

RDS/WHOIS2 Request for Data – Privacy/Proxy Services
 Emails to compliance@icann.org from Alice Jansen on 1 March 2018
 and Jean-Baptiste Deroulez on 2 March 2018

1. Has Contractual Compliance received complaints that have been filed related to Privacy/Proxy specifications of the 2013 RAA?

Yes. Since the effective date of the Specification on Privacy and Proxy Registrations (“Specification”) of the 2013 Registrar Accreditation Agreement (“RAA”) on 1 January 2014 through February 2018, ICANN Contractual Compliance has received the following complaints regarding the Specification’s requirements:

<i>Privacy/Proxy Complaints</i>	<i>2014</i>	<i>2015</i>	<i>2016</i>	<i>2017</i>	<i>2018</i>	<i>Total</i>
<i>Received</i>	<i>49</i>	<i>43</i>	<i>105</i>	<i>83</i>	<i>8</i>	<i>288</i>
<i>Out of scope</i>	<i>17</i>	<i>36</i>	<i>81</i>	<i>66</i>	<i>7</i>	<i>207</i>
<i>In scope and forwarded to registrar</i>	<i>32</i>	<i>7</i>	<i>24</i>	<i>17</i>	<i>1</i>	<i>81</i>
<i>Enforcement</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>

The Specification and the obligations it imposes on registrars can be found at <https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en#privacy-proxy>.

a. If so, how many were received, what was the nature of those complaints, and what were the steps taken?

See above regarding how many complaints have been received by ICANN to date.

Complaints that are determined to be out of scope of the Specification are closed before being forwarded to the registrar for review. This includes complaints about issues outside of the Privacy/Proxy obligations in the Specification (including complaints about registrars that have not yet executed a 2013 RAA, third party private disputes, website content and customer service issues) and complaints where the reporter did not provide information necessary for ICANN Contractual Compliance to validate that the complaint was within scope of the Specification’s obligations.

Complaints that are determined to be within scope of the Specification are forwarded to registrars for review and they are requested to demonstrate compliance with the Specification. Actions taken by registrars to resolve the complaints include adding (or confirming the existing location of) required web posting obligations, demonstrating that the registrar abides by published terms and procedures and ensuring that the privacy or proxy entity is properly identified in the public WHOIS (including accurate contact information).

Other complaint types that may also implicate Privacy/Proxy obligations under the Specification (for example WHOIS inaccuracy or Transfer complaints) are not included in these

metrics. Those complaints were received and processed for the primary nature of the complaint.

Beginning with Quarter Four of 2017, ICANN Contractual Compliance began publishing a Registrar Closed Complaints by Closure Code report. The 2017 Quarter Four Registrar Closed Complaints by Closure Code is available at <https://features.icann.org/compliance/dashboard/2017/q4/registrar-resolved-codes>.