

# Registrar Obligations to Collect, Securely Maintain and Validate Data

<b>ISSUE:</b> A.1.b	Registrar obligations to collect, securely maintain and validate data	
<b>Priority:</b>	RAA Final Report: N/A	
<b>Issue /Request</b>	<p><b>LEA:</b> Registrars and all associated third-party beneficiaries to Registrars are required to collect and securely maintain the following data:</p> <p><b>(i)</b> Source IP address;</p> <p><b>(ii)</b> HTTP Request Headers</p> <p>(a) From</p> <p>(b) Accept</p> <p>(c) AcceptEncoding</p> <p>(d) AcceptLanguage</p> <p>(e) UserAgent</p> <p>(f) Referrer</p> <p>(g) Authorization</p> <p>(h) ChargeTo</p> <p>(i) IfModifiedSince</p> <p><b>(iii)</b> Collect and store the following data from registrants:</p> <p>(a) First Name:</p> <p>(b) Last Name:</p> <p>(c) Email Address:</p> <p>(d) Alternate Email address</p> <p>(e) Company Name:</p> <p>(f) Position:</p> <p>(g) Address 1:</p> <p>(h) Address 2:</p> <p>(i) City:</p> <p>(j) Country:</p> <p>(k) State:</p> <p>(l) Enter State:</p> <p>(m) Zip:</p> <p>(n) Phone Number:</p> <p>(o) Additional Phone:</p> <p>(p) Fax:</p> <p>(q) Alternative Contact First Name:</p> <p>(r) Alternative Contact Last Name:</p> <p>(s) Alternative Contact Email:</p> <p>(t) Alternative Contact Phone:</p> <p>(iv) Collect data on all additional addon services purchased during the registration process.</p> <p>(v) All financial transactions, including, but not limited to credit card, payment information.</p> <p>Each registrar is required to validate the following data upon receipt from a registrant:</p> <p>(1) Technical Data</p> <p>(a) IP addresses used to register domain names.</p> <p>(b) Email Address</p> <p>(i) Verify that registration email address(es) are valid.</p> <p>(2) Billing Data</p> <p>(a) Validate billing data based on the payment card industry (PCI standards), at a minimum, the latest version of the PCI Data Security Standard (DSS).</p> <p>(3) Contact Data</p> <p>(a) Validate data is being provided by a human by using some antiautomatic form submission technology (such as dynamic imaging) to ensure registrations are done by humans.</p> <p>(b) Validate current address WHOIS data and correlate with inhouse fraudulent data for domain contact information and registrant's IP address.</p> <p>(4) Phone Numbers</p> <p>(i) Confirm that point of contact phone numbers are valid using an automated system.</p> <p>(ii) Cross validate the phone number area code with the provided address and credit card billing address</p>	<b>Source:</b> LEA original Request to RAA-DT
<b>Notes</b>	<p>Additional information regarding requests:</p> <ul style="list-style-type: none"> <li>• Not included in LEA Code of Conduct</li> </ul>	<b>Source:</b>
<b>Discussion Points</b>	<b>Description</b>	<b>Date Discussed</b>

	<p>ICANN to seek clarification regarding the request, e.g., definition of "all associated third party beneficiaries" and other questions. Will defer discussion until ICANN receives further input from LEA.</p> <p>Discussion of LE clarification (request pertains to reseller related info); discussion of reseller actions; discussion of PCI standard applicability; discussion regarding availability and relevance of listed data.</p> <p>Discussion of ICANN's request for Registrar Verification of WHOIS Information.</p> <p>Registrars to identify the feasibility of collection/maintenance of points of information identified in LE Request; discussed how to address reseller issue.</p> <p>Discussion of maintenance of IP addresses and appropriate times for maintaining them.</p> <p>Registrars generally amenable to retaining available data but raised concern about impracticality of maintaining certain log data indefinitely.</p> <p>Question raised about scope of LE recommendation to collect data related to "add-on services" as some add-on services may be entirely unrelated to domain registrations.</p> <p><a href="#">Discussion of LE clarification with regard to data maintenance</a></p> <p><a href="#">Discussion of LE clarification with regard to validation of data</a></p>	<p>18 Nov 2011</p> <p>8 Dec 2011</p> <p>20 Dec 2011</p> <p>17 Jan 2012</p> <p>23 Jan 2012</p> <p>16 May 2012</p> <p>16 May 2012</p>
<b>Proposed Text</b>	Open	
<b>Status /Outcome</b>	Under Discussion	
<b>Explanation</b>	Open	
<b>COMMENTS:</b>	Comments may be submitted using the "Add Comment" feature below.	

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