

Report of Public Comments

Title:		Potential Change to Registrar Accreditation Insurance Requirement															
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<table border="1"> <tr> <td colspan="2">Comment Period</td> </tr> <tr> <td>Comment Open Date:</td> <td>15 January 2015</td> </tr> <tr> <td>Comment Close Date:</td> <td>13 March 2015</td> </tr> </table>		Comment Period		Comment Open Date:	15 January 2015	Comment Close Date:	13 March 2015	<table border="1"> <tr> <td colspan="2">Important Information Links</td> </tr> <tr> <td colspan="2">Announcement</td> </tr> <tr> <td colspan="2">Public Comment Box</td> </tr> <tr> <td colspan="2">Relevant Resources</td> </tr> </table>		Important Information Links		Announcement		Public Comment Box		Relevant Resources	
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Section I: General Overview and Next Steps																	
<p>As part of its globalization efforts, ICANN is exploring potential changes to the insurance requirement for registrar accreditation in order to better support underserved regions of the world. ICANN solicited input on whether it should change or even eliminate the existing requirement, which some community members noted does not appear to serve its intended purposes.</p> <p>ICANN's Statement of Registrar Accreditation Policy (the "Accreditation Policy"), adopted in 1999, establishes minimum requirements ICANN must consider when approving applications for registrar accreditation. Among the requirements, the Accreditation Policy provides that registrars must have and maintain commercial general liability (CGL) insurance policies. The insurance requirement is intended "to provide domain-name holders with reasonable compensation for losses caused by [a registrar's] wrongful ... acts." The Accreditation Policy requires CGL policy limits of at least US\$500,000, or a lesser amount if the registrar can demonstrate to ICANN that a lower limit would still provide for reasonable compensation in the event of a covered loss. The 2013 and 2009 Registrar Accreditation Agreements require that registrars maintain coverage at the \$500,000 level (without reference to the Accreditation Policy's potentially lower limits).</p> <p>ICANN staff consulted a number of resources including insurance industry experts with experience in the technology sector. Insurance industry experts told ICANN that today's CGL policies do not generally provide meaningful protection to domain name holders for losses caused by their registrars, as envisioned by the Accreditation Policy. CGL insurance policies generally protect businesses against liability claims for bodily injury and property damage that occur on their premises, as well as for advertising and personal injury liability in some cases. However, most CGL policies would exclude coverage for errors and omissions by the registrar. In other words, domain name holders generally would not be able to receive compensation from an insurance company (under a CGL policy) for negligent acts by the registrar, such as accidentally deleting or failing to renew a registration, or allowing a domain name to be hijacked. Also relevant to this analysis, ICANN notes that some legacy registries that once had a similar insurance requirement in their Registry-Registrar Agreements have since abandoned it.</p> <p>Community members have reported to ICANN that the existing insurance requirement can be difficult or impossible to meet in many jurisdictions, particularly in jurisdictions outside North America and Europe. Some people commented that CGL insurance is not available at all in some countries and, although available in other countries, the \$500,000 limit might be excessive (and therefore commercially infeasible), relative to market conditions, the cost of living, and the risks of doing business in the respective region. At least one prospective registrar has publicly abandoned its efforts to seek accreditation due to its inability to obtain the required insurance on commercially acceptable terms. In addition, some commenters questioned whether the requirement remains necessary given ICANN's institutional improvements in other areas, such as compliance enforcement and data escrow. Some community members have suggested ICANN might provide new and existing registrars with a list of insurers who are known to serve existing registrar businesses so that registrars can secure the insurance required to gain ICANN accreditation.</p> <p>For the Public Comment Period for the Potential Change to the Registrar Insurance Requirement, ICANN solicited input on the following questions:</p>																	

1. Are there valid reasons why ICANN should continue to require CGL insurance?
2. Has any registrar or gTLD or ccTLD registry found CGL coverage useful in running their businesses?
3. Are there alternatives to CGL insurance that would provide similar or better protections for registrants that could be instituted either as new contractual requirements or as "best practice" recommendations?
4. If the CGL requirement is maintained, is the \$500,000 limit appropriate?
5. If ICANN eliminates the CGL requirement, should the elimination apply to all registrars or should "waivers" be granted only on a case-by-case basis?

