

Policy Recommendations to the GNSO Council;

1) Registrars must take reasonable steps to investigate and correct data accuracy complaints received via the Whois Data Problem Reporting System (WDPRS);

a) Registrars may also take action based on complaints received via other means,

2) i) The investigation undertaken by a Registrar in response to a complaint received via the WDPRS must include verification of the data using at least one of the three following mechanisms;

a) via email

b) via telephone

c) via postal mail

ii) In the event that the Registrant fails to respond to an inquiry made by a Registrar regarding data accuracy pursuant to 2i), the Registrar must undertake to continue the verification by using either of the other two methods that did not fail.

iii) In the event that the Registrar has attempted to contact the Registrant using at least two of the methods above per 2.i and 2.ii and the Registrant cannot be contacted or has not responded for a period of 30 days starting from the time of the first inquiry, the Registrar must either;

a) Place the registration in "ON_HOLD" status with the applicable registry pending correction of the inaccuracy.

b) Cancel the registration.

3) In the event that the Registrant has provided updated contact information pursuant to an inquiry made per (2), either

a) the Registrant must certify the accuracy of the updated information.

b) the Registrar must verify that the updated information can be used to contact the Registrant.

i) In the event that the Registrant does not certify the accuracy of the updated information per 3a) or that the Registrar cannot verify that the Registrant can be contacted using the updated information per 3b) within a 30 day period from the start of the re-verification process, the Registrar must either

a) Place the registration in "ON_HOLD" status with the applicable registry pending correction of the inaccuracy.

b) Cancel the registration.

4) A Complainant may only file data accuracy complaints that can be reasonably judged to be valid. In all cases, a registrar must verify the validity of the complaint using the following methods;

a) in the event that the complaint is filed regarding the accuracy of whois data that can be verified using electronic means (i.e. an email address), the Registrar must verify the validity of the complaint by verifying the accuracy of the data.

b) in the event that the complaint is filed regarding the accuracy of whois data that is not verifiable using electronic means (i.e. a mailing address), the complainant must be able to provide the basis for their complaint (i.e. a letter returned by the postal service as undeliverable) when requested by the Registrar required to perform the verification.

Observations & Advisories for ICANN Staff and Board of Directors;

1) In order for these policies to be effective, it will be imperative that they be communicated to the Internet community. ICANN staff should endeavor to publicize these policies and ensure that the

preferred mechanism by which a complaint may be filed is made known to the community. This may include press relations, prominent links on the ICANN website and as appropriate, ICANN advisories targetted at appropriate sectors of the community.

2) In order for these policies to be effective, they must be measured and, as appropriate, modified to ensure their effectiveness. The Task Force recommends that the implementation and execution of these recommendations be monitored by the GNSO. Specifically that;

a) ICANN Staff analyse and report to the GNSO Council at three, six and twelve month intervals after implementation with the goal of determining;

i. How effectively and to what extent the policies have been implemented and adopted by Registrars, Registries and Registrants,

ii. Whether or not modifications to these policies should be considered by the GNSO as a result of the experiences gained during the implementation and monitoring stages,

iii. The effectiveness of the dispute resolution processes and a summary of the filings that have been resolved through the process.

b) Pursuant to which, the GNSO Council may instruct the staff to;

i. Continue bi-annual reviews in a manner consistent with the aforementioned requirements,
or;

ii. Report again to the GNSO Council in an additional twelve month time frame.

c. The purpose of these monitoring and reporting requirements are to allow the GNSO Council to determine when, if ever, these recommendations and any ensuing policy require additional clarification or attention based on the results of the reports prepared by ICANN Staff.