



STAFF OVERVIEW OF RECENT GNSO WHOIS ACTIVITIES

13 September, 2007

STATUS OF THE DOCUMENT

Staff Overview for GNSO Council consideration

SUMMARY

This document represents ICANN staff's overview of the activities of the WHOIS Task Force and WHOIS Working Group, prepared as directed by the GNSO Council Resolution of 6 September, 2007, calling for staff to prepare a "Draft Final Report".

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I. Introduction

This document was prepared in response to the GNSO resolution of 6 September, 2007, which, among other things, directed staff to prepare a Draft Final Report¹ that references the WHOIS Task Force Report, the WHOIS Working Group Charter and the Working Group Report and which includes an overall description of the process by 13 September, 2007. The 6 September resolution also calls for this overview to include the text of motions to be voted on at the end of this process.

Staff has also included in this document an overview of the initial OPOC proposal considered by the WHOIS Task Force and a summary of the additional related issues considered by the WHOIS Working Group, described further in Section V.

II. Background on activities of the WHOIS Task Force and Working Group

In June, 2005, the GNSO Council convened a WHOIS Task Force to address a number of important questions related to WHOIS. Key questions set forth in the Terms of Reference included the purpose of WHOIS service, which information should be available to the public, how to improve WHOIS accuracy and how to deal with conflicts between WHOIS requirements and relevant privacy laws. The Terms of Reference established by the GNSO Council to launch the WHOIS Task Force is posted at: <http://gnso.icann.org/policies/terms-of-reference.html>

In 2006 the WHOIS Task Force completed work on the first two terms of reference, defining the purpose of WHOIS and developing a draft procedure for addressing conflicts between WHOIS contractual requirements and national or local privacy laws. Regarding the term of reference defining the purpose of WHOIS, the Council approved the Task Force provided definition with a simple majority vote that was followed by a large amount of discussion in the community. The recommendation regarding WHOIS contractual requirements was approved by the Council by a supermajority vote and was since implemented as a consensus policy.

The WHOIS Task Force then completed its final report on 12 March, 2007. The Final Task Force Report addressed the three remaining items in the Terms of Reference, as follows:

- To define the purpose of the WHOIS contacts (registered name holder, administrative and technical contacts);
- To determine what data collected should be available for public access and how to access data that is not publicly accessible; and
- To determine how to improve the process for notifying a Registrar of inaccurate WHOIS data, and the process for investigating and correcting inaccurate data.

In the course of deliberation on these questions, several Registrars offered a proposal called the Operational Point of Contact (OPOC). In the final report, a simple majority of members of the WHOIS Task Force endorsed this proposal (The proposal was supported by the Registry Constituency, the Registrar Constituency, the Non Commercial User Constituency and the Nominating Committee appointee. The OPOC proposal was also supported by the non-voting At Large Liaison to the Task Force.)

¹ This Staff Overview of Recent GNSO WHOIS activity is intended to fulfill the resolution passed by the GNSO Council on 6 September for a 'Draft Final Report'. The title was changed so as not to create confusion with the Final Report as that term is used in the PDP in the Bylaws.



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As set forth in the initial OPOC proposal considered by the TF, every registrant would identify a new operational contact which would be published in WHOIS in lieu of the administrative and technical contact information currently displayed. In response to WHOIS queries regarding specific domain names, ICANN-accredited Registrars would display full contact information for the OPOC (name, address, telephone number and email address) but only the registrant's name and country/jurisdiction. In case of an issue with the domain name, the OPOC would contact the registrant to resolve, or to reliably pass on data to resolve, operational issues relating to a domain name. The OPOC proposal considered by the Task Force also set forth means for correcting inaccurate WHOIS data, and for facilitating inter-registrar domain name transfers. The initial OPOC proposal is included in Section 4 of the Task Force Report (see link below).

If implemented, the OPOC proposal would apply to the WHOIS services operated by all ICANN-accredited registrars and all gTLD registries. All Registries would become "thin" registries, only publishing a limited data set for each registration.