Next Steps

ICANN staff is analyzing all community input submitted through this public comment forum.

Many commenters supported a change to or waiver of the existing RAA requirement for registrar CGL insurance. As a result, ICANN continues to explore the possibility of waiving or changing the insurance requirement through a yet-to-be-determined process. ICANN staff will consult with the ICANN Board and the community, including impacted parties before undertaking further steps.

Section II: Contributors

At the time this report was prepared, a total of eight (8) community submissions had been posted to the Forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
Tijani Ben Jemaa	ICANN At-Large	ALAC
Alex Deacon, Elisa Cooper, Steve DelBianco	ICANN Business Constituency	BC
Registrar Stakeholder Group	Michele Neylon	RrSG

Individuals:

Name	Affiliation (if provided)	Initials
Mahmoud A. Lattouf	Abu-Ghazaleh Intellectual Property (AGIP)	AGIP
Michele Neylon	Blacknight Solutions	MN
Mark Elkins	Posix Systems	ME
Lawrence Olawale-Roberts	MicroBoss Technologies	LO
Calvin Browne	Domain Name Service P/L	CB

Section III: Summary of Comments

General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. Staff recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (view Comments Submitted).

General Comments

The comments summarized in this section generally addressed ICANN's Underserved Regions initiative and the proposed potential change to the registrar insurance requirement in a broader sense.

Comments Supporting Modification or Waiver of CGL Insurance Requirement

"As a company based in Ireland, we had some difficulty in applying to ICANN to become accredited as, at the time, the entire process was framed with American companies in mind. In fact this led to us delaying our accreditation by about 2

years due to us misunderstanding how we could represent ourselves in order to meet the criteria, as we understood them. With respect to insurance the terminology is problematic. 'Commercial general liability' insurance is an American concept, so even though we do have more than adequate insurance it wouldn't be called that." (MN)

"The insurance sector in my part of Africa has had to go through great reforms over the last 10 years, and the process is still evolving owing to sharp practices from operators within the sector. This has resulted in a great lack of trust by many would-be clients who are forced to seek insurance covers, because premiums when due are not paid or lost to hidden clauses imbedded into the insurance package. For this reason and more Africans from my divide view insurance companies as a drain-pipe, as their insurance cover amounts to nothing tangible where claims are eventually made. The time through which claims are paid out where they are eventually approved, devalues such claims and almost always leaves the claimant with terrible experiences going back and forth for months or years in some cases." (LO)

"Nigeria's local content law also does not allow businesses with its headquarters in Nigeria to seek such covers outside the shores of the country. The value of the local currency in Nigeria to 1 USD currently stands at over 200 Naira, an insurance cover of \$500,000 USD thus amounts to approximately seeking insurance in the sum of (N100,000,000.00k) one hundred million Naira. For this reason, seeking and paying premiums over an insurance bond of \$500,000USD would not only pose a difficult condition to fulfill but will put any registrar operating in my region at a great disadvantage especially with their peers in the west and other developed economies as they would be forced to pass the cost of servicing their premiums to their clients, thereby inflating the cost of acquiring a domain name locally. The ripple effect of this is that the local DNS market would keep securing their domain names from western companies, as their pricing would remain cheaper whilst capital flight would continue." (LO)

"The evolution of [Domain Name Industry (DNI)] programs should adhere to the following principles: Registrant and user rights and expectations must not be lowered in order to increase DNI penetration; education at all levels is key to increasing demand and local suppliers; requirements placed on registrars should be reasonable based on local cost-of-living and related financial constraints; the insurance required for registrars is a real concern for underserved regions; the second round of the new gTLD program should give preference, if not exclusivity, to applicants from underserved regions, with adequate outreach efforts." (ALAC)

