**Recommendation 2 – The Board should oversee creation of a single WHOIS policy.**

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| 1. What is the rationale for creating a single set of links to policies instead of a single policy document? (i.e., one document someone can read and that explains interconnections, targeted to end users) |
| The Board adopted action plan for the [WHOIS Policy Review Team Final Report](https://www.icann.org/en/system/files/files/implementation-action-08nov12-en.pdf) directed ICANN org “to create and maintain a single public source that compiles current gTLD WHOIS requirements for gTLD registries, registrars and registrants (including consensus policies and contractual conditions)” and provided the following rationale:  *The Board notes that there is not a comprehensive gTLD WHOIS policy that addresses all of the issues raised in the Review Team report and in SAC055. There is a set of existing contractual conditions that have been developed over time by negotiation between ICANN and registries and registrars, and a small set of consensus policies that address some aspects of the management of domain name registration data. These presently available conditions and policies should be publicly available from one source.* |
| 1. What specifically is provided and planned for registrant, registrar, registry, other non-ICANN-insider audiences? |
| The whois.icann.org website provides general information about RDS/WHOIS, its history, how to use registration directory services, and overviews and updates of current activities. In addition, the WHOIS Primer published on the website summarizes the key components of the RDS/WHOIS services, policy, and protocol. The website also hosts a WHOIS “look-up” tool.  The [Single Webpage](https://www.icann.org/resources/pages/whois-policies-provisions-2013-04-15-en) for ICANN RDS/WHOIS-Related Policies and Contract Provisions contains a listing of the gTLD RDS/WHOIS-related ICANN agreement provisions, policies, and Bylaws obligations.  The [Registrants’ Benefits and Responsibilities](https://www.icann.org/resources/pages/benefits-2013-09-16-en) document that registrars are required to link to or provide on their website is published on icann.org.  Information for registrants are published [here](https://www.icann.org/registrants). We will continue to augment this page with more information for registrants regarding the domain name lifecycle, how ICANN policies impact them, the DNS ecosystem and their role within it, as well as other information that would be useful to them.  The progress and status of RDS/WHOIS related policy discussions are available [here](https://gnso.icann.org/en/group-activities/active) and [here](https://www.icann.org/policy/implementation).  ICANN Contractual Compliance publishes metrics and reports, including those on RDS/WHOIS accuracy [here](https://features.icann.org/compliance).  Announcements and blogs to inform the community on RDS/WHOIS activities are published [here](https://www.icann.org/news/announcements) and [here](https://www.icann.org/news/blog).  Community input on RDS/WHOIS related policy and implementation work are available [here](https://www.icann.org/public-comments).  The Global Support Center receives and responds to inquiries from registrants, registrars, and registries. Their resources are available [here](https://www.icann.org/resources/pages/customer-support-2015-06-22-en). |

**Recommendation 3 – ICANN should ensure that WHOIS policy issues are accompanied by cross-community outreach**

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| 1. How is registrant outreach being done? |
| We have created a section on icann.org where we post information for registrants. This page can now be reached directly from the icann.org home page.  We are currently reviewing and updating and creating content to inform registrants of their rights and obligations and how ICANN policies impact them, including WHOIS related policies. The content is written for registrants in a way that is understandable and meaningful to them, and are translated.  In addition to providing the content on icann.org, ICANN org promotes the content via social media. We are having internal discussions on additional ways to promote the content.  We are also working on adapting the content into toolkits for registrars to use in their interactions with registrants. |
| 1. Why are there two different documents with similar titles for registrant rights/benefits and responsibilities and are both required by RAA (3.7.10 and 3.16)? Is Contractual Compliance an auditing requirement for both? |
| The requirements in Section 3.7.10 and 3.16 of the 2013 RAA serve different functions.  Section 3.7.10 refers to a specification that was developed for the RAA, a short statement of what registrants can expect from their registrars and registrant’s commensurate responsibilities.  Section Section 3.16 requires registrars to post a link to educational materials ( ICANN has published an educational webpage summarizing the terms of the Registrar Accreditation Agreement and related Consensus Policies (as of the date of the Agreement, located at: [http://www.icann.org/en/registrars/registrant-rights-responsibilities-en.htm](https://www.icann.org/en/registrars/registrant-rights-responsibilities-en.htm))). This page, though it discusses the 2009 RAA, contains a summary of the RAA and Consensus policies that is not included in the Registrant Benefits and Responsibillities page. Under the 2009 RAA, ICANN had the opportunity (and did) develop the educational page that still exists today (See Section 3.15 of the 2009 RAA, stating "In the event that ICANN gives reasonable notice to Registrar that ICANN has published a webpage that identifies available registrant rights and responsibilities, and the content of such webpage is developed in consultation with registrars, Registrar shall provide a link to the webpage on any website it may operate for domain name registration or renewal clearly displayed to its Registered Name Holders at least as clearly as its links to policies or notifications required to be displayed under ICANN Consensus Policies.”)  Section 3.16 of the 2013 RAA represents an updated version of this same term, referencing the page that was developed.  For registrars under the 2013 RAA (per Section 3.16 and Section 3.7.10), ICANN Contractual Compliance looks for this link <https://www.icann.org/resources/pages/benefits-2013-09-16-en>    For registrars under the 2009 RAA (per Section 3.15), ICANN Contractual Compliance accepts either the 2009 link <https://www.icann.org/resources/pages/responsibilities-2014-03-14-en> or the one above. |

