

I C A N N 4 7



Contractual Compliance Update

Wednesday, 17 July 2013



Agenda Topics

- Brief Update
 - Audit Program Update
 - Operational Accomplishments
 - Compliance Initiatives
 - Compliance Metrics

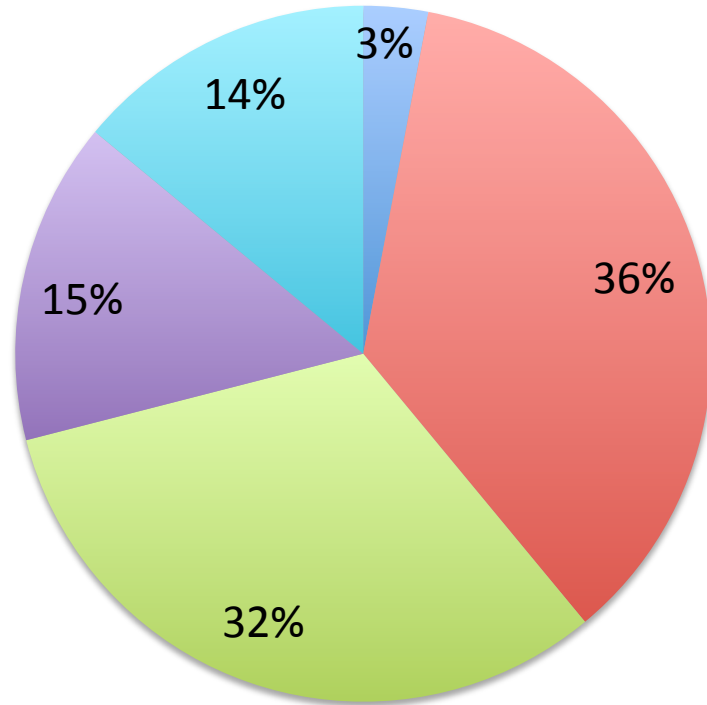
- Q & A

Year-1 Audit Program Completed

- Launched 13 November 2012
- One third (1/3) of the Registrars and Registries randomly selected and audited.
- Over **99%** of all Registrars collaborated with, or immediately remediated their findings if any were noted.
- Registries are under no explicit obligation to participate; many did in a collaborative effort to remedy any observations discovered.
- Published Year-One Audit Program Report at <http://www.icann.org/en/resources/compliance/reports>

Year-1 Audit Program Results

Registrars with Potential Deficiencies

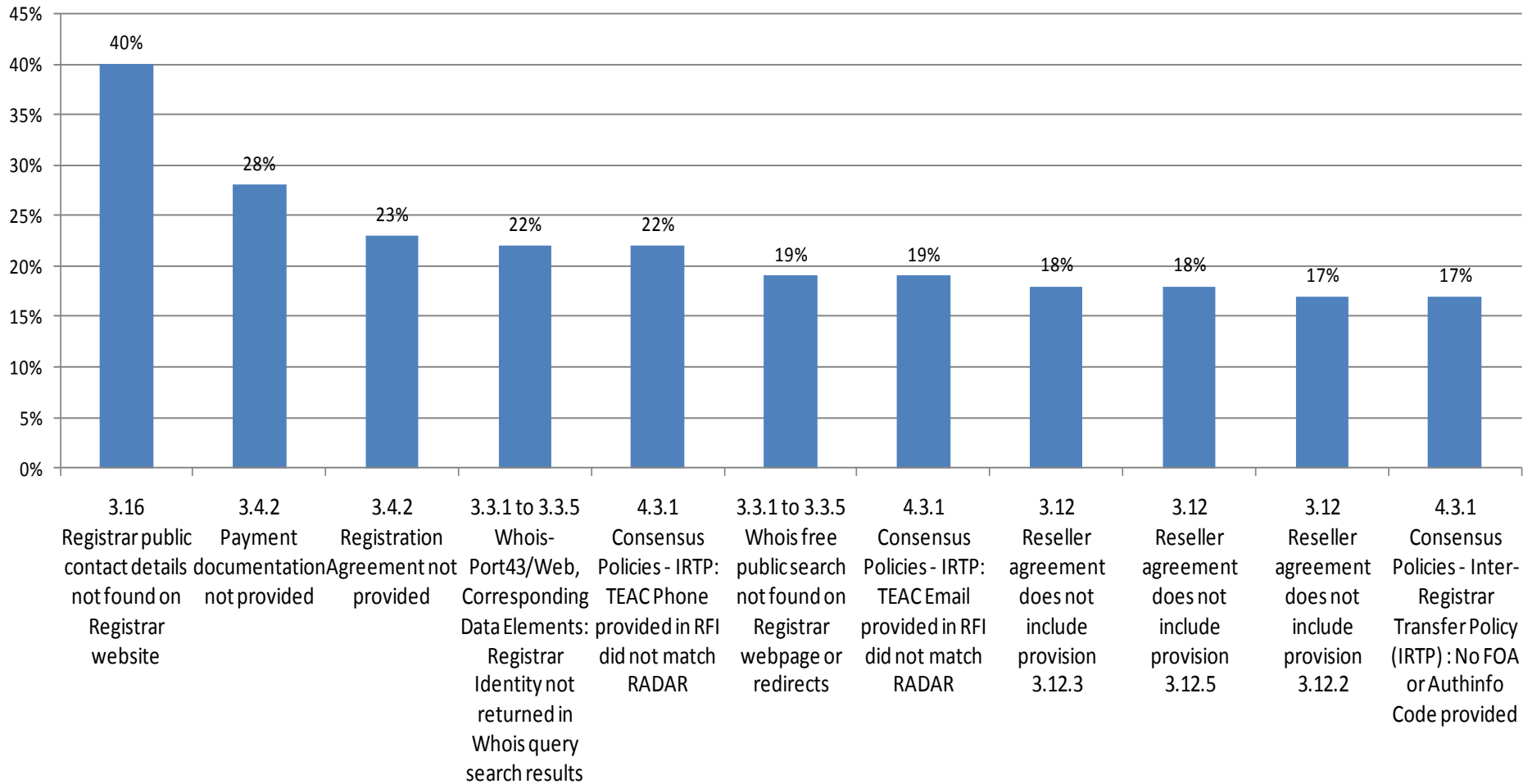


- % Registrars with No Deficiencies
- % Registrars with 1 to 3 Deficiency Areas
- % Registrars with 4 to 6 Deficiency Areas
- % Registrars with 7 to 9 Deficiency Areas
- % Registrars with 10+ Deficiency Areas

The chart above provides an **overview** of the percentage of Registrars with potential deficiencies prior to remediation. Many of these issues were fully remediated after collaboration with the Registrar.

Year-1 Audit Program Results

Top Deficiencies Within Tested Areas



Year-2 Audit Plan Scope and Dates

- Random Sample of remaining Registrars/Registries
- New gTLD Registries with 6 months of historical information
- Timeline
 - Planning & Organizing Phase - mid August - November 2013;
 - Pre-Audit Notice: Late October - mid November 2013
- Follow Compliance Process (1-2-3 Prevention Phases then Enforcement)

Operational Accomplishments

By ICANN 47 - July 2013

- ✓ Migrated complaints from Internic to ICANN.ORG
- ✓ Full automation of compliance process
- ✓ Added Pulse Survey in complaint closure email
- ✓ Added multiple complaint submission
- ✓ Added three registry complaint types
- ✓ Launched Pilot Bulk Complaint submission

Registrar Data Escrow Compliance check

Proactive Exercise

Objective: To ensure that the data being loaded into Iron Mountain is useable and represents the appropriate Registrant Information

Scope:

- ALL Registrars depositing with Iron Mountain
- The most recent deposit
- Compliance with Data Escrow Specifications

Process:

- Conducted an automated and manual review
- Reported results to ICANN Contractual Compliance
- Followed up with each Registrar to ensure proper formatting and RDE issues are corrected

Asia Pacific Outreach Activities Summary

- ✓ Registration Agreements - Registrars incorporated missing mandatory provisions from the RAA
- ✓ Documentation and records to identify gaps and flaws in record keeping and data retention.
- ✓ Conducted 2 general outreach sessions on Whois Inaccuracies, IRTP, Domain Renewal, and overall Compliance process
- ✓ Conducted other outreach calls in native language regarding IRTP, Whois Inaccuracies, UDRP, Domain Renewal, data escrow, and keeping up-to-date contact information.

Bulk Whois Inaccuracy Complaints

- 3-month pilot started 10 July 2013
- 3 users
 - Security industry (KnjOn and Support Intelligence, Inc.)
 - Brand protection industry (MarkMonitor Inc.)
- Limited to 100 complaints per week/user
- Bulk complaints processed same as single complaint
- Review by Compliance to ensure ticket quality
- Abuse of bulk process will result in suspension/revocation of bulk & single ticket Whois access
- ICANN to assess with all parties after pilot

Link to appendix: [TERMS OF USE](#)

Bulk Whois Inaccuracy Differences

Old Bulk	New Bulk
Separate system	Integrated within consolidated system
2 Automatic Notices	Within Compliance process and review
Data file validation at submission only	Additional validation at ticket creation <ul style="list-style-type: none"> • Data file validation • Active domain status • Non-duplicate complaint check (45 days) • Valid gTLD
Outside of ticket process	Bulk tickets within same process and queue as single submission Whois inaccuracy complaints (bulk tag for identification and metrics)
No review of ticket quality	<ul style="list-style-type: none"> • Rejection of invalid tickets • Periodic review/audit of tickets • Outreach to submitters to improve ticket quality
No Terms of Use	Mandatory Terms of Use
No abuse penalties	Abuse penalties include suspension and revocation of access
Unlimited ticket submission	<ul style="list-style-type: none"> - Gradual rollout - Limited to 100 submissions per user per week to ensure quality and scalability - Submission limit will be revisited based upon performance and impact to contracted parties and ICANN
One user	Access application, training & agreeing to Terms of Use. Limited number of users.



