

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
General Information		A. General Information	
1. Full legal name of the Applicant, being the established entity that will be entering into a Registrar Accreditation Agreement (RAA) with ICANN, subject to ICANN's approval of this application.	Included in draft v1 PP App, combined with Rr App Q4	1. Legal Name of Privacy/Proxy Service Provider (hereinafter, "Provider"), including any fictitious/"DBA" names used:	Combination of Rr App Qs 1 and 4
2. Legal form of the Applicant (e.g., LLC, Corporation, Government Body, IO).	Included in draft v1 PP App (Q4), combined with Rr App Q3	2. Designated primary contact person for Provider:	Adapted from Rr App Q13
3. The jurisdiction in which the Applicant's business is registered for legal and financial purposes.	Included in draft v1 PP App (Q4), combined with Rr App Q2	3. Business Address:	Combined multiple address-related questions from RAA app into single "business address" question
3. The Applicant's business registration number and the name of the authority that has issued this number.	Not included in draft v1 PP App	4. Jurisdiction and type of entity (e.g. California non-profit corporation):	Combination of Rr App Qs 2 and 3

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>4. Every business name and/or trade name used by the applicant or that the applicant intends to use in connection with its registrar business at the time of approval.</p>	<p>Included in draft v1 PP App, combined with Rr App Q4</p>	<p>5. Telephone number:</p>	<p>Combined multiple contact-related questions in RAA app into single “telephone number” question</p>
<p>5. Attach documentation demonstrating that the Applicant entity is legally established and in good standing. For proof of establishment, provide articles of association or other equivalent document (e.g., statutes, membership agreement) of the entity. If the Applicant is a government body or organization, provide a certified copy of the relevant statute or governmental decision under which the government body or organization has been established. Where no such certificates or documents are available in the Applicant's jurisdiction, an affidavit drafted and signed by a notary public or a legal practitioner duly qualified in the courts of the Applicant's jurisdiction, declaring that the organization is established and in good standing, must</p>	<p>Not included in draft v1 PP App</p>	<p>6. Email address:</p>	<p>Combined multiple email address-related questions in RAA app into single “email address” question</p>

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
be submitted.			
6. Correspondence address for the Applicant. This address will be used for contractual purposes, and the Applicant must be able to accept notices and service of legal process at this address. No Post Office boxes are allowed.	Combined multiple address-related questions in Rr App into one “business address” question in draft v1 PP App	B. Registrar Relationship	
7. Primary phone number where the Applicant can be reached for contractual purposes.	Combined multiple contact-related questions in RAA app into single “phone number” question in draft PP App	1. Is the Provider Affiliated (as the term is defined in the Privacy and Proxy Service Provider Accreditation Agreement) with an ICANN-accredited registrar(s)? (If yes, please list the registrar(s) and the registrar IANA ID(s) and provide a description and/or diagram of the corporate structure).	This is a variation of Q20 in the RR App, where applicants are asked about relationships with many different types of service providers. This was intended to be a Policy-related question (geared toward evaluating the applicant’s plans for complying with various

