



Registry Services Evaluation Policy (RSEP) Request

December 11, 2017

Registry Operator

fTLD Registry Services LLC
600 13th Street NW, Suite 400
Washington, District of Columbia 20005

Request Details

Case Number: 00879030

This service request should be used to submit a Registry Services Evaluation Policy (RSEP) request. An RSEP is required to add, modify or remove Registry Services for a TLD. More information about the process is available at <https://www.icann.org/resources/pages/rsep-2014-02-19-en>

Complete the information requested below. All answers marked with a red asterisk are required. Click the Save button to save your work and click the Submit button to submit to ICANN.

PROPOSED SERVICE

1. Name of Proposed Service

Dynamic Registration Verification

fTLD Registry Services (fTLD) respectfully submits the following courtesy notification regarding its migration from a Static Registration Verification process to a Dynamic Registration Verification process. This is neither a Service, nor the proposed offering of an Additional Service, as defined in the Registry Agreement. Although fTLD finds no contractual basis for filing this request, fTLD is doing so at the request of ICANN GDD staff who directed fTLD to this process. fTLD reserves all rights and claims concerning ICANN's request for an RSEP.

2. Technical description of Proposed Service. If additional information needs to be considered, attach one PDF file

To understand the technical description of the process, it is helpful to understand the current Static Registration Verification process and how Dynamic Registration Verification will improve the overall Registrant and Registrar experience.

Static Registration Verification (existing process)

Verification, as described in fTLD's Specification 12 to its .BANK and .INSURANCE Registry Agreements with ICANN, is conducted as a part of the registration process to ensure applicants meet the eligibility requirements and have been authenticated as a legitimate member of the community and comply with fTLD's Name Selection Policy available at www.fTLD.com/policies. The Static Registration Verification process is described in the overview documents (attached), in which claims of proprietary and confidential information have been exerted. Additionally, as a part of fTLD's audit of all approved registrations, there is a periodic re-verification process, as described in the overview documents, to ensure continued compliance with fTLD's Registrant Eligibility and Name Selection Policies.

Currently, prospective .BANK or .INSURANCE Registrants use an fTLD-approved Registrar to initiate the domain name registration process. Registrars submit a registration request via EPP to fTLD's back-end registry provider, which puts the domain in a pendingCreate status, and then initiate a verification order via a proprietary API with fTLD's external verification provider. Due to fees imposed for failed registrations, a growing number of Registrars are increasingly engaging with fTLD staff prior to the submission of the EPP command and/or API submission to pre-verify Registrants and their choice of domain name(s). These pre-verification requests often involve multiple interactions with the Registrant and their Registrar and create operational inefficiencies.

Once fTLD's external verification provider receives a verification order from the Registrar, it initiates the verification process which involves interactions and communications with the Registrant, Registrar, and fTLD, as needed to complete the verification. After completing the verification, fTLD's external verification provider submits its recommendation to fTLD for final review and approval or rejection of the verification order. If fTLD approves the verification order, fTLD removes the domain name registration from its pendingCreate status via a secure online portal provided by our back-end registry provider. However, if the domain name fails verification, the domain name request is deleted from the back-end registry provider database via that same secure online portal and the associated verification order is rejected.

This Static Registration Verification process is keyed to the initial domain name registration. fTLD has additional Static Registration Re-verifications associated with domain names that are registered for more three or more years (i.e., the registration verification requirement stipulates this process be undertaken at domain name renewal or every two years, whichever comes first) as well as change/transfer of Registrant Organization control and change of Registrant contact (e.g., Registrant Name) information. As this re-verification process is primarily keyed to the initial registration of the domain name, nearly 80% of all domain names under management require re-verification during the same window-of-time (i.e., April to July) due to .BANK and .INSURANCE both launching in May (the former in 2015 and the latter in 2016). As such, keying thousands of re-verifications to a fixed period-of-time creates administrative bottlenecks and has resulted in a less-than-desirable experience for Registrants, Registrars and fTLD.

Dynamic Registration Verification

fTLD intends to implement a Dynamic Registration Verification process to include, but not be limited to, the following: designation of a new external verification provider; fTLD exercising its rights to conduct verification (and/or parts thereof) if it chooses; pre-verification of Registrants and/or their domain name(s) of choice; and load balancing of ongoing registration re-verifications on a predictable basis (e.g., annually).

fTLD's change to this Dynamic Registration Verification process is being planned as a migration over time rather than a hard cross-over on a fixed date. This migration should minimize any potential inconvenience to Registrants and Registrars and will comply with fTLD's existing contractual obligations with its external verification provider.

Registrant Pre-Verification

Prior to selecting an fTLD-approved Registrar, prospective Registrants (applicants) will provide verification details to fTLD via a secure online portal to commence the process. fTLD and/or its external verification provider will evaluate the information provided and fTLD will inform the applicant if the appropriate criteria have been met. Consistent with the current verification process, fTLD will ensure, among other verification steps, compliance with the Registrant Eligibility and Name Selection Policies accessible at <https://www.register.bank/policies> and <https://www.register.insurance/policies>, respectively.