Proponents of a new OPOC position identified several benefits:

- to reduce the amount of public data that could be used for undesirable purposes such as phishing, spam and consumer fraud
- to simplify the registration process and eliminate confusion around multiple contacts whose functions are difficult to distinguish
- to encourage registrants to submit accurate data and to improve the means for notifying and correcting WHOIS data
- to accommodate the privacy concerns of natural persons (real, live individuals) and ensure adherence with relevant national privacy laws

Concerns about the implications of implementing an OPOC included:

- The OPOC could make contacting the registered name holder more difficult, time-consuming, expensive or less reliable
- Responsibilities and obligations of the OPOC would need to be clearly defined, including accelerated time frames for response
- Mechanisms would be needed to encourage compliance and provide enforcement, including timely alternative mechanisms for access to unpublished information

Some broad directions for development of the Task Force policy recommendations that were raised through the public comments:

- The OPOC should ensure contact with the registered name holder in a defined and short period of time.
- OPOCs should have specified responsibilities for passing communications, including legal notifications, to the registered name holder. Any other responsibilities must also be clearly defined.
- There need to be clear, consistent, timely and predictable procedures for obtaining access to unpublished data.

The final WHOIS Task Force Report of 12 March, 2007 is posted at <http://gnso.icann.org/issues/WHOIS-privacy/WHOIS-services-final-tf-report-12mar07.htm>.



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The GNSO Council met to consider the WHOIS Task Force Report on Sunday, 25 March 2007. Various concerns were raised about recommendations made in the report, and when the GNSO Council met again on 28 March, it approved a resolution creating a WHOIS Working Group (WG) to examine three issues raised in the Task Force Report and to make recommendations concerning how the OPOC proposal might be improved to address these issues:

1. to examine the roles, responsibilities and requirements of the OPOC, and what happens if they are not fulfilled;
2. to examine how legitimate interests will access registration data no longer published via WHOIS; and
3. to examine whether publication of registration contact information should be based on the type of registered name holder (legal vs. natural persons²) or the registrant's use of a domain name.

In examining these issues, the working group sought an outcome that would improve the privacy aspects of WHOIS for natural persons and maintain the ability of legitimate parties to respond in a timely manner against fraud and other illegal acts by certain registrants acting in bad faith. While the WG worked to achieve rough consensus, it did not conduct votes. Some statements are preceded by the term AGREED. These statements are an agreed policy recommendation of this group. Some statements are qualified by a characterization of SUPPORT or ALTERNATIVE VIEW. Points of agreement are noted based on the majority outcome of a series of issue-based discussions, held either by telephone conference or at one physical meeting, subsequently subject to group review. Working with the group, the Chair had the authority to establish where agreement/support/alternative views existed.

The Working Group used the following conventions:

Agreed – there is broad agreement expressed by the contributing members of the working group though not necessarily unanimity (This agreement is majority-based and no attempt was made to categorize agreement by interest group because participation had not been solicited or organized by interest group);

Support – there is a gathering of positive opinion, but a range of alternative views exist and broad agreement was not reached;

Alternative views – differing opinions expressed in relation to the characterizations of Support or Agreed, or opinions about other Alternative views.

Though the WG did reach agreement on certain points as defined in the WG report, there are important aspects of the proposal that were understood to require more definition and structure if implemented. For these reasons, the WG also identified key implementation options. Implementation issues were discussed extensively by the WG, and it became clear that given the nature of the OPOC proposal, important nuances in implementation were of great significance to the WG and would have a great affect on levels of support for the overall proposal. This is also reflected in various statements of agreement, support and alternative views.