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Complaint Management System



Please refer to slides 37 - 42 for demo screen shots.

New Complaint Navigation, FAQ & Form

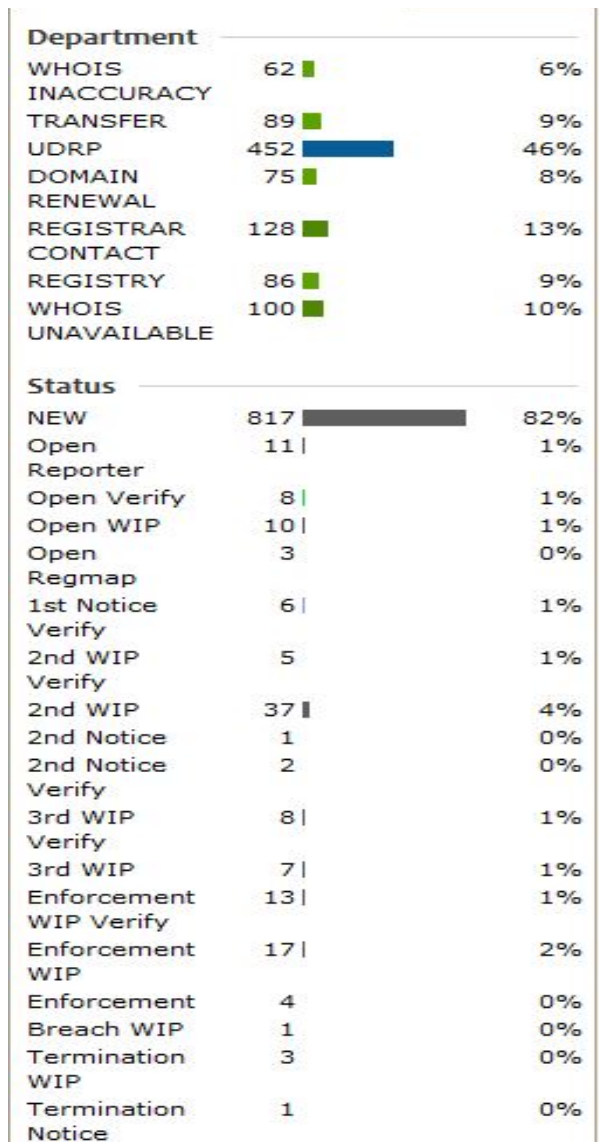
- Replaced complaint forms on Internic.net and redirected to new ICANN.ORG Complaint Submission landing page
- Three column page categorized to group similar FAQs or go directly to complaint form
- Added new navigation and updated 47 FAQs
- URL is <http://www.icann.org/en/resources/compliance/complaints>

The screenshot shows the ICANN website interface. At the top, there is the ICANN logo and the text 'Internet Corporation for Assigned Names and Numbers'. A search bar is located in the top right corner. Below the header is a navigation menu with links for 'About Us', 'News & Press', 'Resources', 'Groups', 'Contact', and 'Help'. The main content area is titled 'Contacting ICANN Regarding Contractual Compliance Complaint' and includes a 'Share' button. The page contains introductory text about common complaints and a table with three columns: 'Help With?', 'Learn More', and 'Take Action'. A left-hand sidebar lists various categories like 'ccTLDs', 'Internationalized Domain Names', 'Registrars', 'Compliance', 'Annual Reports', 'Approach & Processes', 'Audit Program', 'Complaint Submission', 'FAQs', 'Monthly Update', 'Notices', 'Operating Plan', 'Outreach', 'Staff', 'Registries', 'Policy', and 'TLD Acceptance'.

Help With?	Learn More	Take Action
Country Code Domain Names (ccTLDs)	About ccTLD Compliance	ccTLD Compliance
Domain Name Dispute/UDRP	About Domain Name Dispute/UDRP	Domain Name Dispute/UDRP
Domain Name Management	About Domain Name Management	Domain Name Management
Domain Name Transfer to a Different Registrar	About Domain Name Transfer to a Different Registrar	Transfer Domain Name to Different Registrar
Domain Renewal/Redemption	About Domain Renewal/Redemption	Domain Renewal/Redemption
IP Infringement & Cybersquatting	About IP Infringement & Cybersquatting	IP Infringement & Cybersquatting
New gTLDs	About New gTLDs	New gTLD Customer Service
Registrars	About Registrar Compliance	Registrar Compliance
Spam, Phishing & Website Content	About Spam, Phishing & Website Content	Spam, Phishing & Website Content
Whois Complaints	About Whois Complaints	Whois Complaints
Whois Inaccuracy	About Whois Inaccuracy	Whois Inaccuracy Complaint Form



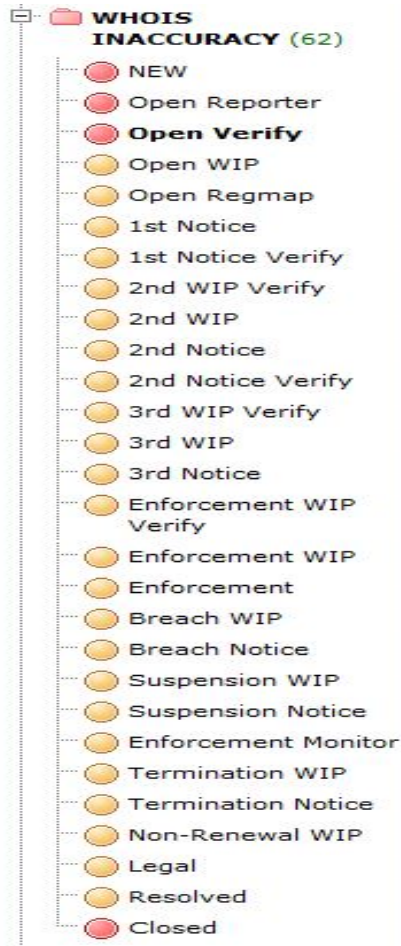
Compliance System Home Page



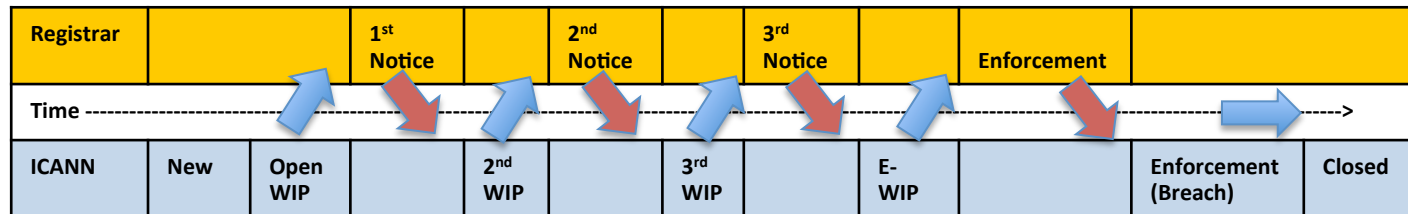
- Displays the number of tickets by complaint type and by complaint status
- From the Home Page selection of the Status or Complaint type directs the staff user to a view of the actual tickets.

Note: This example contains test data.

Complaint status as it moves through the system



- Navigation bar for complaint type and/or status queue
- Consistent workflow
- Queues are used for outbound notices/inquiries to Registrars/Registries
- Work in Process (WIP) queues are used for ICANN processing steps



Example of Notice To Registrar

General Reply Forward Follow-Up Billing Release Chats Calls My Activity 4,253 Domain History Reporter History Phone Fax WHOIS History Audit Log Edit

Send Add Note Attach Follow-Up Options Help

From [REDACTED] compliance-tickets@icann.org

To registrar@test@icann.org

CC

Quick Insert Macro Knowledgebase

DEPARTMENT WHOIS INACCU... OWNER [REDACTED] PROBLEM Issue STATUS 1st Notice PRIORITY Normal

Start typing to insert tags...

» Reply Contents

Dear Registrar, [ICANN TEST - 9999](#):

[ICANN](#) received the [Whois](#) inaccuracy report below. It claims that the contact information associated with the domain name is inaccurate:

[icann.org](#)

As required under Section 3.7.8 of the Registrar Accreditation Agreement ([RAA](#)), please take reasonable steps to investigate this [Whois](#) inaccuracy claim; and, where appropriate, correct the contact information, suspend or delete the domain registration.

To determine whether your registrar is in compliance with Section 3.7.8 of the [RAA](#), please indicate in the email reply which option below describes the actions taken by your registrar on or before 26 July 2013:

1. Your registrar confirmed that the reported inaccuracy was corrected.
2. Your registrar obtained satisfactory verification from the registrant that the data was correct.