Upon fTLD's approval of the applicant's credentials, the applicant will be informed and may register a .BANK or .INSURANCE domain name by selecting its fTLD-approved Registrar of choice. The Registrar will collect and/or be provided with the registration data and submit via the normal EPP process the required registration information to the back-end registry provider.

Domain Name Verification

fTLD's initial implementation of the Dynamic Registration Verification process will focus on the Registrant's eligibility within the respective community. However, it is the intention of fTLD to incorporate domain name validation into the Dynamic Registration Verification process to ensure that the domain name complies with fTLD's Name Selection Policy. Potential integration of this feature may make use of existing token technology employed by other gTLD Registry Operators for pre-verification. fTLD is also exploring alternative comparable technologies that could be more seamlessly integrated with our existing back-end registry provider.

Dynamic Registration Re-verification

fTLD intends to verify all registrations in its respective TLDs on a predictable basis, such as annually, by load balancing verifications using the processes previously described.

In addition, fTLD is exploring how to integrate existing staff outreach to Registrants, (e.g., marketing, policy, and compliance) into this ongoing re-verification process to make a more seamless process for Registrants.

Notwithstanding the proposed Dynamic Registration Verification process, fTLD retains the right to audit domains at any time for compliance with all posted Policies and Requirements available on its website (<https://www.ftld.com/policies>).

If additional information needs to be considered, attach one file

Static Registration Verification Overview Proprietary and Confidential.pdf

CONSULTATION

3. Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?

fTLD maintains an ongoing dialog with members of its communities regarding aspects of its registry operations through an extensive network of professional relationships. Regarding Dynamic Registration Verification, fTLD has engaged with Registrants and Registrars leveraging lessons learned over the past two and half years of operations on how to improve the registration, verification and re-verification processes. fTLD has also consulted with its Operating Management team which includes representatives from leading financial services organizations.

3a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?

As noted above fTLD maintains an ongoing dialog with members of its communities regarding aspects of its registry operations through an extensive network of professional relationships. An impetus for the Dynamic Registration Verification was issues raised by Registrants and Registrars regarding the sometimes confusing, complicated and unnecessarily burdensome aspects of the Static Registration Verification.

As registration verification is central to the value and business propositions of fTLD's domains, the migration to Dynamic Registration Verification will be reviewed by key stakeholders including fTLD's Operating Management team and Board of Directors who are members of the TLD communities (i.e., banks, insurance companies and financial services trade associations).

3b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?

As noted above fTLD is in regular contact with Registrars that provide registration services in the .BANK and .INSURANCE TLDs and have consulted with them on how the verification process could be improved. fTLD also consulted with our largest Registrars to share the proposed Dynamic Registration Verification and how it is intended to create an enhanced use experience for Registrants, Registrars and fTLD. These Registrars expressed support for Dynamic Registration Verification.

3c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?

Not applicable.

3d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?

Direct consultation with end users regarding Dynamic Registration Verification was not conducted. However ongoing feedback provided to fTLD over the past two and half years by Registrants indicates the existing verification process can sometimes be confusing, complicated and unnecessarily burdensome.

3e. Who would endorse the introduction of this service? What were the nature and content of these consultations?

While some Registrars have been supportive of the proposed Dynamic Registration Verification process, fTLD has not sought out specific individuals, businesses and/or organizations to endorse it.

3f. Who would object the introduction of this service? What were (or would be) the nature and content of these consultations?

Unknown/Not applicable.

TIMELINE

4. Please describe the timeline for implementation of the proposed new registry service.

fTLD intends to begin implementation toward the Dynamic Registration Verification process in Q1 2018 after:

- ICANN's approval of the RSEP
- ICANN's approval of changes to the respective Registry-Registrar Agreements (RRAs)
- Notice to Registrars consistent with notification requirements in the respective RRAs

BUSINESS DESCRIPTION

5. Describe how the Proposed Service will be offered.

As noted in the Technical Description above, fTLD intends to migrate from its current Static Registration Verification process to a Dynamic Registration Verification over time rather than a hard cross-over on a fixed date. The Dynamic Registration Verification will include, but not be limited to, the following components: designation of a new external verification provider; fTLD exercising its rights to conduct verification (and/or parts thereof) if it chooses; pre-verification of Registrants and/or their domain name(s) of choice; and load balancing of ongoing registration re-verifications on a predictable basis (e.g., annually).

The manner of how Dynamic Registration Verification will be offered is provided above in the Technical Description section. fTLD would like to emphasize that no changes will be needed to the current EPP process whereby registry data is passed from fTLD-approved Registrars to the back-end registry provider of fTLD. Additionally, the experience for new and existing Registrants will be improved and Dynamic Registration Verification will facilitate Registrars in ensuring WHOIS accuracy via the Dynamic Registration Re-verification process whereby the Registrant's details will be verified on a more frequent basis than in the Static Registration Verification process.

