

Registrar Outreach



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Seoul
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Agenda

- Web-posting Obligations
- Registrar's Action Requirement in an UDRP Proceeding
- Communicating with ICANN Contractual Compliance
- Q&A

Registrar Information Specification (RIS) & Web Posting Obligations (WPO)

2013 RAA Registrar Information Specification (RIS) & Web Posting Obligations (WPO)

WPO Requirements

1. RIS

- Correspondence Address
- Principal Place of Business (if different from correspondence address)
- Officers' Full Names and Positions
- Parent Entity (if any)

2. Link to Registrant Benefits and Responsibilities

3. Abuse

- Handling Procedures
- Abuse Email Address

4. ICANN Logo

5. Domain Renewals

- Deletion and Auto-Renewal Policies
- Renewal Fees, Post-expiration Renewal Fees (if different) and Redemption/Restore Fees
- Methods Used to Deliver Pre and Post Expiration Notifications

2013 RAA RIS

2013 RAA Section 3.17

- Registrar shall provide to ICANN and maintain accurate and current information as specified in the Registrar Information Specification (RIS) to this Agreement.

There are (3) parts in order to satisfy RIS requirements:

1. RIS document

- All fields in RIS spreadsheet must be completed.

2. Documentation (Question #6)

- Demonstrates registrar entity is (i) legally established and (ii) currently in good standing

3. Web posting obligations (Questions #7, #11, #17 and #22)

- Registrar shall publish on each website the information specified as requiring such publication in the Registrar Information Specification.

RIS Document

2013 RAA_Rr Info Spec Sheet_BLANK

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A15 fx 11. If the location or address of Registrar's principal place of business is different from the address provided in 7, provide details including address, phone number, f

	A	B	C	D
1	2013 RAA - Registrar Information Specification Sheet	Registrar 1	Registrar 2	Registrar 3
2				
3	General Information			
4				
5	1. Full legal name of Registrar.			
6	2. Legal form of the Registrar (e.g., LLC, Corporation, Government Body, Intergovernmental			
7	3. The jurisdiction in which the Registrar's business is registered for legal and financial			
8	4. The Registrar's business registration number and the name of the authority that issued this			
9	5. Every business name and/or trade name used by the Registrar.			
10	6. Provide current documentation demonstrating that the Registrar entity is legally established and in good standing. For proof of establishment, provide charter documents or other equivalent document (e.g., membership agreement) of the entity. If the Registrar is a government body or organization, provide a certified copy of the relevant statute, governmental decision or other instrument under which the government body or organization has been established. With respect to an entity other than a government body or organization, where no such certificates or documents are available in the Registrar's jurisdiction, an affidavit drafted and signed by a notary public or a legal practitioner duly qualified in the courts of the Registrar's jurisdiction, declaring that the organization is established and in good standing, must be provided.			
11	7. Correspondence address for the Registrar.* This address will be used for contractual purposes, and the Registrar must be able to accept notices and service of legal process at this address. No Post Office boxes are allowed.			
12	8. Primary phone number where the Registrar can be reached for contractual purposes.			
13	9. Primary Fax number where the Registrar can be reached for contractual purposes.			
14	10. Primary Email address where the Registrar can be reached for contractual purposes.			
15	11. If the location or address of Registrar's principal place of business is different from the address provided in 7, provide details including address, phone number, fax number and email address.* Provide ICANN with current documentation demonstrating that the Registrar is legally entitled to do business in the principal place of business.			
16	12. Any other addresses where the Registrar will be operated or managed, if different from either its principal place of business or correspondence address provided above. (If so, please explain.) Provide ICANN with current documentation demonstrating that the Registrar is legally entitled to do business in each location identified.			

WPO - Abuse Procedures & Abuse Contacts

2013 RAA 3.18.3

- Registrar shall publish on its website a description of its **procedures** for receipt, handling, tracking of abuse reports.

2013 RAA 3.18.1

- Registrar shall publish an **email address** to receive such reports on the home page of Registrar's website.