- Domain History & Reporter tabs: complaint historical data
- Audit tab: history of all key communications with recipient
- Consistent subject line on all notices
- Template library allows for consistent communications based on complaint type
- All templates are auto-populated which allows for consistent and efficient processing

... What next?

- Email notice sent by the system, which **require a reply** back from the registrar/registry
- The response should be:
 - Total email size with attachments should not be greater than 4MB
 - Preferred file formats .pdf,.doc(x), .txt
 - Reply directly to the email w/formal responses
 - Do not edit subject line
 - Other than replying to a ticket, please do not send emails directly to compliance-tickets@icann.org
- Complaint is either Closed or forwarded for Enforcement review
- Email closing the complaint is sent to the Reporter and the Registrar/Registry.

Pulse survey in closure notice email

Reporter Survey Questions:

- How easy was it to submit a complaint?
- How clear were the instructions?
- Was your complaint resolved?
- Overall, how do you rate the complaint submission experience?**
- May we contact you for further clarification as needed?

Registrar/Registry Survey Questions:

- Did the complaint have the appropriate information for processing?
- How clear were the instructions?
- How responsive was ICANN to your questions?
- Overall, how do you rate the complaint experience?**
- May we contact you for further clarification as needed?

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Contractual Compliance Initiatives



Compliance Initiatives

- ❑ Implement [Expired Registration Recovery Policy](#), effective 31 August 2013
- ❑ Implement [2013 RAA](#) in phases; effective upon registrar signing and 1 January 2014
- ❑ Define and rollout [new Registry](#) related functions and complaint types
- ❑ Define and Implement Consumer Trust and Consumer Choice [metrics](#)

ICANN CONSENSUS POLICIES

Expired Registration Recovery Policy (ERRP)

- Effective Date: 31 August 2013
- Purpose
 - Establish minimum communication requirements for registrars
 - Make renewal and redemption of registrations uniformly available
 - Align registrant expectations with registrar practices
- Link:
<http://www.icann.org/en/resources/registrars/consensus-policies/errp>

ERRP Changes Summary

EDDP Requirement	New ERRP Requirement
Registrar must publish fee charged for recovery of names during RGP on website	<ol style="list-style-type: none"> 1. Registrar must publish renewal fees, post expiration renewal fees (if different), and redemption/restore fees on website; 2. Must provide a link to fees in registration agreement; and 3. Fees must be displayed on resellers' websites.
Registrar must send 2 renewal notices prior to domain name expiration	<p>Registrar must provide two notices of domain name expiration:</p> <ul style="list-style-type: none"> 1 month prior to expiration; and 1 week prior to expiration <p>If the name is not renewed by the registrant or deleted by the registrar within 5 days after expiration, registrar must send an additional expiration notice that includes instructions for renewal.</p>
No Renewal Process Requirements	<ol style="list-style-type: none"> 1. Upon expiration until the time the registrar deletes the domain name, registrant is permitted by the registrar to renew the expired registration. 2. Registrars may delete registrations any time after exp. 3. Required DNS Resolution Interruption Period established in the ERRP.
No Required Redemption Grace Period	<ol style="list-style-type: none"> 1. Registries must offer a RGP of 30 days following the deletion of a registration, during which time the deleted registration may be restored; and 2. During RGP, registry must disable DNS resolution and prohibit transfers. 3. Registries must permit registrants to redeem deleted registrations during RGP.

2013 RAA Effective Dates

Effective Upon Registrar Signing

- Must enter into agreements with resellers (Section 3.12)
- Registration Data Directory Service Specification (Whois formatting)
- Must provide specific information to ICANN and publish on website:
 1. Correspondence address for the Registrar
 2. If the location or address of registrar's principal place of business is different from the correspondence address, provide details including address, phone number, fax number and email address
 3. Officer(s) full name, contact information, and position
 4. Name of the ultimate parent entity of the registrar, if applicable
- Must provide notice to ICANN in 7 days of bankruptcy, convictions and security breaches (Section 3.20)
- Additional Reasons for Suspension and Termination (Sections 5.5 and 5.7)
- CEO Certification - Due 20 January 2014 (Section 3.15)

2013 RAA Effective Dates

Effective 1 January 2014

- Abuse Contact Requirements (Section 3.18)
- Description of Customer Service Handling Process (Section 3.7.11)
- Registrars and Resellers must provide a link to Registrant Benefits and Responsibilities (Sections 3.7.10 and 3.12.7)
- Whois Accuracy Program Specification
- Data Retention Specification
- Additional Registrar Operation Specification (DNNSEC, IDNs and IPV6)
- Section 2.2 of the Registration Data Directory Service Specification RE: Whois Service Level Agreement
- Registrars and Resellers must comply with the Proxy and Privacy Registration Program established by ICANN (Sections 3.12.4 and 3.14)

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New gTLD Readiness Update



New gTLD Compliance Readiness Plan

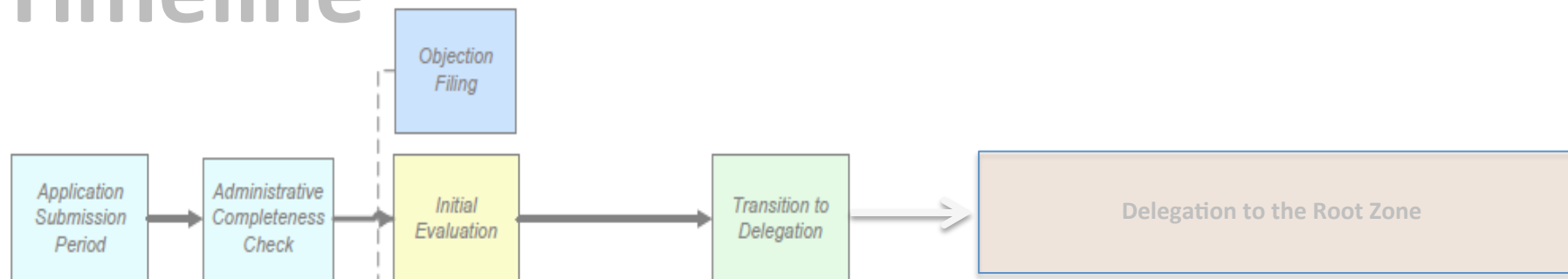
Operational Readiness

- ✓ Dedicated resources
- ✓ Reviewed and assessed operational needs and changes
- ✓ Developed and implementing readiness plan
- Enhance the complaint system to accept IDN & new complaint types
- Prepare standard complaints communication templates
- ✓ Designed an audit strategy
- Design new gTLD metrics
- Plan Outreach activities

Note: Approach is based on proactive, automated monitoring and leveraging ICANN-wide tools



New gTLD Readiness Based on AGB Timeline



Planning Phase

- Determine Ry contract obligations
- Assess how to monitor/audit obligations
- Identify needs
- Create Readiness Plan

Contracting Phase:

- Compliance Onboarding

Delegated Phase - Automated Processes:

- Data Escrow
- Monthly Reports
- Reserved Names
- Wildcard Redirection
- Code of Conduct
- DNS Zone File Transfer

List of new gTLD Complaints

New gTLD Complaints:

1. Reserved Names
2. Abuse Contact Data
3. Registry Operator Code of Conduct
4. Sunrise Period
6. Dispute Resolution Process
 - Public Interest Commitments,
 - Registry Restriction Dispute,
 - Uniform Rapid System,
 - Trademark Post Delegation Dispute
7. Code of Conduct

Internal, Monitoring-driven Complaints:

1. Data Escrow
2. Monthly Reports
3. Reserved Names
4. Wildcard Redirection Prohibition
5. Service Level Agreement
6. DNS Zone File to EBERO
7. Code of Conduct

NOTE: Complaints will follow compliance model

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Contractual Compliance Metrics