The WHOIS Outcomes Working Group Report was finalized on 20 August, 2007 and has been forwarded to the GNSO Council for consideration. It is posted at <http://gnso.icann.org/drafts/icann-WHOIS-wg-report-final-1-9.pdf>

² The term "natural person" is used in the Working Group Report to mean a real, living individual. The term "legal person" is used in the Working Group Report to mean a company, business, partnership, non-profit entity, association, etc. (Sec. 5.2)



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The GNSO Council has discussed WHOIS twice since then, first on 30 August and again on 6 September 2007. On the 6 September call, a resolution was approved establishing the schedule for consideration of the Working Group Report, in conjunction with the earlier WHOIS Task Force Report, completed last March. The schedule for consideration calls for a final vote by the GNSO Council during the LA public GNSO meeting. The full text of the resolution, including the schedule, is reprinted in Section III.

This resolution also directed staff to proceed with a study on gTLD registrations and registrants and how WHOIS data is used and misused as described in the GAC Principles of 28 March, and to provide updates to the Council on ICANN's WHOIS data accuracy audit that is currently underway and an update on the SSAC study presented on 28 September 2006, which examined the extent to which personal contact information can be extracted from registration records. Lastly, the motion directs staff to produce a draft final report that incorporates any other factual information and the text of motions to be voted on at the end of the process.

Staff is currently working on these deliverables. It is also preparing an Implementation Assessment on an accelerated timeline to help inform the Council of implementation issues as it considers the outcomes of both reports.



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III. Text of Motion approved by the GNSO Council 6 September, 2007

Whereas the WHOIS WG has now completed its work,

Therefore;

The GNSO Council accepts the WG report and appreciates the efforts made by WG participants and ICANN staff in preparing this report.

Further, the GNSO council:

a) graciously thanks all of the volunteers, consultants, staff and others who have participated in the Task Force and Working Group.

b) makes no specific policy recommendation to the ICANN board at this time concerning WHOIS or related policy.

c) requests ICANN Staff proceed with a study of gTLD registrations and registrants and how WHOIS data is used and misused as described in the GAC Principles Regarding gTLD WHOIS Service paragraph 4.2, and by the Working Group Final outcomes report. This study should include a review and analysis of the different proxy services available today and a summary of any other statistical studies that Staff can locate. We ask staff to report back to the council on the 'study to date' by October 4.

d) requests an update on the WHOIS Data Accuracy Program outlined by ICANN Staff on April 27th, including any statistical information that can be summarized thus far. See <http://www.icann.org/WHOIS/WHOIS-data-accuracy-program-27apr07.pdf>.

e) requests an update on the pending SSAC study on "Information Gathering Using Domain Name Registration Records" outlined in September, 2006. See <http://www.icann.org/committees/security/information-gathering-28Sep2006.pdf>

f) shall review any additional factual information, in conjunction with the policy suggestions from the Task Force and Working Group reports, complete this work on WHOIS, and make a report to the ICANN community and to the ICANN Board, as follows:

1 - Staff will produce a Draft Final Report that references the TF report, the WG charter and the WG report and which includes an overall description of the process by September 13. This overview should include the text of motions to be voted on at the end of this process.

2 - This report will be sent out for Constituency Statement Review on September 13. Constituencies will be asked to follow the by-laws on constituency statements. Specifically:

Constituency Statements. The Representatives will each be responsible for soliciting the position of their constituencies, at a minimum, and other comments as each Representative deems appropriate, regarding the issue under consideration. This position and other comments, as applicable, should be submitted in a formal statement to the Council list and to the ICANN Policy Lead (each, a "Constituency Statement") within twenty one (21) calendar days after initiation of the PDP.

Every Constituency Statement shall include at least the following:



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(i) If a Supermajority Vote was reached, a clear statement of the constituency's position on the issue;

(ii) If a Supermajority Vote was not reached, a clear statement of all positions espoused by constituency members;

(iii) A clear statement of how the constituency arrived at its position(s). Specifically, the statement should detail specific constituency meetings, teleconferences, or other means of deliberating an issue, and a list of all members who participated or otherwise submitted their views;

(iv) An analysis of how the issue would affect the constituency, including any financial impact on the constituency; and

(v) An analysis of the period of time that would likely be necessary to implement the policy.