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			<p>requirements that will involve the registrar. But this question could be expanded to ask about the other types of related entities, creating a combination policy/background question.</p> <p><u>Final Report, p. 11-12, states that PPs should declare their Affiliation with a registrar (if any) as a requirement of the accreditation program.</u></p>
9.Primary Fax number where the Applicant can be reached for contractual purposes.	Did not include fax # question in draft v1 PP App	C. Background Screening (note that background checks may be conducted on any or all entities	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
		and individuals identified in this section)	
10.Primary Email address where the Applicant can be reached for contractual purposes.	Combined multiple email address-related questions in RAA app into single “email address” question in draft v1 PP App	(a) Provide the full names of all owners/shareholders of the applicant entity that own at least 5% of the company, as well as all directors, officers, and managers who will be involved in providing privacy/proxy services:	
11.If the location or address of Applicant's principal place of business is different from the address provided in Question #7 please provide details including address, phone number, fax number and email address (ICANN must be able to conduct site visits for audit purposes at the given address or, if no distinct address is given, at the address provided in Question #7).	Combined multiple address-related questions in RAA app into single “business address” question in draft v1 PP App	(b) Within the last ten (10) years, has the applicant or any of the people or entities listed above been charged with or convicted of a felony or of a misdemeanor related to financial activities, fraud, breach of fiduciary duty or dishonesty, or been the subject of a judicial or	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
		administrative determination that is similar or related to any of these? If so, identify them:	
12.Any other addresses where the Applicant's proposed Registrar will be operated or managed, if different from either its principal business or correspondence address provided above. (Please explain.)	Combined multiple address-related questions in RAA app into single "business address" question in draft v1 PP App	(c) Within the last ten (10) years, has the applicant or any of the people or entities listed above been investigated or disciplined by the government of its, her, or his domicile for conduct involving dishonesty or misuse of funds of others? Is so, identify them:	
13.Primary contact information (this contact will be listed as contact party for the applicant on the Registrar Accreditation Agreement, should this application be approved).	Included in draft v1 PP App, Q2	(d) Is the applicant or any of the people or entities listed above currently involved in any judicial, administrative, or regulatory proceeding that could result in a conviction, judgment, determination, or discipline of the type specified in "b"	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
		or "c" above? If so, identify them:	
14. Application contact information (if different) (this person will be ICANN's main point of contact for all matters concerning this application).	Not included in draft v1 PP App	(e) Has the applicant or any of the people or entities listed above been declined by ICANN of registrar accreditation?	
15. Enter the full name, contact information, and position of any persons or entities owning at least 5% of the applicant's current or proposed business entity. For each person listed, please specify whether they own over 15% of the applicant's current or proposed business entity. If applicable, please list the ultimate parent entity (entities) of the Applicant.	Rr App Qs 15-19 are background check-related question; combined into one "background check" section in draft v1 PP App, Section C	D. Business Operations	
16. Enter the full name, contact information, and position of all directors of the Applicant. (ICANN may conduct background investigations on any or all individuals listed in questions 16-18).	Rr App Qs 15-19 are background check-related questions; combined into one "background check"	1. Does the applicant currently offer privacy and/or proxy registration services? If so, which one(s)?	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
	section in draft v1 PP App, Section C		
17. Enter the full name, contact information, and position of all officers of the Applicant.		2.If so, how long has the applicant offered these services?	
18. Enter the full name, contact information, and position of all relevant managers of the Applicant.		3.How many customers does your privacy/proxy service currently service? 4.What volume of registrations do you anticipate servicing under this accreditation?	
19. For every person or entity mentioned in the answers to questions 15 to 18, indicate if that person or entity: a. within the past ten years, has been convicted of a felony or of a misdemeanor related to financial activities, or has been judged by a court to have committed fraud or breach of fiduciary duty, or has been		5.How will your privacy/proxy service notify existing customers of any new requirements, processes and/or contractual provisions related to	This draft question is intended to evaluate the applicant's plans to come into compliance with the new accreditation program requirements.

