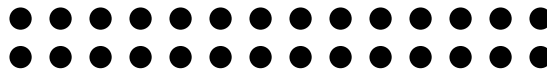
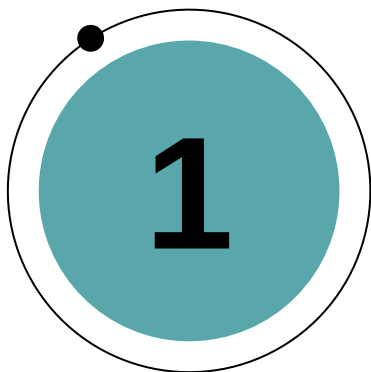




79 | COMMUNITY
FORUM

**Registrars &
ICANN:
Validation,
Verification &
Accuracy
- Oh My!**

6 March 2024

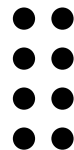


ICANN | RrSG

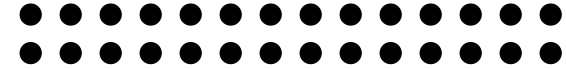
Registrar Stakeholder Group

Welcome & Overview

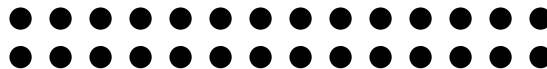
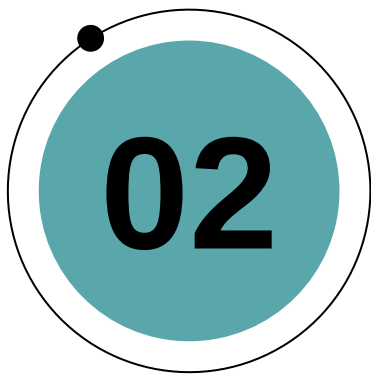
Ashley Heineman, GoDaddy, RrSG Chair



Meeting Agenda

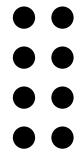


No.	Topic	Lead
1	Welcome & Overview (5 min)	Ashley Heineman, GoDaddy, RrSG Chair
2	ICANN Registrar Resources (10 min)	Andee Hill, ICANN, Director of gTLD Accounts
3	RrSG Membership Benefits (5 min)	Eric Rokobauer, Squarespace, RrSG Secretary
4	Validation, Verification and Accuracy: Background (10 min)	Heidi Revels, Amazon, RrSG Comms & Outreach Committee
5	ICANN & Other Obligations (10 min)	Owen Smigelski, Namecheap, RrSG VC Policy
6	Why Does it Matter? (10 min)	Catherine Paletta, Name.com
7	Registrar Experiences (10 min)	Sarah Wyld, Tucows, RrSG Comms & Outreach Group Chair
8	Q&A and Discussion (30 mins)	Ashley



ICANN Registrar Resources

Andee Hill, ICANN, Director of gTLD Accounts

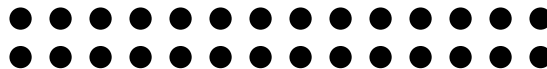


ICANN Org Resources For Registrars

- ICANN org is committed to providing registrars with needed resources to successfully navigate ICANN requirements.
- Resources for Registrars
 - Welcome Kit
 - Registrar [Operations Handbook](#)
 - Registrar Online Portal (NSp) [User Guide](#)
 - ICANN Learn - [RAA Training](#)
 - ICANN.org website - [Information for Registrars Section](#)

Keeping Up With ICANN Org

- Registrars can ask general questions by submitting an email to globalsupport@icann.org or reach out to their Account Manager.
- To learn more about Registrar Accreditation Agreement (RAA) obligations, please visit ICANN Learn. Registrar RAA training modules include:
 - Introduction
 - Enforcement & Administration
 - Dealing with Registrants & Registrant Responsibilities
 - Transfer Policy
 - Trademark Dispute Resolution Proceedings
 - Data Management

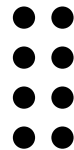


ICANN | RrSG

Registrar Stakeholder Group

RrSG Membership Benefits

Eric Rokobauer, Squarespace Domains, RrSG Secretary



Benefits of RrSG Membership



Decision Making

Registrars follow ICANN's policies & contracts as well as local laws; important to be a part of the process that shapes them



Knowledge

Become acquainted and involved with what happens in ICANN early on through participation in policy development (PDPs/IRTs) and RrSG/CPH subgroups

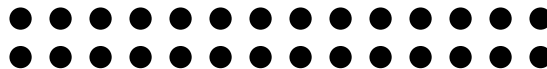


Development

Build professional relationships and friendships within the industry, ICANN Org, and community



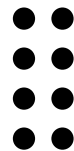
RrSG website: <https://rrsg.org>



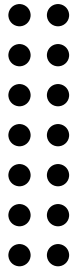
Validation, Verification & Accuracy: Background

What is registration data accuracy?

Heidi Revels, Amazon Registrar, Inc, RrSG Comms & Outreach Committee



RrSG POLL!