WPO - ICANN Logo

2013 RAA Logo License Specification

<https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en#logo-license>

로고 라이선스 명세서

<https://www.icann.org/resources/unthemed-pages/approved-with-specs-2013-10-31-ko#logo-license>

- Registrar shall not use the Trademarks, any term, phrase, or design which is confusingly similar to the Trademarks or any portion of the Trademarks in any manner whatsoever.
- If the ICANN-accredited registrar logo is used, it must conform to the one in the 2013 RAA Logo License Specification



WPO - Domain Renewal Policies

2013 RAA 3.7.5.5

- Details of Registrar's **deletion** and **auto-renewal** policies must be clearly displayed on the website.









WPO - Domain Renewal Fees

2013 RAA 3.7.5.6

- Registrar should state in a clear place on its website, any fee charged for the recovery of a domain name during the Redemption Grace Period.

ERRP 4.1

- Registrars must make their renewal fees, post-expiration renewal fees (if different), and redemption/restore fees reasonably available.

	Renewal Fees	Post Expiration Renewal Fees (if any)	Redemption/ Restoration Fees
ERRP 4.1.1 – Registrar’s website			
ERRP 4.1.1- Registrar’s Registration Agreement			
ERRP 4.1.2- Resellers’ websites			







WPO- Domain Expiration Reminder Notices

ERRP 4.2

- Registrars must describe on their websites (if used) the methods used to deliver pre- and post-expiration notifications.

ERRP 4.2.1

- This description should generally include (i) communications channels/media that will be used and (ii) identification of the point of contact to which the notices will be transmitted.

	Pre-expiration Notifications	Post-expiration Notifications
ERRP 4.2 – Registrar’s website		
ERRP 4.2.2 – Registrar’s Registration Agreement		
ERRP 4.2.3- Resellers’ websites		

2013 RAA Registrar Information Specification (RIS) & Web Posting Obligations (WPO)

2013 RAA:

2013 Registrar Accreditation Agreement (RAA)

<https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en>

레지스트라인증 계약

<https://www.icann.org/resources/unthemed-pages/approved-with-specs-2013-10-31-ko>

RIS:

Registration Information Specification

<https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en#information>

레지스트라 정보 명세서

<https://www.icann.org/resources/unthemed-pages/approved-with-specs-2013-10-31-ko#information>

ERRP:

Expired Registration Recovery Policy

<https://www.icann.org/resources/pages/errp-2013-02-28-en>

만료 등록 복구 정책

<https://www.icann.org/resources/pages/errp-2013-02-28-ko>

Registrar's Action Requirement in an UDRP Proceeding

UDRP – Registrar’s Action Requirement

- Within two business days of request for verification from UDRP Provider:
 - Registrar must lock domain(s), confirm lock and provide information requested in verification request to Provider
 - clientTransferProhibited
 - clientUpdateProhibited
 - clientDeleteProhibited
 - Lock must be removed within one business day of Registrar being notified that proceeding has been withdrawn or dismissed
 - Lock means registrant cannot update Whois or transfer domain (domain must still resolve)

UDRP – Registrar’s Action Requirement

- Within three business days of receiving Provider’s Decision, registrar must communicate implementation date to Parties, Provider and ICANN
- For cases settled between parties outside the UDRP cases
 - Provider to inform Registrar of suspension and outcome of the settlement
 - Registrar shall remove the lock within two business days of being notified by the Provider

Communicating with ICANN Contractual Compliance

Communicating with ICANN

- Whitelist ICANN IP addresses **192.0.33.81**; **192.0.46.81**
- Check that your mail servers are not blocking emails from ICANN
- Reply to compliance notices ASAP and state what you are doing
- Ensure all questions are answered and documents provided
- Reply before due date, early response allows for follow up and collaboration if sufficient
- Do not change the subject lines in any way when responding to compliance notices
- Make sure response and attachments are less than 4MB size total

Informal Resolution Process - Clarifications

- ICANN will generally send a follow up for:
 - Insufficient response received before due date
 - Extension requested by contracted party by due date (with reason)
 - Clarification requested by contracted party before due date
- ICANN will advance to next phase for:
 - No response from contracted party