Year to date metrics provided on slides 46 - 54

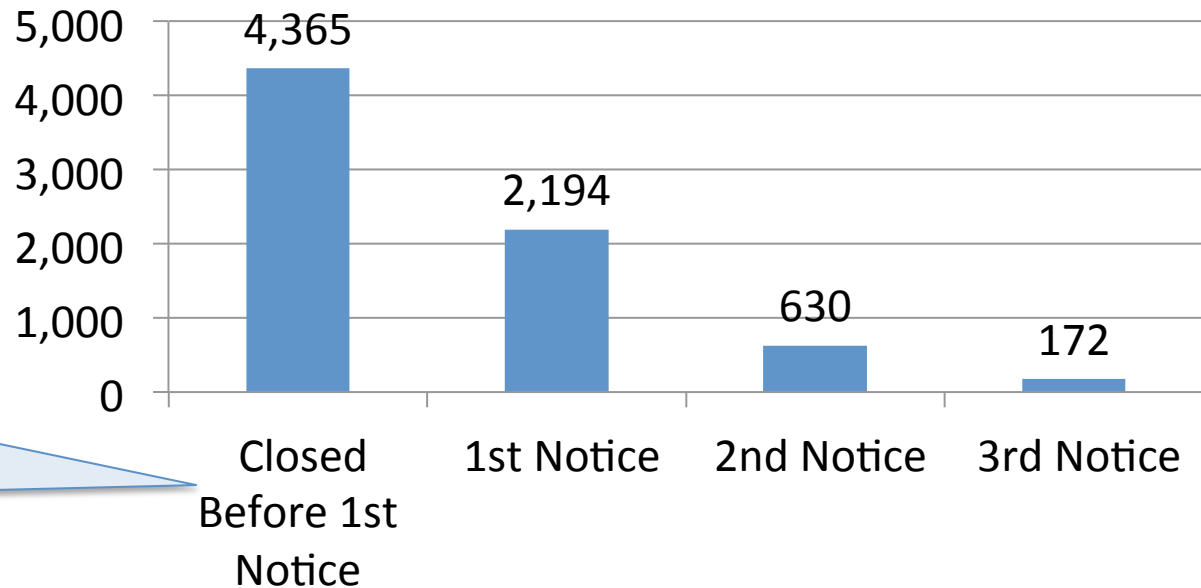


Contractual Compliance Complaints per Notification Cycle

Apr 2013 - June 2013

Closure Rate 55%

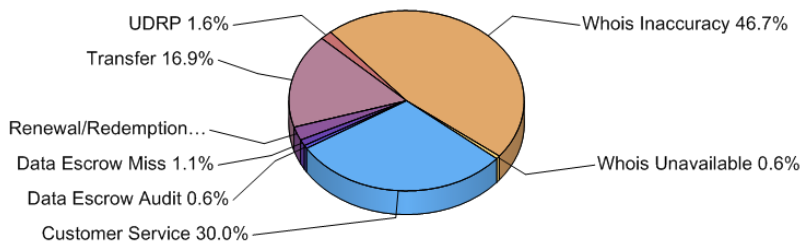
<i>Complaint Summary</i>	Apr – Jun Total Complaints Processed	Apr – Jun Total New Complaints Received	Apr – Jun Complaints Closed	Complaints Remaining Open After June 30
	10,098	7,110	5,534	1,082



43% complaints closed before sending to Registrar

Compliance Operations Scorecard

Complaint Count of June 2013



REGISTRAR TAT

	Avg TAT 1st Notice	Avg TAT 2nd Notice	Avg TAT 3rd Notice
June 2013	11.2	12.1	5.3

CC STAFF TAT

	Avg TAT Open-1st Notice	Avg TAT 2nd WIP	Avg TAT 3rd WIP	Avg TAT Received-Closed
June 2013	1.4	2.9	5.9	7.7

Complaint Count

	Compliance - June 2013	YTD
Customer Service	568	4,368
Data Escrow Audit	11	23
Data Escrow Miss	21	44
Renewal/Redemption	46	382
Transfer	320	2,353
UDRP	31	330
Whois Inaccuracy	884	7,550
Whois Unavailable	11	58
Total	1,892	15,108
Breach	3	47
Non-Renewal	N/A	N/A
Suspended	N/A	N/A
Terminated	1	7
Total	4	54

Closure Rates

	May 2013	June 2013
Volume Received All	3,548	2,417
Volume Received Curr Month	2,475	1,892
Volume Open Carryover	642	244
Volume Closed	1,834	1,335
Closure Rate Received All (%)	51.69 %	55.23 %
Closure Rate Curr Month (%)	56.57 %	55.71 %
Closure Rate Before 1st Notice (%)	42.78 %	48.28 %
Closure Rate Before 2nd Notice (%)	4.57 %	3.81 %
Closure Rate Before 3rd Notice (%)	1.21 %	1.78 %
Closure Rate Before Enforcement WIP (%)	0.06 %	0.00 %
Open Carryover Rate (%)	18.09 %	10.10 %



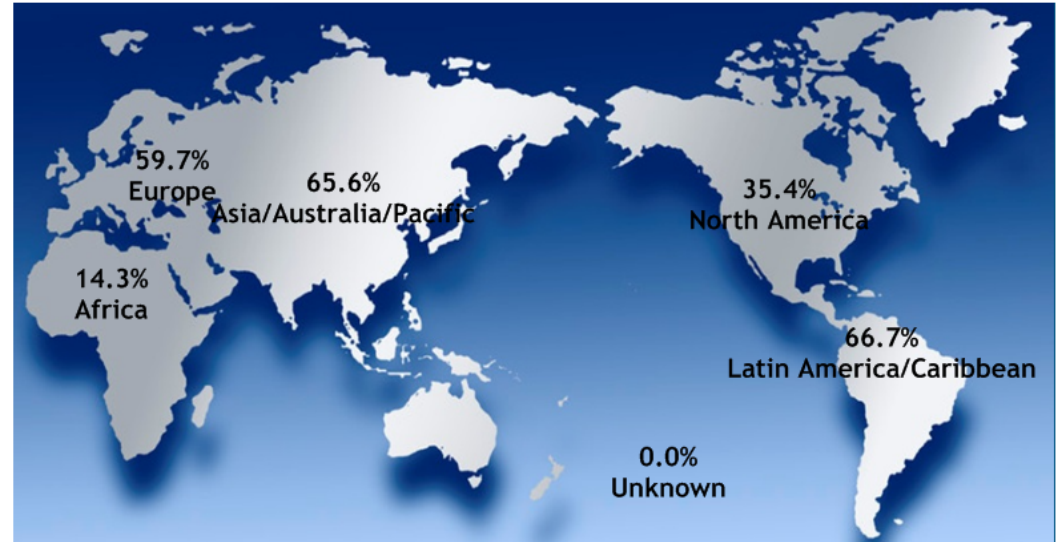
Compliance Operations Scorecard (2)

Registrar TAT Detail Business Days/Complaint

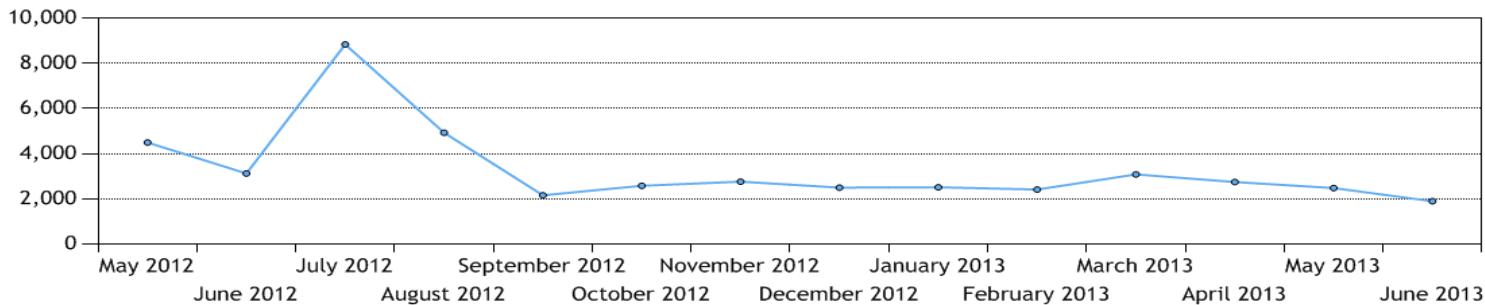
Avg TAT 1st Notice

Contact Update	6.0
Data Escrow Audit	5.4
Data Escrow Missed Weekly	6.0
Domain Renewal	6.0
Financial Transaction	6.2
Redemption	6.0
Registrar Contact	5.1
Transfer	5.8
UDRP	4.2
Whois Inaccuracy	17.6
Whois Unavailable	6.0

