# Policy Advisory Committee

17 April 2018 Meeting - PAC#15

- 1. Apologies (absentees)
- 2. Minutes of the Meeting of PAC#14 (7 Feb '18)
- 3. Review of action points from 7 Feb 2017

(relating to matters not otherwise appearing on the Agenda)

a. Proposal to alter the operation of the DNS check validation process

#### 4. Update on the policy change

To remove the 'claim to the name' requirement from the Registration & Naming Policy

#### 5. Update on the policy change

To introduce Alternative Dispute Resolution Process (ADRP)

#### 6. Policy changes arising from the introduction of GDPR

- a. Privacy Policy
- b. Retention Policy
- c. WHOIS Policy and Acceptable Use Policy
- d. Registrar Agreement
- e. Registrant Terms and Conditions

#### 7. Update on the policy change

To remove restrictions on .ie domains corresponding to TLDs

#### 8. Any Other Business

a. Industry related developments /relevant legislative changes to be outlined by PAC members

### 3. Action Points & updates

from the 7 February 2018 meeting

a. Policy change – to alter the operation of the DNS check validation process

(for new registration, modification and registrant transfer tickets)

#### **Action Points:-**

- Consensus found for the proposed change following Registrar consultation period
- > IEDR is working to update its internal systems to support this change

#### **Updates:-**

- ➤ Implementation is expected in Q2 2018.
- > Normal minimum notice periods will apply

#### a. Proposal to alter the operation of the DNS check validation process

To ensure that a FAIL result on the technical check does not delay the completion of a request

#### What is being proposed?

- The triple-pass check would continue to run.
- A FAIL result on the technical check would not delay the completion of the request, provided that the admin and financial checks are successful.

Admin Check

Technical Check

Financial Check

Checks that requests must pass currently:-



Checks that requests must pass after proposed change:-

- Email notifications would continue to issue to the relevant contact(s) to notify them of the DNS configuration failure, but the need to correct the DNS would not delay the completion of the request.
- > IEDR is in favour of this change to enhance the customer experience. We will monitor the impact of the change and if there is a deterioration in the quality of the zone, we may need to re-visit the DNS check process.

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#### **Action Points:-**

- > IEDR and PAC Stakeholders were to continue awareness-building efforts
- > IEDR and PAC Stakeholders were to manage the issues identified to date, esp during the Public Consultation
- > Working Group was to finalise word-crafting of the revisions to the 'Guidelines' of the Registration & Naming Policy
- ➤ Policy change was to be implemented on 21 March 2018

Update:- Marketing & promotion - Communications & Awareness building

#### **FASTPASS**

#### ONE-DOC

for returning customers

for new customers

#### SNAP and SEND

for fast transmission of ONE-DOCs



✓ Company - Registry will accept any ONE of the documentation types outlined above in B.

Other - If the organisation is otherwise established, Registry will accept either a bank statement, or any ONE of

the documentation types outlined at C above for citizens / residents of the island of ireland, from a nominated

✓ Charity - Registry will accept a registered Charity number.

✓ Partnership - Registry will accept a VAT or RBN number

member of the organisation.









#### **IEDR Radio Ad**

click here



Liberalisation Radio Ad.mp3



#### .ie rules are changing

The rules for registering .ie online addresses are changing.

From March 21st, the need to provide a claim to the name will be removed, but **proof** of your connection to Ireland will still be required.

This will make it faster and easier to register your preferred .ie online address.

Visit www.iedr.ie/finalcall for more information.