"The ALAC emphasizes that the CGL requirement is not only the barrier for underserved regions to participate in the domain name industry, but the most critical one." (ALAC)

"(...) with respect to the specific topic under review, the RrSG welcomes ICANN's reconsideration of the Registrar Accreditation processes." (RrSG)

"Having read through the 'Background' section related to this topic, and your consultation with insurance industry experts, and since it turned out that 'today's CGL policies do not generally provide substantial protection for domain name holders for losses caused by their registrars, as envisioned by the Accreditation Policy', I think there should be another mechanism or substitute for the existing one that both protects registrants rights and is not an obstacle for registrars." (AGIP)

Comments Opposing Modification of the CGL Insurance Requirement

"The BC is supportive of ICANN's efforts to promote the DNS industry in regions that have typically been underserved. However, we firmly believe that the existing commercial general liability (CGL) insurance requirement is fundamental and ensures registrar accountability and beneficial protections of both consumers and business interests. In addition, the BC firmly believes that the CGL insurance requirement remains essential, even with new compliance and data escrow policies required by the 2013 RAA." (BC)

Additional Comments

"I have engaged with ICANN staff and other members of the ICANN Community around the topic of 'Underserved Regions' over the past 18 months. While I still think that ICANN needs to clearly define what it means by 'underserved regions' I also think that reviewing the criteria and processes associated with becoming an ICANN accredited registrar is an important and worthwhile exercise. Like any process it should be reviewed from time to time to make sure that it is still 'in tune' with reality. The world of 2001 was very different and things like data escrow did not exist." (MN)

"There is a misconception that the required insurance needs to cover the Registrar in every jurisdiction that a Registrant of a potential Registrar may be in. It seems this stems from: 3.7.7.10 For the adjudication of disputes concerning or arising

from use of the Registered Name, the Registered Name Holder shall submit, without prejudice to other potentially applicable jurisdictions, to the jurisdiction of the courts (1) of the Registered Name Holder's domicile and (2) where Registrar is located (taken from the RAA agreement). However, the above provision only applies to the REGISTRANT and not the REGISTRAR. There is nothing forcing the REGISTRAR to accede to the Jurisdiction of the REGISTRANT.” (CB)

“(…) we reiterate our previously submitted comments on this topic, and ask that ICANN establish clear, objective metrics and indicators to determine whether or not a region or market is “underserved”. Moreover, once identified, establish benchmarks to determine whether or not increased efforts are successful and when the target market is no longer “underserved”.” (RrSG)

“The At-Large Advisory Committee (ALAC) would like to reiterate its full support to the development of the domain name industry (DNI) in underserved regions, as was originally expressed in 2014.” (ALAC)

1. Are there valid reasons why ICANN should continue to require CGL insurance?

The comments summarized in this section generally addressed the question mentioned here.

Comments Supporting Modification or Waiver of CGL Insurance Requirement

“I'm not sure that there are. What purpose is the insurance meant to serve exactly?” (MN)

“I hope not as to me the insurance obligation is too costly.” (ME)

“The CGL concept does not transfer the required benefits to the end user as envisioned by ICANN, so it should be discontinued or made optional for companies that desire to use it as a marketing clause for their clients.” (LO)

“We recognize the value represented by a third party, such as an insurance company, being involved in the vetting process for new Registrars. However, we believe that many of the reasons for the insurance requirement are either covered in other parts of the accreditation requirements or have been superseded by changes to Registry, Registrar and ICANN operations. When the accreditation process was first designed requirements for data escrow were not included, nor was there an established process to migrate domain names between Registrars in the case of registrar failure. These issues have been successfully addressed.” (RrSG)

