

The complaint volume increased by approximately 11% from 2016, primarily due to complaints related to the WHOIS Accuracy Reporting System (WHOIS ARS)

In addition to handling 50,489 complaints in 2017, the team conducted proactive monitoring reviews, outreach activities, and completed several continuous improvements efforts.

Request details of proactive monitoring review

WHOIS inaccuracy complaints were processed as individual WHOIS inaccuracy complaints, and the WHOIS format data was used to select registrars for targeted outreach. **(Confirm if the compliance team is proactively working with registrars based on inaccuracy reports of WHOIS to ensure they are understanding requirements of compliance?)**

Most common issues in 2017

WHOIS Inaccuracy:

- a. Registrars failing to verify or validate WHOIS information as required by the WHOIS Accuracy Program Specification (WAPS) of the 2013 RAA. **(Review WAPS)**
- b. Registrars not distinguishing between the terms “verification” (which means to confirm or correct) and “validate” (which means to ensure data is consistent with standards) as used in WAPS. **(ask for more details on this)**
- c. Registrars asking their resellers to confirm the accuracy of the WHOIS information of domain names of which ICANN received complaints, rather than providing confirmation from the

registrant. (How prevalent is this problem)

- d. Registrars failing to provide supporting documentation for updated or changed WHOIS information. (what documentation is required?)
- e. Registrars failing to suspend domain names within 15 calendar days of receiving a WHOIS inaccuracy complaint and the Registered Name Holder failing to respond as required by WAPS. (What action does the Compliance team take in these instances?)

WHOIS Format:

Registrars failing to display WHOIS data in the layout specified in the Registration Data Directory Service (WHOIS) Specification of the 2013 RAA, the Additional WHOIS Information Policy (AWIP), and the Advisory: Clarifications to the Registry Agreement, and the 2013 Registrar Accreditation Agreement (RAA) regarding applicable Registration Data Directory Service (WHOIS) Specifications. (How common is this?)

Registrars failing to display WHOIS data in the syntax required by the 2013 RAA or related standards. (How common is this?)

Renewal/Redemption, Expired Domain Deletion Policy (EDDP), Expired Registration Recovery Policy (ERRP):

Registrars not sending renewal notices to the registrant listed in the public WHOIS or at the intervals required by the ERRP. (Do they send notices at all, if so who do they send them to? The account holder?)

Data Escrow

Registrars on the 2013 RAA failing to escrow both the public WHOIS data and underlying customer information for domains utilizing privacy or proxy services. (need data on this)

Registry Processing

Third-party zone file access complaints and incomplete data escrow deposits continued to be the largest volume areas of registry processing conducted by Contractual Compliance in 2017. Contractual Compliance also invoked its first use of the Public Interest Commitment Dispute Resolution Policy Standing Panel in 2017. The monthly, quarterly, and annual metrics are found [here](#), and the Contractual Compliance notices [here](#).

Zone File Access by Third Parties via the Centralized Zone Data Service

Registry operators not responding to requests for zone file access. (which registries? How frequent?)

Registry operators denying or revoking access for reasons not permitted under the Registry Agreement. (what reasons? What action is taken?)

As part of ongoing proactive monitoring and at the ICANN org's request, Iron Mountain performed in-depth reviews of registrars' escrow file contents. ICANN org focused on registrars that received a third notice or a notice of breach (how many?)

Resolution?)

List of Activities to Support Contractual Compliance Initiatives and Improvements

Request more details on the activities highlighted in yellow

Updates to complaint forms and Contractual Compliance pages on icann.org.

Updates to consolidated ticketing system to improve complaint processing when changing complaint type.

Updates to reduce invalid automatic closures.

Updates to resolved codes to improve communications, metrics, and reporting.

Update to increase visibility of responses to closed complaints.

Communication template updates for reporters and contracted parties in multiple complaint types.

Removal of automated closure for WHOIS inaccuracy complaints filed within 45 days of a complaint regarding the same domain name to allow inaccuracies to be addressed with the same or different registrar.

System updates to capture and report more granular data.

Automated email uptime monitoring.

System update to account for registry contact data migrated from the Global Domains Division portal to the Naming Services portal.

Creation of an internal on-demand report to identify all pending complaints during enforcement.

System update to reduce automated closures for improperly formatted domain names entered in complaint web forms.

Improvements to complaint web forms on icann.org for multiple complaint types.

Updates to the Contractual Compliance Program pages at icann.org for registrars and registry operators regarding contractual obligations