Newspaper Ad

Update: - Marketing & promotion - Communications & Awareness building

Phase 1 of communications completed - Public Consultation (28 Aug '17 – 30 Sept '17)

Phase 2 of communications completed – Awareness-building (Nov'17 – March'18)

- Registrars awareness building for existing registrants and current customers (final call to ring-fence your name)
- PAC Mothership Stakeholders & Registrars got a toolkit from IEDR which included:-
  - Informational Flyers + Short animation videos (x2) + Skyscraper banners (for digital ads),
  - Sample content for social media, stakeholder websites, articles etc.
- IEDR website with marketing toolkit FAQ, informational flyers, home page carousel, timetable etc.
- Promotion and awareness-building of the 'Final Call' message continued throughout Q1

#### Phase 3 of communications completed - Public Service type comms by IEDR

- Press releases issued in March 2018 and appeared in the national press as follows:-
  - ❖ Irish Independent (8 March 2018) + Irish Times (9 March 2018) + Sunday Business Post (11 March 2018)
- Promoted content on Twitter and YouTube from late-Feb to mid-March
- Radio notices on Newstalk and Today FM during w/c 5 March and 12 March

Update:- formal documentation of the new Policy, Process, Procedures, Rules and Guidelines (PPPRG)

#### Registration and Naming Policy (PPPRG)

- > Working Group finalised word-crafting of 'Guideline' revisions within the Registration and Naming Policy,
- removed claim references, and
- > updated PPPRG to account for policy changes completed since baseline version was first published in Sept 2016.

#### > Registrar Agreement

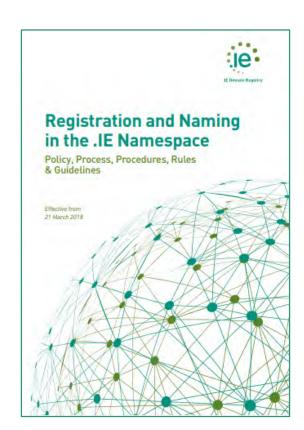
> IEDR issued a supplemental Registrar Agreement (with minor edits reflecting Claim policy change)

#### > Registrant Terms and Conditions

➤ T&Cs updated on IEDR website

#### > Plain English information and FAQs

➤ IEDR website with user-friendly text, video clips and infographics



Update:- Issue management

#### > Issues

- ➤ Potential cyber squatters
- > Brand infringement
- > Application queues
- Disputes/appeals/challenges
- Awareness gaps
  - "we weren't we told about changes"
  - "Why did you give them my name"

Update:- Issue management

Issue management – potential for Brand Infringement, warehousing

Mar 21st - 31st		Class of Registrant														
Category of Domain Names	Body Corporate (Ltd, PLC, Company)	Sole Trader	Natural Person	Discretionary Applicant	Unincorporated Association	School/ Educational Institution	Statutory Body	Constitutional Body	Grand Total							
Discretionary Name	1,227	794	869	387	40	5	14		3,336	87.49%						
Corporate Name	174								174	4.56%						
Registered Business Name	27	117			12				156	4.09%						
Personal Name			74						74	1.94%						
Personal Trading Name		32							32	0.84%						
Unincorporated Association Name					17				17	0.45%						
School/Educational Institution Name						13			13	0.34%						
Registered Trade Mark Name	9								9	0.24%						
State Agency Name							2		2	0.05%						
Grand Total	1,437	943	943	387	69	18	16	0	3,813	100.00%						
	<b>37.7%</b> 62.49	<b>24.7%</b>	24.7%	10.1%	1.8%	0.5%	0.4%	0.0%	100.0%							

Update:- Issue management

Issue:- Easier and Faster? Queue management



Issue:- potential International Cybersquatters

Row Labels	Count of D_Name
Ireland	3584
United Kingdom	65
Northern Ireland	53
France	40
USA	22
Spain	11
Germany	9
Canada	5
Belgium	4
Switzerland	4
Australia	4
Austria	3
Poland	2
Netherlands	1
Czech Republic	1
Vietnam	1
Malta	1
Denmark	1
Bulgaria	1
Iceland	1
<b>Grand Total</b>	3813

There were 2,076 different domain holders, 485 with multiples, 98 registered 5+ domains

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Objective is an easier and affordable process

