

**Governmental Advisory Committee comments on the revised Registrar Accreditation Agreement**  
(version released 22 April 2013)

The Governmental Advisory Committee (GAC) welcomes the new Registrar Accreditation Agreement (RAA), released for public comment on 22 April 2013. The GAC acknowledges the hard work reflected in this comprehensive revision to the new RAA. The GAC views these revisions as a valuable step toward ensuring that gTLD domain names are not misused for fraudulent or criminal purposes.

In particular, the GAC welcomes changes that will help to:

- ensure that registrars will maintain proper business transactional information, in accordance with national and local privacy laws
- provide consumers, registrants, and law enforcement with a point of contact to quickly report and respond to domain name abuses; and
- increase the clarity of relations between registrants, resellers, and registrars.

Consistent with earlier GAC advice that all of ICANN's contracts should be clear, unambiguous and enforceable, the GAC notes the potential for further improvements to the draft RAA by:

- ensuring that the RAA consistently and clearly specifies time frames to take defined actions
- clarifying the precise circumstances and timeframes for when a Registrar is obligated to do the validation and verification steps included in the specification. Ideally, Registrars would verify and validate registration information before registration is complete. If the parties are unable to reach an agreement on pre-verification, then the time-period for post-registration verification should be as short as possible
- closing a potential loophole by clarifying that privacy and proxy service providers should be subject to the same data verification and validation protocols that apply to registrars
- clarifying that registrars should be fully responsible for maintaining complete and accurate contact information for all of its Resellers, and
- eliminating unclear language that serves to qualify Registrar's affirmative obligations to enforce compliance with the terms of the Registration Agreement.

The GAC looks forward to further discussion with the community on ways to minimize the risk of misuse of the domain name system, and to the finalisation of the new RAA.