Question 1

Accurate registrant data means:

- a) The registrant data is formatted correctly and reachable
- b) The registrant data contains a local phone number
- c) The registrant data contains an email address

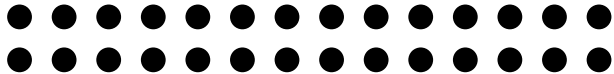
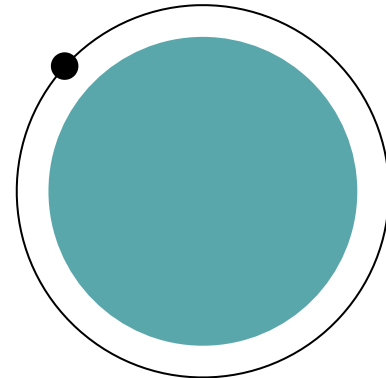




What is Registration Data Accuracy?

The RrSG understands Registration Data Accuracy to mean that the registration data elements provided by the Registered Name Holder or Account Holder are “syntactically accurate”, and either the telephone number or the email address are “operationally accurate.”

According to the, Registrar Accreditation Agreement (RAA) as well as Consensus Policies, domain name registration data should be accurate, reliable, and up-to-date.



What is Registration Data Accuracy?



Syntactical accuracy

To be considered “syntactically accurate”, the **validation** requirements of the [Whois Accuracy Program Specification](#) Sections 1b-d must be met. The format of the registration data is correct.

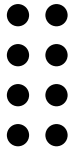
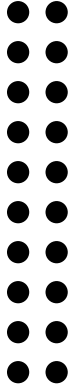
E.g., for email addresses all characters must be permissible, the “@” symbol is required, and there must be characters before the “@” symbol.



Operational accuracy

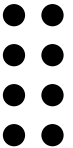
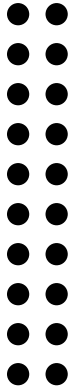
To be considered “operationally” accurate”, the **verification** requirements of the [Whois Accuracy Program Specification](#) Section f must be met. The registration data actually works.

E.g., an email sent to the Registered Name Holder must receive an affirmative response.

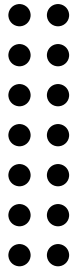


What is Registration Data Accuracy?

Upon notice of alleged inaccuracy or if the Registrar learns of inaccurate contact information, the Registrar must take reasonable steps to investigate that claimed inaccuracy and to correct inaccuracy. If a Registered Name Holder willfully provides inaccurate or unreliable registration data information, the registrar will take additional action to terminate, suspend or place a registration on hold.



RrSG POLL!

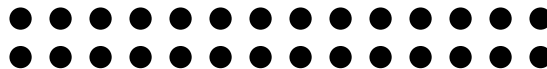
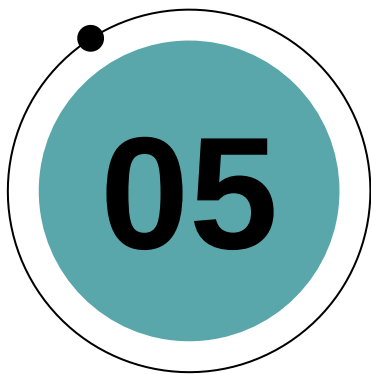


Question 2

Why is Registration Data Accuracy Important?

- a) Meet legal, contractual, and policy obligations
- b) Send the domain owner important, mandatory notices (e.g. renewal reminders)
- c) Contact the domain owner when problems arise
- d) All of the above

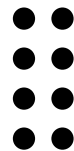




ICANN & Other Obligations

What does ICANN require in relation to registration data accuracy and what other legal obligations do registrars have?

Owen Smigelski, Namecheap, RrSG Vice Chair of Policy



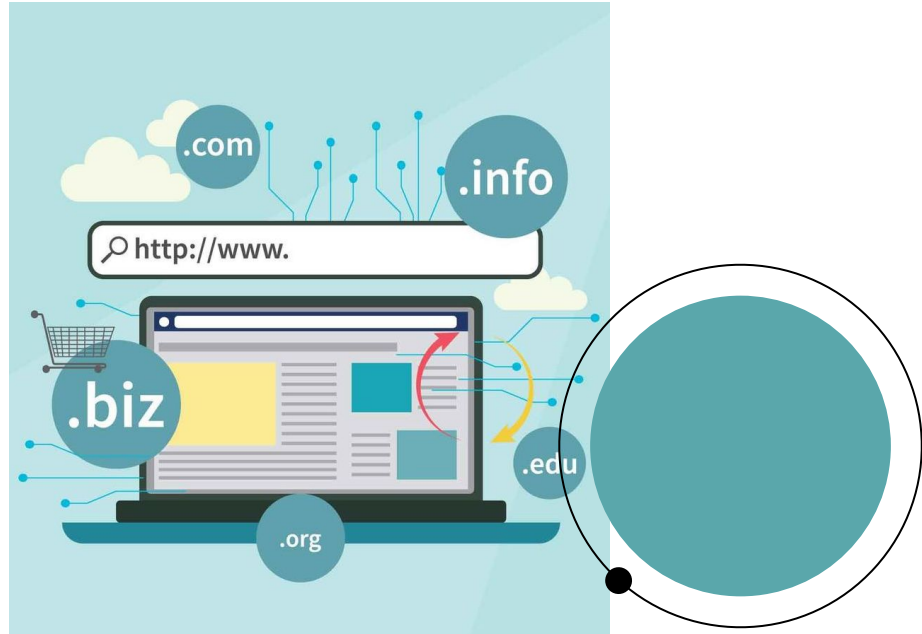
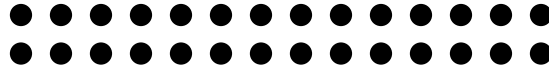
RAA