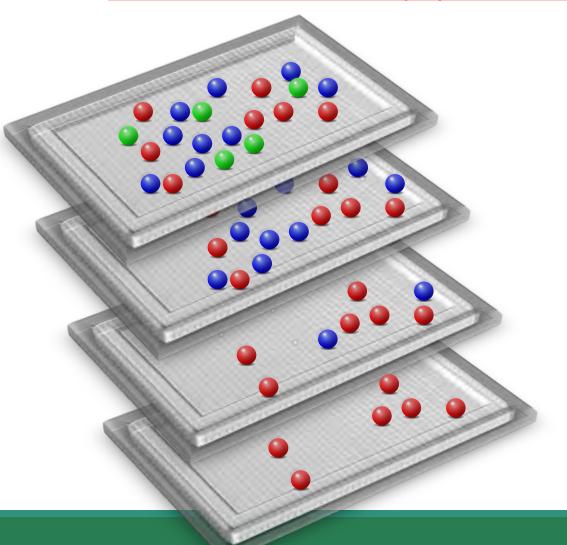
#### **Action Items:-**

- Following the positive findings from the initial feasibility check, Working Group (WG) was to continue its review of the proposed policy change, in particular, the design and scope of the process.
- > PAC Secretariat was to continue feasibility checks with other potential mediation / service providers.

#### **Updates:-**

- > No WG engagement via conference call and mailing list since last PAC meeting.
- ➤ WG discussion expected to continue on:-
  - Reviewing the ADR processes used by other ccTLD and gTLD operators
  - Considering if a third party should / could manage the process
  - Considering if a mediation service should be offered with the process
  - Considering alternatives / options for an ADR process (that are easier and more affordable than the IE DRP with WIPO)
  - Considering if access to an ADRP should be limited e.g. to complainants with rights / interests
  - Undertaking a review of potential costs associated with offering a mediation service and Expert Decision

Consensus within PAC for the proposed filtering in Levels 1-3 below. Further consideration required for Level 4



Level 1: IEDR can filter and deal with cases, such as :-

**Technical abuse** – malware, phishing, DNS hijacking or poisoning, botnet command and control, willful distribution of malware......

**Obvious criminality** - distribution of material depicting child abuse, human trafficking **Court Order** – including an instruction to suspend, delete a domain

**Level 2**: WIPO and Regulatory Authority protocol (RAP)

**IP infringement**:- complainant sends to WIPO directly Regulatory body - notice of illegal activity - existing protocol (RAP)

**Level 3**: Registration abuse

Breach of t&c's during registration - incorrect supporting documentation

**Level 4**: complex cases – refer to Expert Panel, Courts

**Legal matters**:- defamation, slander, impersonation, passing-off **Registration issues**:- bad faith registrations, non-rights IPR breach

'Ownership' issues:- Business disputes, family disagreements

#### **WG:- Further emerging consensus for:-**

- > Formalisation of the Regulatory Authority Protocol (RAP)
  - > Use of a single, standardised template (to be available for national Regulatory Authorities on the IEDR.ie website)
- Certain breaches of the rules could not be assessed / adjudicated-on by IEDR subjective or legal judgement (and therefore ought to be escalated to a mediation service or an Independent Expert or referred to parties' legal advisors)
  - > e.g. defamation, slander, impersonation, passing-off, bad faith registrations, bad faith use/content, legitimate interest etc.

#### > ADR design

- > WG should be mindful of offering a mechanism for addressing certain instances, such as:-
  - > where a web designer registers a .ie domain to themselves (rather than to their client),
  - for disputes between business competitors,
  - > for disputing personal domain name registrations (e.g. MickMurphy.ie, where there may be multiple interested / disappointed parties).

#### **WG:- Scope considerations:-**

It was proposed that any of the following criteria could be used to legitimately restrict the scope of the ADR:-

- > the complainant should have legitimate rights or interests in the name?
- > the complainant should be **negatively impacted** by the disputed registration?
  - (a complainant who is just "a concerned citizen" could be referred to relevant regulatory bodies).
- > the current registrant should have **no legitimate rights** to the name?
- > the domain should have been registered in bad faith and/or subsequently, used in bad faith?
- > the domain should be used currently for the provision of bona fide services (and so remain out the scope)?

#### **WG:- Other considerations:-**

#### Potential outcomes / remedies:-

> Outcome / remedy could be:- Suspension? Deletion? Transfer to the Complainant? Indefinitely block/shelf it?