**Recommendation 4 - ICANN should ensure that its compliance function is managed in accordance with best practice principles, including full transparency on resourcing and structure; provide annual reports; appoint a senior executive whose sole responsibility would be to oversee and manage ICANN’s compliance function (reporting to Board Committee); provide all necessary resources to manage and scale compliance team’s activities**

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| 1. How does ICANN envision the role of the Consumer Safeguards Director, now and in the future? |
| The Consumer Safeguards Director role is currently envisioned as dual-pronged. First, it will facilitate community-wide conversations and education through transparent discussions on safeguards within ICANN’s remit and mission, voluntary actions to address DNS abuse, and other relevant topics raised by the community.  Second, upon community request, it will perform research regarding the role of consumer safeguards in the DNS to support fact-based policy making. The Consumer Safeguards role will likely evolve over time pursuant to the community’s input. It is important to note that the Consumer Safeguards role is separate and distinct from ICANN’s contractual compliance department. |

**Recommendation 5 - ICANN should ensure that requirements for accurate Whois data are widely and pro-actively communicated**

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| 1. Does the portal provide support for all new gTLDs? (e.g., gTLD .film returns an error message) |
| We understand this question to refer to the WHOIS look-up tool.  The look-up tool allows for queries to be performed on domain names across all gTLDs, legacy and new. It does not support ccTLDs.  Note that if a gTLD returns results in a format that does not align with ICANN’s parsing rules, the returned result will only appear in the Raw Record section of the page (which is the raw result from the registry/registrar). |
| 1. How often do WHOIS queries performed through the portal fail, is this tracked, and is any action taken to remediate failures? What does ICANN do to ensure that each registry or registrar is compliant with allowing lookups? |
| This number cannot be calculated with precision. Because the current WHOIS protocol does not enforce any standard error handling, failures must be inferred. Failure rate is not currently being calculated or tracked.  Users are encouraged to file a contractual complaint ticket if they identify any issues with the WHOIS record. A link to file a ticket is provided on the page where results are displayed.  ICANN Contractual Compliance proactively monitors registrar WHOIS availability and will send registrars a compliance notice if it is not available. Registrar and registry web-based WHOIS services are also tested during registry and registrar audits. |
| 1. Why do some WHOIS queries performed through the portal return blank fields? (i.e., some registrar-supplied WHOIS fields appear to be blank in some responses) |
| As background, when a user looks up a domain name on the ICANN WHOIS look-up tool, the tool fetches data from the registry/registrar, parses the data, and displays it in a form on the web page. The webpage also displays the raw data from the registry/registrar below the form.  If the result returned by the registry or registrar is blank or is a very small package of data then the web page could display blank fields. If the returned result is in a format that cannot be parsed this too could cause the web page to display blank fields. In either case, users could look at the raw record displayed below the form for more information. If users identify any issues with the WHOIS record, they are encouraged to file a contractual complaint ticket. A link to file a ticket is provided on the page where results are displayed. |
| 1. With regard to compliance checks to verify that Registrars are publishing this info, are Resellers also required to publish this info and does compliance spot-check Reseller publication? |
| ICANN Contractual Compliance reviews reseller’s websites to check if the registrant rights/benefits and responsibilities are displayed as required during registrar audits or as needed to address a complaint. |

**Recommendation 5-9**

**Recommendation 5 -- ICANN should ensure that the requirements for accurate WHOIS data are widely and proactively communicated, including to current and prospective Registrants, and should use all means available to progress WHOIS accuracy, including any internationalized WHOIS data, as an organizational objective.**

**Recommendation 6 -- ICANN should take appropriate measures to reduce the number of WHOIS registrations that fall into the accuracy groups Substantial Failure and Full Failure (as defined by the NORC Data Accuracy Study, 2009/10) by 50% within 12 months and by 50% again over the following 12 months.**