The [Registrar Accreditation Agreement](#) (RAA) provides requirements for the registration agreement that domain owners enter into with their domain registrar, including specific requirements relating to domain name registration data.

Domain owners are obligated to provide accurate and reliable contact details to the registrar, and update their contact info within 7 days of any change.

This includes the domain owner's name, email address, phone number, and postal address.

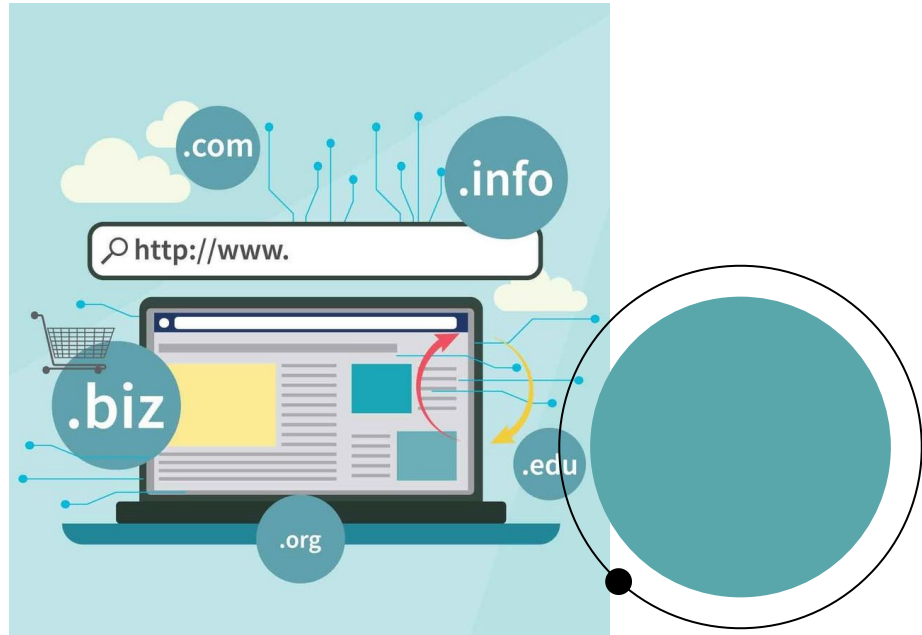
If the domain owner purposely provides accurate or unreliable information, or does not update their data within 7 days of any change, or does not respond to verification requests within 15 days, then the domain must be suspended or canceled.



RAPS

The [RDDS Accuracy Program Specification](#) (RAPS) of the RAA provides detailed requirements for **validating** and **verifying** the accuracy of domain name registration data, and for disabling domain names when the data is not validated and verified within 15 days of being first provided or updated.

If a domain's data is not validated (all required info is provided; data is in the correct format for the field) and verified (affirmative response from the point of contact, such as following a link to a website) within the required timeframe, then the domain is suspended and related services may not function until that validation and verification are complete.

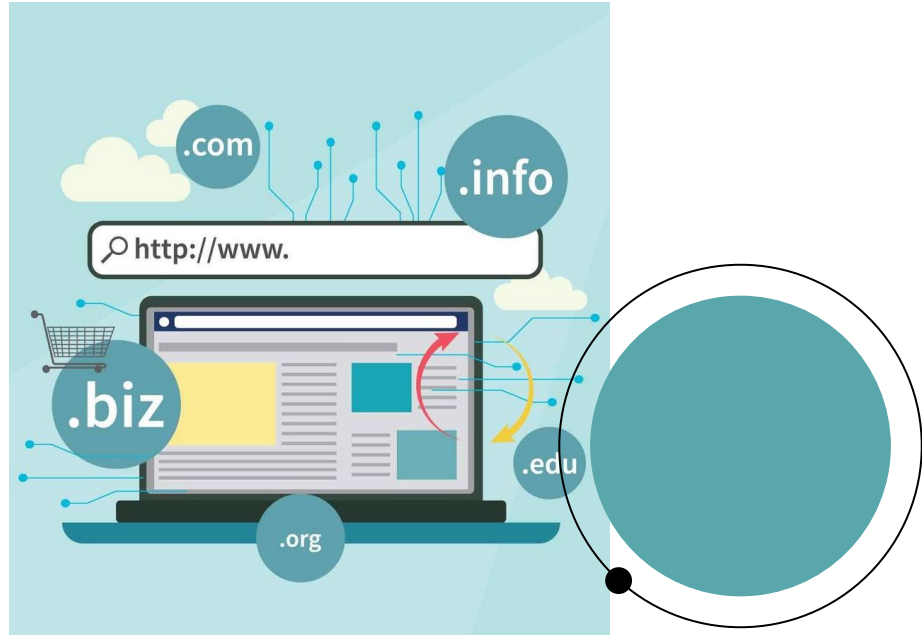
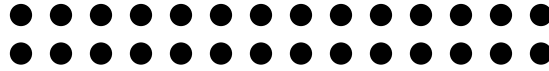