**Final Date for updated constituency statements: October 4, 2007

3 - Staff will Incorporate Constituency comments and any additional factual information into Final Report by October 11, 2007

4 - Staff is requested to produce staff implementation notes by October 15

5 - Community Public Comment on Final Report: October 15 - 31, 2007

6 - A Public and Council Discussion will be held during the LA Public Meeting

7 - Final vote during the LA public GNSO meeting.



IV. Text of motions offered to-date that may be voted on at the end of the process

Motion #1 offered by Avri Doria, seconded by Ross Rader

Whereas the WHOIS Task Force has delivered its report and
Whereas the Outcomes report of WHOIS Working Group on OPOC implementation issues has also been released and
Whereas the ICANN staff has produced notes on a proposed implementation and
Whereas the GNSO constituencies and the larger community have reviewed and commented on both reports and the proposed implementation notes

Resolved:

The GNSO council supports the OPOC recommendation as contained in the Task Force report and requests that the staff consult the report of the Working Group and all follow-on discussions, including comments supplied by the constituencies during the review and by the community during the open review, in creating a proposed implementation of OPOC.

The council further requests that the staff consult with the GNSO and the community at large once it has developed this proposed implementation plan.

Motion #2 offered by Kristina Rosette, seconded by Mike Rodenbaugh

WHEREAS:

1. The GNSO Council hereby accepts the Working Group report and acknowledges the tremendous effort by Working Group participants and ICANN staff.
2. The GNSO Council does not consider the Working Group report as an adequate basis for any implementation of the Operational Point of Contact (OPOC) proposal, due to the inability to reach agreement on a number of key issues identified in the charter of the Working Group.
3. The GNSO Council notes that no comprehensive, objective study has yet been made of key factual issues regarding the WHOIS system, and that future ICANN policymaking could greatly benefit from the results of such a study.

THEREFORE BE IT RESOLVED:

1. The GNSO Council thanks all of the volunteers, consultants, staff and others who have participated in the GNSO's examination of WHOIS policy over the last four years.
2. Building on the work done in response to paragraph (c) of the GNSO Council Resolution #3 of September 6, 2007, the Council requests that ICANN staff take the necessary steps to proceed with a comprehensive, objective study on the issues identified by the WHOIS Working Group, by the Governmental Advisory Committee in its statement of principles on WHOIS, and by the Council. These issues include the characteristics of gTLD registrants, the uses and abuses of WHOIS data, and a review and analysis of the different proxy services available today. Specifically, the Council directs the staff to present for its review a draft Request for Proposals for such a study, including a proposed budget and timeline, and a methodology for outreach to knowledgeable parties, within 90 days from the date of adoption of this resolution.
3. The GNSO Council will take the results of this study, once completed, into account in deciding on the next steps in WHOIS policy development.



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Motion #3 conditional motion offered by Ross Rader, seconded by Mawaki Chango (may be withdrawn if Doria motion above is approved)

Whereas;

- (i) The GNSO Council has considered the reports of the WHOIS Working Group and WHOIS Task Force, and;
- (ii) That the GNSO Council vote on resolution [XXXXX] failed to produce supermajority or majority support for the recommendations of the report of the Task Force, and;
- (iii) The GNSO Council considers that the results of this vote signifies the continued lack of consensus on the key issues and possible solutions to those issues, both within the Council, the GNSO and between key stakeholder groups, and;
- (iv) The GNSO Council recognizes that there is no standing consensus policy concerning the management of the WHOIS service and data provided to the public through that service by ICANN's contracted commercial operators, the registries and registrars, save and except the WHOIS Data Reminder Policy and the WHOIS Marketing Restriction Policy, and;
- (v) That significant policy must have the support of the Internet and DNS community and without that support, those policies cannot be reasonably implemented or enforced.

