Agenda

- Brief Update Since ICANN 55
  - RAA Lessons Learned Summary
  - Transfer Policy Compliance Update
  - Compliance Certification Requirements Reminder
  - Registrar Collected Compliance Issues October 2016

- Questions & Answers

- Additional Slides Provided in Appendix for Reference:
  - Continuous Improvement Update
  - WHOIS ARS Compliance Effort Update
  - Registrar Metrics Update
  - Audit Activities Update
Registrar Accreditation Agreement
Lessons Learned
Summary
RAL Lessons Learned Summary

1. **Registrar Data Escrow Obligations**
   Terms, Format and Schedule

2. **Domain Renewal Reminders**
   Sending timely reminders to registered name holder

3. **Inter-Registrar Transfer Requirements**
   Transfer of registrations between Registrars

4. **Uniform Dispute Resolution Policy Requirements**
   Lock and Verification requirements UDRP Rule 4(b)
1. Data Escrow Obligations

Terms, Format and Schedule

- Registrar Data Escrow Specification

- Data escrow format requirements are applicable to all registrars
  - Match domain’s public WHOIS - format and content
  - Include privacy/proxy service customer information as required by 2013 RAA

- Deposit schedule will vary depending on registrar's quarterly gTLD transaction volume as determined by ICANN (daily or weekly)

- Registrars may elect to escrow data with ICANN's designated escrow agent (Iron Mountain) or an ICANN-approved Third Party Provider (TPP)

- Seven data escrow providers now approved:
Common errors with data escrow deposits

- Data in deposit does not match WHOIS lookup or port 43 WHOIS blocked
- 2013 RAA: deposit must contain P/P and underlying customer data
- Incomplete header row (missing ICANN required fields)
- Deposit file is empty or only contains a header row
- Deposit file name is incorrect
- Handle file (if required) is missing from the deposit
- Not comma de-limited
- Full file and Handle file contains no header row
2. Domain Renewal Requirements

Sending timely reminders to registered name holder - ERRP

- Renewal reminders must be sent at required times to registered name holder (RNH)
  - Approximately 1 month (26-35 days) and 1 week (4-10 days) prior to expiration and within 5 days after expiration
  - Required even if registration is on auto-renew
  - Must be communicated at least in language of registration agreement, and in a way not requiring affirmative action to receive notice
  - Can be sent to other email addresses in addition to RNH email address
  - Can be sent at other intervals in addition to those prescribed by ERRP

- For at least last eight consecutive days after expiration that registration is renewable, DNS resolution path must be interrupted
  - If traffic is re-directed to a parking page, it must say name expired and include renewal instructions
  - If RAE renews name, DNS resolution path must be restored as soon as commercially reasonable
2. Domain Renewal Requirements (continued)

Common errors with renewals

- Failure to send renewal reminders at required intervals
- Failure to timely disrupt DNS
- Reseller failing to send renewal reminders on behalf of registrars
- Sending renewal reminders to incorrect contact
- Registrar not specifying date/time zone notice was sent (time zone differential) when providing records to ICANN
3. Inter-Registrar Transfer Requirements

Transfer of registrations between registrars

- Registrars must use standardized Form Of Authorization (Sections 2 and 3 of IRTP)
  - Gaining registrar FOA: https://www.icann.org/resources/pages/foa-auth-2004-07-12-en
    - Affirmative response required from Transfer Contact before sending command to registry
  - Losing registrar FOA: https://www.icann.org/resources/pages/foa-conf-2004-07-12-en
    - FOA must be in English; additional languages are permitted

- AuthInfo code must be used to identify RNH only, be unique to each domain, and records may be requested to demonstrate compliance

- Additional information on changes to Transfer Policy in Policy Update Section
3. Inter-Registrar Transfer Requirements (continued)

Common errors with transfers

- Failure to provide AuthInfo Code within 5 days of request or provide facilities for registrant to obtain AuthInfo Code
- Failure to remove “ClientTransferProhibited” within 5 days of request or provide facilities for registrar to remove the lock
- Sending Form of Authorization (FOA) to non-Transfer Contact
- FOA not complying with standard FOA
4. UDRP Rule Requirements

Lock and Verification requirements UDRP Rule 4(b)

- Within two business days of receiving Provider's verification request, registrar shall provide information requested in verification request and confirm Lock of domain has been applied.