RNAP

The [Restored Names Accuracy Policy](#) sets requirements for registration data updates in cases where a domain was deleted due to inaccuracy and is now being restored.

The policy is:

“When a registrar restores a name (from the redemption grace period) that had been deleted on the basis of submission of false contact data or non-response to registrar inquiries, the name must be placed on Registrar Hold status until the registrant has provided updated and accurate Whois information.”

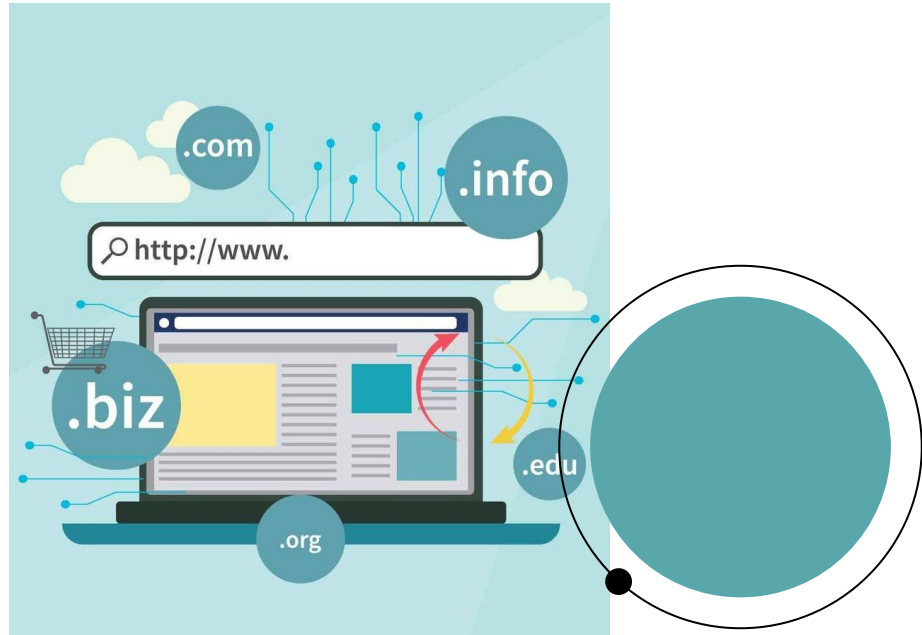
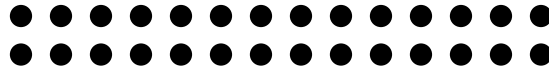


WDRP

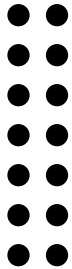
The [Whois Data Reminder Policy](#) requires registrars to show domain owners their registration data and remind the registrant that they are required to provide accurate data.

The policy is:

“At least annually, a registrar must present to the registrant the current Whois information, and remind the registrant that provision of false Whois information can be grounds for cancellation of their domain name registration. Registrants must review their Whois data, and make any corrections.”



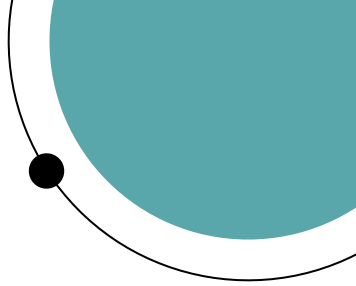
GDPR



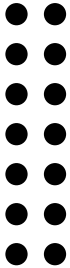
Article 5 states that data must be:

“accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.”

Article 16 of the GDPR gives data subjects the right to rectification, allowing them to require data controllers to correct any inaccurate personal data.



NIS2

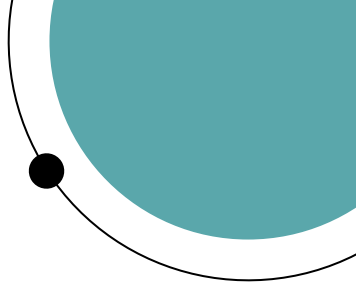


[NIS2](#) is a Directive which will be implemented into EU member-state law by October 2024.

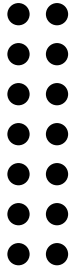
Article 28 of NIS2 provides specific obligations relating to (among other things) the accuracy of domain name registration data.