Therefore be it resolved;

- (i) That, with regret, the GNSO Council advises the ICANN staff and Board of Directors of the lack of general consensus on the key issues and solutions pertaining to gTLD WHOIS, and;
- (ii) That due to this lack of consensus the GNSO Council recommends that the Board consider "sunsetting" the existing current contractual requirements concerning WHOIS for registries, registrars and registrants that are not supported by consensus policy by removing these unsupported provisions from the current operating agreements between ICANN and its contracted parties, and;
- (iii) That these provisions be sunset no later than the end of the 2008 ICANN Annual General Meeting and;
- (iv) That such provisions will remain sunset until such time that consensus policy in this area has been developed to replace the sunset provisions, at which point they will be eliminated or modified.



V. Overview of OPOC proposal as considered by the Task Force and summary of issues considered by the Working Group

The purpose of this chart is to convey at a high level the components of the initial OPOC proposal considered by the WHOIS Task Force, and the areas of further consideration that were subsequently explored by the WHOIS Working Group. As directed by Charter, the WG only considered certain questions, largely focused on the OPOC’s responsibilities and what happens if those functions are not fulfilled. Thus, the WG did not re-consider each aspect of the initial OPOC proposal. Instead it attempted to answer three specific questions asked by the GNSO Council about the OPOC proposal.

Regarding the Working Group Report, note that some statements are preceded by the term AGREED. These statements are an agreed policy recommendation of this group. Some statements are qualified by a characterization of SUPPORT or ALTERNATIVE VIEW. Points of agreement are noted based on the majority outcome of a series of issue-based discussions, held either by telephone conference or at one physical meeting, subsequently subject to group review. Working with the group, the Chair had the authority to establish where agreement/support/alternative views existed.

The Working Group used the following conventions:

- Agreed – there is broad agreement expressed by the contributing members of the working group though not necessarily unanimity (This agreement is majority-based and no attempt was made to categorize agreement by interest group because participation had not been solicited or organized by interest group);
- Support – there is a gathering of positive opinion, but a range of alternative views exist and broad agreement was not reached;
- Alternative views – differing opinions expressed in relation to the characterizations of Support or Agreed, or opinions about other Alternative views.

Initial OPOC Proposal	Summary of WG topics considered
<p>General points:</p> <p>The OPOC proposal considered by the WHOIS Task Force pre-supposes that 1) domain name contact data not be available through any sources other than those discussed by this proposal, unless by Registrars, and in that case at the Registrar's option, and that 2) regardless of the information displayed, the domain name contact data collected by registrars remain as specified in the RAA ("Underlying WHOIS Contact Data").</p>	<p>General points:</p> <p>The WG considered aspects of the OPOC, as directed by the WG Charter, that expand on the “purpose of the OPOC” envisaged initially. These are highlighted below with citations to full text. As a threshold matter, the Report notes that implementing an OPOC would change the way certain data is collected, displayed and accessed, resulting in increased costs for service providers and delays for requesters of unpublished WHOIS data, compared with the status quo.</p> <p>The WG agreed that only the contact information of registrants who are natural persons (real, living individuals) would no longer be published. This issue was not considered in the initial OPOC proposal.</p>
<p>Purpose of the OPOC:</p> <p>The purpose of the OPOC is to resolve, or to reliably pass on data to resolve, operational issues relating to a domain name. At</p>	<p>Potential roles of OPOC:</p> <ul style="list-style-type: none"> • to relay a request to a registrant. Agreement that relay must be timely and meet key requirements (3.1)



