrar Group's charter, goals, membership as well ICANN's role through the rr-whois-wg@ICANN.org listserv - [Archive](#).

| Registrar Group Meetings | |
|---------------------------------|----------------------------------|
| 6 June 2013 | Initial Meeting |
| 20 June 2013 | Conversation with Melissa Data |
| 21 June 2013 | Conversation with Experian |
| 28 June 2013 | Conversation with Address Doctor |

The Registrar Group had a spirited discussion about whether or not they should elect a Chair and Vice Chair as opposed to having staff manage the group. The consensus was yes, elect a chair but no further action was taken. In response to concerns about conflicts of interest, members sent to the email list links to their Statements of Interest (SOI) posted on ICANN.org. The members felt that the GAC should be invited to have non-voting members participate in the working group discussions, but no further action was taken.

The Registrar Group also participated in a [three question survey](#) to determine ICANN's role in the implementation of address validation by registrars (attached as an Appendix).

- Q1: 75% of respondents choose: "ICANN should identify a universally acceptable vendor at whatever cost and pay for the service from ICANN's "contingency" fund (assuming the ICANN Board of Directors would approve the use of contingency funds for this purpose)."
- Q2: 81.3% of respondents choose "ICANN should operate an address validation service at no cost to registrars. (Registrars could use a different service at their cost if they prefer.)"
- Q3: 87.5% of respondents choose: "Would you find it helpful to invite a few address validation vendors to present and describe their services to our working group?"

The Registrar Group met with three Address Validation Service (AVS) vendors (Melissa Data, AddressDoctor, and Experian). The Registrar Group members provided a list of more than 40 questions for the AVS vendors (attached as an Appendix).

The Registrar Group members also expressed, during the online discussion, concerns they had with the validation requirements, costs to implement and the lack of available tool-sets. The Working Group expressed some of these concerns to the Board at ICANN47 (see attached Appendix).

The Registrar Group went on hiatus while Registrars focused on implementing the provisions of the [2013 Registrar Accreditation Agreement](#) (2013RAA) and ICANN Staff focused on providing training to registrars regarding the 2013RAA.

Phase Two

Phase Two ran from 2 February 2014 to 1 April 2014. The Registrar Group only met once during this period, which was a face-to-face meeting at ICANN 49 on 26 March 2014.

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| ICANN49 - AFAV Meeting Announcement |
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| ICANN49 - AFAV Meeting Summary. |
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At this meeting, the Registrar Group learned that the Expert Working Group (Whois) had been active in undertaking a data validation/verification survey of ccTLDs and that seven (7) ccTLDs had expressed interest in collaborating with each other and ICANN to explore future data validation/verification efforts. The Registrar Group also learned that the Expert Working Group (EWG) was proposing that WHOIS be centralized. The EWG was also exploring how that data could be validated and/or verified by a central entity. Several registrars voiced concern that, if the Expert Working Group's ideas were implemented, the work and expense being undertaken by them to implement cross-field validation will have been wasted.

During this phase, the Registrar Group jointly issued a [Request for Information \(RFI\) on Contact Data Validation and Verification Systems](#) with the Expert Working Group on Next Generation gTLD Directory Services ("EWG") to seek information to understand the breadth and depth of data validation/verification solutions that are commercially available. The RFI was intended to help inform the Registrar Group's work when it reengaged on this project.

Vendors were requested to submit proposals that addressed:

- Quality and sources of comparison data used to verify addresses
- Scoring methodology, if applicable
- Handling of non-ASCII characters in addresses or supplied data
- Robustness / redundancy / geographic diversity of hardware / connectivity, if applicable
- A description or example of technical implementation of the service or software
- A list of the countries for which address validation services are provided, along with the level of precision of validation available.
- The type of validation or verification that the respondent is capable of performing (Syntactical, Operational, Identity).
- The general time frame required for each of the validation services to be performed (e.g., n milliseconds/hours/, etc.).
- Known limitations of the validation and verification services that might be relevant to the projects described herein.
The relative incidence of errors or false positives (if known), and any process for solving them.

In April 2014, the Registrar Group again went on hiatus while the Expert Working Group on Next Generation gTLD Directory Services ("EWG") was exploring how data could be validated and verified by a central entity.