- Collect and maintain accurate and complete domain name registration data
- Have policies and procedures, including verification procedures, in place to ensure that the registration data is accurate and complete

The good news: **This all matches up with our ICANN accuracy requirements!**



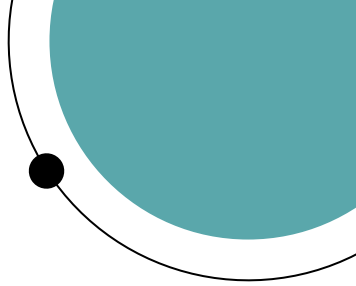
RrSG POLL!



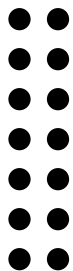
Question 1

Inaccurate registration data must be corrected for a suspended domain name.

- a) True
- b) False
- c) It depends



RrSG POLL!



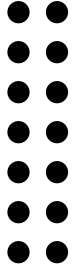
Question 2

How can a domain name be suspended pending verification?

- a) clientHold
- b) fake.nameservers.tld
- c) stop web service functionality only
- d) a) and b)
- e) all of the above



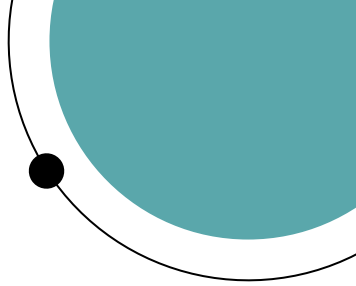
RrSG POLL!

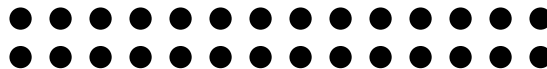
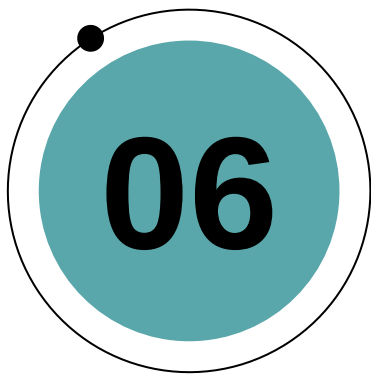


Question 3

NIS2 requires that all registration data be accurate.

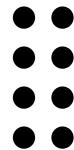
- a) True
- b) False
- c) It depends



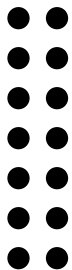
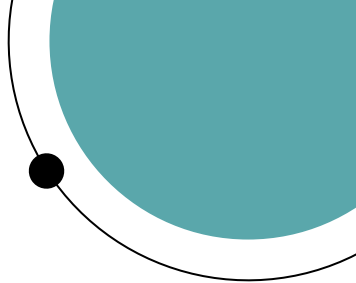


Why does it matter?

Catherine Paletta, Name.com, RrSG RRA Amendment Team Lead



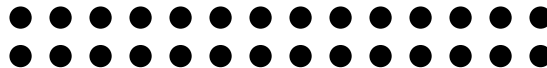
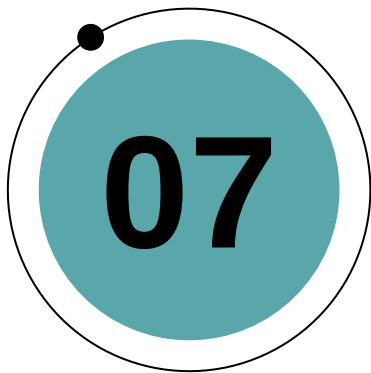
Why Accuracy is important



Maintaining accurate and up-to-date domain name registration data allows registrars to:

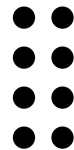
- ★ Meet legal, contractual, and policy obligations
- ★ Send important mandatory notices to the domain owner, such as renewal reminders
- ★ Contact the domain owner when problems arise, such as a compromised domain being used for DNS Abuse

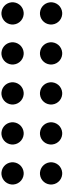
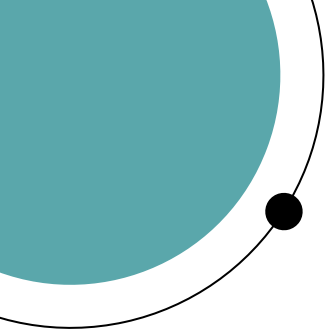




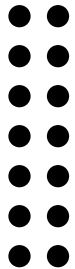
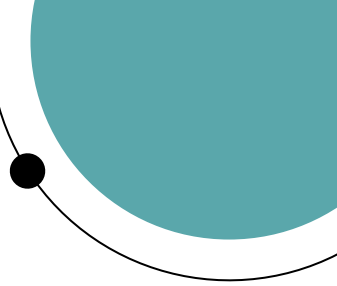
Registrar Experiences

Sarah Wyld, RrSG Comms & Outreach Group Chair, Tucows





Survey Responses - Validation



How do you comply with RAA requirements for data validation?