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>the subject of a judicial determination that is similar or related to any of these;</p> <p>b. within the past ten years, has been disciplined by any government or industry regulatory body for conduct involving dishonesty or misuse of funds of others;</p> <p>c. is currently involved in any judicial or regulatory proceeding that could result in a conviction, judgment, determination, or discipline of the type specified in questions #19(a) or 19(b); or</p> <p>d. is the subject of a disqualification imposed by ICANN and in effect at the time of this application.</p> <p>If any of the above events in (a)-(d) have occurred, please provide details.</p>		<p>obtaining this accreditation?</p>	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>20. Does the Applicant or do any of the people or entities mentioned in this application have a common controlling interest in one or more ICANN-accredited registrars, registry operators or back-end registry operators?</p> <p>If yes, please list the concerned entities or persons, the registrar(s), registry operator(s) or back-end registry operator(s) in which they have a common controlling interest and describe the connections between them.</p>	<p>Included a variation of this question in draft v1 PP App (Section B); in draft v1 PP App, only asked about Affiliated registrars (this was intended to be a policy-related question, but could be expanded to include all of the entities listed here to create a combined Policy/background screening question)</p>	<p>6. Provide a description of the services the applicant intends to offer using this privacy/proxy service accreditation. (e.g. Is the applicant going to offer privacy services, proxy services, or both? Does the applicant provide other services, such as registrar, reseller, hosting, etc?)</p>	
<p>21. Has the Applicant and/or any of the persons or entities mentioned in the answers to questions 15 to 18 submitted to ICANN within the past year an accreditation application or material accompanying an accreditation application that ICANN has found to</p>	<p>Not included in draft v1 PP App. This is somewhat related to draft v1 PP App background screening question</p>	<p>7. How will the privacy/proxy customer use the privacy/proxy service during the domain registration process? (e.g. will this be</p>	

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Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>contain a material misrepresentation, material inaccuracy, or materially misleading statement? If yes, then please explain the circumstances.</p>	<p>B.e—has the applicant or entities listed been declined by ICANN of registrar accreditation?</p>	<p>provided as an option through the registrar interface, will the service register names on behalf of its customers, etc?)</p>	
<p>22. Please list all URL and/or domain names the Applicant uses or intends to use for conducting its services at the time of approval.</p>	<p>Not included in draft v1 PP App.</p>	<p>8.How many employees are associated with the applicant, and how many will be involved in the operation and support of privacy/proxy services? Note how many full-time employees will be responsible for customer service, including responding to third-party requests.</p>	
<p>23. Please indicate where the information required by Sections 3.16, 3.17 and 3.18 of the RAA and the Registrar Information Specification are listed or will be listed online prior to</p>	<p>Not included in draft v1 PP App, as there are currently no information specification</p>	<p>E. Policy Requirements</p>	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
completion of the accreditation process.	requirements for PPs. If these are added via the contract, this Q could be added.		
Business Overview/Business Plan		1. Identify the steps (in detail) the Provider will take to validate and verify your customers' contact information.	The answer to this question is intended to demonstrate that the applicant understands and will comply with Final Recommendation 5, p. 9).
24. Give an overview of the Applicant's current business or business plan.	Rr App Qs in this section have been modified and appropriated into draft v1 PP App in Section D.	2. Describe how the Provider will comply with the ICANN Transfer Policy when the privacy/proxy service is activated and/or terminated for a customer.	
25. What volume of domain name registrations does the Applicant reasonably project to be able to handle per month? If the Applicant is already providing domain name registration		3. Describe the steps the Provider will take to avoid the need to disclose underlying customer data in the process of renewing,	The answer to this question is intended to demonstrate the applicant's plans for following best