Informal Resolution Process - Clarifications

- Registrars: 1-2-3 notices sent to designated email contacts depending on complaint type; primary contact is also copied on 3rd notice and sent 3rd notice fax
- Reminder calls are made to contracted parties after 2nd and 3rd notices (if response is insufficient)
 - Primary contact for registrars
 - Telephone numbers are encouraged to be direct lines (rather than general customer service lines), with voicemail

Questions & Answers



Send compliance questions

To: compliance@icann.org

Subject line: [ICANN Korea Outreach](#)

Additional RAA Guidelines and Reference

- ⦿ Distinguishing verification/validation
- ⦿ Verify
 - “to confirm or correct accuracy of Whois data”
 - Requires contacting and receiving response from RNH
- ⦿ Validate
 - “to ensure format of Whois data is consistent with standards”
 - Validation is conducted by registrar, not RNH

2013 RAA: WAPS Validation

- Validation: ensure data is present and formatting is consistent with standards
 - “Standards” includes RFC 5322 (email), ITU-T E. 164 (telephone), UPU postal or S42 addressing templates (postal addresses) or equivalents for country or territory
 - Not websites or map applications (unless they rely on standards)
 - Not something obtained from RNH
- ICANN request registrars to specify the standards used for validation and validation results

2013 RAA: WAPS Verification

- ⦿ Verification: to confirm or correct information
 - Affirmative response verification by email:
 - Receive email from registrant email address listed in Whois data, or
 - Returning a unique code in a manner designated by the Registrar
 - Affirmative response verification by telephone:
 - Calling or sending an SMS to the Registered Name Holder's telephone number providing a unique code that must be returned in a manner designated by the Registrar, or
 - Calling the Registered Name Holder's telephone number and requiring the Registered Name Holder to provide a unique code that was sent to the Registered Name Holder via web, email or postal mail.
- ⦿ Absent affirmative response verification within 15 days of trigger:
 - Registrar must manually verify or suspend domain until verification occurs

2013 RAA: WAPS Triggers by Section Number

- ⦿ Section 1: validation and verification required for all new registrations, inbound transfers or when the RNH changes
- ⦿ Section 2: verification and validation required for updated Whois data
- ⦿ Section 4: if registrar has information suggesting Whois data is incorrect it must also verify or re-verify email addresses of RNH and account holder
 - Whois inaccuracy complaint triggers verification

2013 RAA: Whois Inaccuracy Notices and WAPS

- ⦿ Section 3.7.8: Registrars are required to take reasonable steps to investigate and correct Whois data inaccuracies
- ⦿ ICANN requests:
 - Correspondence during investigation, including email headers and investigation details, including when, how, and with whom communication was conducted
 - Validation of any data updated following investigations per Section 2 of WAPS (ICANN requires registrars to specify the standards used for validation and validation results)
 - Verification of RNH email per Section 4 of WAPS
- ⦿ The obligations to validate, verify and investigate alleged Whois inaccuracies under RAA Section 3.7.8 are not interchangeable

2013 RAA: Whois Inaccuracy Notices and WAPS

- ⦿ Registrars have 15 calendar days after trigger event (for ex new registration, in-bound transfer, change to registrant, Whois Inaccuracy complaint) to verify/validate, as applicable
 - Multiple triggers within initial period do not add time
- ⦿ ICANN's 1st compliance notice remains 15 business days
- ⦿ ICANN asks in 2nd compliance notice why registrars did not suspend or delete registrations within 15 calendar days

2013 RAA: Whois Inaccuracy Notices and WAPS

- ⦿ ICANN looking for one of three results to Whois inaccuracy complaint:
 - Whois updated within 15 days of notifying RNH – registrar provided documentation of validation of updates and verification (including affirmative response or manual verification)
 - No response from RNH within 15 days of notifying RNH – domain suspended until registrar has verified information
 - Whois verified as accurate (no change) within 15 days of notifying RNH – registrar provided documentation of verification

- ⦿ ICANN may also request evidence of WAPS fulfillment under Section 1

2013 RAA: Abuse Reports Requirements

- ⦿ Most common abuse reports are about online pharmaceuticals, malware, viruses, spam and IP Infringement.
- ⦿ Examples of out of scope reports:
 - Registrars on 2009 RAA
 - Reporter did not contact the registrar before complaining to ICANN
- ⦿ ICANN continues to conduct outreach with registrars, abuse reporters and IP rights protection groups