#### **Binding decisions:-**

Expert Decision should be binding on the parties (otherwise ADRP is pointless) thereby permitting the Registry to act per .ie T&Cs (however, legal recourse permitted, if disagreement still exists)

#### **Independent Expert:-**

- > Should an Expert Panel adjudicate on certain instances, such as bad faith reg., slander, defamation etc.?
- Affordable / low-price point is realistic

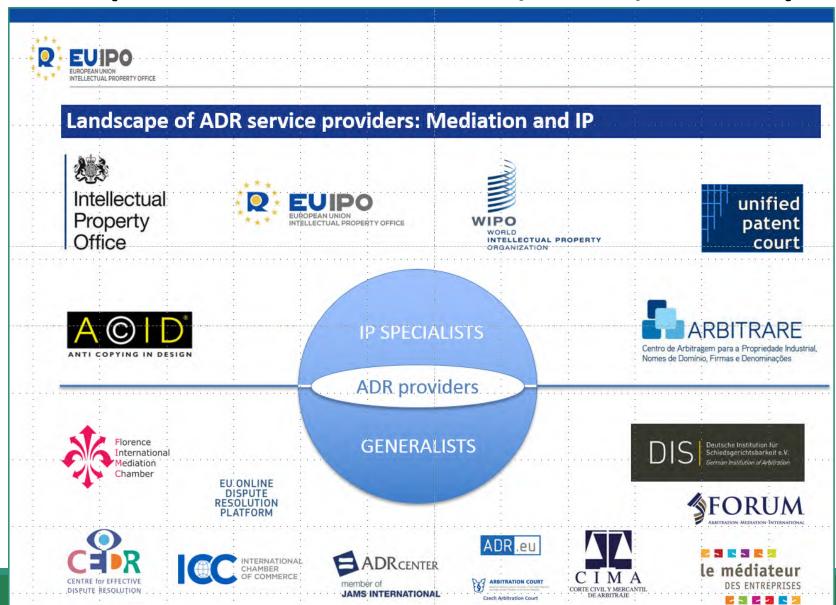
#### Mediation:-

- > Should it be offered? If so, should it be provided internally by IEDR or/and external Mediation Service?
- Affordable / low-price point is realistic

EU legislative changes following Mediation Directive 2008/52/EC.

**Legal Reform** legislation allows **EUIPO** to create a **Mediation Centre**(art. 151, 170)

"The Office (EUIPO) will evaluate the feasibility of creating such a centre to promote alternative dispute resolution for all parties involved in disputes pending before any of its decision-making instances."



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- GDPR Task-Force setup internally in July '17 to coordinate IEDR's compliance
  - > Data-mapping exercise undertaken to determine what Personal Data is held, access levels, where/how/why it is stored
  - ➤ IEDR engaged with Office of the Data Protection Commissioner
  - > IEDR observed and participated in industry discussions to determine emerging best practice (e.g. CENTR)
  - > Engaged with our external Legal Counsel, Arthur Cox, on revisions required to IEDR's contracts and suite of Policies
- GDPR-related edits are required to the contracts between IEDR, Registrars and Registrants:-
  - > Registrar Agreement
  - Registrant Terms and Conditions
- GDPR-related edits are required to the following IEDR Policies:
  - a) Privacy Policy
  - b) Data Retention Policy
  - c) WHOIS Policy and Acceptable Use Policy

#### a) Privacy Policy

#### Edits for GDPR:-

- Data subject rights have been included
- Data subject access requests provided for
- Analytics and Cookies (including WebCrawler opt-out)
- Disclosure practices
- Location of Processing
- Communications from IEDR
- > Summary of data retention practices