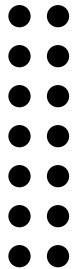
- Everyone said they ensure all required fields are populated
- Most respondents do automated format checks for phone numbers, email addresses, and postal addresses
- A small portion of respondents use human review for formatting

Why have you chosen the validation method that you use?

- To meet the ICANN and registry requirements for data collection
- There are many acceptable global data formats; automated review is low-cost and can be fast even at high volume, unlike human review



Survey Responses - Verification



How do you comply with RAA requirements for data verification?

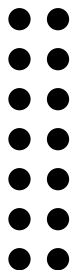
- Everyone said they send an email to the domain owner
 - Often a two-step process, follow email link and click page link
- One registrar calls the provided phone number; two send SMS
- One registrar embeds the verification process into the order form and registration agreement acceptance

Does this work well? What would improve things?

- Can be a confusing process for registrants
- Difficult to balance requirement to click the verification link against phishing education to not click *every* link



RrSG POLL!



Question 1

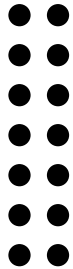
Guess the survey outcome!

Do you use any validation, verification, or accuracy review measures that go beyond what is required by the RAA?

- a) 50% yes, 50% no
- b) 60% yes, 40% no
- c) 20% yes, 80% no
- d) 40% yes, 60% no

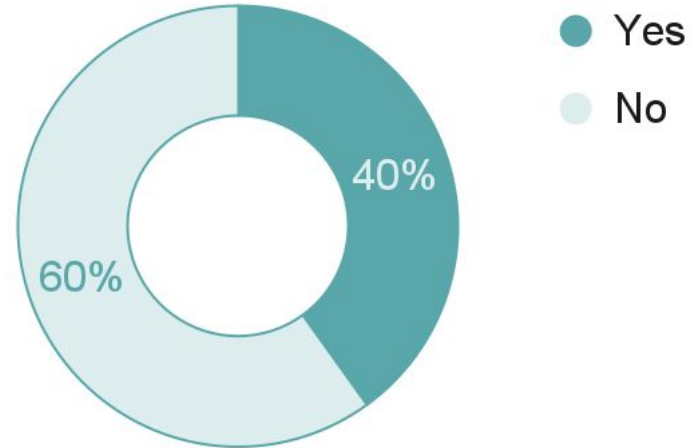


Survey Responses - Other measures

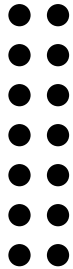


Do you use measures beyond those required by the RAA?

- One registrar checks physical ID
- One declined to share further info!
- Four registrars described processes triggered by notification of inaccuracy or similar flags
- These measures could include manual verification of address, contact info, SMS or phone call, etc



RrSG POLL!

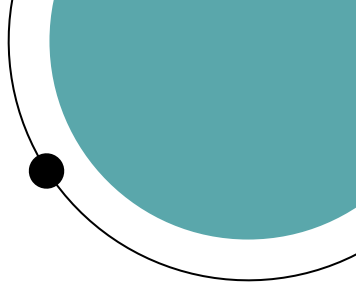


Question 2

Guess the survey outcome!

Have you considered or are you currently doing any identity document verification?

- a) 50% yes, 50% no
- b) 60% yes, 40% no
- c) 20% yes, 80% no
- d) 40% yes, 60% no



Survey Responses - ID review

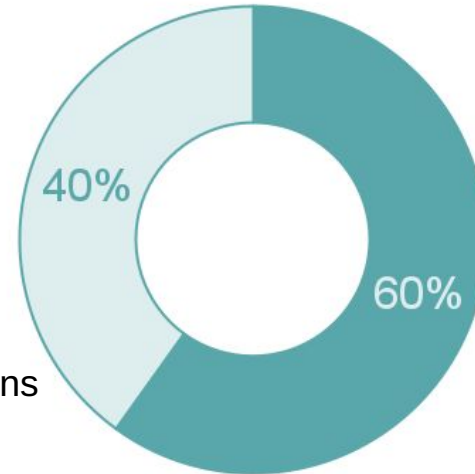
Are you doing or considering identity document verification?

Yes:

- Regaining lost account access
- Flagged by fraud review team
- Required by specific TLDs

No:

- Volume/scaleability and cost
- Cannot judge documents from other jurisdictions (or local ones!)
- No legal basis to process the data
- Might discourage legit registrants
- *"We don't consider our clients criminals by default"*



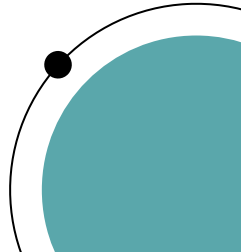
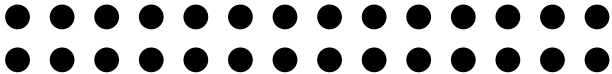
● Yes
● No



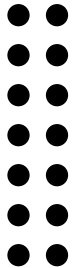
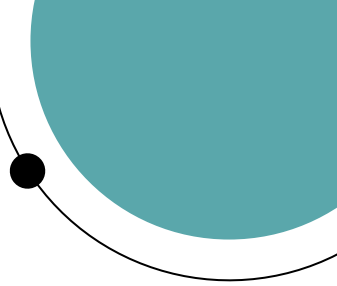
It is impossible. Some forms of documents can be verified by some vendors but only for certain jurisdictions and if people have those documents. It is not reasonable to expect all potential domain owners to have this document (for example, to require that all potential domain owners have US-issued drivers licenses).