2013 RAA: Abuse Reports Requirements

- ⦿ Section 3.18 of 2013 RAA
- ⦿ 3.18.1: anyone worldwide can file valid abuse reports
- ⦿ 3.18.2: law enforcement, consumer protection, quasi-govt. - No jurisdictional limitation once entity is designated by registrar's local government.
- ⦿ Registrar must investigate reports
 - Court order NOT required to investigate
 - Investigative process can vary depending on report
- ⦿ Home page must link to abuse process and email address (contact form only is not sufficient)

2013 RAA: Abuse Reports Requirements

Section 3.18.1

- Registrars must:
 - Take reasonable and prompt steps to investigate and
 - Respond appropriately to ANY reports of abuse
- Reasonable steps may include:
 - Contacting the RNH of the domain(s)
- Appropriately varies depending on the facts and circumstances
- Whois data verification by itself is insufficient
- Court order is not required for registrar to investigate absent a specific local law or regulation provided to ICANN

VS

Section 3.18.2

- Registrar must have dedicated abuse email and phone number in Whois output
- Reports of Illegal Activity must be reviewed within 24 hours by an individual who is empowered to take necessary and appropriate actions
- Reports can be from any applicable jurisdiction once reporter is designated by registrar's local government as an authority

2013 RAA: Abuse Reports Requirements

- ⦿ ICANN confirms that reporter sent abuse report to registrar abuse contact before sending complaint to registrar

- ⦿ ICANN could request the:
 - Steps taken to investigate and respond to abuse report
 - Time taken to respond to abuse report
 - Correspondence with complainant and registrant
 - Link to website's abuse contact email and handling procedure
 - Location of dedicated abuse email and telephone for law-enforcement reports
 - Whois abuse contacts, email and phone

- ⦿ Examples of steps registrars took to investigate and respond to abuse reports:
 - Contacting registrant
 - Asking for and obtaining evidence or licenses
 - Providing hosting provider info to complainant
 - Performing Whois verification
 - Performing transfer upon request of registrant
 - Suspending domain

2013 RAA: Abuse Reports Resolve Codes

- Abuse contact info published on registrar website
- Added required abuse information in Whois output
- Abuse report handling procedures published on registrar website
- Registrar suspended or canceled domain
- Registrar demonstrated that it maintained abuse records
- Registrar responded to abuse report (non-LEA), including:
 - Communicating report to registrant
 - Registrant provides copy of government license
 - Reporter removed from email distribution list (spam complaint)
 - Website content in complaint removed
- Registrar responded to LEA illegal activity reports
- Registrar documented valid non-action, including
 - Registrar previously responded to complaint
 - Invalid abuse complaint
- Registrar now monitoring abuse email address/phone
- Registrar showed email/phone already published

2013 RAA: Domain Renewal Requirements

Expired Registration Recovery Policy

- Renewal reminders must be sent at required times to RNH
 - Approximately 1 month (26-35 days) and 1 week (4-10 days) prior to expiration and within 5 days after expiration
 - Required even if registration is on auto-renew
 - Must be communicated in a way that does not require an affirmative action to receive the notice
 - Can be sent to other email addresses in addition to the RNH email address
 - Can be sent at other intervals in addition to those prescribed by the ERRP
- For at least the last eight consecutive days after expiration that the registration is renewable, the DNS resolution path must be interrupted
 - If traffic is re-directed to a parking page, it must say that the name expired and include renewal instructions
 - If RAE renews name, DNS resolution path must be restored as soon as commercially reasonable

General UDRP Issues

Uniform Domain Name Dispute Resolution Policy

- ⦿ Verify with providers and prevent improper transfer
 - Registrars not responding to verification requests from providers
 - Registrars transferring names during proceedings or instead of implementing Decision
- ⦿ Complexity of matters involving “mutual jurisdiction”
- ⦿ Complainants not providing information to registrars to update Whois
- ⦿ If domain name expires or is deleted during the course of a UDRP dispute, Complainant has the right to renew or restore under same commercial terms as RNH
- ⦿ Note: UDRP Rule revisions took effect 31 July 2015