- Lock is set of measures registrar applies to domain, which prevents any modification to registrant and registrar information by Respondent, but does not affect resolution or renewal of domain.

- Expedited processing of UDRP Lock complaints:
  - Complaints are submitted by UDRP providers
  - One calendar day notice deadline
Common errors with UDRP Rules

- Failure to timely respond to verification requests from UDRP Providers
- Failure to lock domain subject to UDRP
- Allowing domain to expire or be deleted during UDRP dispute without providing Complainant option to renew or restore under same commercial terms as Registrant
- Failure to timely implement UDRP Decision
- Failure to communicate UDRP Decision and implementation date to all parties (including ICANN)
Transfer Policy Compliance Update

Compliance Certification Reminder
Transfer Policy Compliance Update

Effective 1 December 2016

https://www.icann.org/resources/pages/transfer-policy-2015-09-24-en

- Introduces a Change of Registrant (COR) procedure for Material Changes that requires registrars to:
  - Obtain express consent from both Prior Registrant and New Registrant through secure mechanism
  - Process COR within one day of receiving consent
  - Notify both Registrants of COR per policy
  - Impose 60-day inter-registrar transfer lock following COR
    - Registrants may opt out of lock prior to any COR request
  - Material Change is a non-typographical correction
Transfer Policy (continued)

Effective 1 December 2016

- Changes to inter-registrar transfer process:
  - Registrars must deny a transfer request:
    - Notification of pending UDRP, URS or TDRP proceedings
    - Receipt of court order by court of competent jurisdiction
    - Due to 60-day lock following a Change of Registrant (COR)
  - FOA used by gaining registrars shall expire:
    - After 60 days from FOA being issued (unless registrar provides automatic renewal and registrant expressly agrees)
    - Domain expires before transfer is completed
    - COR is completed
    - Inter-registrar transfer is completed
Transfer Policy (continued)

Compliance Impact

New scenarios within contractual scope:

- Change of Registrant (COR) request within same registrar
- COR request and inter-registrar transfer request
- COR within one registrar and subsequent transfer to a different registrar
- Transfer from one registrar to another and subsequent COR

- ICANN may request information and records relating to five new mandatory reasons for denying inter-registrar transfer:
  - Registrar informed of pending UDRP
  - Court order of court of competent jurisdiction
  - Pending Transfer Dispute Resolution Policy (TDRP) proceeding
  - Registrar informed of pending URS proceeding or suspension
  - 60-day lock following COR (and registrant did not opt out)
Compliance Impact (continued)

- Additional information and records ICANN may request to determine compliance:
  - Records relating to communication and acceptance of COR (including dates/times)
  - Details regarding secure mechanism for transmission of COR
  - Records relating to New Registrant, Prior Registrant and Designated Agent
  - Consent by Registrant to use Designated Agent
  - Consent by Registrant to opt out of 60-day lock after COR
  - WHOIS information before and after COR
  - Reauthorization of expired FOA
  - Details regarding telephone FOA confirmation (date, time, telephone numbers and specific person)
  - New Losing Registrar’s FOA (see https://www.icann.org/resources/pages/foa-registrar-transfer-confirmation-2016-06-01-en)
Compliance Certificate Requirements - Reminder

When to submit and what fields to complete

- Annually complete and return to ICANN within twenty days following end of each calendar year
- Certificate certifying compliance with terms and conditions of 2013 RAA
- Must be executed by president, chief executive officer, chief financial officer or chief operating officer (or their equivalents)
- Calendar year should be entered at top of form for year which compliance is being certified (for form submitted by 20 January 2017, the year certified will be 2016)
- Format is specified in 2013 RAA and at https://www.icann.org/resources/pages/registrar-compliance-certificate-2015-12-09-en
Registrar Collected Compliance Issues
October 2016
Registrar Collected Compliance Issues Oct 2016

