

How the SLA proposal works

Introduction

The SLA proposed in the EPDP Phase 2 Draft Report is different than previous SLAs and has resulted in some confusion. This document is intended to help explain it.

This explanation is for requests which are of normal priority and which are not automated. High priority requests and automated requests will require faster response than what is described below.

Because there is some uncertainty regarding the volumes of requests and the complexity of those requests, the SLA enforcement takes two forms, with one form phasing in in 6 months and the second phasing in after 1 year. NOTE: After 1 year, both forms will be active; the first form is not retired when the second form is activated.

The proposal is a significant compromise; the time durations proposed may not support all use cases. It is also possible that due to volumes and complexity that even these proposed average response times may be too aggressive. Therefore, these response timeframes shall be reviewed periodically and may be revised by a yet to be determined mechanism.

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Forms of the SLA

Form 1:

- If the mean time for a CP to respond to requests exceeds [5] business days, the Gateway operator shall contact Compliance and the CP shall participate in a review with Compliance to establish the root cause for exceeding the average response time expectation. .
- Failure to review with Compliance shall result in a Compliance violation and is subject to sanction.
- Measurement of durations shall start immediately, but the obligation to contact Compliance only starts after 6 months.
- Basic intent of form 1 is to provide a warning that there may be an issue with response times and to allow the involved parties to remedy them and to address causes in a cooperative manner before compliance action kicks in.

Form 2:

- Form 1 remains in effect. Gateway shall continue to notify Compliance for mean times over business [5] days, and CPs shall continue to review with Compliance when the Gateway has detected such mean time durations.
- If the mean time for a CP to respond to requests exceeds business [10] days, the Gateway operator shall inform Compliance that the CP is in breach of SLA and may be subject to sanction.
- Breach of SLA is not necessarily a breach of the RAA. CP may still provide to compliance data or evidence as to the root causes for failing the SLA requirements. Compliance shall also review complaint volumes and registrar size to take into account for potential penalties.
- Measurement of durations shall start immediately, but enforcement of the [10]-day threshold by Compliance only starts after Form 1 has been active for 6 months (i.e. 12 months after start).

- Intent is to create ability to enforce violations of SLA while still maintaining room for specific circumstances that may exculpate CP.
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Examples:

Example #1: What happens after the first 6 months

For the purposes of the example, assume there are 10 CPs, and each receives 22 requests after the 6-month date has arrived. The number of days to resolve each request is shown in the column below each CP. (These numbers of days were selected randomly and are for illustrative purposes only.)

| | CP1 | CP2 | CP3 | CP4 | CP5 | CP6 | CP7 | CP8 | CP9 | CP10 |
|------|-----|-----|-----|-----|-----|-----|-----|-----|------|------|
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 3 | 3 | 5 | 2 |
| 2 | 1 | 1 | 1 | 1 | 2 | 2 | 3 | 4 | 5 | 5 |
| 3 | 2 | 1 | 2 | 2 | 2 | 3 | 3 | 4 | 6 | 5 |
| 4 | 2 | 1 | 2 | 3 | 3 | 3 | 4 | 4 | 6 | 5 |
| 5 | 2 | 1 | 2 | 3 | 3 | 3 | 4 | 5 | 6 | 7 |
| 6 | 2 | 2 | 2 | 4 | 3 | 3 | 4 | 6 | 7 | 7 |
| 7 | 2 | 2 | 2 | 4 | 4 | 4 | 5 | 7 | 8 | 8 |
| 8 | 3 | 2 | 2 | 4 | 4 | 4 | 5 | 7 | 8 | 9 |
| 9 | 3 | 2 | 2 | 4 | 4 | 4 | 5 | 8 | 8 | 9 |
| 10 | 3 | 3 | 3 | 5 | 4 | 5 | 5 | 8 | 10 | 10 |
| 11 | 3 | 3 | 3 | 5 | 5 | 5 | 6 | 9 | 11 | 11 |
| 12 | 4 | 3 | 3 | 5 | 5 | 5 | 6 | 9 | 11 | 11 |
| 13 | 4 | 4 | 3 | 5 | 5 | 5 | 6 | 9 | 12 | 12 |
| 14 | 5 | 4 | 5 | 5 | 6 | 6 | 6 | 9 | 12 | 12 |
| 15 | 5 | 4 | 5 | 5 | 7 | 6 | 7 | 10 | 12 | 12 |
| 16 | 5 | 5 | 6 | 5 | 8 | 6 | 7 | 10 | 13 | 13 |
| 17 | 5 | 5 | 6 | 6 | 8 | 6 | 7 | 11 | 13 | 14 |
| 18 | 6 | 5 | 6 | 6 | 8 | 7 | 8 | 11 | 13 | 14 |
| 19 | 6 | 5 | 6 | 7 | 8 | 8 | 9 | 11 | 13 | 14 |
| 20 | 6 | 6 | 6 | 7 | 9 | 9 | 10 | 12 | 13 | 14 |
| 21 | 6 | 15 | 7 | 8 | 9 | 9 | 10 | 12 | 14 | 15 |
| 22 | 6 | 20 | 20 | 8 | 9 | 10 | 11 | 12 | 14 | 15 |
| Mean | 3.7 | 4.3 | 4.3 | 4.7 | 5.3 | 5.2 | 6.1 | 8.2 | 10.0 | 10.2 |

