

SSR2 F2F Meeting in LA

Contractual Compliance
WHOIS - registrar agreement

10 October 2017



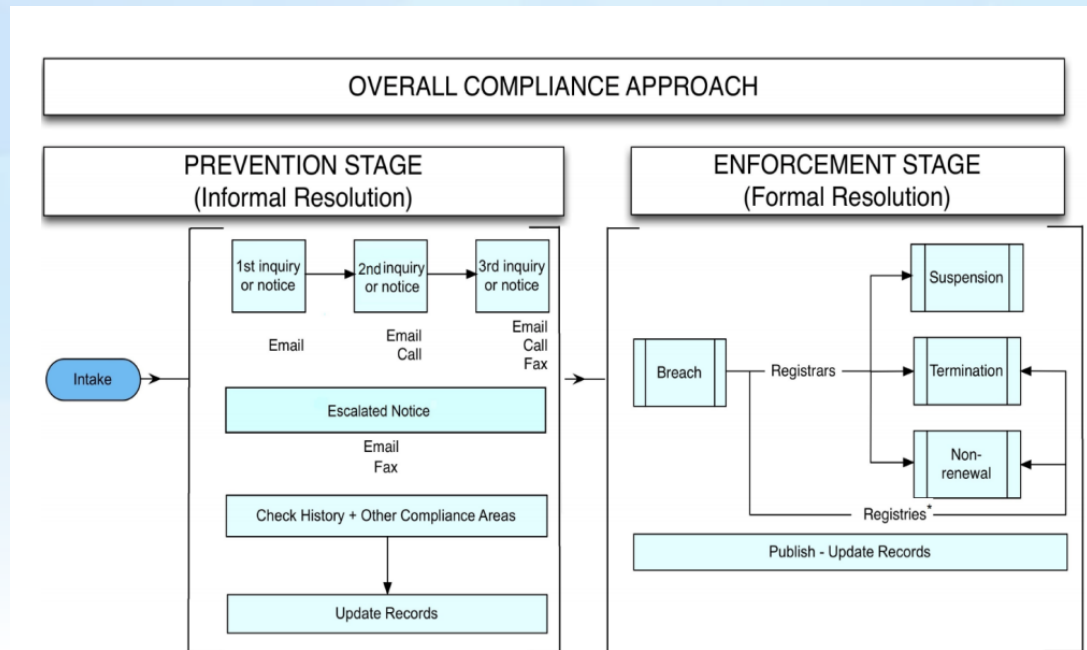
WHOIS Compliance Registrar Agreement

Perform an assessment how effectively ICANN has implemented its processes to ensure compliance regarding registrar agreement and the consensus policies.

- WHOIS Accuracy Program Specification (WAPS)
- WHOIS Accuracy Reporting System (WHOIS ARS)

ICANN Contractual Compliance Follow-Up

- WHOIS complaints follow the Contractual Compliance Approach and Process
- Registrars must investigate and correct inaccurate WHOIS data:
 - Section 3.7.8 of 2009 and 2013 RAA (and WHOIS Accuracy Program Specification)
 - Failure to respond or demonstrate compliance during complaint processing will result in a Notice of Breach



2013 RAA: WHOIS Inaccuracy Notices and WAPS

- ⦿ Section 3.7.8: registrars are required to take reasonable steps to investigate and correct WHOIS data inaccuracies
- ⦿ ICANN requests:
 - ⦿ Correspondence during investigation, including email headers and investigation details, including when, how, and with whom communication was conducted
 - ⦿ Validation of any data updated following investigations per Section 2 of WAPS (ICANN requires registrars to specify the standards used for validation and validation results)
 - ⦿ Verification of RNH email per Section 4 of WAPS
 - ⦿ Registrars have 15 calendar days after trigger event (for ex new registration, in-bound transfer, change to registrant, WHOIS Inaccuracy complaint) to verify/validate, as applicable

2013 RAA: WHOIS Inaccuracy Notices and WAPS

- ⦿ ICANN looking for one of three results to WHOIS inaccuracy complaint:
 - ⦿ WHOIS updated within 15 days of notifying RNH – registrar provided documentation of validation of updates and verification (including affirmative response or manual verification)
 - ⦿ No response from RNH within 15 days of notifying RNH – domain suspended until registrar has verified information
 - ⦿ WHOIS verified as accurate (no change) within 15 days of notifying RNH – registrar provided documentation of verification
- ⦿ ICANN may also request evidence of WAPS fulfillment under Section 1