- Compliance Tickets and Process Issues
- Registrant Data Escrow Issues
- Transparency on Audit Process
Results of ICANN review

- **System limitations:**
  - Compliance Contact will be in ICANN’s Salesforce.com platform
  - Complaint processing system missing/misformatted attachments
  - Closure notice missing resolve code wording
  - ICANN is exploring possible short term fixes

- **Opportunities for template and communication improvements:**
  - Request what and why information is requested
  - Communication updates to request registrars to specify attachment file names and explanation of attachment contents
  - Reduce or modify follow ups (include explanation for follow up)
  - Updates to communications regarding resellers
  - Provide ICANN with any pertinent information, including if complaint contains false or fake information

- Escalation of issues may be sent to compliance@icann.org
ICANN Audit Information Confidentiality & Security

The following measures are implemented to maintain security of audit site:

- Unique user IDs and complex passwords
- User access provisioning and de-provisioning
- Antivirus measures
- Firewalls, intrusion detection sensors and event monitoring
- Demilitarized zone for Internet facing applications
- Physical and environmental controls
- Encryption of communications across public networks and Internet using MoveIT tool

- Documentation is reviewed by audit team

- Audit site security rating is “A” based on [https://www.ssllabs.com/](https://www.ssllabs.com/) test

- KPMG's contractual agreement with ICANN includes confidentiality obligations requiring KPMG to protect data
Registrar Stakeholder Group – Transparency On Audit Process

- Audit Selection Criteria Remains:
  - Not previously or recently audited
  - Highest number of 3rd notices per number of domain names under management
    - Calculated over past 12 months
  - Received Notice of Breach in last 12 months
  - Highest number of failed data escrow deposits
  - Low responsiveness to ICANN’s requests
    - Consistently waiting to respond until final deadline or responding partially
  - ICANN Community Concerns – for example media/blogs, contracted parties

- Audit Communications
  - All contracted parties receive pre-audit notification to alert audit is occurring
  - Based on feedback at Los Angeles GDD Summit, notifications are also sent to those not included in audit
Questions & Answers

Send compliance questions
To: compliance@icann.org
Subject line: ICANN 57 Registrar Outreach Session

The ICANN 57 presentations are available at:

- The ICANN Contractual Compliance outreach page at this link
  https://www.icann.org/resources/compliance/outreach

- The ICANN 57 Schedule page at this link https://icann572016.sched.org/
Appendix

- Continuous Improvements Update
- Whois ARS Compliance Effort Update
- Registrar Metrics
- Audit Activities Update
- Visit https://www.icann.org/resources/pages/registrar-2012-02-25-en for information about:
  - Process Guidelines
  - RAA Guidelines
Continuous Improvement Update
Continuous Improvement Updates

- 3rd Notice Outreach Pilot
  - To improve registrar compliance and resolution rate
  - Eight registrars selected (six participated)
  - Positive feedback from participating registrars
  - ICANN will monitor 3rd notice volume until end of December 2016

- Remediation Validation Pilot
  - To test and validate past remediation efforts
  - 20 registrars with prior audit findings June 2015 - June 2016
  - No new instances of noncompliance
Registrar Outreach in Korea and China
https://www.icann.org/resources/compliance/outreach

- WHOIS Accuracy Specification Program
- WHOIS Format
- Uniform Domain Name Dispute Resolution Policy
- Contractual Compliance approach and process

WHOIS Verification Projects in Korea and China

- To test registrars’ compliance with the 2013 RAA requirements to verify and validate WHOIS information
- In progress
WHOIS ARS Compliance Effort Update
WHOIS ARS Compliance Update Since ICANN 55

- WARS main page: https://whois.icann.org/en/whoisars

- WHOIS inaccuracy complaints - tested operational accuracy of addresses, telephone numbers, and email addresses of registrant, admin and tech contacts in WHOIS data
  - Phase 2, Cycle 1
    - 2,689 WHOIS inaccuracy tickets
    - 1,378 forwarded to registrars
    - 2 tickets still in remediation
  - Phase 2, Cycle 2
    - 4,005 WHOIS inaccuracy tickets
    - 964 forwarded to registrars
    - 2,202 remain to be processed

