



84

ANNUAL
GENERAL
MEETING



Pre-ICANN84 Webinar: GAC & Compliance

Enforcement of accuracy-related requirements

15 October 2025

Agenda

1. Accuracy-related requirements in the RAA
2. Compliance enforcement
3. Registrar Audit Program

Requirements: Validation, Verification & Investigation

- Within 15 days of registration, transfer-in, or change to Registered Name Holder (RNH or registrant):
 - Validate that all of the data elements are provided and in the correct format.
 - Verify* that the RNH email address or telephone number is operational.
- Upon receipt of reports of inaccuracy in contact information in registration data:
 - Investigate and, where applicable, correct inaccuracies and re-verify the registrant contact.
- Failure to verify the RNH contact in either case requires suspension of the registration.
 - Suspension must be maintained until verification is completed.

*verification can be via the manner described in Section 1(f)(i-ii) or manual verification (such as email communication that establishes validity of RNH email).

Requirements: Registrant Identity

Requirements regarding Registrant Name and Organization

- Collect the Registrant Name (Section 6.1.9); if applicable, collect Registrant Organization (Section 6.5).
- Require registrants to provide accurate contact information via registration agreement provision (this includes Registrant Name and/or Organization) and make commercially reasonable efforts to enforce.
- Investigate reported inaccuracies in contact information, including Registrant Name or Organization.
- Identity verification is not required, the requirement is limited to the contactability of registrant email OR phone.

Requirements: Registration Agreements

Section 3.7.7 requires registrars to enter into registration agreements with registrants.

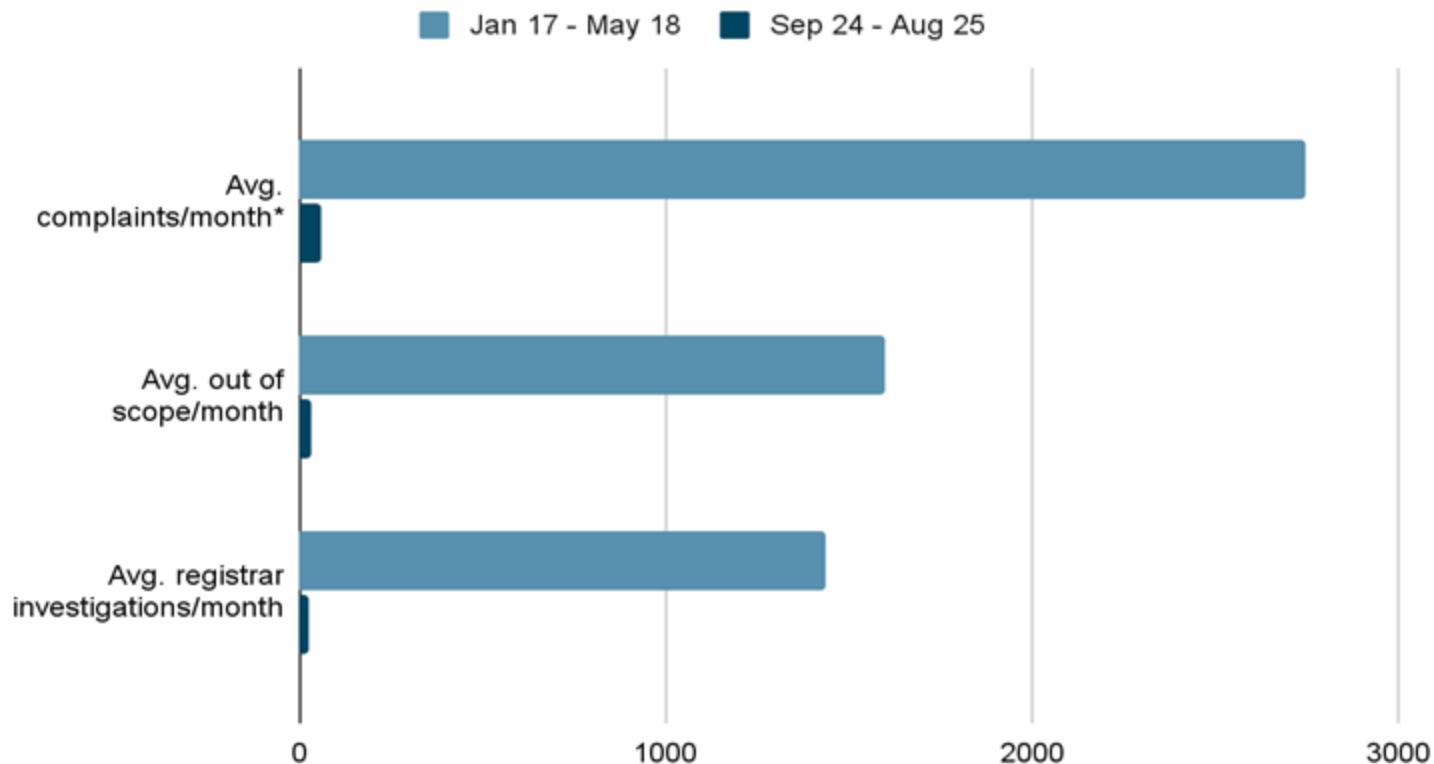
- Agreements must include specific provisions, including regarding accuracy.
- Relevant accuracy-related provisions:
 - Registrants must (1) provide accurate and reliable contact information; (2) promptly update changes to contact information (3.7.7.1).
 - Willful provision of inaccurate or unreliable information, willful failure to update information, or failure to respond to registrar accuracy inquiries is a basis for suspension and/or cancellation of the registration (3.7.7.2).
- Registrars must use commercially reasonable efforts to enforce compliance with the agreement.
- ICANN is not a party to these agreements and does not directly enforce the obligations therein.
 - Compliance enforces registrar requirements to use commercially reasonable efforts to enforce via Section 3.7.8 of the RAA and the RDDS Accuracy Program Specification (RAPS).