**Recommendation 7 -- ICANN shall produce and publish an accuracy report focused on measured reduction in WHOIS registrations that fall into the accuracy groups Substantial Failure and Full Failure, on an annual basis.**

**Recommendation 8 -- ICANN should ensure that there is a clear, unambiguous and enforceable chain of contractual agreements with registries, registrars, and registrants to require the provision and maintenance of accurate WHOIS data. As part of these agreements, ICANN should ensure that clear, enforceable and graduated sanctions apply to registries, registrars and registrants that do not comply with its WHOIS policies. These sanctions should include de-registration and/or de-accreditation as appropriate in cases of serious or serial non-compliance.**

**Recommendation 9 -- Board should ensure that the Compliance Team develop metrics to track the impact of the annual WHOIS Data Reminder Policy (WDRP) notices to registrants; metrics should be used to As per (1) above, the Board will initiate a policy on the purpose of the gTLD WHOIS service, and this will help drive the principles behind privacy/proxy develop and publish performance targets, to improve data accuracy over time; if this is unfeasible, Board should ensure that an alternative, effective policy is developed and implemented that achieves the objective of improving data quality, in a measurable way.**

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| 1. Who is the complainant when an inaccurate record results in compliance ticket that is not remedied and eventually generates a breach notice? |
| “WHOIS Accuracy Reporting System (ARS)” is the default complainant in WHOIS ARS complaints. Please note that notices of breach do not identify the complainant. ICANN-received complaints or tickets are created from different sources; WHOIS ARS, WHOIS bulk submitters, individual reporter or ICANN internal review. |
| 1. Is the percentage of inoperable addresses the percentage of all sampled addresses, or the percentage of just the syntactically correct addresses in the sample? |
| The inoperable address percentage is the percentage of all the sampled addresses. |
| 1. Is there a way through registration obligation to check data? Could inaccurate data be compared against other data (e.g., billing data)? |
| The WHOIS Accuracy Program Specification of the [2013 Registrar Accreditation Agreement](https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en) contains a requirement for registrars to: “Validate that all postal address fields are consistent across fields (for example: street exists in city, city exists in state/province, city matches postal code) where such information is technically and commercially feasible for the applicable country or territory.”  ICANN org is [seeking](https://www.icann.org/news/announcement-3-2017-10-26-en) information regarding commercial services that focus on global address validation. |
| 1. Has the process changed to allow registrar feedback that potentially-inaccurate records were in fact correct? |
| The ICANN Contractual Compliance process has always allowed registrar and registry feedback on compliance tickets. Registrars do provide feedback on potentially-inaccurate records that were in fact correct. |
| 1. Are metrics kept on tickets where addresses were correct?  (e.g., format differences that appear to be inaccurate but are not) |
| Yes, metrics are kept on Whois ARS tickets where addresses were correct. Those tickets are closed with a closure reason of “verified correct.” The metrics are not currently published. ICANN Contractual Compliance is working on a report to bring more metric granularity related to closed complaints. |
| 1. Does ARS take into account different address formats? |
| The Universal Postal Union (UPU), our vendor who assesses address validity, maintains a database that undergoes continuous updating to match different/changing address formats. For instance, if a country does not require a postal code for a valid address, then the UPU database would reflect that and would not improperly penalize a record. |
| 1. Is there a process to handle complaints from parties who claim that a WHOIS record is inaccurate because their data is used in that record without authorization? |
| Yes, this is available in the existing WHOIS inaccuracy complaints process. |
| 1. What is the definition of “untouched” for 2013 RAA grandfathered domain names? (e.g., does it include domain names that were renewed with the same WHOIS?) |
| Renewal of a domain name registered prior to the 2013 RAA effective date does not require registrar review, and the data remains grandfathered to the 2009 requirements.  An update to any data fields (or a registration transfer) will require registrar review, and the review will be performed against the registrar’s current WAPS requirement (thus will “break” the grandfathering).  In either case, the ARS tests all records against the 2009 RAA requirements, so there should be no issue of an incorrectly applied label. |

**Recommendation 8 - ICANN should ensure that there is a clear, unambiguous and enforceable chain of contractual agreements with registries / registrars / registrants to require the provision and maintenance of accurate Whois data**