- WHOIS format complaints - Syntax failure
  - Combined results from Phase 2, Cycles 1 and 2
  - 1,127 domains across 15 registrars
  - Fourteen of fifteen registrars have completed remediation
Sample of the top closure reasons and volume for Phase 2 Cycle 1:

- Domain suspended or canceled (989)
- WHOIS data at ticket creation different from sampled WHOIS data (569)
- Domain not registered when ticket processed (413)
- WHOIS data changed or updated (393)
- Registrar verified sampled WHOIS data is correct (158)

Sample of top closure reasons and volume for Phase 2 Cycle 2 (some complaints closed with multiple reasons):

- WHOIS data at ticket creation different from sampled WHOIS data (859)
- Domain suspended or canceled (289)
- Domain not registered when ticket processed (217)
- WHOIS format issue identified for 2013 Grandfathered Domain (144)
- WHOIS data changed or updated (90)
WHOIS ARS Compliance Scope & Approach

- Compliance coordinates with WHOIS ARS team to ensure testing aligns with RAA and provides processing feedback to improve WHOIS ARS.

- Complaints created from WHOIS ARS are processed as WHOIS inaccuracy or WHOIS format complaints, following published Contractual Compliance Approach and Process [https://www.icann.org/resources/pages/approach-processes-2012-02-25-en](https://www.icann.org/resources/pages/approach-processes-2012-02-25-en)

- ICANN issued 4 notices of breach for Phase 2 Cycles 1 and 2 tickets.

- WHOIS ARS Phase 2 Cycle 2 completion expected around 30 November 2016.

- WHOIS ARS Phase 2 Cycle 3 complaints processing expected to begin November 2016.

- ICANN will continue to give priority to complaints submitted by community.
Registrar Metrics
## Registrar Complaint Types in Detail

<table>
<thead>
<tr>
<th>Registrar Complaints</th>
<th>Quantity</th>
<th>Closed before 1st inquiry / notice</th>
<th>ICANN Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>WHOIS INACCURACY</td>
<td></td>
<td>ICANN 55</td>
<td>ICANN 57</td>
</tr>
<tr>
<td>WHOIS INACCURACY</td>
<td>10,399</td>
<td>19,686</td>
<td>3,974</td>
</tr>
<tr>
<td>QUALITY REVIEW</td>
<td>1</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>Bulk Submission</td>
<td>3,223</td>
<td>2,744</td>
<td>455</td>
</tr>
<tr>
<td>individual submission</td>
<td>7,175</td>
<td>13,932</td>
<td>3,519</td>
</tr>
<tr>
<td>WHOIS ARS</td>
<td>0</td>
<td>3,005</td>
<td>0</td>
</tr>
<tr>
<td>TRANSFER</td>
<td>2,345</td>
<td>3,825</td>
<td>1,567</td>
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<tr>
<td>WHOIS FORMAT</td>
<td>352</td>
<td>735</td>
<td>214</td>
</tr>
<tr>
<td>DOMAIN RENEWAL</td>
<td>260</td>
<td>603</td>
<td>149</td>
</tr>
<tr>
<td>DOMAIN DELETION</td>
<td>172</td>
<td>370</td>
<td>162</td>
</tr>
<tr>
<td>ABUSE</td>
<td>158</td>
<td>377</td>
<td>121</td>
</tr>
<tr>
<td>WHOIS UNAVAILABLE</td>
<td>130</td>
<td>399</td>
<td>66</td>
</tr>
<tr>
<td>DATA ESCROW</td>
<td>97</td>
<td>310</td>
<td>0</td>
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<tr>
<td>WHOIS SLA</td>
<td>79</td>
<td>126</td>
<td>70</td>
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<tr>
<td>CUSTOMER SERVICE</td>
<td>59</td>
<td>173</td>
<td>41</td>
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<tr>
<td>REGISTRAR INFO SPEC</td>
<td>57</td>
<td>91</td>
<td>25</td>
</tr>
<tr>
<td>UDRP</td>
<td>55</td>
<td>153</td>
<td>22</td>
</tr>
<tr>
<td>REGISTRAR CONTACT</td>
<td>53</td>
<td>78</td>
<td>27</td>
</tr>
<tr>
<td>DNSSEC, IDN, IPV6</td>
<td>11</td>
<td>17</td>
<td>8</td>
</tr>
<tr>
<td>REGISTRAR OTHER</td>
<td>10</td>
<td>36</td>
<td>5</td>
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<tr>
<td>FAILURE TO NOTIFY</td>
<td>8</td>
<td>28</td>
<td>7</td>
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<tr>
<td>PRIVACY/PROXY</td>
<td>6</td>
<td>44</td>
<td>4</td>
</tr>
<tr>
<td>RESELLER AGREEMENT</td>
<td>1</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>FEES</td>
<td>0</td>
<td>1</td>
<td>0</td>
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<tr>
<td>CEO CERTIFICATION</td>
<td>0</td>
<td>230</td>
<td>0</td>
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<tr>
<td>Total</td>
<td>14,252</td>
<td>27,283</td>
<td>6,462</td>
</tr>
</tbody>
</table>
Registrar Complaint Volume & Turnaround Time

