

Privacy and Proxy Service Provider Accreditation Program IRT

PPAA discussion



IRT Meeting
12 September

Agenda

- ◉ Data Escrow
- ◉ Privacy/Proxy Applicant Guide v2

Data Escrow

Design Principles

- ⦿ Data Escrow of P/P data allows recovery of the underlying customer contact information in case of disaster
- ⦿ Re-use the Registrar data escrow specification as much as possible
- ⦿ Leverage RRI tool (where possible) to allow P/P providers and ICANN organization learn the status of escrow deposits

Pending From Last Discussion

Need to consider the scenarios where:

- ⦿ A registrar and P/P provider are affiliated
- ⦿ An affiliated P/P provider offers P/P services for other registrars

Scenarios

1. Unaffiliated P/P Provider

- ⦿ P/P provider will do escrow on its own

2. Affiliated P/P Provider Working With One Registrar

Which of the below should ICANN support?

- a) Separate deposits; one as P/P provider, another as registrar
- b) One deposit that covers both the registrar and the P/P provider escrow obligations

3. Provider Affiliated With 1 Registrar, Working with Others

- ⦿ Should ICANN support the scenario when a P/P provider is affiliated with one registrar, but is also working with multiple other registrars?
- ⦿ If so, which of the below should ICANN support?
 - a) Separate deposits; one as P/P provider, another as registrar
 - b) One deposit that covers both registrar and P/P provider escrow obligations
 - P/P registration data would include P/P data from registrations from other registrars that are not related or affiliated, is that an issue?

4. P/P Provider Affiliated, Working With 1 Registrar Family

- Should ICANN support a scenario when a P/P provider is affiliated with and working with one registrar family (multiple registrars that are all affiliated)?
- If so, which of the below should ICANN support?
 - a) Separate deposits; one as P/P provider, multiple others as registrars
 - b) One deposit that covers both, one registrar and the P/P provider escrow obligations
 - P/P registration data would include P/P data from registrations from other registrars in the family, is that an issue?

5. Provider Affiliated w/Rr Family, Works With Others

- ⦿ Should ICANN support a scenario when a Provider is affiliated with one registrar family, but also offers P/P services through other registrars outside that family?
- ⦿ If so, which of the below should we support?
 - a) Separate deposits; one as P/P provider, multiple others as registrars
 - b) One deposit that covers both, one registrar and the P/P provider escrow obligations
 - P/P registration data would include P/P data from registrations from other registrars, some in family, and others that are not related or affiliated, is that an issue?

Use of RRI

P/P Provider Escrow Deposit on its Own

- ⦿ Similar to the Registries, allowing for full automation on all sides (i.e., P/P providers, DEAs, ICANN):
 1. P/P provider sends escrow deposit to Escrow Agent
 2. DEA validates the deposit, and if problems are found, DEA works with the P/P provider on fixing the issues
 3. The P/P provider notifies ICANN using the RRI that the escrow deposit was sent to the DEA
 4. The DEA notifies ICANN using the RRI that a deposit was received, validation results, and object counts
 5. P/P provider has visibility through the RRI about the delivery of notifications from DEA and its escrow compliance status

P/P and Registrar Escrow Deposit Commingled

- ⦿ Similar to Registries, allows for full automation on all sides (i.e., P/P providers, DEAs, ICANN) with some differences:
 1. P/P provider/registrar sends escrow deposit to Escrow Agent
 2. DEA validates the deposit, and if problems are found, DEA works with the P/P provider/registrar on fixing the issues
 3. The P/P provider/registrar **optionally** notifies ICANN using the RRI that the escrow deposit was sent to the DEA
 4. The DEA notifies ICANN using the RRI that a deposit was received, validation results, and object counts
 5. P/P provider/registrar has visibility through the RRI about the delivery of notifications from DEA and its escrow compliance status

Applicant Guide v2

Background

- ⦿ Proposed Privacy/Proxy accreditation process is modeled on registrar accreditation process
- ⦿ IRT advised that process should be streamlined wherever possible for affiliates
- ⦿ Updates to Applicant Guide from v1:
 - Streamlined process for affiliates
 - Fees proposal added
- ⦿ IRT feedback is requested on all elements of this document

Overview: Application Process (Initial Window)

- ⦿ Initial application window to be opened on a to-be-determined date following announcement of final accreditation program requirements
- ⦿ Proposed window open date: 3 months after announcement of final program requirements
- ⦿ Applicants will submit expression of interest
- ⦿ ICANN will send credentials for educational program and application to each applicant (educational program must be completed prior to submitting application)
- ⦿ Proposed application period: 3 months

Summary: Accreditation Criteria

- Applicants for accreditation must:
 - Clear compliance check for any affiliated contracted parties;
 - Have at least one current employee who has completed educational program;
 - Clear all due diligence checks;
 - Demonstrate understanding of policy and contractual requirements;
 - Demonstrate access to adequate capital;
 - Demonstrate adequate technical infrastructure;
 - Demonstrate adequate planning for occurrence of security breaches, natural disasters, infrastructure and/or business failure

Summary: Accreditation Criteria

- ⦿ Accreditation criteria are identical for all applicants, regardless of whether the applicant is affiliated with an existing ICANN organization-contracted party
- ⦿ Criteria met in different ways, depending on affiliate relationship(s)
 - If an applicant is affiliated with an entity that has already satisfied relevant criteria through prior evaluation, re-evaluation will not be required

Summary: Accreditation Criteria

- ⊙ Types of affiliate relationship:
 - **No affiliation with any contracted party:** Applicant will be evaluated on all application criteria
 - **Applicant affiliated with gTLD registry operator only:** Applicant meets financial, technical and possibly background check criteria (depending on length of time since last ICANN background check)
 - **Applicant affiliated with ICANN-accredited registrar:** Applicant meets financial, technical criteria. Applicant meets some, but not all, policy and contractual requirements. Applicant may meet background check criteria (depending on length of time since last ICANN background check).

Summary: Accreditation Criteria

- ⦿ Types of affiliate relationship (continued):
 - **Applicant affiliated with ICANN-accredited privacy/proxy service provider (not applicable during initial application window):** Applicant meets all accreditation criteria other than background check (background check will depend on time since last screening).

Summary: Application for Non-Affiliate

- Draft application for non-affiliates includes:
 - General information (name, address, primary contact information);
 - Background screening questions;
 - Completion of educational program;
 - Questions about data escrow processes, transition planning in event of de-accreditation;
 - Operational, policy and contractual questions;
 - Documentation of corporate status/good standing;
 - Financial statement; and
 - Datacenter certification documentation.

Summary: Application for Registrar Affiliates

- Draft application for registrar affiliates includes:
 - General information (name, address, primary contact information);
 - Background screening questions;
 - Completion of educational program;
 - Questions about data escrow processes, transition planning in event of de-accreditation;
 - Documentation of corporate status/good standing;

Proposed Program Fee Structure

- ⊙ **Application Fees:**
 - \$3,500 for non-affiliates
 - \$2,000 for affiliates

- ⊙ **Annual Accreditation Fee:** \$4,000 for all providers

- ⊙ **No transaction-based or variable fees**

Next Steps

- IRT feedback on applicant guide requested by **18 Sept**
- **Any additional requests for Accreditation Agreement discussion items should be sent to the list by 18 Sept**
- ICANN is updating draft contract per IRT feedback
- Known topics to revisit:
 - Data escrow;
 - De-accreditation process;
 - LEA framework (possible, depending on further input from PSWG);
 - Policy document

Engage with ICANN – Thank You and Questions



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