Percent Registrars with Complaints January 2012 ... June 2013

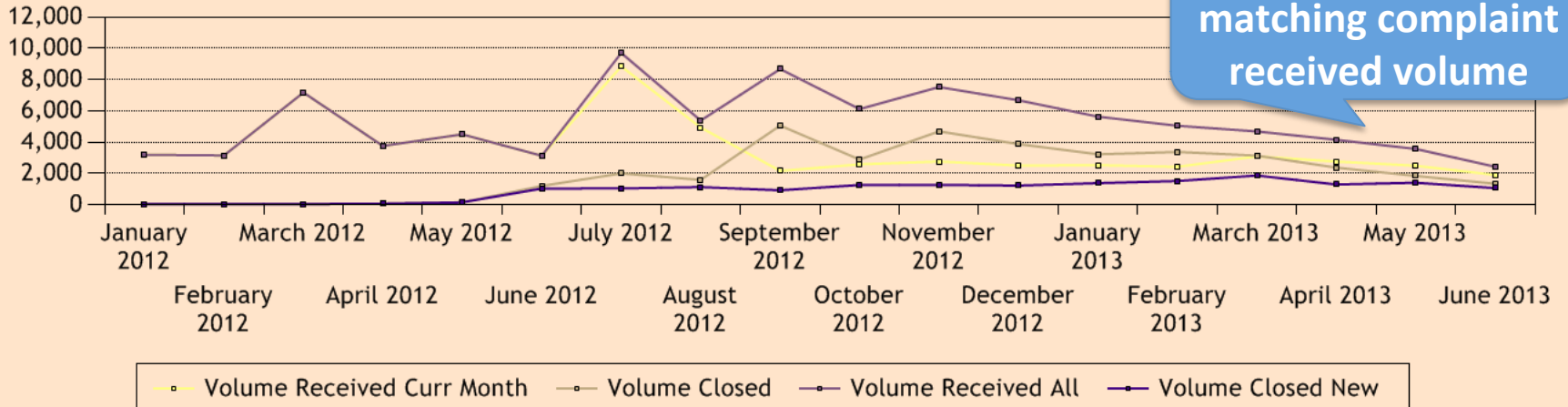


Monthly New Complaint Volume



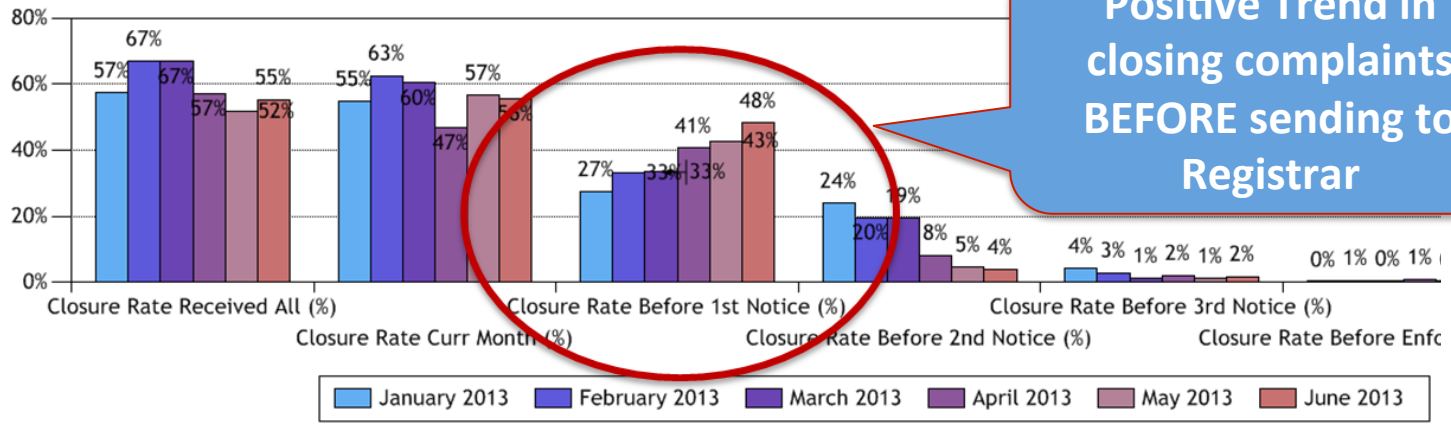
Compliance Operations Scorecard (3)

New, Processed & Closed Complaint Volume



Closure Rate matching complaint received volume

% Rates



Positive Trend in closing complaints BEFORE sending to Registrar



- Learn more about ICANN Compliance

<http://www.icann.org/en/resources/compliance>

- Please send general questions to Compliance@icann.org

Subject line: ICANN47 Contractual Compliance

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Thank you



Contractual Compliance Process & System Accomplishments

Standardized business processes & procedures for:

- Domain Redemption
- Domain Renewal
- Enforcement Notices
- Transfer
- Registrar Contact
- UDRP
- Whois Inaccuracy
- Whois Unavailability

- ✓ Standard correspondence templates
- ✓ Enabled consistent process for all complaint types, system & user self-help

Systems

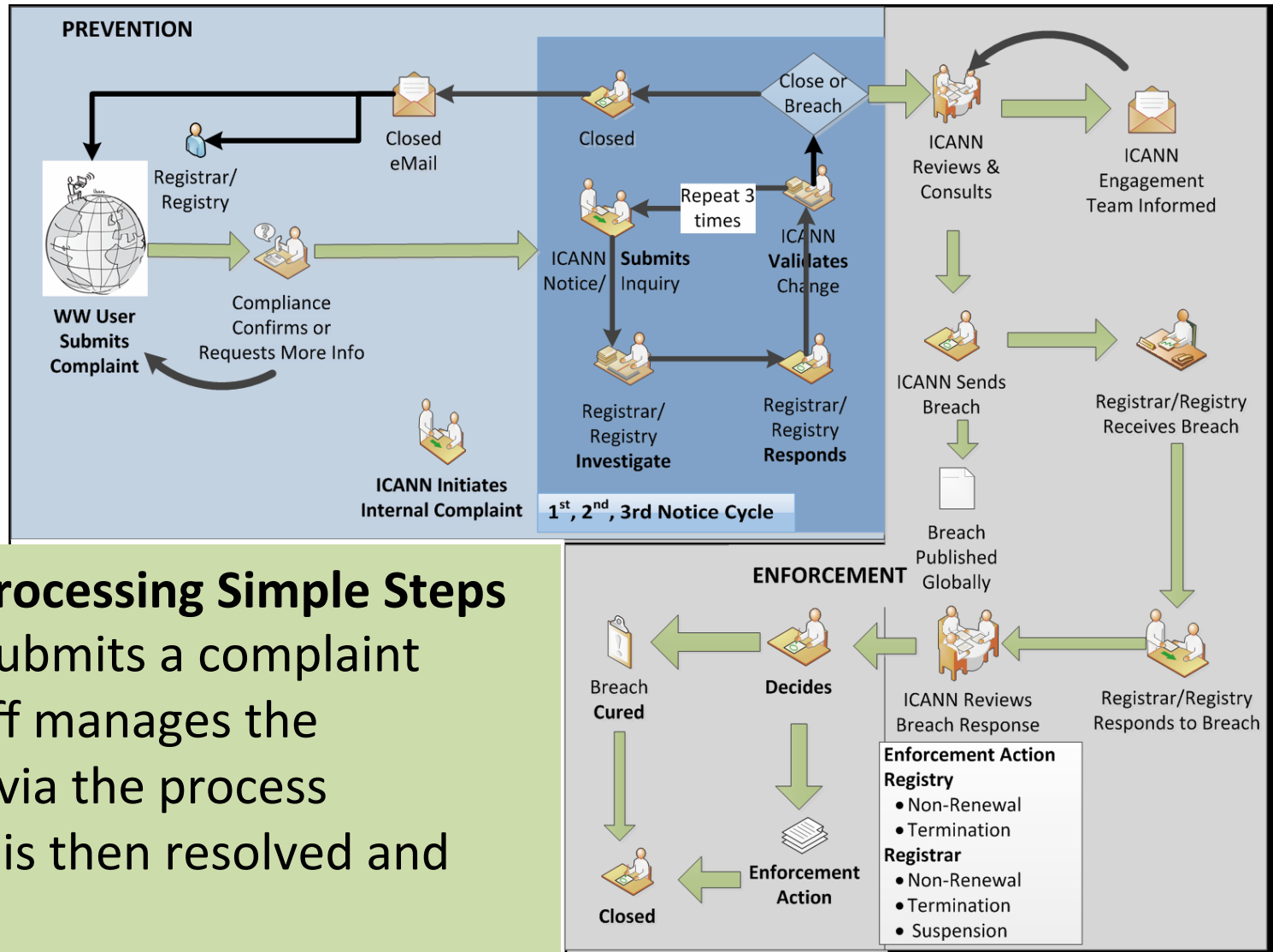
- ✓ Migrated multiple ticket systems into one consolidated system
- ✓ Migrated Internic.net complaint forms to ICANN.ORG
- ✓ Revamped web navigation and added ~50 FAQs for complaint submittal
- ✓ Email notice subject line to Registrars follow standard layout
- ✓ Complaint notices sent to contact email from RADAR (ie. Transfer contact-> Transfer)
- ✓ Pulse survey invite to all Reporters and Registrars in complaint closure email

Metrics

- ✓ Public metrics published monthly at MyICANN.org (12 month rolling data)
- ✓ Public & Operational Compliance metrics



Complaint Life-Cycle



Complaint Processing Simple Steps

- 1) Reporter submits a complaint
- 2) ICANN Staff manages the complaint via the process
- 3) Complaint is then resolved and closed

Complaint Submission Landing Page

Complaint Submission

- 1) Find & read about complaint type
- 2) Complete complaint FORM

The screenshot shows the ICANN website's compliance section. The main heading is "Contacting ICANN Regarding Contractual Compliance Complaint". Below this, there is a table with three columns: "Help With?", "Learn More", and "Take Action". The table lists various complaint types and provides links to learn more or take action for each.

Help With?	Learn More	Take Action
Country Code Domain Names (ccTLDs)	About ccTLD Compliance	ccTLD Compliance
Domain Name Dispute/UDRP	About Domain Name Dispute/UDRP	Domain Name Dispute/UDRP
Domain Name Management	About Domain Name Management	Domain Name Management
Domain Name Transfer to a Different Registrar	About Domain Name Transfer to a Different Registrar	Transfer Domain Name to Different Registrar
Domain Renewal/Redemption	About Domain Renewal/Redemption	Domain Renewal/Redemption
IP Infringement & Cybersquatting	About IP Infringement & Cybersquatting	IP Infringement & Cybersquatting
New gTLDs	About New gTLDs	New gTLD Customer Service
Registrars	About Registrar Compliance	Registrar Compliance
Spam, Phishing & Website Content	About Spam, Phishing & Website Content	Spam, Phishing & Website Content
Whois Complaints	About Whois Complaints	Whois Complaints
Whois Inaccuracy	About Whois Inaccuracy	Whois Inaccuracy Complaint Form
Registry Compliance	About Registry Compliance	Registry Compliance
Most Popular Complaints	Whois Inaccuracy Domain Transfer Domain Renewal	Whois Inaccuracy Complaint Form Transfer Complaint Form Domain Renewal Complaint Form

<http://www.icann.org/en/resources/compliance/complaints>

Step 1: Fill out complaint form

Complaint Submission

- 1) Answer questions
- 2) Preliminary edit checks are performed at this point
- 3) Enter Captcha data

Whois Inaccuracy Complaint Form

This form allows Internet users to submit a complaint to ICANN regarding incomplete or incorrect Whois data, including privacy or proxy contact information. The complaint is then forwarded to the sponsoring registrar, who must take reasonable steps to investigate and correct inaccurate data.