Total Complaints
- ICANN 55: 14,252
- ICANN 57: 27,283

Closed before 1st inquiry / notice
- ICANN 55: 6,462
- ICANN 57: 14,473

ICANN Issues
- ICANN 55: 7
- ICANN 57: 12

Average TAT Received to Closed (days)
- ICANN 55: 10
- ICANN 57: 7

Registrar Average Turn Around Time (TAT)

<table>
<thead>
<tr>
<th>Business Days</th>
<th>ICANN 55</th>
<th>ICANN 57</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Notice</td>
<td>13.9</td>
<td>12.4</td>
</tr>
<tr>
<td>2nd Notice</td>
<td>7.4</td>
<td>6.3</td>
</tr>
<tr>
<td>3rd Notice</td>
<td>7.5</td>
<td>8.2</td>
</tr>
</tbody>
</table>

Staff Average Turn Around Time (TAT)

<table>
<thead>
<tr>
<th>Business Days</th>
<th>ICANN 55</th>
<th>ICANN 57</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open WIP-1st Notice</td>
<td>1.4</td>
<td>1.3</td>
</tr>
<tr>
<td>2nd WIP-2nd Notice</td>
<td>3.1</td>
<td>2.9</td>
</tr>
<tr>
<td>3rd WIP-3rd Notice</td>
<td>2.4</td>
<td>2.4</td>
</tr>
</tbody>
</table>
Registrar Complaint Types & Top Closure Reasons (Feb 2016 – Sep 2016)

Disclaimer: Due to rounding, percentages may not always appear to add up to 100%.
Registrar Complaint Types & Top Closure Reasons (Feb 2016 – Sep 2016)

Disclaimer: Due to rounding, percentages may not always appear to add up to 100%.
Registrar Complaint Types & Top Closure Reasons (Feb 2016 – Sep 2016)

Whois Unavailable

- Service restored: 60.3%
- Duplicate complaint (open): 10.1%
- Incomplete or broad - Rr: 11.9%
- Requested evidence not provided: 9.9%
- Rr compliant at submission: 7.8%

Abuse

- Requested evidence not provided: 41.3%
- domain suspended or canceled (Abuse): 17.1%
- Invalid TLD: 13.6%
- Incomplete or broad - Rr: 5.0%
- Responded to abuse report (non-LEA): 23.0%

Disclaimer: Due to rounding, percentages may not always appear to add up to 100%.
Whois Inaccuracy Complaints – Individual vs. Bulk (Feb 2016 – Sep 2016)

![Graph showing the number of individual and bulk Whois inaccuracy complaints from February 2016 to September 2016. The graph includes data on complaints closed before the first notice was sent.](image-url)
Registrar Audit
## Registrar Audit Timeline – May 2016