#### b) Data and Document Retention Policy

Data type	Proposed retention	Legal Basis
Domain data (Domain holder name and domain name)	Lifetime of the domain + 2 years (out of 6 years potential retention under statute of limitations for breach of contract)	<ul> <li>Contract</li> <li>Legitimate interest</li> <li>For defence of legal rights</li> <li>Compliance with Registration and Naming Policy</li> </ul>
	Anonymised thereafter, and held indefinitely	- Archive purposes, Public Interest obligations as the National Registry.
Contact data (Admin Contact, Tech Contact and Billing Contact)	Lifetime of the domain + 2 years (out of 6 years potential retention under statute of limitations for breach of contract)	<ul> <li>Contract</li> <li>Legitimate interest</li> <li>For defence of legal rights</li> <li>Compliance with Registration and Naming Policy</li> </ul>
NameServer data (NS records)	Lifetime of the domain + 2 years (out of 6 years potential retention under statute of limitations for breach of contract)  Anonymised thereafter, and held indefinitely	<ul> <li>Contract</li> <li>Legitimate interest</li> <li>Compliance with Registration and Naming Policy</li> <li>Archive purposes, as National Registry</li> </ul>
Documents submitted as support for domain registration, modification or transfer (e.g. passports etc.)	New Registration - 30 days after commencement of the Contract  Modification, Transfer - 30 days after Ticket is passed	<ul> <li>Contract</li> <li>Data minimisation and purpose limitation</li> </ul>
Documents submitted – unsuccessful registration, (e.g. passports etc.)	Within 7 days after Ticket expires (dropped), or is cancelled	- No Contract established

#### c) WHOIS Policy and Acceptable Use Policy

- > Consensus changes:- from the 2017 Consultation Process with Registrars (on a FastTrack approved by PAC) included:-
  - > Abuse Contact provided for, implementation deferred
    - (may require an API change for database solution. Interim solution can be implemented immediately)
  - > Billing Contact Account Name will appear later in 2018 (applicable only where the BillC is an accredited Registrar)

#### GDPR proposed changes:-

#### Where Registrant is a Natural Person (i.e. non-legal person, private individual, non-commercial):

- Default is opt-out (Domain name will be displayed with technical domain info.)
- Domain Holder, Admin Contact and Technical Contact names will not appear (just their NIC handle ref / account number)
- > Registrant will have the option of an opt-in

#### Where Registrant is a Legal Person (i.e. Commercial entity, Government Body etc.):

- Domain Holder name will appear
- Admin Contact and Technical Contacts' personal names will not appear (just their NIC handle ref / account number)
- No opt-out permitted for these entities

#### **Existing WHOIS Output**

domain: iedr.ie

descr: IE Domain Registry Limited

descr:

admin-c: IH4-IEDR tech-c: ITS2-IEDR

registration: 16-March-1999

renewal: 01-January-2025 holder-type: NonBillable

locked: N

ren-status: Active

in-zone: 1

nserver: ns0.iedr.ie 77.72.74.133 2a01:4b0:0:6::5 nserver: ns2.iedr.ie 77.72.78.88 2a01:4b0:2:2::88

nserver: e.ns.ie nserver: f.ns.ie

nserver: ns.heanet.ie

source: IEDR

person: IE Domain Registry Limited

nic-hdl: IH4-IEDR source: IEDR

person: IEDR Technical Services

nic-hdl: ITS2-IEDR source: IEDR

#### Proposed GDPR WHOIS Output

Non-legal persons

Domain: JohnDoe.ie

Domain Holder: **BLANK** 

Admin-c: **abc-IEDR** 

Tech-c: xyz-IEDR

Account Name: accredited .ie Registrar name

Registrar Abuse Contact: (email address or

"Service not currently supported")

Registration Date:99/abcd/9999

Renewal Date:99/abcd/9999

Holder-type: Billable

Locked status: Yes or No

Renewal status: Active

In-zone: 99

Nserver: ns1.DNS.ie

Nserver: ns2.dns.ie

Nserver: ns3.dns.ie

Nserver: ns4.dns.ie

Nserver: ns5.dns.ie

### Proposed WHOIS GDPR Output - legal persons

Domain: iedr.ie

Domain Holder: IE Domain Registry Limited

Admin-c: abc-IEDR
Tech-c: xyz-IEDR

Account Name: accredited .ie Registrar name

Registrar Abuse Contact: (email address or "Service

not currently supported")