Initial OPOC Proposal	Summary of WG topics considered
<p>minimum, this must include the resolution of issues relating to the configuration of the records associated with the domain name within a DNS nameserver. The OPOC may also resolve additional types of issues based on agreement with the registered name holder to do so.</p>	<ul style="list-style-type: none">• to reveal unpublished registrant information to a requester. Also must be timely and meet key requirements (3.2). No agreement that OPOC should perform this role. Concerns include whether “reveal” contravenes national law, cost and scalability for registrars, potential delays for requesters, and the need to define conditions under which reveal should be an option (e.g. reasonable likelihood of harm? Inaccurate WHOIS data? Failure to relay as a pre-condition?).• to provide a remedy in narrow case when registrant consents. WG agreed --out of scope (3.3) <p>OPOC characteristics and requirements: The WG agreed there may be up to two OPOCs; an OPOC may be a Registrant, Registrar or third party appointed by the Registrant; all Registrants must appoint an OPOC (2.1, 2.2)</p> <p>Verification: The WG agreed that accrediting of OPOCs is neither scalable nor practicable. There was support (but not agreement) that verification of an OPOC’s active email address must be obtained before enabling a website to resolve. Failure to obtain verification in a given time period must result in a failure to register (2.3). Alternative views opposing verification include registrar concerns about cost and delay and potential burden to users.</p> <p>Consent: The WG agreed that the Registrant must name a functional OPOC and that a process to establish the relationship between the OPOC and Registrant is required (2.4). Alternative views differ about when and how consent might be obtained, and raise concerns about costs and burden of an explicit consent requirement on Registrants and Registrars. Other concerns include timing, and whether consent should be required before registration is completed.</p> <p>Proxy services: The WG agreed that proxy services are irrelevant to the existence of an OPOC, and that when a proxy service is used, the proxy and the first designated OPOC must be the same (2.5).</p> <p>OPOC and tech/admin contacts: The WG agreed a technical contact would continue to be displayed only when registrant contact data is displayed, and there is no need to display admin contact if OPOC is implemented (2.6).</p>



Initial OPOC Proposal	Summary of WG topics considered
	<p>What happens if OPOC responsibilities are not fulfilled: The WG agreed if an OPOC fails to respond to relay or reveal within a set time, the requester may contact the Registrar to reveal the registrant's WHOIS data, to suspend the domain name record or web-site DNS, and to lock the domain from transfer for a set period (Sec. 4). There was support for the view that this service should be free to requesters. Alternative views questioned whether registrars should reveal data without due process, whether web site suspension is out of scope, how costs should be recovered and sanctions for OPOCs who repeatedly fail to perform.</p> <p>Examining how legitimate interests will access unpublished registration data (Sec. 6) Typically, requesters of unpublished data about natural persons would contact the OPOC. The WG also considered the circumstances in which a requester might access unpublished data directly from a Registrar. The WG considered four types of access:</p> <ul style="list-style-type: none">(6.1) Access to displayed WHOIS records – Agreed that public access to full records for legal persons would continue but only limited data would be displayed for natural persons(6.2) One-time access to a specified un-displayed data record – see below(6.3) Regular query-based access to un-displayed records – see below(6.4) Full access to displayed and un-displayed records – see below <p>The WG agreed that there were circumstances where law enforcement might need each type of access (6.2, 6.3, 6.4) and where private actors might need 6.2 and 6.3 access. Various alternative views urged narrowing or broadening of access, two alternative views opposed the recommendation.</p> <p>Authentication (6.6): The WG knew of no globally scalable means of authentication and agreed the feasibility, practicality and cost-effectiveness of authentication mechanisms should be studied. The WG agreed OPOC implementation should be contingent on a broadly supported means of access. There was support (but not agreement) that self-declaration is sufficient in the absence of more reliable means. An alternative view objected to self-declaration, others disagreed with the recommendations.</p> <p>Charging for access services (6.7) Agreement that a fee may be charged.</p>



