ccNSO News Session

CCTLDS & SECURITY: REGULATORY DEMANDS

Crystal Peterson, Director, Registry | Franchise TLD Business Affairs
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Security Regulations & the usTLD

GoDaddy Registry has a contract and scope of work with the Department of Commerce which guides the responsibilities and relationship between the Registry, Registrar and Dept of Commerce that include obligations to detect, investigate and report activities that may harm usTLD registrants or the Internet community online.

Policies

GoDaddy Registry is the Administrator for ccTLDs, such as the .US Top-Level Domain.

GoDaddy Registry is also the Registry service provider for over 200+ gTLDs and ccTLDs.

Key usTLD Documents & Policies:
• Dept of Commerce Scope of Work
• Acceptable Use Policy
• Nexus Policy

Practices & Partnerships

Using the usTLD Policies, GoDaddy Registry has established practices and procedures for ensuring the safety and security of its registrant and registrar base online.

Key usTLD Practices:
• Nexus Spot Checks & Annual WHOIS Accuracy Review
• Registry Threat Mitigation Service (RTMS)
• Framework to Address DNS Abuse
• Trusted Notifier – Internet Watch Foundation
• Trusted Notifier – Food & Drug Administration
usTLD Scope of Work

Core Policy Requirements

- The usTLD Administrator operates the .US namespace under a contract (Scope of Work) with the Dept of Commerce/National Telecommunications and Information Administration (NTIA).

Core Policies: (not exhaustive)

- Nexus Policy
- usDRP / usRS (Dispute Resolution & Rapid Suspension Policies)
- Multistakeholder Consultation Process
- Domain Policies including:
  - Data Rights & Use
  - Domain Name Review
  - Registration Abuse
Acceptable Use Policy

Acceptable Use / Security Regulations

• The usTLD Acceptable Use Policy (AUP) addresses the requirements of the Scope of Work for both policies and domain name registration and management.

• Highlights of the usTLD AUP; Registrants agree they:
  - Will not distribute malware or engage in other forms of technical abuse
  - Will not promote or engage in child exploitation
  - Will not sell or distribute pharmaceuticals
  - Will not engage in spam or bulk mail
  - Will abide by US Law and usTLD Policies
Nexus Policy

CATEGORY 1

Individual

• US Citizen
• Permanent Resident

CATEGORY 2

Business

• Incorporated in the United States, or
• Incorporated in a US Territory
• Non-commercial organization of United States or Territory

CATEGORY 3

Foreign Business

• Bona-fide interests in the United States (engage in commercial or non-commercial activities)
• Maintain an office/property in the United States
usTLD Practices & Partnerships
Nexus & Data Domain Reviews

Spot Checks
Cadence: Monthly
Review of .US new registrations to determine accuracy and/or Nexus compliance

Annual Review
Cadence: Annual
Review of the full usTLD zone based on two (2) semi-annual randomized data reports to determine data accuracy and/or Nexus compliance

Third Party Complaint Tool
Cadence: As received
Review of domain names received via our Complaint Tool regarding data accuracy or Nexus complaints.
As an example, of the hundreds of alerts per month received, the typical frequency for action includes:

- ~10% are actioned by the Registrar clientHold.
- ~5% are actioned by the Registry setting serverHold.
- Remainder are ‘cleared’ alerts.

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<th>Policy Requirement</th>
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| GoDaddy Registry has developed a proprietary product called Registry Threat Mitigation Service (RTMS). The RTMS service monitors for phishing, malware and botnet activity within TLDs hosted by GoDaddy Registry. This includes TLDs for which we do not provide Registry services. This service helps to remain in compliance with our usTLD Scope of Work and Abuse Policies. | Public and private data feeds and notification are monitored for reports of abuse. If a domain name is reported as involved in abuse an alert is created. The Registry Support team engages in the mitigation process, including Registrar communications and any modifications to the domain such as suspension. | As an example, of the hundreds of alerts per month received, the typical frequency for action includes:

- ~10% are actioned by the Registrar clientHold.
- ~5% are actioned by the Registry setting serverHold.
- Remainder are ‘cleared’ alerts. |
Voluntary Framework to Address DNS Abuse

As the Administrator of the usTLD, we are signatory to the Framework to Address Abuse developed by Registries and Registrars.

The definition of DNS Abuse contained in the Framework is consistent with those listed in the Registry Agreement: Pharming; Phishing; Malware; Botnets; and Spam only where it is used as an attack vector for the other forms of abuse.

In addition to the technical abuses, The Framework lists four key reasons when a Registry Operator should address abusive content:

- child sexual abuse materials (CSAM);
- illegal distribution of opioids;
- human trafficking; and
- specific and credible incitements to violence.

Underlying these content abuses is the physical and often irreversible threat to human life.
## Trusted Notifier – Internet Watch Foundation

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<td>None.</td>
<td>When an alert is received to the designated email address from the IWF, it is sent to National Center for Missing &amp; Exploited Children (NCMEC) for reference. To limit exposure, only one team member reviews the alert and sends an email to the relevant Registrar giving a 72 hour period in which to take action. The domain name is placed on serverHold if no action is taken.</td>
<td>In most months there are between one and three alerts. In most cases the Registrar will either: 1. Work to get the content removed; or 2. Place the domain name on clientHold. Less than 10% do not respond. These are placed on serverHold.</td>
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GoDaddy Registry entered into a Trusted Notifier arrangement with the Internet Watch Foundation (IWF) for the .us, TLD (along with the .co, and .biz TLDs).

GoDaddy Registry determined that this arrangement would be beneficial and have had excellent results to date while also meeting its security regulatory requirements in regards to eradicating any child exploitation in the namespace.
# Trusted Notifier – US Food & Drug Administration

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<td>None.</td>
<td>The FDA issues warning letters to operators of websites that offer for sale misbranded and unapproved drugs to U.S. consumers. When an alert is received from FDA a letter / email is sent to the relevant Registrar giving a 72 hour period in which to take action. The domain name is placed on serverHold if no action is taken. GoDaddy Registry also created a ‘Watch List’ for key terms. Domain names containing these terms are reviewed. Any of concern are referred to the FDA.</td>
<td>The trial program was three months in duration. The pilot enhanced the effectiveness of the FDA’s existing program by engaging the Registries to take action. The voluntary collaboration among NTIA, FDA and the domain name registries helped to curb access to opioids illegally being sold online, while also respecting technical safeguards for the DNS.</td>
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We entered into a Trusted Notifier arrangement with the US Food & Drug Administration (FDA) for the .us, and .biz TLDs, in relation to online pharmacies. Verisign (.com, .net) and Public Interest Registry (.org) were also part of the trial. It is likely that the trial will become a permanent program.
Thank You