Please note: To update your own contact information, go to [Correct My Whois Data](#) to find out how.

[Items with an asterisk (*) are required]

Name *


Email *


Domain Name *

I do not want my e-mail address disclosed to the registrar who the domain name is registered with. If checked, please give reason below.

Reason

Characters remaining: 2486

 Saarent five

[Privacy & Terms](#)  reCAPTCHA™ stop spam. read books.

[Next Page >](#)

Step 2: Fill out complaint form (continued)

Whois Inaccuracy Complaint Form

This form allows Internet users to submit a complaint to ICANN regarding incomplete or incorrect Whois data, including privacy or proxy contact information. The complaint is then forwarded to the sponsoring registrar, who must take reasonable steps to investigate and correct inaccurate data.

Please note: To update your own contact information, go to [Correct My Whois Data](#) to find out how.

[Items with an asterisk (*) are required]

Registrant Data

Name: Wrong person or entity

Address: Incorrect address

Comment

Administrative Contact Data

Name: Nothing to report

Address: Incorrect address

Phone: Incorrect phone

Fax: Nothing to report

Email: Nothing to report

Comment

Technical Contact Data

Name: Nothing to report

Address: Nothing to report

Phone: Nothing to report

Fax: Nothing to report

Email: Nothing to report

Comment

Registration Dates

Create Date: Nothing to report

Comment

Registration Dates

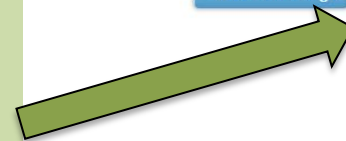
Expire Date: Nothing to report

Comment

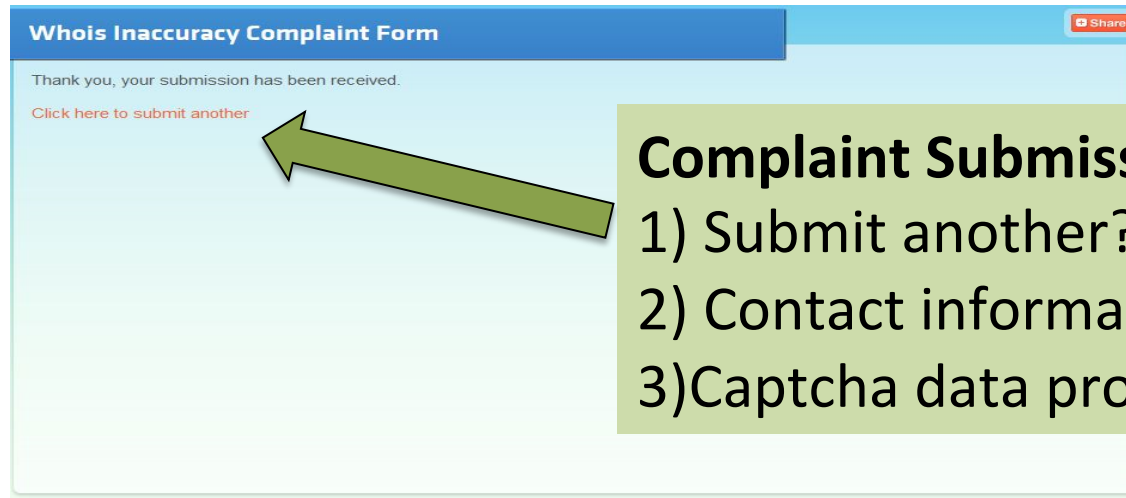
< Previous Page Submit

Complaint Submission

- 1) Answer questions
- 2) Enter 'Submit'



Step 3: “submit another” or Stop



Complaint Submission

- 1) Submit another?
- 2) Contact information is kept
- 3) Captcha data prompt

NEXT STEPS

- System checks that include: duplicate report submissions within 45 days (applies to Whois Inaccuracy only), Domain Status and valid domain name checks.
- The reporter may be asked for clarifying information
- Reporter must reply to a confirmation email request within 5 days or the complaint will be closed.

TERMS OF USE OF ICANN CONTRACTUAL COMPLIANCE BULK WHOIS INACCURACY COMPLAINT TOOL PILOT PROGRAM

AGREEMENT BETWEEN USER AND ICANN

The ICANN Contractual Compliance Bulk Whois Complaint Submission Tool (“Bulk Tool”) Pilot Program is offered to you conditioned on your acceptance without modification of the terms and conditions herein.

Please read the following terms of use and disclaimers carefully before using the Bulk Tool. By accessing or using the Bulk Tool, you agree to the terms and conditions, and all applicable laws. If you do not agree to these terms, you will not be allowed to use the Bulk Tool.

TERMS AND CONDITIONS

1. The Bulk Tool is subject to ICANN’s modification and enhancements, without notice as deemed necessary.
2. The Bulk Tool may be suspended by ICANN at any time if in its discretion ICANN deems it necessary.
3. Login information for the Bulk Tool is personal to you, and must not be shared with others.

TERMS OF USE OF ICANN CONTRACTUAL COMPLIANCE BULK WHOIS INACCURACY COMPLAINT TOOL PILOT PROGRAM (Continued)

4. Each user is limited to submitting no more than 100 Whois inaccuracy complaints through the Bulk Tool per calendar week. A calendar week starts on Sunday at 00:00 UTC. Additional submissions beyond 100 per week will be rejected. ICANN in its sole discretion may modify the submission limit with advance notice to the users and registrars.
5. Bulk submissions shall use current Whois data and may only be submitted in the data format specified by ICANN.
6. Bulk submissions shall not be used to harass ICANN, any ICANN-accredited registrar, or any domain name registrant or contact.
7. ICANN will review Bulk Tool submissions for validity, and improper tickets will be rejected by ICANN. Bulk Tool submissions must contain sufficient information to allow ICANN to validate each complaint independently. Factors to determine validity include, but are not limited to, complaint data quality and contactability (ability to reach Whois contacts).

TERMS OF USE OF ICANN CONTRACTUAL COMPLIANCE BULK WHOIS INACCURACY COMPLAINT TOOL PILOT PROGRAM (Continued)

8. ICANN will conduct periodic reviews or audits of user's Bulk Tool submissions to:
(i) determine compliance with these terms and conditions; and (ii) improve ticket validity levels. Users that do not demonstrate improvement for identified issues may have their Bulk Tool user access suspended or revoked.
9. ICANN may suspend or revoke Bulk Tool user access (either permanently or temporarily) for violations of these terms and conditions. Any suspension or revocation of Bulk Tool user access shall apply to single and multiple ("Submit another") Whois inaccuracy submissions.
10. Bulk Tool users must collaborate with ICANN to submit test data through a test Bulk Tool that conforms to these Terms of Use before being allowed to submit to production Bulk Tool.
11. Any and all information submitted to the Bulk Tool can be submitted to an ICANN-accredited Registrar or any other party that ICANN may need to notify related to a Bulk Tool submission. ICANN will not consider or treat any information submitted through the Bulk Tool as confidential
12. ICANN retains that right to revise these terms and conditions at any time without notice.

Contractual Compliance

Metrics
2013 YTD

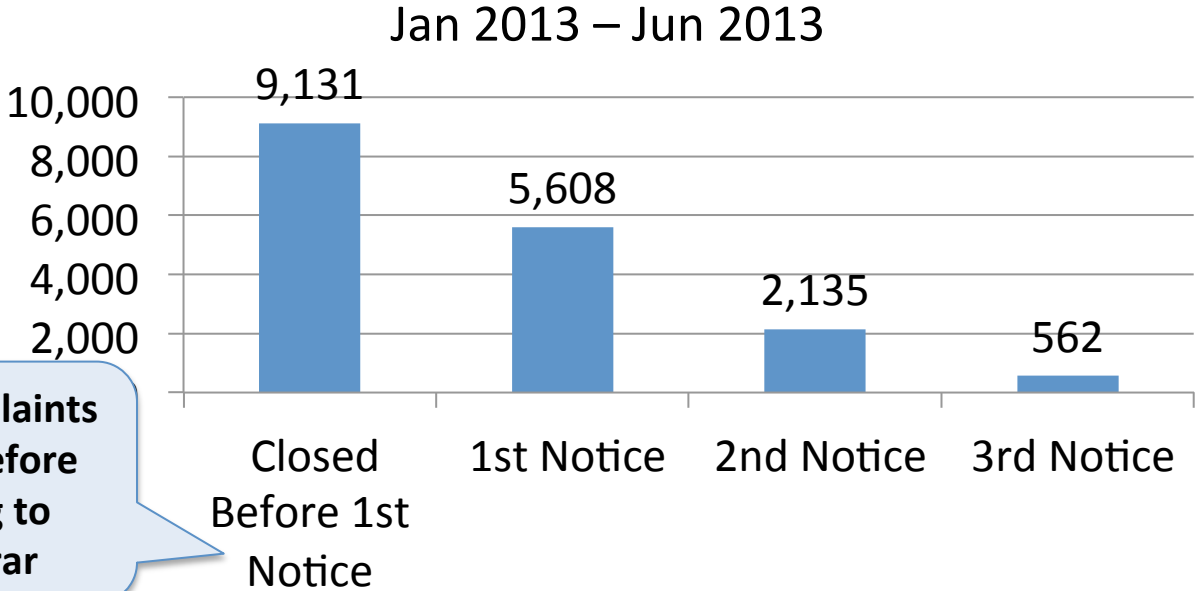
Contractual Compliance

Complaints per Notification Cycle

Jan 2013 - Jun 2013

Closure Rate 60%

Complaint Summary	Jan – Jun Total Complaints Processed	Jan – Jun Total Complaint Received	Jan – Jun Complaints Closed	Complaints Remaining Open After June 30
	25,397	15,108	15,256	1,082