As a result of their resolution durations:

- CP1, CP2, CP3, and CP4 have each achieved the [5]-business day threshold required in Form 1. The Gateway operator shall take no action and these CPs have no obligation to contact Compliance.
- For each of the remaining CPs, the Gateway operator shall contact Compliance, and each CP shall investigate their durations, while working with Compliance to improve them. Failure to do this results in a Compliance violation.
- During this period, the 10-business day Form 2 threshold is not in effect. As a result, CP10 is treated no differently in this time period even though their mean response rate exceeds [10] business days.

Example #2: What happens after the first 12 months

Again, for the purposes of the example, assume there are 10 CPs, and each receives 22 requests after the 12-month date has arrived. The number of days to resolve each request is shown in the column below each CP. (Again, these numbers of days were selected randomly and are for illustrative purposes only.)

| | CP1 | CP2 | CP3 | CP4 | CP5 | CP6 | CP7 | CP8 | CP9 | CP10 |
|------|-----|-----|-----|-----|-----|-----|-----|------|------|------|
| 1 | 1 | 1 | 1 | 2 | 3 | 2 | 3 | 8 | 5 | 2 |
| 2 | 1 | 1 | 1 | 2 | 3 | 2 | 4 | 8 | 5 | 3 |
| 3 | 2 | 1 | 2 | 2 | 3 | 2 | 4 | 8 | 5 | 5 |
| 4 | 2 | 1 | 2 | 2 | 3 | 3 | 5 | 8 | 6 | 7 |
| 5 | 2 | 3 | 3 | 3 | 4 | 3 | 5 | 8 | 6 | 8 |
| 6 | 3 | 3 | 3 | 3 | 4 | 4 | 6 | 8 | 8 | 9 |
| 7 | 3 | 4 | 3 | 4 | 4 | 6 | 6 | 9 | 8 | 9 |
| 8 | 3 | 4 | 3 | 4 | 4 | 6 | 7 | 9 | 8 | 9 |
| 9 | 3 | 4 | 4 | 5 | 5 | 7 | 8 | 9 | 9 | 10 |
| 10 | 3 | 4 | 4 | 6 | 5 | 7 | 8 | 9 | 9 | 10 |
| 11 | 4 | 5 | 4 | 6 | 5 | 7 | 8 | 9 | 10 | 11 |
| 12 | 4 | 5 | 5 | 7 | 5 | 7 | 8 | 10 | 11 | 11 |
| 13 | 4 | 5 | 5 | 7 | 5 | 7 | 9 | 10 | 11 | 12 |
| 14 | 4 | 5 | 5 | 7 | 7 | 8 | 9 | 10 | 12 | 12 |
| 15 | 5 | 5 | 5 | 7 | 7 | 8 | 9 | 10 | 12 | 12 |
| 16 | 5 | 5 | 6 | 7 | 7 | 9 | 9 | 11 | 13 | 12 |
| 17 | 5 | 5 | 6 | 7 | 7 | 9 | 9 | 11 | 13 | 13 |
| 18 | 5 | 6 | 6 | 8 | 8 | 9 | 10 | 12 | 14 | 13 |
| 19 | 6 | 7 | 6 | 8 | 8 | 9 | 10 | 12 | 14 | 14 |
| 20 | 6 | 7 | 6 | 8 | 8 | 10 | 10 | 13 | 15 | 15 |
| 21 | 6 | 7 | 7 | 15 | 8 | 10 | 10 | 15 | 15 | 16 |
| 22 | 8 | 15 | 20 | 15 | 9 | 10 | 11 | 15 | 20 | 20 |
| Mean | 3.9 | 4.7 | 4.9 | 6.1 | 5.5 | 6.6 | 7.6 | 10.1 | 10.4 | 10.6 |

As a result of their resolution durations:

- CP1, CP2 and CP3 have each achieved the 5-business day threshold required in Form 1. The Gateway operator shall take no action and these CPs have no obligation to contact Compliance.
- For CP4, CP5, CP6 and CP7 the Gateway operator shall contact Compliance, and each CP shall investigate their durations, while working with Compliance to improve them. Failure to do this results in a Compliance violation.
- CP8, CP9 and CP10 have failed to achieve the 10-business day Form 2 threshold and are in violation, and thus subject to potential sanction, absent any exculpatory causes for this failure.