Phase Three

Phase Three of the Registrar Group ran from 24 November 2014 to 9 March 2015. The Registrar Group meet five (5) times and contemporaneously conducted an in-depth discussion as to the Registrar Group’s charter, goals, membership as well ICANN’s role online through the rr-whois-wg@ICANN.org listserv - [Archive](#).

| Registrar Group Meetings | Adobe Connect |
|---|---|
| 9 January 2015 | https://icann.adobeconnect.com/p3lse6wrzyh/ |
| 23 January 2015 | https://icann.adobeconnect.com/p10k9x7zxr1/ |
| 30 January 2015 | https://icann.adobeconnect.com/p3tl58w5avh/ |
| 12 February 2015 – ICANN52 | https://icann.adobeconnect.com/p97u56hl4zk/ |
| 27 February 2015 | https://icann.adobeconnect.com/p8u0h2npfni/ |
| <ul style="list-style-type: none"> • Adobe Access Code: AFAVWG | |

By consensus the Registrar Group established a working scope and structure:

- They would have a “registrar lead representative,” and Volker Greimann was selected;
- The members would work in good faith to explore the “technical and commercial feasibility” of implementing the cross-field validation requirements;

- The cross-field validation requirements should not be a competition barrier to smaller registrars;
- The members would work out the detailed requirements for validation and then look for tool-sets;
- To prevent “forum shopping” all countries and territories must be included;
- The members would research industry experience with validation and staff will draft questions to facilitate this research;
- Staff will provide prior research and conduct additional research.

The Registrar Group discussed the specificity of validation, must all addresses be validated to the same standard? Most members agreed that consistent validation regardless of country, would be operationally easier and prevent “forum shopping.” Members raised concerns about the handling of false positives and requested further discussion.

During the RrSG meetings at [ICANN52](#) concerns were raised about the number of simultaneous WHOIS initiatives underway, specifically those impacting Registrars (see attached Appendix). The RrSG also expressed concern about not having enough volunteers for other working groups and PDPs such as IRTP parts C and D; Privacy Proxy PDP; UDRP revision implementation, Thick Whois (registry) implementation, and the ERRP (Expired Registration Recovery Policy) effectiveness.

The Registrar Group decided to pause efforts again during the Registrar Stakeholder Group and ICANN review of the Whois Accuracy Program Specification.

Summary:

1. Registrar Group Objectives

- Registrar led;
- The members would work out the detailed requirements for validation and then look for tool sets;
- The cross-field validation requirements should not be a competition barrier to smaller registrars;
- To prevent “forum shopping” all countries and territories must be included.

2. Actions Taken and by Whom

- Mike Zupke was exclusively responsible for Phases One and Two of the Registrar Group;
- He initiated the Registrar Group meetings, survey regarding ICANN’s role and arranged the discussions with the three vendors;
- Howard LI was responsible for Phase Three of the Registrar Group.

3. Research of Vendors

- Melissa Data, AddressDoctor, and Experian made presentations to the Registrar Group;
- All three also submitted responses to the Expert Working Group (WHOIS) RFI.

4. Identified Service Gaps

- All countries not covered by the Address Validation Service providers;
- 100% accuracy not available, 2013RAA doesn't account for .01% inaccuracy;
- Pricing is not consistent between countries or providers;
- Transliteration and IDN not addressed by all vendors.

5. Known Issues

- AVS providers must provide a 100% SLA;
- AVS providers must provide real-time validation and at comparable speeds globally;
- Provider must adhere to all privacy laws and not store the Registrars data;
- Is there a threshold less than 100% accuracy that ICANN will accept?
- Registrars must have the ability to whitelist an address to avoid false positives and repeat processing of an existing contact;
- Vendors all have different ways of dealing with false positives;
- Service pricing and implementation requirements must not be a competitive barrier;
- Each Registrar must individually acquire a license.

6. Criteria (if defined)

- The Registrar Group did not define criteria.

7. Conclusion

There is an appearance that ICANN and the Registrar Group have not taken this project seriously.

The RrSG and ICANN face increasing pressure and criticism for not acting on this requirement promptly. ICANN needs to resist any attempts to slow down or end the Registrar Group's efforts.

Unless the RrSG formally seeks to amend the 2013RAA and remove the address validation requirements, this project should proceed.

8. Next Steps if determined

The next steps are to continue with the recruitment of members of the Registrar Group and proceed towards an eventual vote.

- Reminder emails
- Doodle Poll
- Agenda for 1st Meeting
- Determine if members need to file SOI's
- Compile data on which countries don't have Postal Addressing Standards and Postal address databases.
- Determine what information e.g. prior meeting minutes should be uploaded to the community wiki.