Transfer Policy

Inter-Registrar Transfer Policy

- ⦿ Registrars must use the standardized Form Of Authorization (Sections 2 and 3 of the IRTP)
 - Gaining registrar FOA: <https://www.icann.org/resources/pages/foa-auth-2004-07-12-en>
 - Affirmative response required from Transfer Contact before sending command to registry
 - Losing registrar FOA: <https://www.icann.org/resources/pages/foa-conf-2004-07-12-en>
 - FOA must be sent in English (other languages permitted in addition to English version)
 - The AuthInfo code must be used to identify the RNH only, must be unique and on a per-domain basis
 - The new IRTP, renamed the "Transfer Policy", will be effective 1 August 2016: <https://www.icann.org/news/announcement-2-2015-09-24-en>

2013 RAA: Privacy/Proxy Services

- ⦿ Section 3.4.1.5 and Specification on Privacy and Proxy Registrations
- ⦿ Privacy service: shows actual registrant's name, but alternative contact information
- ⦿ Proxy service: is the registrant and licenses domain to beneficial user
- ⦿ Whois data for these registrations must be reliable and accurate
 - Registrant must be contactable for both privacy and proxy services
- ⦿ Registrar must verify/validate Whois data as required by 2013 RAA
- ⦿ Underlying Whois info must be included in data escrow deposits

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- ⦿ Underlying Whois info must be included in data escrow deposits

2013 RAA: Registrar Information Specification

- ⦿ Section 3.17 and Registrar Information Specification
- ⦿ Registrars must provide ICANN completed RIS after execution of RAA
- ⦿ Additional website posting requirements (contact information, officer information and parent entity)
- ⦿ Most common issues:
 - Not providing supporting documentation per RIS Section 6 demonstrating good standing
 - Providing incomplete information
 - Not publishing required data on website

2013 RAA: Resellers

Section 3.12

- ⦿ Resellers cannot cause registrar to breach RAA
- ⦿ Registrar must use efforts to ensure reseller compliance
- ⦿ ICANN may review registrar/reseller written agreement
- ⦿ Resellers may not use ICANN-accredited logo
- ⦿ Resellers must identify registrar upon request
- ⦿ Resellers must abide by Privacy/Proxy Specification and Consensus Policies

2013 RAA: Domain Deletion

Whois Accuracy Program Specification

- ⦿ ICANN's review includes check for whether domain was deleted or suspended in cases of registrant's:
 - Non-response within 15 days of registrar's Whois inquiry
 - Willful provision of inaccurate or unreliable contact information
 - Willful failure to update information within 7 days of change
- ⦿ If registrar demonstrates compliance, ICANN will notify complainant to contact registrar regarding reactivation

2013 RAA: Customer Service Handling Process

Section 3.7.11

- ⦿ ICANN requests could include, for example:
 - Copy of customer service handling process
 - Link to customer service handling process on website
 - Written communications with RNH regarding notification of customer service handling process

2013 RAA: DNSSEC, IPv6 and IDN

Section 3.19 and Additional Registrar Operation Specification

- ⦿ DNSSEC:
 - Must allow customers to use DNSSEC upon request
 - All requests shall be transmitted to registries using the EPP extensions in RFC 5910 or its successors

- ⦿ IPv6:
 - If registrar offers nameserver specification by customer, IPv6 must be allowed

- ⦿ Internationalized Domain Names:
 - Compliance with Additional Registrar Operation Specification

2013 RAA: Bankruptcy, Conviction, Security

- ⦿ Section 3.20
- ⦿ Registrar required to provide ICANN notice of these events
- ⦿ ICANN review could include requesting:
 - Proof of bankruptcy proceeding or conviction
 - Detailed description of breach (breach itself is not noncompliance)
 - How it occurred
 - Number of registrants affected
 - Any action taken in response

2013 RAA: Registrant Rights and Responsibilities

- ⦿ Sections 3.7.10 and 3.16
- ⦿ Registrar must publish or provide a link to the Registrants' Benefits and Responsibilities Specification (attached to RAA) on its website (Section 3.7.10)
- ⦿ Registrar must provide a link to ICANN's registrant educational information (Section 3.16) on its website
- ⦿ ICANN review could include requests, for example, of:
 - Website URLs
 - Screenshots

