

# Responses for Data Accuracy Subgroup Questions

RDS/WHOIS Review Recommendations 5-9



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# Data Accuracy Subgroup Questions

## RESPONSE FROM ICANN GLOBAL DOMAIN DIVISION AND CONTRACTUAL COMPLIANCE

### 1. Have there been any specific reports/documents on the implementation status of WHOIS ACCURACY PROGRAM SPECIFICATION in 2013 RAA?

We take this question to mean implementation status of the Across-Field Address Validation provision of the WHOIS Accuracy Program Specification in the 2013 RAA. In October 2017, ICANN org issued a [Request for Information](#) seeking information regarding commercial services that focus on global address validation. The Request for Information is intended to educate ICANN org and its contracted parties on various tools in the marketplace that support physical address validation including geographic coverage, service availability and response times. Nine parties responded to the Request for Information. In January 2018, ICANN org published a [summary](#) of the responses. Currently, a sub-team of the Registrar Working Group along with ICANN org are working on formal criteria that both parties deem to be 'Technically and Commercially Viable' per the WHOIS Accuracy Program Specification. The target for completion is set for late April. All documents related to the Across-Field Address Validation work is located on the [Across Field Address Validation WIKI page](#).

### 2. Besides the WHOIS Accuracy Reporting System (ARS), are there any contractual compliance tools/measures for ICANN Org to trace the implementation of the WHOIS ACCURACY PROGRAM SPECIFICATION (WAPS)?

Compliance enforcement of the WAPS began for all registrars under the 2013 Registrar Accreditation Agreement (RAA) on 1 January 2014, or if the registrar entered into the 2013 RAA after that date, the effective date of the registrar's RAA.

ICANN Contractual Compliance ensures compliant implementation of the WAPS by registrars through:

- ① **WHOIS inaccuracy complaint processing.** All WHOIS inaccuracy complaints processed for registrars under the obligations of the WAPS include demonstrating compliance with the terms of the WAPS. Registrars are required to remediate any deficiencies identified by ICANN, and failure to resolve issues during the informal resolution process will result in escalation to the formal resolution process (including notice of breach, suspension, and/or RAA termination). Some registrars have been issued enforcement notices for noncompliance with the WAPS. [Enforcement notices](#) and [enforcement notice reasons](#) are published for the past 13 rolling months and repeated in the annual report for the enforcement reasons ([ICANN Contractual Compliance 2017 Annual Reports](#)).

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- ⦿ **Contractual Compliance Registrar Audit Program.** Compliance with the obligations of the WAPS is part of the [2013 RAA Audit Plan](#). The majority of registrars under the 2013 RAA have completed the 2013 RAA audit. Registrars that have not been previously audited are eligible for audit in future audit rounds.
  - ⦿ **Targeted outreach.** ICANN Contractual Compliance has conducted targeted outreach for registrars and regions that were identified as opportunities to improve compliance with 2013 RAA obligations, including the WAPS. The [Compliance Outreach Activities webpage](#) provides additional information.
  - ⦿ **Metrics and Reporting.** ICANN Contractual Compliance publishes metrics and reporting for the past 13 rolling months at [ICANN Contractual Compliance Performance Reports](#), including all WHOIS related complaints. In addition, the [Contractual Compliance Performance Measurement page](#) includes monthly, quarterly and annual reports with additional granularity of data for WHOIS inaccuracy and related complaints.

For more information, please visit the [WHOIS-ARS page](#).

3. Any updates on the commercial feasible tools/services that focus on global address validation?

ICANN just completed a Request for Information (RFI) and nine (9) responses were received. These responses contained updated information regarding current services available to complete across field address validation and verification. A summary of these nine responses are located on the [Across Field Address Validation WIKI page](#).