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| 1. When will the Registrar option to renew under the 2009 RAA be disallowed? |
| ICANN-accredited registrars have not had able to renew under the 2009 RAA since 2014. Please note, though, that registrars who signed the 2009 RAA in 2013 were not forced to adopt the 2013 RAA before their current RAA expired. For example, if a registrar signed the 2009 RAA on 1 April 2013, a date before the 2013 RAA was approved by the ICANN Board, their RAA would expire on 31 March 2018 if the registrar chose not to adopt the 2013 RAA before the expiration date of its 2009 RAA. |
| 1. When can it be expected that all Registrars (not just those offering new gTLDs) will move to 2013 RAA? |
| The last 2009 RAA will expire on 31 July 2018, so this will be latest date a registrar will operate under the 2009 RAA. As of 9 November, 2017, only 19 registrars are still on the 2009 RAA. |

**Recommendation 10 - ICANN should initiate processes to regulate and oversee privacy proxy service providers**

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| 1. Are there any privacy services? (e.g., studies identifying P/P services) |
| The following studies were considered by the Privacy/Proxy PDP Working Group:  [NORC Whois Accuracy Study January 2010](https://community.icann.org/download/attachments/43984221/NORC%20whois-accuracy-study-17jan10.pdf?version=1&modificationDate=1393868725000&api=v2)  [Interisle Final Report on Relay & Reveal Survey Aug 2012](https://community.icann.org/download/attachments/43984221/Interisle%20Final%20Report%20on%20P%26P%20R%26R%20Survey%20Aug%202012.pdf?version=1&modificationDate=1386110409000&api=v2)  [WHOIS Registrant Identification Study - Project Summary Report June 2013](https://community.icann.org/download/attachments/43984221/WHOIS%20Registrant%20Identification%20Study%20-%20Project%20Summary%20Report.pdf?version=1&modificationDate=1393868686000&api=v2)  [WHOIS Privacy & Proxy Abuse Study Final Report March 2014](https://community.icann.org/download/attachments/43984221/FINAL%20REPORT%20NPL%20Whois%20P%3AP%20Abuse%20Study%20March%202014.pdf?version=1&modificationDate=1398795462000&api=v2) |
| 1. What are the reasons for delay between GNSO approval/Board adoption of PPSAI policy and IRT launch? |
| The Board approved the Working Group’s recommendations on 9 August 2016. The IRT held its first meeting on 18 October 2016. ICANN handled various administrative functions in the time between 9 August and 18 October, including, but not limited to, convening the IRT, which includes reaching out to various ICANN stakeholders, deciding on a upon a meeting time that worked for all members, etc. |

**Recommendation 12 - The final data model, including (any) requirements for the translation or transliteration of the registration data, should be incorporated in the relevant Registrar and Registry agreements within 6 months of adoption of the working group’s recommendations by the ICANN Board. If these recommendations are not finalized in time for the next revision of such agreements, explicit placeholders for this purpose should be put in place in the agreements for the new gTLD program at this time, and in the existing agreements when they come up for renewal.**

**Recommendation 13 - The final data model, including (any) requirements for the translation or transliteration of the registration data, should be incorporated in the relevant Registrar and Registry agreements within 6 months of adoption of the working group’s recommendations by the ICANN Board. If these recommendations are not finalized in time for the next revision of such agreements, explicit placeholders for this purpose should be put in place in the agreements for the new gTLD program at this time, and in the existing agreements when they come up for renewal.**

**Recommendation 14 - Metrics should be developed to maintain and measure the accuracy of the internationalized registration data and corresponding data in ASCII, with clearly defined compliance methods and targets.**

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| 1. Can staff provide a written briefing with links to where additional detail is available on what was done for each recommendation? |
| Yes, ICANN org can provide in written form the verbal implementation briefings provided to the Review Team during plenary meeting numbers 7 (14 September, 2017), 8 (28 September, 2017), and 9 (2-3 October, 2017). |
| 1. What support is provided for internationalized email addresses, where transliteration of an email address may render email sent to that address undeliverable? |
| From a technical point of view, an email address (internationalized or otherwise) is a protocol identifier that has to be used as-is to work.  It should also be noted that the [Internationalized Registration Data (IRD) Final Report](https://www.icann.org/news/announcement-3-2015-09-25-en), which is informing the current implementation of the [Translation and Transliteration of Contact Information](https://www.icann.org/resources/pages/transliteration-contact-2016-06-27-en) PDP Recommendations (see [Board Resolution 2016.03.10.07](https://www.icann.org/resources/board-material/resolutions-2016-03-10-en#1.e)), specifies which RDS data fields should have a language tag to enable translation and/or transliteration. Email addresses are not included in that specification. Thus, they are not expected to be translated and/or transliterated.  The Review Team might also be interested in reviewing the current work of the [Universal Acceptance Steering Group](https://www.icann.org/resources/pages/universal-acceptance-2012-02-25-en), who is looking at international email, amongst other things, in their work. |