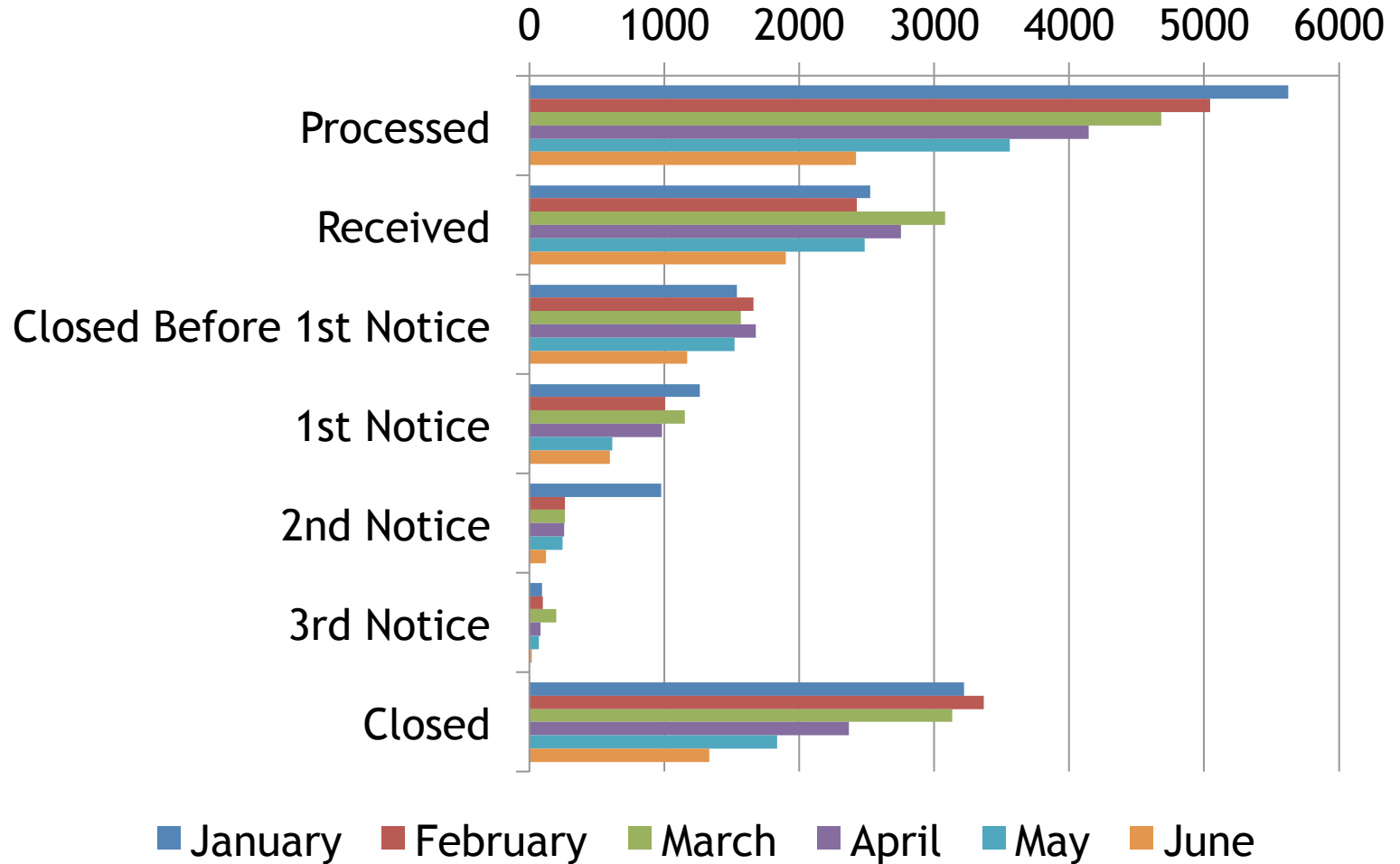
Backlog During 2013 = 9,059
After June = 1,082

36% complaints closed before sending to Registrar

Closed Before 1st Notice = # tickets received AND closed without any notice being sent to a registrar