### Audit Program Milestones

<table>
<thead>
<tr>
<th>Pre-Audit Notification</th>
<th>Request for Information (RFI) Phase</th>
<th>Audit Phase</th>
<th>Initial Report</th>
<th>Remediation Phase</th>
<th>Final Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Notice</td>
<td>2nd Notice</td>
<td>3rd Notice</td>
<td>Date Issued</td>
<td>Start - End</td>
<td>Date Issued</td>
</tr>
</tbody>
</table>
### Registrar Audit – May 2016

<table>
<thead>
<tr>
<th>RFI Phase</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Registrars selected for the audit</td>
<td>123</td>
</tr>
<tr>
<td>Registrars excluded from audit (part of family)</td>
<td>108</td>
</tr>
<tr>
<td><strong>Total Remaining Registrars</strong></td>
<td><strong>15</strong></td>
</tr>
</tbody>
</table>

#### Initial Report Phase

|Registrars passing all audit tests | 0     |
|Registrars requiring follow-up and remediation | 15    |
|**Registrar Total** | **15** |

#### Remediation Phase and Final Report Phase

|Registrars completing resolution of initial findings | 5     |
|Registrars implementing a remediation plan | 9     |
|Registrars with notice of breach for insufficient response | 1     |
|**Registrar Total** | **15** |
## Registrar Audit Deficiencies Noted – May 2016

<table>
<thead>
<tr>
<th>Description or area where deficiency was noted</th>
<th>Registrars with Deficiencies</th>
<th>Potential Risk/Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Whois- Port43/Web, Corresponding Data Elements</td>
<td>67%</td>
<td>Format / content of Public Whois output is not in compliance with RAA requirements</td>
</tr>
<tr>
<td>Retention of Registration Data</td>
<td>20%</td>
<td>Registration records are not retained as required by RAA.</td>
</tr>
<tr>
<td>EDDP-Domain name renewal, provision of applicable information to registrants</td>
<td>73%</td>
<td>Registrants are not aware of renewal/expiration terms &amp; conditions</td>
</tr>
<tr>
<td>Registration Agreement (mandatory provisions are missing)</td>
<td>93%</td>
<td>Registrants are not aware of all terms and conditions of the agreement between Registrant and Registrar</td>
</tr>
<tr>
<td>Complaints &amp; Dispute Resolution process</td>
<td>7%</td>
<td>Registrants are not aware of customer service handling processes established by Registrar</td>
</tr>
<tr>
<td>Reseller agreement (mandatory provisions are missing)</td>
<td>7%</td>
<td>Resellers are not fully aware of all of their obligations when representing a Registrar</td>
</tr>
<tr>
<td>Registrar Training</td>
<td>47%</td>
<td>Registrar is not fully aware of Registrar’s rights and responsibilities under RAA</td>
</tr>
<tr>
<td>Obligations Related to Proxy and Privacy Services</td>
<td>33%</td>
<td>Registrar is not fully compliant with requirements of the Specification on Privacy and Proxy Registrations</td>
</tr>
<tr>
<td>Link to Registrant Educational Information is missing</td>
<td>53%</td>
<td>Registrants are not fully aware of their rights and responsibilities</td>
</tr>
<tr>
<td>Registrar contact details on Registrar website is missing or incomplete</td>
<td>27%</td>
<td>Inability to contact a Registrar</td>
</tr>
<tr>
<td>Registrar Abuse Contact and Duty to Investigate Abuse Reports</td>
<td>60%</td>
<td>Registrar is not compliant with its responsibilities to receive reports of abuse and respond to such reports</td>
</tr>
<tr>
<td>Description or area where deficiency was noted</td>
<td>Registrars with Deficiencies</td>
<td>Potential Risk/Impact</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Issues with DNSSEC</td>
<td>13%</td>
<td>Registrar does not offer / support additional level of security &amp; protection to registrants requesting this service</td>
</tr>
<tr>
<td>Notice of Bankruptcy, Convictions and Security Breaches</td>
<td>13%</td>
<td>Registrar is not aware of or fails to comply with its obligation to notify ICANN about these events</td>
</tr>
<tr>
<td>Consensus Policies - Inter-Registrar Transfer Policy (IRTP) and Transfer Emergency Action Contact (TEAC)</td>
<td>60%</td>
<td>Registrar does not fully follow IRTP requirements when domain transfers are done; TEAC contact information is not available</td>
</tr>
<tr>
<td>Consensus Policies - Expired Registration Recovery Policy (ERRP)</td>
<td>13%</td>
<td>Registrar is not fully compliant with its domain expiration obligations under the RAA and, as a result, Registrants are not aware of renewal/expiration terms and conditions</td>
</tr>
<tr>
<td>Consensus Policies - Restored Names Accuracy Policy</td>
<td>7%</td>
<td>Registrar is not fully compliant with its obligations when deleted domains are restored</td>
</tr>
<tr>
<td>Consensus Policies - Whois Data Reminder Policy (WDRP)</td>
<td>20%</td>
<td>Registrar is not fully aware of potential changes to Registrant contact information</td>
</tr>
<tr>
<td>Incorrect / Outdated Contact Information in RADAR</td>
<td>27%</td>
<td>ICANN is unable to contact Registrar</td>
</tr>
</tbody>
</table>
Registrar Audit Deficiency Profile – May 2016