It is too expensive. In order to verify the forms of documents that CAN be verified, the cost is around \$18/verification, which would more than double the price of a single .com domain, for example.

It is not necessary. The current level of validation is sufficient for our purposes (to have a party that can be contacted for billing and abuse issues) and additional validation does not result in an appreciable benefit."



Survey Responses - ID Review

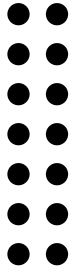


What have been your experiences with identity doc verification?

- “It's really difficult to operate. Especially with so-called AI tools enabling almost anyone to create fake photos and documents.”
- “As a registrar, no significant demonstrable benefit. It also potentially creates issues with handling and retaining personally identifiable data”
- “We feel justified using it in situations where fraud alert was issued on the account” - *notice that this is related to the account, not the domain*



RrSG POLL!

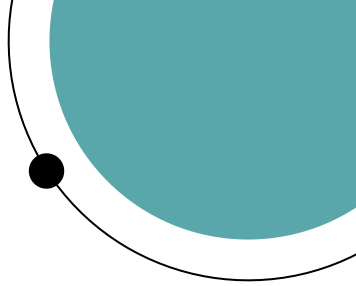



Question 3

Guess the survey outcome!

Do you use any commercial solutions to check registration data accuracy?

- a) 50% yes, 50% no
- b) 60% yes, 40% no
- c) 20% yes, 80% no
- d) 40% yes, 60% no



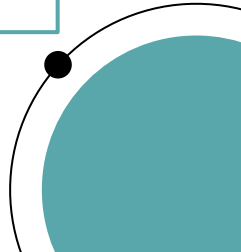
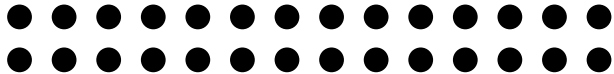



Trust but verify. And such solutions should only be used to monitor possible cybercrime as such you are looking at a possible indicator in relation to cybercrime.

Adding a point of failure for breaches would not bring me comfort. Using a third party would require providing them with access to all customer data my company is a custodian of and provide an additional vector for compromise of that data.

There is no globally appropriate sole-source solution, it requires use of multiple regional or national services. The registrant being self-interested in not losing their domain name due to providing inaccurate data has been likely more effective.

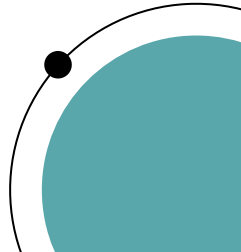
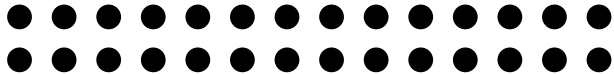
I would need to be shown a practical reason this would be needed, other than the surveillance economy data researchers wanting cleaner source data

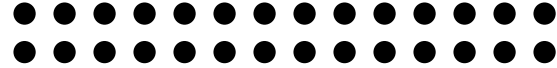
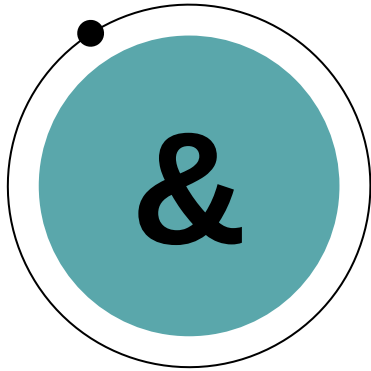




Moving to ID verification for every registration will significantly lower the number of domains registered and will not stop fraud or abuse. The fraudsters will become smarter, while making it more difficult for legitimate customers to register domains.

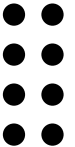
The idea to combat cybercrime with data validation was maybe a valid tactic in 2013 and before. The last few years have shown that cybercriminals outpace anything and everything. The amount of breached data that is available is stunning. Digital profiles that are used for authentication are dirt cheap and available on many dark markets. Criminals now have access to real passports, real digital identities to bypass any verification. Discussions on accuracy are no longer valid and must progress to today's cybercrime.





RrSG Survey Questions

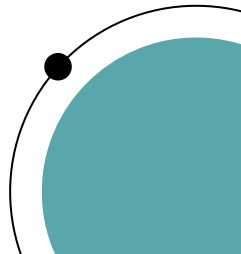
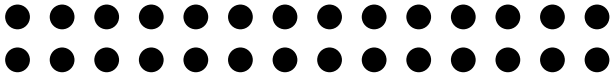
This section shows the survey questions, for reference






RrSG Survey: Validation, Verification, and Accuracy

The RrSG is gathering input from members to inform our discussion of gTLD validation, verification, and accuracy processes and requirements at ICANN79. We are collecting the form user's name, email, and registrar so that we can ensure we do not include duplicates in our reporting; all data shared outside the RrSG ExCom and Communications teams will be anonymized.