ICANN's GDD has hosted multiple sessions at recent ICANN meetings regarding this topic:

- ⦿ ICANN 61 GNSO: RrSG Meeting <https://61.schedule.icann.org/meetings/647700>
- ⦿ ICANN 60 GNSO-Registrar Stakeholder Group (RrSG) Meeting <https://icann60abudhabi2017.sched.com/event/CbII/gnso-registrar-stakeholder-group-rrsg-meeting>
- ⦿ ICANN 59 GNSO-Registrar Stakeholder Group Policy Meeting <https://icann59johannesburg2017.sched.com/event/B3pH/gnso-registrar-stakeholder-group-policy-meeting>
- ⦿ ICANN 58 GNSO Registrar Stakeholder Group Meeting <https://icann58copenhagen2017.sched.com/event/9npZ/gnso-registrar-stakeholder-group-meeting>
- ⦿ ICANN58: ICANN GDD: Whois Validation Working Group <https://icann58copenhagen2017.sched.com/event/9nnE/icann-gdd-whois-validation-working-group-c>
- ⦿ ICANN 57 GNSO Registrar Stakeholder Group Meeting <https://icann572016.sched.com/event/8cxt/gnso-registrar-stakeholder-group-meeting>
- ⦿ ICANN 53 Whois Accuracy Specification Review Discussion <https://archive.icann.org/meetings/buenosaires2015/en/schedule/wed-whois-accuracy-review.html>
- ⦿ ICANN 53 Registrars AFAV WG (Across-field Address Validation Working Group) (12 February 2015)
- ⦿ <https://archive.icann.org/meetings/singapore2015/en/schedule/thu-registrars-afav.html>

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- ⦿ ICANN 52 Registrars AFAV WG (Across-field Address Validation Working Group)
  - ⦿ <https://archive.icann.org/meetings/singapore2015/en/schedule/thu-registrars-afav.html>
  - ⦿ ICANN 51 RrSG Meeting, Whois Address Cross-Field Validation Initiative
  - ⦿ <https://archive.icann.org/meetings/losangeles2014/en/schedule/tue-ccnso-members/presentation-whois-validation-14oct14-en.pdf>
  - ⦿ GDD Industry Summit, Registrar Breakout Session, Agenda included Across Field Validation
  - ⦿ <https://www.icann.org/en/system/files/files/presentation-gdd-summit-registrar-breakout-session-10may17-en.pdf>

4. What is in common behind the bulk WHOIS inaccuracy complaint (3,199 tickets in 2017), i.e. sponsored by same Registrar, from same Registrant?

Common elements of complaints submitted through the bulk WHOIS inaccuracy complaint tool vary, and can include:

- ⦿ same Registered Name Holder (RNH)
- ⦿ same WHOIS contact data
- ⦿ domain names that are registered for suspected DNS abuse
- ⦿ domain names that are allegedly engaging in trademark or copyright infringement

Where both the registrar and the RNH data is common across multiple complaints (whether submitted in bulk or individually), ICANN Contractual Compliance may bundle the complaints into one ticket for processing by the registrar.

*Background Information:*

ICANN Contractual Compliance provides a mechanism for bulk WHOIS inaccuracy complaint submissions, which allows a user to submit multiple complaints through a single file upload. Each user can submit up to 300 total complaints per week. The complaints are processed in the same method and queue for WHOIS inaccuracy complaints. Users of the bulk system must agree to mandatory terms of use, and their complaint quality is monitored by ICANN to ensure submission of complaints are within scope of the RAA and WHOIS requirements. There are currently approximately ten approved users for the bulk system, and within the past six months, three were active users.

5. What's the latest progress of WHOIS ARS Phase 3? Are there any means identified how to conduct identity validation?

ICANN org has looked into identity verification or validation as part of the phase 3 work of the ARS, but was not able to identify any services that would meet the intent of identity verification.

6. The road map of WHOIS ARS, e.g. when will the ARS cover the entire gTLD population, not only the sample selection?

The ARS is based on a sampling methodology that was scientifically constructed with experts at the University of Chicago to be able to predict accuracy to a 95% confidence interval. This Quantitative Sample testing is a well-recognized and reliable way to review data on large data

sets. There are currently no plans to extend the ARS to the full population of WHOIS records, however, we are exploring the feasibility of performing additional cycles, increasing number of records per cycle, reducing cycle time, and other areas where additional efficiency and effectiveness could be gained. Separately, ICANN org is [seeking](#) information regarding commercial services that focus on global address validation as part of the [Across-Field Address Validation](#) work.

