

# RrSG Input: GNSO Council Accuracy Assignment - February 2025

## **What are concrete and articulable examples of what inaccurate data DOES prevent or inhibit, and how does it do so?**

Inaccurate registration data can cause problems for identifying the domain owner, which may disrupt registrant access to the domain. For example, if a registrant provides an inaccurate name and later loses access to their registrar account or even passes away then they or their successors would not be able to demonstrate their right to the domain name.

Inaccurate registration data can prevent the registrar from contacting the registrant with mandatory notices such as renewal reminders and registration data reminders, or contacting them as needed to address abuse reports or account-related concerns.

For the domain owner, the consequence of this difficulty with identifying or contacting the domain owner would be disruption and delay when they want to manage the domain and must first go through a process to confirm ownership. For the registrar, the consequence is increased costs resulting from the need to work with the party claiming ownership to verify their claim, and increased risk of incorrectly determining the owner.

## **What are concrete and articulable examples of what inaccurate data does NOT prevent?**

Inaccurate registration data does not prevent use of the domain name, either for legitimate or illegitimate purposes, nor does it prevent the registrar from contacting the account holder if their data is different.

Registration data may be inaccurate only in part, reducing the adverse effects. For example, an inaccurate postal address does not prevent contact via email or telephone.

Inaccurate registration data does not prevent a registrar from taking action against DNS Abuse or illegal activity associated with a domain name.

## **Are there specific stakeholders, industries, or sectors particularly vulnerable to the effects of inaccurate registration data? If so, what are they and why?**

The registrar is *not* especially vulnerable to the effects of inaccurate data as there are several processes in place to ensure accuracy and protect against adverse effects:

- Validation and verification of registration data - required under the [RAA RDDS Accuracy Program Specification](#)

- Annual confirmations of registration data accuracy - required under the [Registration Data Reminder Policy](#)
- Alternative contact data on file for related but separate processes;
- Legal processes to validate identity and confirm ownership of assets.

The registrant is similarly protected against the potential for inaccurate registration data which could lead to adverse effects by these same accuracy-affirming processes.

Law enforcement efforts may be adversely affected by inaccurate registration data.

Those organizations which would send bulk unsolicited emails to domain owners may be affected by inaccurate registration data as they would be unable to do so when the registrant email is invalid.

If any stakeholder encounters inaccurate registration data, existing ICANN requirements require that the data be corrected or the domain name be suspended.

**Given the examples provided in response to the three questions above (if any), please articulate a short problem statement for accuracy. The problem statement should consider:**

- **What is the current problem or challenge?**
- **What are the consequences of this problem or challenge?**
- **What is the ultimate objective of working on this problem or challenge?**

Regarding the current problem or challenge, the RrSG notes that registration data overall is validated and verified to ensure accuracy throughout the lifetime of the domain name. While it has been repeatedly suggested that there is a “problem with accuracy” or that “most domains have inaccurate data” these claims are not supported by verifiable evidence.

As such, the true problem is lack of trust in the process to validate and verify accuracy of registration data and contactability of registrants.

The ultimate objective of addressing the question of registration data accuracy is to maintain the ongoing security and stability of the domain name system by ensuring that processes are in place to require and maintain the accuracy of registration data and the ability to contact the domain owner.

Any attempts to achieve this goal must account for potential adverse effects on the registrant resulting from improper disclosure of their personal data.

**Considering the limitations of data processing, how do you propose to address this problem?**

The limitations of data processing do not prevent addressing this problem; instead (as previously mentioned) there are already processes in place to do so: validation and verification of registration data; annual confirmations of accuracy; alternative contact data on file for related but separate processes; legal processes to confirm ownership of assets.

It is crucial to consider that problems often arise from inappropriate use of domain registration data, accurate or not. Publication or disclosure of registrant data puts the registrant at risk of data mining and identity theft; third-party data users who fail to comply with best practices, regulation, and law governing storage, use, disclosure, and destruction of personal data put the registrant at risk of data breaches leading again to data mining and identity theft.

**Is now the appropriate time to address the problem? For example, some stakeholders have mentioned the implementation of NIS2 as an important precursor to understanding new accuracy requirements. Should this or other examples be considered prior to engaging in potential policy work?**

ICANN Policy already requires validation and verification of registration data to an extent that satisfies NIS2 requirements, as the RrSG has [demonstrated](#). The Community should wait for local laws such as NIS2 to be fully implemented before considering the creation of any further Policy on the same topic.

**Are the ICANN org alternatives proposals worth exploring, such as:**

- **Provision of historical audit data that measures registrars' compliance with accuracy-related provisions in the RAA.**
- **Engagement with contracted parties and ccTLD operators on developments in European policymaking regarding registration data accuracy.**

There is no benefit to the Community in exploring these proposals at this time. The Community should be very cautious applying limited ccTLD measures (which can work for a particular jurisdiction with unified identification/address systems) to the gTLD landscape, and should keep in mind that some ccTLDs have high rates of abuse despite strict identification systems.

**What are the limitations of the ICANN proposals? Why should or should they not be pursued?**

**What other possibilities can be explored to move our work on Accuracy forward?**

These proposals would provide data which may be informative regarding the rate of registrar compliance with specific contractual requirements (which should be assumed to be at or near 100%) or informative regarding the legal landscape in a specific region of the world. These proposals would not result in any improvement in the rate of collection of accurate registration data, or reduction of collection of inaccurate data, nor would they affect the underlying reasons why data may be inaccurate.

Registration data is inaccurate primarily due to circumstance or unawareness of requirements, sometimes due to wilful disobedience, and only occasionally due to actual malice. The party adversely affected by inaccurate data is primarily the registrant themselves, and so any corrective measures must ensure that the registrant is appropriately protected.

Efforts regarding registration data accuracy should focus on two areas: first, education of the registrant so they understand why their data is required, what is done with their data, and how it is protected, which will lead to improved willingness to provide accurate data. Second, correspondingly, these efforts should provide requirements for protection of that personal data by both the registrar and any third party data recipients.

The RrSG would like to note the following resources offered relating to registration data accuracy:

- [ICANN79 Session Presentation: Validation, Verification & Accuracy – Oh My!](#)
- [RrSG Approach to Registration Data Accuracy](#)
- [RrSG Letter re: NIS2 Art 28](#)
- [Understanding RDDS Responses](#)