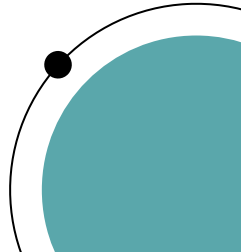
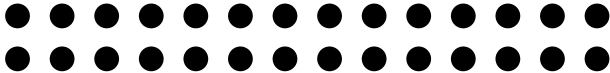
RAA Requirements

How do you comply with RAA requirements for data validation? *Select all applicable:*

- Ensure all required fields are populated
- Automatically check email address formatting against the relevant RFC
- Human review of email address formatting against the relevant RFC
- Automatically check that postal addresses are in a proper format for the applicable location
- Human review of postal address formatting for the applicable location
- Automatically check phone number formatting against the relevant ITU-T E.164 notation
- Human review of phone number formatting against the relevant ITU-T E.164 notation
- Other:

If you selected “Other”, please explain.

Please explain why you have chosen the validation method that you use. *E.g. is human review required for all domains, or only some? How is a domain selected for human review?*





How do you currently comply with RAA requirements for data verification? *Select all applicable:*

- Send an email to the domain owner
- Call the phone number provided by the domain owner
- Send an SMS to the domain owner
- Other:

If you selected "Other", please explain.

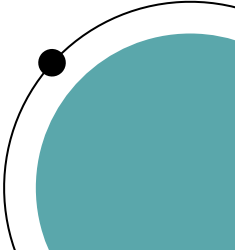
Please describe your verification process. *E.g. do you require that the Registered Name Holder click a link, or must they also perform an action on the linked page (e.g. check a box).*

Have you found that these validation and verification processes work well? What could be changed to improve the outcome?

Do you use any validation, verification, or accuracy review measures that go **beyond** what is required by the RAA?

- Yes
- No

If you selected yes, please describe the processes you use, and their benefits and drawbacks.





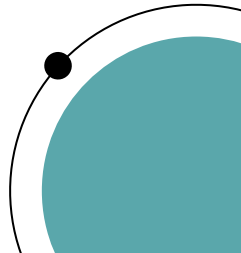
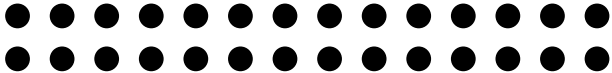
Identity document verification

Have you considered or are you currently doing any identity document verification?

- Yes
- No

Please explain why you are or are not currently doing identity document verification.

If you do use identity document verification for domain registration data, what have been your experiences?
Is there a demonstrable benefit?





Data Accuracy Review

Do you use any commercial solutions to check registration data accuracy?

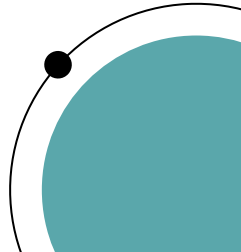
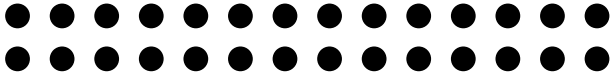
- Yes
- No


If you answered 'yes', which service(s) do you use?

If you answered 'yes', what have been your experiences? Have you found a decrease in inaccuracy complaints, or other benefits?

If you answered 'no', please expand on why. Did you consider using such a service but decide not to move forward? Is there anything that would change your decision to a 'yes'?

Would/does your company trust the reliability of commercial solutions? Why or why not?





If you are in direct contact with domain owners to ensure data accuracy, what methods do you use?

- Email
- Telephone
- Postal mail
- In-person visit
- Other:

If you selected “Other”, please explain

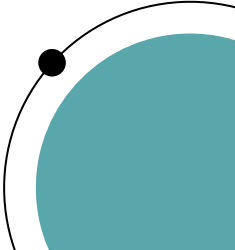
What is the response rate?

How frequently do you engage with your customers to ensure data is accurate? *Select all applicable:*

- Annually
- Every time you are in contact with your customers
- When made aware there is inaccuracy in the data
- Other:

If you selected “Other”, please explain

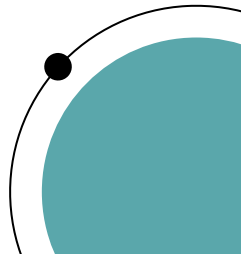
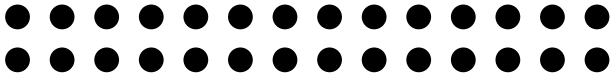
Is there any particular data field that you/your company finds the most difficult to confirm accuracy? If so, why?





Conclusion

Do you have any further info you would like to share with the RrSG regarding registration data validation, verification, and accuracy?





Thanks!

Do you have any questions?

www.rrsg.org