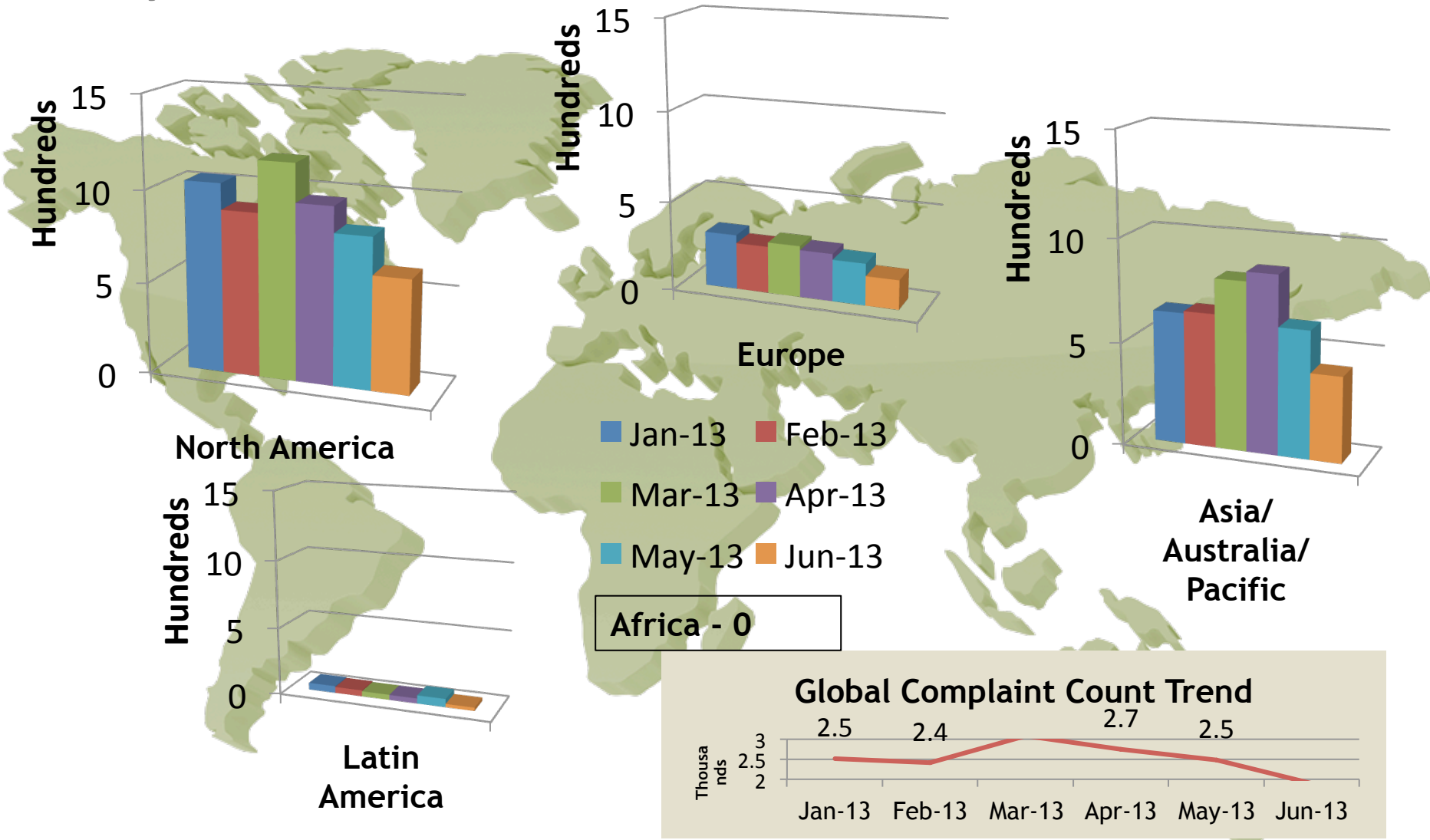
Complaints per Notification Cycle

January - June 2013



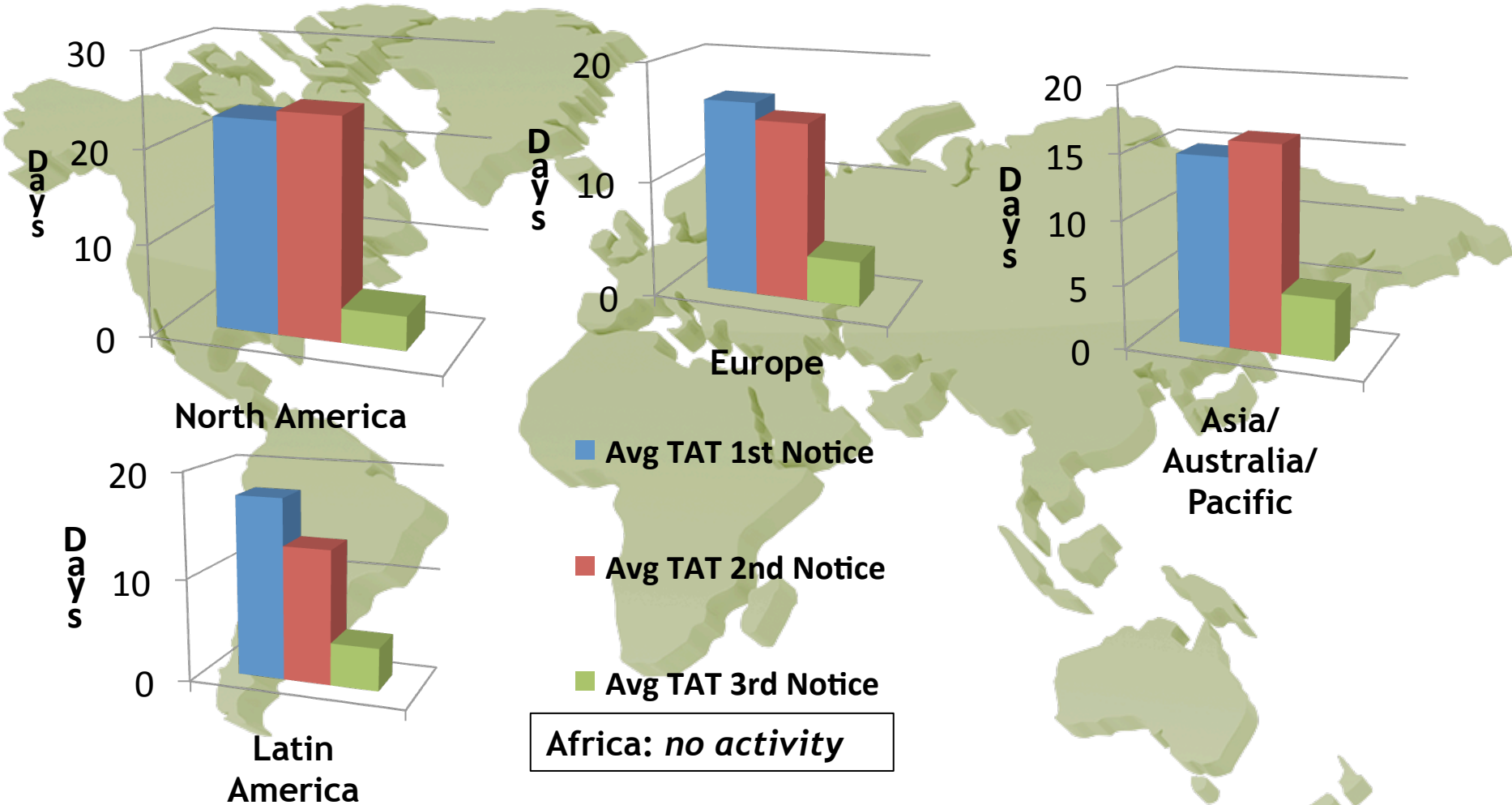
Contractual Compliance - Global Complaint Trend

January – June 2013



Contractual Compliance - Global Registrar Response TAT

January – June 2013



TAT = Average Turn Around Time, in Business Days



Complaints per Domain Volume

January – June 2013

N. America	100.6M	5,516	.005%
	741	262	35.4%

Europe	22.8M	1,530	.007%
	159	95	59.7%

Asia/A/P	23.2M	4,024	.017%
	160	105	65.6%

Latin America	1.3M	276	.021%
	24	16	66.7%

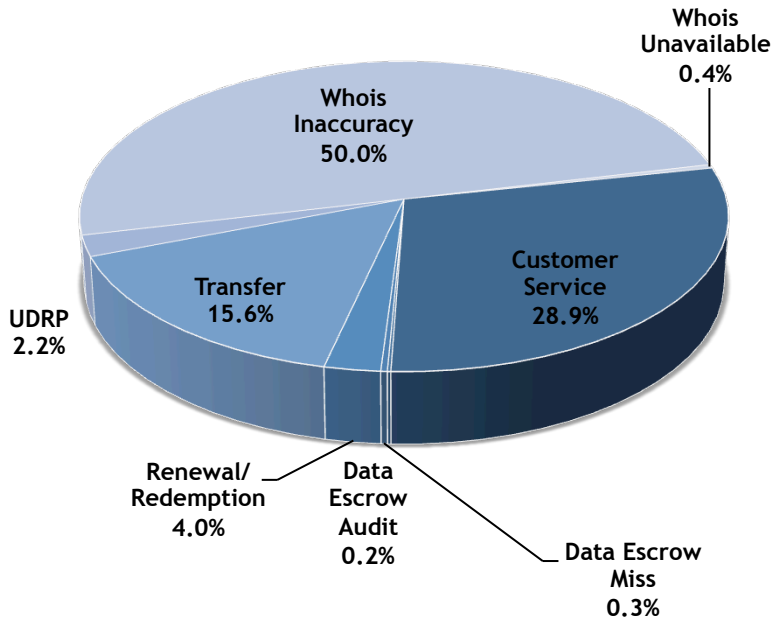
Africa	5,504	1	.018%
	7	1	14.3%

LEGEND	March 2013 Domain Volume/Million	# Complaints	% Complaints per Domain Volume
	# registrars per region	# registrar w/ Complaints	% registrars with complaints per region

Note: "# registrars per region" data may contain some obsolete registrars but is retained for reporting history

Complaint Types and Phases

January – June 2013

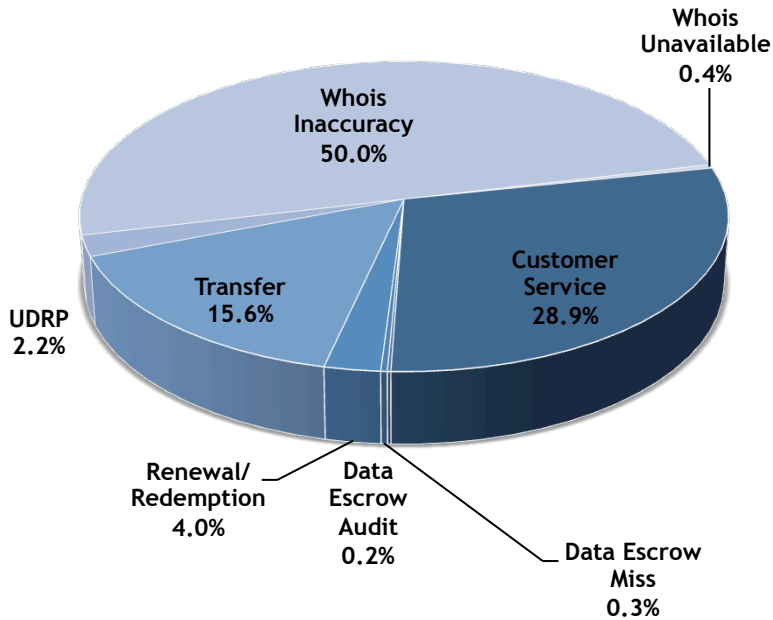


15,108 Complaints
54 Enforcement Actions

January - June 2013	All Complaints Received by Type	Quantity
Prevention Phase	Customer Service	4,368
	Data Escrow Review	23
	Data Escrow Miss	44
	Transfer	2,353
	UDRP	330
	Renewal/Redemption	382
	Whois Unavailable	58
	Whois Inaccuracy	7,550
	Total Complaints	15,108
Enforcement Phase	Breach	47
	Suspension	0
	Terminated/Non-Renewal	7

Complaint Types and Phases

January - June 2013



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Enforcement Notice Status by Registrar - January 2013 ... June 2013

	A. Telecom, ...	AsiaRegister, ...	Bargin Register, ...	Basic Fusion, ...	Black Ice Domains, ...	C Host, ...	Central Registrar, ...	Cheapies.com, ...	Dattatec.com, ...	DNS:NET Internet, ...	DomainSnap, ...	Dotted Ventures, ...	Elseserver SRL 1497,	Ground Internet, ...	Homestead Limited, ...	Internet Solutions, ...	Korea Electronic, ...	Lime Labs, ...	Mat Bao Trading, ...	Pacnames Ltd. 103,	Power Brand Centre, ...	R. Lee Chambers, ...	USA Webhost, ...	
Communicate contact data changes (RAA 5.11)																								
Link to ICANN's registrant rights & responsibilities website (RAA 3.15)																								
Maintain and provide communication records (RAA 3.4.2/3)																								
Pay accreditation fees (RAA 3.9)																								
Provide a reasonable opportunity to unlock the domain name (IRTP 3)																								
Provide AuthInfo code (IRTP 5)																								
Provide communication records (RAA 3.4.3)																								
Provide documents within 15 days (RAA 5.9.2)																								
Provide Whois Services (RAA 3.3.1)																								
Registrar becomes bankrupt or insolvent (RAA 5.3.7)																								
Respond to audits (RAA 3.14)																								
Take reasonable steps to investigate claimed Whois inaccuracies (RAA 3.7.8)																								

Cured
Not cured
Terminated