Comments Favoring Maintenance of Current CGL Insurance Requirement

“The BC is supportive of ICANN’s efforts to promote the DNS industry in regions that have typically been underserved. However, we firmly believe that the existing commercial general liability (CGL) insurance requirement is fundamental and ensures registrar accountability and beneficial protections of both consumers and business interests. In addition, the BC firmly believes that the CGL insurance requirement remains essential, even with new compliance and data escrow policies required by the 2013 RAA.” (BC)

“To cite a concrete example, the BC is concerned that changes to CGL requirements could minimize or even eliminate the effectiveness of 2013 RAA obligations that indicate acceptance of liability for unlawful conduct. Specifically, Section 3.7.7.3 of the 2013 RAA that states: ‘3.7.7.3 Any Registered Name Holder that intends to license use of a domain name to a third party is nonetheless the Registered Name Holder of record and is responsible for providing its own full contact information and for providing and updating accurate technical and administrative contact information adequate to facilitate timely resolution of any problems that arise in connection with the Registered Name. A Registered Name Holder licensing use of a Registered Name according to this provision shall accept liability for harm caused by wrongful use of the Registered Name, unless it discloses the current contact information provided by the licensee and the identity of the licensee within seven (7) days to a party providing the Registered Name Holder reasonable evidence of actionable harm.’ If CGL requirements are eliminated or minimized, then the effectiveness of this and perhaps other registrar obligations would be called into question.” (BC)¹

¹ ICANN acknowledges the concern raised by the Business Constituency about the impact of the insurance requirement on Section 3.7.7.3 of the RAA. ICANN notes that Section 3.7.7.3 of the RAA pertains only to Registered Name Holder liability when licensing the use of a domain name to a third party, and does not seem to establish registrar liability. Given this, it seems that the registrar CGL insurance requirement imposed by Section 3.10 of the RAA is inapplicable to the situation described in the comment. The Business Constituency supplemented its submission after the public comment period closed to clarify that this comment was intended to reference situations when a registrar provides Whois proxy services. The BC

Additional Comments

"Registrant rights must be secured through the CGL insurance or any other mechanism(s). Even if things have evolved, there is still a requirement to secure registrant rights through the commercial general liability (CGL) insurance or any other mechanism(s)." (ALAC)

"It does not make sense to waive the current requirement for all or some registrars without replacing it with the right mechanisms to protect registrants, it is also important to keep in mind that this mechanism should not be complicated for registrars to attain." (AGIP)

2. Has any registrar or gTLD or ccTLD registry found CGL coverage useful in running their businesses?

The comments summarized in this section generally addressed the question mentioned here.

"We are legally obliged to have several different types of insurance in order to operate a business in Ireland. We review our insurance every year to make sure that we have ample coverage for our staff, key staff, equipment and an ever growing range of potential issues." (MN)

"I'd ask - has anyone ever claimed on this type of policy with good cause? Why not make it voluntary?" (ME)

"I do not have adequate information in this regard, but I am sure every statement issued by ICANN accredited Registrar's to their clients offering a 30-day money back guarantee is not because of the CGL coverage." (LO)

"No opinion." (ALAC)

"These policies, by their nature, usually require court action in any case, before the Registrant may get a payment. As such, they only cover Registrants able to cover the requisite initial court proceedings. Registrants able to finance such action are rarely the ones requiring such action." (CB)

"No comment." (BC)

"Yes, some Registrars have reported that having CGL coverage has been useful when exhibiting at trade shows and for certain partnerships related to the reselling of domain names." (RrSG)

3. Are there alternatives to CGL insurance that would provide similar or better protections for registrants that could be instituted either as new contractual requirements or as "best practice" recommendations?

The comments summarized in this section generally addressed the question mentioned here.