2013 RAA: WHOIS Accuracy Program Specification (WAPS)

Distinguishing verification/validation

Verify

- ⊙ “to confirm or correct accuracy of WHOIS data”
- ⊙ Requires contacting and receiving response from RNH (email or phone)
- ⊙ Absent affirmative response verification within 15 days of trigger - Registrar must manually verify or suspend domain until verification occurs

Validate

- ⊙ “to ensure data is present and format of WHOIS data is consistent with standards”
- ⊙ Validation is conducted by registrar, not RNH
- ⊙ ICANN request registrars to specify the standards used for validation and validation results

2013 RAA: WAPS Triggers by Section Number

- ◉ Section 1: validation and verification required for all new registrations, inbound transfers or when the RNH changes
- ◉ Section 2: verification and validation required for updated WHOIS data
- ◉ Section 4: if registrar has information suggesting WHOIS data is incorrect it must also verify or re-verify email addresses of RNH and account holder
 - ◉ WHOIS inaccuracy complaint triggers verification

Contractual Compliance Summary

- Established a process and approach for enforcing the contract at <https://www.icann.org/resources/pages/approach-processes-2012-02-25-en>
- Overview of the Registrar Compliance Program at <https://www.icann.org/resources/pages/registrar-2012-02-25-en>
- Contractual Compliance Reporting & Performance Measurement published at: <https://www.icann.org/resources/compliance-reporting-performance>
- Annual reports and financials can be found at: <https://www.icann.org/resources/pages/compliance-reports-2017>
- Contractual Compliance Related Reports inclusive of WHOIS ARS
- <https://features.icann.org/compliance>

Detailed Slides

WHOIS Accuracy Reporting System (WHOIS ARS)

Background and Goals

The WHOIS ARS project was created both in response to Recommendations compiled and delivered by the 2012 WHOIS Review Team, under the [Affirmation of Commitments](#) (AoC), as well as to address GAC concerns on WHOIS accuracy. ICANN committed to proactively identify potentially inaccurate gTLD WHOIS contact data and forward this information to gTLD Registrars for investigation and follow-up.

WHOIS ARS Phases

The ARS is divided into three phases based on the types of validation identified in [SAC058](#) (SSAC report on Domain Name Registration Data Validation):

[Phase 1](#): Syntax Accuracy

[Phase 2](#): Syntax + Operability Accuracy

Phase 3: Syntax + Operability + Identity (TBD; requires further consultation with the community as to if and how this phase would be implemented)

2013 RAA: WHOIS Format

WHOIS output format as required by 2013 RAA

- ⦿ Data fields must be shown in format specified in 2013 RAA, including order of keys
- ⦿ “Advisory: Clarifications to the Registry Agreement, and the 2013 Registrar Accreditation Agreement regarding applicable Registration Data Directory Service (WHOIS) Specifications” effective 31 January 2016

<https://www.icann.org/resources/pages/registry-agreement-raa-rdds-2015-04-27-en>

Clarifications include:

- ⦿ Which fields in the WHOIS output are optional
 - ⦿ If no data for optional field, value must be blank or field must not be shown
 - ⦿ Value cannot be “N/A” or any other placeholder data such as “00000”
 - ⦿ If data exists, key and value with data must be shown

2013 RAA: WHOIS Format

Clarifications continued:

- ⦿ “Registrar Abuse Contact Email” and “Registrar Abuse Contact Phone” keys may appear immediately before last field instead of following “Registrar IANA ID” key
- ⦿ The value section of “Reseller” field should be shown, but may be left blank or not shown at all
 - ⦿ If shown, value must be name of organization, in case Reseller for domain is legal entity, natural person name or otherwise
- ⦿ WHOIS output may show translation of key names in other languages

2013 RAA: WHOIS Format

“Additional WHOIS Information Policy” effective 31 January 2016

- ⦿ Registrars must:
 - ⦿ Only refer to registration statuses in WHOIS by EPP status codes
 - ⦿ Include link for each EPP status code in WHOIS to ICANN webpage explaining each code
 - ⦿ List of URLs available at <https://www.icann.org/resources/pages/epp-status-codes-list-2014-06-18-en>
 - ⦿ Include this message in WHOIS output: “For more information on WHOIS statuses, please visit: <https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en> .”
- ⦿ Registrars shall not remove links and message when providing WHOIS services