Registration Date:99/abcd/9999

Renewal Date:99/abcd/9999

Holder-type: NonBillable

Locked status: Yes or No

Renewal status: Active

In-zone: 99

Nserver: ns1.DNS.ie 77.72.74.133 2a01:4b0:0:6::5

Nserver: ns2.dns.ie 77.72.78.88 2a01:4b0:2:2::88

Nserver: ns3.dns.ie

Nserver: ns4.dns.ie

Nserver: ns5.dns.ie

#### d) Registrar Agreement

#### Some notable edits arising from Policy changes:-

- Registrars will not be obliged to retain documentary evidence of Registrant's compliance with Registration & Naming Policy
- > Registrars may choose to have (future) Registrant's send supporting docs to IEDR directly.
- New data processing requirements
- New standard contractual clauses for Third Country data transfers (where country is not subject to an EU adequacy decision / Privacy Shield)
- Changes to provisions on liability and indemnity arising from GDPR breaches

#### Some operational matters arising from Policy changes:-

- > By 25 May, IEDR Console will facilitate provision (upload) of docs directly to IEDR (without needing to login).
- > The 'Snap and Send' feature will also continue using the <a href="Support-Docs@iedr.ie">Support-Docs@iedr.ie</a> facility

#### e) Registrant T&Cs

#### Some notable edits arising from Policy changes :-

- > Obligation on registrant to re-submit supporting docs, if requested (e.g. for ADRP)
  - Mandatory, due to data destruction within 30 days, under new Retention Policy
- Natural Persons / Non-Legal Persons may opt-in to WHOIS publication / disclosure of Personal Data elements
- Requests to delete Personal Data (from Legal Person)
  - will trigger a deletion of the domain name (on the basis that processing is necessary for the duration of domain registration contract)
- New conditions now included on Data Subject rights
  - including right to provide / withdraw consent for Personal Data processing only where the legal basis for this is consent (e.g. new WHOIS operations)
- Registrants must be over 18 years of age to contract
  - this is now specified in t+cs (even though GDPR creates a new digital age of consent of 13 years)

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### 7. Policy change – TLD names

#### Policy change – to remove restrictions on .ie domains corresponding to TLDs

#### **Action Point:-**

> PAC formal recommendation for the implementation of the policy change to be provided to IEDR Board of Directors for consideration in accordance with 10-step PDP.

#### **Update:-**

- > IEDR Board of Directors are expected to consider PAC recommendations at their next meeting in late April 2018.
- > Further updates to be provided via PAC mailing list and at PAC#16.
- > Implementation:- dependent on completion of current priorities of GDPR and ADRP.

aero.ie coop.ie post.ie wpad.ie porn.ie school.ie kid.ie heis.ie sheis.ie weare.ie allinthename.ie allinthenames.ie elliptic.ie pin.ie

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b. Annual Report 2017

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# Next Meeting PAC #16

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6 13 20 27	7 14 21 28	1 8 15 22 29	2 9 16 23 30	3 10 17 24	4 11 18 25	5 12 19 26	3 10 17 24	4 11 18 25	5 12 19 26	6 13 20 27	7 14 21 28	1 8 15 22 29	2 9 16 23 30	1 8 15 22 29	2 9 16 23 30	3 10 17 24	4 11 18 25	7 5 12 19 26	6 13 20 27	7 14 21 28	5 12 19 26	6 13 20 27	7 14 21 28	1 8 15 22 29	2 9 16 23 30	3 10 17 24	4 11 18 25
2 9 16 23 30	3 10 5 17 8 24	4 11 18	100	6 13 20	7 3 14 0 21	1 8 15 22	7 14 21 28	1 8 15 22 29	2 9 16 23	24	4 11 18	5 12 19	20	4 11 18 25	5 12 19	6 13 20	7 14 21 28	1 8 15 22 29	2 9 16 23 30	24	2 9 16 23 30	3 10 17 24	4 11 18 25	5 12 19 26	6 13 20	7 14 21	1 8 15 22 29

# Policy Advisory Committee

17 April 2018 Meeting - PAC#15