Enforcement

Contractual Compliance undertakes enforcement actions resulting from proactive and audit-related activities, and complaints received from external users.

- Registrar Audit Program is typically conducted once a year, auditees vary.
 - Includes accuracy-related questions and information requests.
- External inaccuracy complaints may result in contracted party investigations where complaint is supported by evidence or information demonstrating inaccuracy.
 - Substantial drop in external complaints following changes in global data privacy laws and reduced availability of public registration data in RDDS.
- ICANN's ability to perform proactive monitoring also substantially reduced due to lack of public registration data in RDDS.
 - ICANN's ability to collect nonpublic registration data is limited to transactions or circumstances subject to a compliance-related inquiry.
 - WHOIS accuracy reporting system (ARS) discontinued in 2018 due to changes in data processing/publication requirements and legality of processing randomized registration data.

Closed Registration Data Accuracy Complaints



*Totals from Jan 17 - May 18 estimated based on complaint totals received

Registrar Audit Program

- The Audit Program includes compliance checks related to the Accuracy Program Specification and Sections 3.7.7 - 3.7.8 of the RAA (among others).
 - Registration agreements are checked to ensure that they include the minimum required content.
 - Verification, validation, and inaccuracy investigation processes are examined to ensure compliance with requirements.
 - Records and system logs are examined to ensure compliant processes are in place regarding verification, validation and investigation.
 - Detailed audit reports, including findings are published [here](#).
 - Ongoing audit (launched July 2025) expanded accuracy-related questions.
- Deficiencies discovered during audits result in enforcement actions following the compliance approach and process [here](#).
 - Auditees are requested to remediate noncompliance as part of the informal resolution process.
 - Failure to remediate will result in formal enforcement via public breach.
 - All deficiencies detected in the last 2 audits were resolved during the informal resolution stage.

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Appendix A: Questions

1. To what extent, proportionally, is Compliance enforcement of requirements regarding the accuracy of registration data driven by complaints received, or conducted proactively by Compliance?
2. What is Compliance's approach to auditing Contracted Parties for compliance with accuracy-related requirements? For example, how often are these audits done, what is the methodology, what have the results been from recent audits, and what enforcement actions have been taken if the obligations are not met?
3. What is ICANN's analysis of the possibility to use an external auditing service to evaluate Contracted Parties' accuracy verification procedures and compliance? Could approaches such as those used in the INFERMAL study to evaluate Registrar's verification of contact information be used ? (see section 6.4 in INFERMAL Report)
4. Can ICANN Compliance clarify the accuracy requirements that relate to a registrant's name? Are Contracted Parties required to verify a registrant's name? Some GAC members may be confused by accuracy-related requirements appearing in multiple parts of the RAA, including the RDDS Accuracy Program Specification on the one hand (regarding operational/syntactical accuracy), and RAA provisions such as 3.7.7.1 and 3.7.7.2 on the other hand (regarding requirements on Registrar-Registrant agreements and their enforcement). Is the registrant's name considered part of the "contact information" associated with a domain name? And if not, why not?
5. Can ICANN Compliance explain how it enforces RAA 3.7.7 which requires Registrars to include accuracy-related requirements in their agreements with Registrants? What are "commercially reasonable efforts" in this context?