2013 RAA: Data Retention Waiver

- ⦿ Data Retention Specification
- ⦿ Registrars may retain for shorter period or provide fewer records per Data Retention Waiver
 - Waiver is based on legal opinion or government ruling that retention violates applicable law
 - Limited to specific terms and conditions of retention requirements
 - Example: waiver changing post-sponsorship retention period from 2 years to 1 year
- ⦿ Registrars in same jurisdiction as already-approved registrar may request similar treatment
- ⦿ ICANN must approve waiver before registrar can deviate from retention obligations

2013 RAA: Data Retention Waiver

Section 3.3

- ⦿ Registrars are required to provide public access to contact details for each domain via Port 43 and the web
 - 2013 RAA only: Port 43 Whois access is required for “thin” registries only

- ⦿ 2013 RAA only: additional Whois Service Level Agreement (SLA) requirements in Section 2 of the Registration Data Directory Service (Whois) Specification

2009/2013 RAA: Other Web Posting Obligations

- ⦿ Some of the other registrar web posting obligations include:
- ⦿ Publishing valid contact details per Sections below
 - 2009 RAA Section 3.16
 - 2013 RAA Section 3.17
- ⦿ If the ICANN-accredited registrar logo is used, it must conform to the one in the RAA
 - 2009 RAA Logo License Appendix
 - 2013 RAA Logo License Specification



WPO - Domain Renewal

ERRP 4.1.1

- At a minimum, these fees must be clearly displayed on the registrar's website.
- 到期前和到期后的域名续延费用以及域名赎回费用至少必须刊登在注册服务商的网站上。

ERRP 4.1.1

- A link to these fees must be included in the registrar's registration agreements.
- 注册服务商在注册协议中必须提供有关到期前和到期后的域名续延费用以及域名赎回费用的链接。

ERRP 4.1.2

- Additionally, registrars must ensure that these fees are displayed on their resellers' websites.
- 注册服务商也必须确保以上费用刊登在旗下代理商的网站上。

WPO- Domain Expiration Reminder Notices

ERRP 4.2.2

- Registrars' registration agreements must include either a similar description of its notification methods or a link to the applicable page(s) on its website where this information is available.
- 注册服务商在注册协议中必须提供有关发送到期提醒通知的信息或者通往网站上刊登此资料的链接。

ERRP 4.2.3

- Additionally, registrars must ensure that these communication methods are described on their resellers' websites.
- 注册服务商也必须确保以上信息刊登在旗下代理商的网站上。

2013 RAA Registrar Information Specification (RIS)

Items marked with "*" must be published on Registrar's website.

* 标有“*”的项目须在注册服务商网站刊登。

RIS 7:

- Correspondence address for the Registrar. *
- 注册服务商的通讯地址。

RIS 11:

- If the location or address of Registrar's principal place of business is different from the address provided in 7, provide details including address, phone number, fax number and email address. *
- 若注册服务商的主要营业地点与以上通讯地址不一致，需提供主要营业地址、电话号码、传真号码及电子邮件地址等资料。

RIS 17:

- Full name, contact information, and position of all officers of the Registrar. *
- 注册服务商所有主管人员的全名、联系信息和职位。

RIS 22:

- List the ultimate parent entity of the Registrar, if applicable. *
- 请提供注册服务商的总公司名字（若有）。

RIS - Common Issues (Web posting Obligations)

Obligation 要求	Sample RIS Response 标准RIS答复	Sufficient Sample Posting	Insufficient Sample Posting
RIS #7: The correspondence address for the registrar 注册商的地址	Sample Registrar 123 Sample St. Bldg #5 Shanghai, China Postal Code	Sample Registrar 123 Sample St. Bldg #5 Shanghai, China Postal Code	Sample Registrar 12024 Waterfront Dr. Los Angeles, CA 90094 -completely different address 地址不一样
RIS #11: The registrar's principal place of business (if different than the correspondence address) 注册商的主要营业地址 (如果和以上的地址不一样)	Sample Registrar 456 Sample St. Bldg #10 Shanghai, China Postal Code	Sample Registrar 456 Sample St. Bldg #10 Shanghai, China Postal Code	-no posting- 没有在网上刊登

