ICANN responded to a request for information regarding ARS and grandfathered domain names on 26 July 2018 in a document called “[Written answer from GDD on ARS/GRANDFATHERING](https://community.icann.org/download/attachments/71604711/Response%20to%20Subgroup%20Compliance%20Grandfathering%20Request%5B1%5D.pdf?version=1&modificationDate=1532625239172&api=v2).” We would like to provide additional clarifying information due to on-going conversations on this subject.

Specifically, the 40.8% provided earlier, was about estimated records applied to RAA requirement and not about adoption of the 2013 RAA.

For background on WHOIS ARS, ARS uses the Created Date of a domain registration to evaluate if a record could be categorized as Grandfathered (i.e. Registrar under 2013 RAA, but the record is grouped under 2009 Requirement).  There are reasons why a record may be subject to the 2013 RAA requirements even if the registration was created prior to the Registrar signing the 2013 RAA (e.g.  transfer of domain registration to a new registrar); however, because ARS does not have an automated way to capture those reasons/updates with the data used, the WHOIS ARS project defers to Created Date.

It’s important to note that if a Grandfathered record provides an email or telephone number, WHOIS ARS will assesses those fields for accuracy. While the WHOIS ARS doesn’t include % of missing Registrant Email and Telephone numbers for grandfathered registrations vs. non-grandfathered registrations; the overall missing counts of Registrant email and telephone numbers based on our subsample seem fairly low (see Table 12 and Table 13)

Our report also highlights 2013 RAA – Operability (see Table C4).