Registrar Deficiency Profile

- 20% (9 or more)
- 13% (1 – 2)
- 20% (3 – 4)
- 7% (5 – 6)
- 40% (7-8)

- % of Registrars with 1 to 2 Deficiencies
- % of Registrars with 3 to 4 Deficiencies
- % of Registrars with 5 to 6 Deficiencies
- % of Registrars with 7 to 8 Deficiencies
Registrar Audit Update
(October 2016 in-progress)
Goal: Proactively identify potential instances of non-compliance with RAA and manage remediation process to ensure compliance with contractual obligations.

Approach: Implement continuous audit program to all contracted parties with a consistent process and methodology.

Selection Criteria:

- Last audited in 2012-2013
- Are not part of a registrar family
- On the 2013 or 2009 RAA
- ICANN community concerns and responsiveness to compliance requests
## Registrar Contractual Compliance Audit Timeline – October 2016

### Audit Program Milestones

<table>
<thead>
<tr>
<th>Pre-Audit Notification</th>
<th>Request for Information (RFI) Phase</th>
<th>Audit Phase</th>
<th>Initial Report</th>
<th>Remediation Phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date sent</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; Notice</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Notice</td>
<td>3&lt;sup&gt;rd&lt;/sup&gt; Notice</td>
<td>Begin</td>
</tr>
</tbody>
</table>

For Registrars located in China, ICANN granted an extra week due to National Holidays during the week when RFI was sent.

| Date sent              | 1<sup>st</sup> Notice | 2<sup>nd</sup> Notice | 3<sup>rd</sup> Notice | Begin | End* | Date Issued* | Start – End* |

* Audit and Remediation Phases may be completed, and reports sent out, prior to dates shown.

During the Request for Information and Audit Phases, ICANN will follow the 1-2-3 notification process (15 business days, 5 business days, 5 business days).

Registrars: 55 (Audit and follow-up re-testing)
Countries Represented: 25

- North America
  - United States – 15
  - Canada – 3

- Latin America/Caribbean Islands
  - Brazil – 1
  - Panama – 1

- Africa
  - Morocco – 1

- Europe
  - Germany – 3
  - Spain – 3
  - Denmark – 2
  - Italy – 2
  - Russian Federation – 2
  - Sweden – 2
  - Austria – 1
  - United Kingdom – 1
  - Hungary – 1
  - Netherlands – 1
  - Norway – 1
  - Turkey – 1

- Asia/Australia/Pacific Islands
  - China – 6
  - India – 2
  - Korea (South) – 2
  - Australia – 1
  - Singapore – 1
  - Hong Kong – 1
  - Vietnam – 1
  - UAE – 1

Registrars: 55  (Audit and follow-up re-testing)
Countries Represented: 25