7. How would ICANN Org assess the achievement and impact of WHOIS ARS on reducing the WHOIS inaccuracy?

ICANN Contractual Compliance’s participation in the WHOIS Accuracy Reporting System (ARS) is limited to providing guidance for RAA obligations regarding syntax and accuracy, and processing complaints generated by the WHOIS ARS. The WHOIS ARS is managed by ICANN GDD per the methodology published at <https://whois.icann.org/en/whoisars>. ICANN org publishes 2 ARS reports per year. For each report ICANN org polls a sample of about 200,000 records of which about 12,000 records are checked for syntax and operability accuracy. The 12,000 sample records is reflective of the entire WHOIS population. Potentially inaccurate records are identified through the syntax and operability checks sent to ICANN Compliance for follow-up.

The below table shows syntax and operability accuracy from December 2015 through December 2017 by ICANN region.

	December 2017	June 2017	December 2016	June 2016	December 2015
<b>North America</b>					
Syntax	89.4%	88.3%	85.7%	82.8%	83.9%
Operability	84.9%	81.2%	77.0%	80.2%	73.2%
<b>Latin America</b>					
Syntax	80.7%	78.1%	67.0%	64.7%	56.9%
Operability	70.2%	74.2%	68.0%	71.6%	72.7%
<b>Africa</b>					
Syntax	45.2%	46.1%	31.3%	29.3%	29.8%
Operability	35.2%	51.6%	49.5%	64.6%	57.0%
<b>Asia/Australia/Pacific Islands</b>					
Syntax	73.9%	68.8%	37.0%	45.0%	39.5%
Operability	37.5%	42.1%	51.9%	57.6%	49.4%
<b>Europe</b>					
Syntax	73.0%	74.5%	65.4%	60.6%	58.8%
Operability	41.9%	59.3%	55.6%	63.1%	59.8%
<b>Overall</b>					
Syntax	81.5%	79.3%	66.6%	67.2%	67.2%
Operability	63.4%	65.4%	65.1%	70.2%	64.7%

The table below shows the number of total compliance tickets created for each ARS cycle. The numbers for cycle 5 will be published soon. More information regarding ARS contractual compliance metrics can be found at <https://whois.icann.org/en/whoisars-contractual-compliance-metrics>.

	Phase 2 Cycle 4	Phase 2 Cycle 3	Phase 2 Cycle 2	Phase 2 Cycle 1
Total tickets created	4,681	4,552	4,001	2,688

8. What's the proportion of WHOIS inaccuracy complaints falling in Proxy & Privacy Service?

Although ICANN Contractual Compliance receives and processes WHOIS inaccuracy complaints regarding domain names that utilize Privacy and Proxy Services, it does not identify the proportion of complaints this represents. Absent an accreditation system for Privacy and Proxy service providers, it is difficult to automate the accurate identification of domain names subject to Privacy and Proxy services in WHOIS inaccuracy complaints.

9. Have there been any measures for ICANN Org or Registrars or Proxy & Privacy Service Providers to validate and verify the WHOIS data collected from Registrants by Proxy & Privacy Service Providers?

Yes. ICANN Contractual Compliance receives and processes WHOIS inaccuracy complaints regarding domain names using Privacy and Proxy Services, which on occasion are related to the domain name's underlying customer information. This includes inaccurate underlying customer contact information that was revealed to the complaint reporter and invalid underlying email addresses returning delivery failures when communications are sent to the Privacy or Proxy forwarding email address listed in public WHOIS.

10. Besides the PPSAI under implementation, are there any contractual requirements on Proxy & Privacy Service Providers through ICANN or Registrars?

Section 3.14 of the 2013 RAA requires registrars to comply with the Specification on Privacy and Proxy Registrations (P/P Specification). In addition, Section 3.12.4 of the 2013 RAA requires any resellers the registrar utilizes to comply with the P/P Specification.