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Initial OPOC Proposal	Summary of WG topics considered
	<p>Whether publication of registrants’ contact information should be based on the type of registrant (legal vs. natural persons) or the registrant’s use of a domain name (Sec. 5)</p> <p>The WG agreed the OPOC proposal should change WHOIS policy to distinguish between natural persons (real, living individuals) where only limited data is displayed, and legal persons (business, partnership, non-profit) where data would be fully displayed. The WG agreed that a distinction based on use was neither timely at registration nor easily operational (5.2).</p>
<p>Contact data published by Registrars via WHOIS: Registrars would display full contact information for the OPOC (name, address, telephone number and email address) but only the registrant’s name and country/jurisdiction.</p> <p>Registrars would also publish the initial domain name registration date, expiry date and certain registry level data (see attachment 1). Registrars may choose to publish additional data at their discretion.</p>	<p>WG discussions regarding OPOC and Registrars</p> <p>Potential impacts are described throughout the report, two directly related to data display are highlighted below:</p> <p>RAA: There will need to be a change to both the Registrar Accreditation Agreement (RAA) and subsequently Registrar-Registrant agreements to reflect a new OPOC relationship.</p> <p>Regarding the OPOC and the tech/admin contacts: The WG report suggests that consideration be given to reconciling the different display obligations between registrars and registries (2.6).</p>
<p>Contact data published by Registries via WHOIS: Registries will only publish data as follows:</p> <ul style="list-style-type: none"> • Registered name • Identity of Sponsoring Registrar including; <ul style="list-style-type: none"> ○ the Registrar Name and; ○ corresponding IANA Registrar Identification Number • The URI of the authoritative WHOIS server • All authoritative nameserver hostnames and corresponding IP addresses • Status of Registered Name and any other EPP RFC Registry value) • Initial registration date and expiry date 	<p>WG discussions regarding OPOC and Registries</p> <p>Potential impacts are described throughout the report, three related to data display are highlighted below:</p> <p>Should all registries become thin registries? There may be differences among registries in the information displayed based on national laws and whether the registry is sponsored or generic. A sponsor may not want to be a thin registry. There may be benefits to the thick registry model.</p> <p>Registry agreements: Changes will be needed to the public WHOIS provisions in the gTLD registry agreements.</p> <p>Regarding the OPOC and the tech/admin contacts: The WG report suggests that consideration be given to reconciling the different display obligations between registrars and registries (2.6).</p>
<p>Mechanism to deal with inaccurate data:</p>	<p>Regarding inaccurate data:</p>



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Initial OPOC Proposal	Summary of WG topics considered
<p>Registrars must continue to update registration records when a registrant provides updated information and positively respond to notices of alleged inaccuracies in a timely manner. Specifically, when a Registrar is notified of an alleged inaccuracy in a WHOIS record;</p> <ol style="list-style-type: none"> 1. the Registrar must notify the OPOC or registrant in a timely manner. 2. The OPOC or registrant must correct the alleged inaccuracy or defend the accuracy of the data, also in a timely manner. 3. If the OPOC or registrant does not correct information within this time period, the Registrar must either "hold" the domain name or revoke the registration. 4. Before accepting new information, the Registrar must verify that the OPOC or registrant can be contacted using the new email address provided. 5. If the basis for the original complaint included data elements other than e-mail address, the Registrar must take reasonable steps to validate corrections to these data elements before accepting. <p>A standardized mechanism should be used to convey notices of alleged inaccuracy from the internet community and distribute them to the relevant registrar.</p>	<p>Working Group discussion focused on this issue in Section 3 (role of OPOC to relay and/or reveal when a requester asserts that data is inaccurate), Section 4 (failure of OPOC to perform) and Section 6 (direct access to data from Registrars).</p>
<p>Contact information and domain name transfers: Registrars must continue to transfer detailed contact records at the request of the registrant or OPOC. Thus a Sponsoring Registrar must make the data outlined in RAA section 3.3.1 available to a prospective gaining registrar upon request for the purpose of confirming Registrant/OPOC identity and authenticating the transfer request. This mechanism should be augmented by using EPP AUTH-INFO tokens/codes where appropriate. The Inter-registrar Transfer policy should be amended to recognize the OPOC and sunset of the Administrative, Technical and Billing Contacts.</p>	<p>Topic was not addressed further in WG Report.</p>