RIS - Common Issues (Web posting Obligations)

Obligation	Sample RIS Response	Sufficient Sample Posting	Insufficient Sample Posting
<p>RIS #17: The full names and positions of all officers of the registrar.</p> <p>公司里的主要人员姓名和职位</p>	<p>Mr. Chang, CEO; Ms. Wu, CFO; Mr. Jiang, General Manager; Ms. Chen, CTO.</p>	<p>Mr. Chang, CEO; Ms. Wu, CFO; Mr. Jiang, General Manager; Ms. Chen, CTO.</p>	<p>Mr. Chang, CEO; Ms. Chen, CTO.</p> <p>-missing 2 officers from RIS response</p>
<p>RIS #22: The ultimate parent entity of the registrar, if applicable.</p> <p>如果没有母公司，不需要刊登</p>	<p>Parent Company, Inc.</p>	<p>Parent Company, Inc.</p>	<p>-no posting-</p> <p>没有刊登</p>

2009/2013 RAA: Data Escrow

- ⦿ Section 3.6
- ⦿ Registrars with registered domains are required to deposit registration data into escrow
- ⦿ ICANN monitors the data deposits to ensure that they:
 - Are made on schedule (daily/weekly)
 - Correspond to each registrar's requirements (full deposit only vs. full and incremental deposits)
 - Are valid in format and completeness
- ⦿ Manual data escrow audits are performed upon request

2009/2013 RAA: Data Escrow – Common Errors

Common errors with registrar data escrow deposits

- ⦿ Data in deposit does not match Whois lookup
- ⦿ Whois lookup blocked
- ⦿ Incomplete header row (missing ICANN required fields)
- ⦿ Deposit file is empty or only contains a header row
- ⦿ Deposit file name is incorrect
- ⦿ Handle file (if required) is missing from the deposit
- ⦿ Not comma de-limited
- ⦿ Full file and Handle file contains no header row

2009/2013 RAA: Accreditation Fees

Section 3.9

- ⦿ Registrars are required to pay ICANN yearly and variable accreditation fees.
- ⦿ ICANN requests could include, for example:
 - Immediate payment (no extensions for past due fees)
 - Reply to compliance notice upon payment
 - Emailing/CC to accounting@icann.org upon payment
- ⦿ Ensure reply with credit card authorization form does not exceed 4 MB size <https://www.icann.org/en/system/files/files/credit.pdf>

2009/2013 RAA: Registration Data and Records

Sections 3.4.2 and 3.4.3

- ⦿ Registrars are:
 - Required to maintain and provide registration data and records of written communications
 - Responsible for maintaining data and documents and providing them to ICANN regardless of the business model (reseller)
- ⦿ Note: not responding to ICANN compliance notices is commonly a violation of these requirements

2009/2013 RAA: Registration Agreement

- ⦿ Section 3.7.7
- ⦿ Agreement should include all provisions of Section 3.7.7:
 - The same or equivalent language provided in Sections 3.7.1.1-12 must be included in registration agreements
- ⦿ Agreement must be with a person or legal entity other than the registrar unless the registrar is using the domain for Registrar Services

2009/2013 RAA: Registrar Contact Data

- ⦿ 2009 RAA Section 5.11 and 2013 RAA Section 7.6
- ⦿ Registrars must have a point of contact where compliance communications, notices and enforcement are sent
 - Keep contact information in ICANN's Registrar Database (RADAR) up to date
 - To update Primary Contact, follow the instructions located here: <https://www.icann.org/resources/pages/registrar-contact-updates-2015-09-22-en>
 - Send contact data questions to radaradmin@icann.org

2013 RAA Links

1

2013 RAA

<https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en>

2

2009/2013 RAA Redline

<https://www.icann.org/en/system/files/files/approved-with-specs-21may09-redline-27jun13-en.pdf>

3

2013 RAA FAQ (includes links to four webinars)

<https://www.icann.org/resources/pages/faqs-2013-11-26-en>