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>services, how many domain names is it currently managing (including the proportion of gTLD domain names) and how many registrations does it currently handle per month? If the Applicant is a reseller, please explain how the Applicant will handle its customers' existing registrations if the Applicant obtains registrar accreditation. If applicable, please also specify which ccTLD registries have accredited the Applicant.</p>		<p>transferring or restoring a domain name.</p>	<p>practices in Final Report p. 11, item 9.</p>
<p>26. How many employees (full time and part time, stated separately) will the Applicant have dedicated to the registrar business? Please indicate the number of employees (full-time equivalents) in each area (e.g., customer service, programming, etc.).</p> <p>27. Please explain how the Applicant will handle customer service and claims of domain name abuse, including planned hours of service and type of support (e.g., phone, email, web chat, etc.). Please indicate in detail how the</p>		<p>4. Describe the steps the Provider will take to ensure continued operations for its customers (and privacy for customer data) in the event the Provider goes out of business or becomes de-accredited for some other reason.</p>	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
Applicant will comply with Section 3.18 of the RAA.			
Operational and Technical Capabilities		5. Describe the steps the Provider will take to ensure the security of its customers' information, including identifying and account information and other data, including payment information.	
28. Please provide a technical overview of the Applicant's proposed registrar, including details concerning the type of registrar that will be operated and the interfaces that will be provided for registration transactions.	This is related to Qs D6 and D7 in the draft v1 PP App.	6. How will your Provider ensure that domain name registrations utilizing your service are clearly labeled as such in the Registration Data Directory Service?	The answer to this question should demonstrate the applicant's understanding of RDDS labeling requirements, see Final Report p. 9, recommendation 4.
29. Please provide details of the system and network architecture that supports or will support the Applicant's operations. Answers should include information such as: architecture and	Not included in draft v1 PP App.	F. Recordkeeping	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>network diagrams, details of hardware and software platforms, network bandwidth provision, IPv6 connectivity, firewalls, the intended physical location of systems, operations centers, and other infrastructure, a description of backup power systems (with multi-day powered source), and security and physical safeguards against intrusion, including a description of remote alternate sites for this.</p>			
<p>30. Please explain in detail how the Applicant will comply with the Additional Registrar Operation Specification, related to DNSSEC, IPv6, and IDNs.</p>	<p>Not included in draft v1 PP App.</p>	<p>1. How will the Provider ensure that customer data is escrowed in compliance with its Accreditation Agreement requirements?</p>	
<p>31. What method(s) does the Applicant use or propose to use to accept and process orders for new registrations?</p>	<p>This is similar to Q D7 in draft v1 PP App.</p>	<p>2. Describe the Provider's processes for maintaining records on the number and type of relay, disclosure and publication requests received, and the number honored.</p>	<p>See Final Report p. 18, "...providers should be required to maintain statistics on the number of Publication and Disclosure requests received and the number honored, and</p>

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
			provide these statistics in aggregate form to ICANN for periodic publication.”
32. Please explain how the Applicant plans to comply with ICANN's Inter-Registrar Transfer Policy – specifically, please describe the procedures the Applicant will implement to accept and process orders for transfer requests both as a gaining registrar and as a losing registrar.	Appropriated into draft PP App v1, Q E.2.	G. Third-Party Requests	
33. Please explain how the Applicant plans to implement and comply with the obligations for the Applicant's registration agreement for Registered Name Holders as detailed in Section 3.7.7 of the RAA. If available, please provide a copy of the Applicant's registration agreement.	Appropriated for draft PP Appv1, Section I.	1. Describe the process and criteria the Provider will use to determine whether or not to relay communications from a third party to the privacy/proxy customer.	See Final Report, p. 13, recommendation 16.
34. Please describe the compliance procedures the Applicant will follow if it becomes aware of any conduct by a Registered Name Holder that violates any	Not included in draft PP App v1.	2. Describe the process and criteria the Provider will use to determine	See Final Report, p. 10-11, recommendation 8.

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>provision required by Sections 3.7.7.1 through 3.7.7.12 of the RAA or any applicable consensus policies.</p>		<p>whether or to disclose or publish a customer’s identity or contact details in response to a third-party request (Do not include specific processes for intellectual property or law enforcement-related requests here, additional questions follow).</p>	
<p>35. Please describe the steps the Applicant takes or will take to verify reasonable assurance of payment of the registration fee before activating domain registrations. In the response, please describe the form(s) of payment that will be accepted. Please refer to Section 3.7.4 of the Registrar Accreditation Agreement in preparing the response.</p>	<p>Not included in draft v1 PP App.</p>	<p>3. Provide a link to the webpage where third parties can initiate a request for relay, disclosure or publication of your customers’ contact information. Note, this location should also include a mechanism for a third</p>	<p>See Final Report, recommendations 11/12, p. 12; recommendation 16, p. 13-14.</p>