6. Describe quality assurance plan or testing of Proposed Service.

Consistent with its existing best practices, fTLD will employ appropriate due diligence to ensure that all registration data is treated in a safe and secure manner. This ethos is the bedrock upon which fTLD was established, and currently embodied in its Security Requirements, which is comprised of Registrant Security Requirements and the fTLD Operations Pledge, available at: <https://www.ftld.com/security/>.

fTLD currently processes registration data from vendors in a secure fashion, and intends to follow this same process in designing the Dynamic Registration Verification process using qualified programmers and consultants. Currently the only substantive change appears to be the need for fTLD to create a secure API to process registration data via our current CRM platform. fTLD has already issued a call for qualified parties to submit expressions of interest to support design and implementation of Dynamic Registration Verification.

With Dynamic Registration Verification, there is no impact to the existing EPP for domain name registrations by Registrars with fTLD's back-end registry provider. As noted above domain name pre-verification may make use of a token system or similar alternative technology as has previously been used by other Registry Operators (e.g., .travel). fTLD will fully test its systems and associated website and/or application platform prior to implementation of Dynamic Registration Verification, including due diligence of any external verification provider.

7. Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.

If fTLD is to implement a token system or similar alternative technology, it is anticipated this would rely on the JSON Web Token as described in RFC 7519 (see <https://tools.ietf.org/html/rfc7519>).

CONTRACTUAL PROVISIONS

8. List the relevant contractual provisions impacted by the Proposed Service.

No contractual provisions and/or specifications of Registry Agreement (RA) will be impacted.

9. What effect, if any, will the Proposed Service have on the reporting of data to ICANN.

None.

10. What effect, if any, will the Proposed Service have on the Whois?

None.

11. What effect, if any, will the proposed service have on the price of a domain name registration?

None.

CONTRACT AMENDMENTS

12. Please describe or provide the necessary contractual amendments for the proposed service

No contractual amendments required in Registry Agreement (RA).

BENEFITS OF PROPOSED SERVICE

13. Describe the benefits of the Proposed Service.

Once Dynamic Registration Verification is implemented:

- Verification is streamlined and results in a better Applicant and Registrant experience
- Applicants and Registrants will have a better understanding of the Policies and Requirements of fTLD and the information needed to complete the verification process
- Registrar role in verification and re-verification is significantly streamlined making it easier to support .BANK and .INSURANCE customers
- Increased operational efficiencies and potential cost and resource savings in verification for fTLD
- Easier adoption for new Registrars seeking to provide domain name registration services in .BANK and .INSURANCE TLDs.

COMPETITION

14. Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain.

fTLD does not anticipate any impact on competition.

15. How would you define the markets in which your proposed Registry Service would compete?

Not applicable .

16. What companies/entities provide services or products that are similar in substance or effect to your proposed Registry Service?

There are a number of Registry Operators that currently employ Registrant and/or Registration verification processes in their business operations including, but not limited to, .PHARMACY, .COOP, .REALTOR and .MOI. As part of its due diligence prior to submitting this RSEP, fTLD consulted with several Registry Operators about their approach to Registration verification.

17. In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?

No.

18. Do you propose to work with a vendor or contractor to provide the proposed Registry Service? If so, what is the name of the vendor/contractor, and describe the nature of the services the vendor/contractor would provide.

fTLD plans to outsource the system(s) and/or application platform, and reserves the option to use its own system(s) and/or application platform for Dynamic Registration Verification. At this time, no external vendor has been identified/selected.

19. Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed Registry Service? If so, please describe the communications.

Please refer to consultations as previously described in this request.

20. Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).

Not applicable.

SECURITY AND STABILITY

21. Does the proposed service alter the storage and input of Registry Data?

No.

22. Please explain how the proposed service will affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems.

There will be no impact on throughput, response time, consistency or coherence of responses to internet servers or end systems.

23. Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?

No.

OTHER ISSUES

24. Are there any Intellectual Property considerations raised by the Proposed Service?

No.

25. Does the proposed service contain intellectual property exclusive to your gTLD registry?

No.

26. List Disclaimers provided to potential customers regarding the Proposed Service.

Any commercially reasonable disclaimers will be finalized and provided before Dynamic Registration Verification is implemented.

27. Please provide any other relevant information to include with the request.

As referenced in Question 2, overview documents describing the Static Registration Verification process are attached and claims of proprietary and confidential information have been exerted with respect to these documents.

Click the Save button to save your work and click the Submit button to submit to ICANN.

Affected TLDs

Current Registry Operator	Top Level Domain	Registry Agreement Date
fTLD Registry Services LLC	bank	2014-09-25
fTLD Registry Services LLC	insurance	2015-02-19



ICANN