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
		party to escalate or follow up on a request.	
36. What method(s) does the Applicant use or propose to use to allow its customers to manage, update, renew or delete their domain names?	Similar question asked in draft v1 PP App QD7	4. Describe the processes the Provider will follow when it receives a request for disclosure from an intellectual property holder.	The answer to this question should demonstrate the applicant's understanding of the IP framework requirements (see Final Report, Annex B, p. 85)
37. On average, how long will it take the Applicant to complete customer requests for changes to the contact and billing information?	Not included in draft v1 PP App.	5. Describe the processes the Provider will follow when it receives a request for disclosure from law enforcement.	The answer to this question should demonstrate the applicant's understanding of the LEA framework requirements (TBD).
38. How will the Applicant allow Registered Name Holders to unlock their domain names and how will the Applicant give them access to the AuthInfo codes of their domain names, should they wish to transfer their domain names to another registrar	Not included in draft v1 PP App.	H. Abuse Reporting	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
(including the registrants that have registered domain names via resellers of the Applicant, if any)?			
39. (i) What method(s) does the Applicant use or propose to use to notify Registered Name Holders that their domain names will expire or have expired? (ii) How will a Registered Name Holder that has neglected to renew a domain name prior to expiration be given an additional opportunity to renew or restore it post-expiration? (iii) If the Applicant already provides domain name registration services, please indicate where on its website(s) the Applicant's Deletion and Auto-Renewal Policy as well as the fee charged for the recovery of a domain name during the Redemption Grace Period are displayed.	Not included in draft v1 PP App.	1. Describe, in detail, the Provider's process for managing claims of abuse.	The answer to this question should demonstrate the applicant's understanding of all requirements implemented pursuant to Final Recommendations 11, 13, 14, 15, Final Report pp. 12-13).
40. How will the Applicant implement any UDRP and URS decisions concerning any domain name registered via its accreditation (describe all the steps to	Not included in draft v1 PP App.	I. Customer Agreement/Terms of Service	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>be taken by the Applicant from the start of a new Proceeding through the implementation of a decision)?</p>			
<p>41. In the event that a domain name registered via the Applicant that is the subject of a UDRP dispute expires during the course of the dispute, how will the Applicant give the complainant the option to renew the disputed domain name?</p>	<p>Not included in draft v1 PP App</p>	<p>1. Identify where, in your customer agreement/terms of service (submitted with this application) the following terms appear:</p> <ul style="list-style-type: none"> (a) any specific requirements applying to transfers and renewals of a domain name; (b) pricing; (c) the specific grounds 	<p>See Final Report, Recommendations 6, 7, 8 (Final Report p. 9-10).</p>

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
		<p style="text-align: right;">under which a customer's details may be disclosed or published;</p> <p>(d) the specific grounds under which a customer's privacy/proxy service may be suspended or terminated, including publication in the event of a customer's initiation of a transfer of the underlying</p>	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
		domain name; (e) clarification as to whether or not a customer will be notified when the privacy/proxy service provider receives a request for disclosure or publication and whether the customer may opt to cancel the domain registration in lieu of	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
		disclosure or publication;	
42. If the Applicant intends to offer services through a reseller, please explain how your agreement with the reseller will comply with Section 3.12 of the RAA. If the Applicant has already entered into agreements with a reseller of registrar services, please describe the nature of the reseller's arrangement with the Applicant or, provide a copy of the Applicant's agreement with the reseller.	Not included in draft v1 PP App.	2. Provide a link to the page where your privacy/proxy service terms of service are displayed on your website.	
43. Please explain the procedures the Applicant will apply to be compliant with Section 3.12.6 of the RAA if the Applicant becomes aware of any breach of any of the provisions of Section 3.12 of the RAA caused by any of its resellers.	Not included in draft v1 PP App.	3. Provide a link to the page where privacy/proxy service contact information is displayed on your website.	See Final Report, recommendation 12, p. 12).
44. Security Policy: provide an outline of the security policy and procedures for	This question was modified for	J. Required Appendices	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>the proposed registrar, including: (1) system and network access control, ensuring systems are maintained in a secure fashion, including details of how they are monitored, logged and backed up; (2) provisioning and other measures that mitigate risks posed by denial of service attacks; (3) computer and network incident response policies, plans, and processes; (4) plans to minimize the risk of unauthorized access to its systems or tampering with registration and customer data, and how the registrar proposes to mitigate denial of service attacks; (5) intrusion detection mechanisms, and (6) a threat analysis for the proposed registrar and the defenses that will be deployed against those threats.</p>	<p>discussion purposes in draft v1 PP App (a very general security-related question is included in draft PP App Q E.5).</p>		
<p>45. With regard to domain names registered in "thin" registries, how will the Applicant ensure that the Whois data of the domain names under the Applicant's management will be available to the public and be updated at least daily, pursuant to Section</p>	<p>This specific question was not included in draft v1 PP App. There is a WHOIS labeling-related question that will be used to</p>	<p>Business registration certificate</p>	

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
3.3.1 of the Registrar Accreditation Agreement and the Registration Data Directory Service Specification? How will the Applicant ensure that its proposed Whois service will be available both via IPV4 and IPV6?	evaluate the applicant's understanding and ability to comply with labeling requirements implemented pursuant to this program (See Q E.6)	Verified financial statement	
46. Please fully describe the Applicant's procedures for complying with Section 3.7.8 of the RAA upon receiving notification by any person of an inaccuracy in the contact information associated with any registered domain name the Applicant will manage as a registrar; as well as how the Applicant will comply with the Whois Data Reminder Policy.	Q not included in the draft v1 PP App; draft PP App includes Q re: validation/verification of customer contact information (Q E.1).		
47. Which steps will the Applicant take in order to escrow its registration data pursuant to Section 3.6 of the RAA? Which Data Escrow Service Provider does the registrar intend to utilize?	See draft v1 PP App, Q F.1.		
48. Does or will the Applicant offer Whois	NA		

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>privacy or proxy registration services? If so, please explain in detail how the Applicant will comply with the Specification on Privacy and Proxy Registrations.</p>			
<p>49. Backup: provide details of frequency and procedures for backup of data, hardware, and systems used for backup, data format, escrow, or other data backup features, and procedures for retrieval of data/rebuild of database.</p>	<p>Question not included in draft v1 PP App (draft app Qs do ask about escrow and continued operations in the event of de-accreditation or business failure, but this may not cover other catastrophic events). IRT input is especially welcome on whether a question similar to this is advised for PP Applicants.</p>		
<p>50. Which method(s) does the Applicant use or propose to use for retention of records relating to its registrar business, including a description of all records to</p>	<p>Q not included in draft v1 PP App. There will, however, be retention requirements for PPs</p>		

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>be retained, the location at which they will be retained, the form in which they will be retained and the length of their retention? (Please refer to Section 3.4 of the Registrar Accreditation Agreement as well as to the Data Retention Specification in preparing this response). If the Applicant provides or intends to provide its domain name registration services via third parties such as resellers, please also indicate how the Applicant collects or will collect the required data from the concerned third parties.</p>	<p>and a question similar to this could be added. IRT input is requested on this topic.</p>		
<p>51. How does the Applicant propose to provide domain name holders with continued use of their domain names while ensuring that the operation of the Internet will not be adversely affected in the event the Applicant goes out of business or otherwise ceases to operate as an ICANN-accredited Registrar. 52. Registrar Transition: provide a plan that could be followed in the event that it becomes necessary to transition the</p>	<p>Question modified/appropriated into draft v1 PP App, QE.4.</p>		

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>Applicant's domain portfolio to another Registrar, including a transition process, should the Applicant go out of business or, for any other reason, cease to be an ICANN-accredited Registrar. If the Applicant's plan includes specifying a particular Registrar in case such a transition becomes necessary, please provide that Registrar's business name.</p>			
<p>53. Failover Testing: provide a description of the Applicant's failover testing plan. Examples may include a description of plans to test failover of data centers or operations to alternate sites, from a hot to a cold facility, or continuity testing with other registrars, registries or ICANN.</p>	<p>Q not included in draft v1 PP App.</p>		
<p>54. Monitoring and Fault Escalation Processes: provide a description of the proposed (or actual) arrangements for monitoring critical registrar systems (including SRS, database systems, DNS servers, publicly available registration data (Whois) policy network connectivity, routers and firewall). This description should explain</p>	<p>Q not included in draft PP App.</p>		

Comparison Summary:
Application for Registrar Accreditation vs. Draft v1 Application for PP Accreditation

Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>how these systems are monitored and the mechanisms that will be used for fault escalation and reporting, and should provide details of the proposed support arrangements for these registry systems.</p>			
<p>Financial and Insurance Obligations</p>			
<p>55. Please provide an externally verified document demonstrating the Applicant's ability to procure liquid working capital immediately available in the Applicant's name in an amount of at least US\$70,000 or equivalent in the Applicant's local currency. If the Applicant already owns a registrar business or wishes to convert a reseller business into a registrar business, an independently verified financial statement (for example, an external accountant's audit report) showing the working capital devoted to the business should be enclosed.</p> <p>In cases where an applicant cannot demonstrate that it has access to at least \$70,000 in liquid working capital, the applicant must demonstrate that it has sufficient resources available to meet its</p>	<p>Draft v1 PP App includes a requirement that a financial statement be attached with the application. Specific requirements for this document will be discussed further.</p> <p>Does the IRT think that PPs should be demonstrating the same level of capital devoted to the PP business?</p>		

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Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>business needs in addition to adequate cash reserves, and that its business model does not require US\$70,000 in liquid working capital for day-to-day operations.</p> <p>Factors that may demonstrate this include:</p> <ul style="list-style-type: none"> a. verifiable and reliable cash flow that is sufficient to maintain ongoing operations; or b. the registrar is an Affiliate (as defined in RAA) of an existing, sufficiently capitalized registrar; c. the registrar’s projected registration volume warrants lesser capitalization; d. the registrar’s operating costs are projected to be demonstrably less than industry norms, or identifiable circumstances will result in more predictable and stable operating costs; e. reduced projected registrar start-up costs due to current operation of a registrar or reseller business; 			

Comparison Summary:
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<p>f. other factors in furtherance of ICANN’s underserved regions initiative, such as targeting domain name registration services to an underserved market region where costs might be lower.</p>			
<p>8. 56. Please provide a certificate of insurance in the name of the Applicant for a Commercial General Liability or equivalent policy with coverage of at least US \$500,000 or equivalent in the applicant's local currency, or a document evidencing the ability to obtain such an insurance policy. If the proposed insurance is not in force at the time this application is submitted, it will have to be in place prior to completion of the accreditation process.</p> <p>NOTE: This question was deleted because the ICANN Board of Directors resolved 28 September 2015 (https://www.icann.org/resources/board-material/resolutions-2015-09-28-en) that</p>	<p>NA</p>		

Comparison Summary:
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Registrar Accreditation Application	Notes	Draft v1 Privacy/Proxy Provider Accreditation Application	Notes
<p>ICANN should waive the Registrar Accreditation Agreement's Commercial General Liability insurance policy requirement.</p>			
<p>OTHER</p>			
<p>57. Can the Applicant meet all of a registrar's obligations under the Registrar Accreditation Agreement? If there are any provisions of the Registrar Accreditation Agreement the Applicant may not be able to fulfill, please explain the circumstances that prevent the Applicant from doing so.</p>	<p>Not included in the draft v1 PP App.</p>		