"I'm not sure it's really required, as with data escrow etc., the domains and the data are protected and there is a fully operational process to migrate domains to a new registrar in case of registrar failure." (MN)

"As per our comments above, we acknowledge that many of the previous reasons for the insurance requirement have been mitigated by operational improvements within the industry. In addition, it is common in many countries for businesses to require some level of insurance for their general business needs, and many of the domain name registries will request insurance documentation from Registrars both at the time of accreditation and during regular reviews." (RrSG)

"(...) since it turned out that 'today's CGL policies do not generally provide substantial protection for domain name holders for losses caused by their registrars, as envisioned by the Accreditation Policy', I think there should be another mechanism or substitute for the existing one that both protects registrants rights and is not an obstacle for registrars." (AGIP)

"(...) ICANN should make arrangements with several insurance providers around the world, so that registrars would have a pool of specified providers to choose from for this policy. Also, the new arrangement should provide protection for

suggests that Whois proxy services provided by a registrar or its subsidiary should trigger potential registrar liability under RAA Section 3.7.7.3.

domain name holders for losses caused by their registrars unlike the existing policy.” (AGIP)

“Perhaps a general pool policy - that people contribute to according to number of domains???” (ME)

“As an option to what presently exists, I propose a contributory floating fund of between \$5,000 to \$10,000 (possibly managed by 2 or 3 Insurance firms) which all Registrars contribute to based on the volume of domain names registered or maintained within a period. Once the fund contributed by a Registrar is drawn down on claims to a certain extent, it should be replenished by the participating Registrar. This floating fund contribution where not utilized, stands in the credit of the Registrar.” (LO)

“If ICANN determines that a permanent fund reserved by ICANN and provided by the registrars based on their transaction volumes for covering any harm caused to registrants is a ‘best practice,’ registrants using registrars that do not follow the practice must NOT be disadvantaged. A permanent fund reserved by ICANN for covering any harm caused to registrants may be a reasonable option; having volume-based contributions from the registrars to this fund is also reasonable. However if ICANN chooses to make this a ‘best practice,’ registrants using registrars that choose not to follow the practice must NOT be disadvantaged.” (ALAC)

“The elimination of the CGL requirement could be the best way to support underserved regions to participate in the DNI. Registrant rights must be secured by another mechanism. [...] Its elimination could be the best way to support underserved regions to participate in the domain name industry. Registrant rights must be secured by another mechanism, such as a fund reserved by ICANN and provided by the registrars according to their transaction volumes. Underserved regions’ registrars could be exempted from paying their parts in this fund.” (ALAC)

“Simply applying this in the (non-public) procedures the registrar accreditation staff use to vet applications, and only requiring REGISTRARS to get the requisite insurance for jurisdictions in which they would contract, would go a long way towards allowing more registrars that have previously had issues in this regard.” (CB)

“(…) has the insurance requirement served as intended? What are the issues the insurance requirement is looking to solve? These issues should be defined. Once defined, we can then review alternatives or options that could potentially fill the requirement.” (RrSG)

“(…) if it is determined that insurance is required, ICANN should identify suitable insurance companies in different regions offering the relevant insurance and have prospective registrars approach them directly.” (RrSG)

“The BC believes that it would be beneficial if ICANN could provide a list of CGL insurance providers so that registrars can more easily comply with the requirement.” (BC)

4. If the CGL requirement is maintained, is the \$500,000 limit appropriate?

The comments summarized in this section generally addressed the question mentioned here.

“Nope - way too high. To buy insurance for US\$500,000 that covers all territories (inc USA, Canada and Australia) will cost me around R100,000 (US\$10,000) per year. That is a deal breaker. If you would like more than the 8 or so ICANN Accredited Registrars in Africa - there needs to be a change. If the insurance cost was proportional to the number of gTLD domains - perhaps something like US\$1 per domain - then the picture would I believe change.” (ME)

“Where the CGL requirement is to be maintained as an option for insurance, it’s value (an equivalent of 100million naira) should be reduced by 80% in the least.” (LO)

“If the CGL requirement is maintained, the \$500,000 limit should be lowered to an amount that the registrar can demonstrate that it would still provide registrants reasonable compensation to cover potential losses.” (ALAC)

“(…) a stand-alone policy in South Africa of the type required, with non-North American jurisdiction (as opposed to liability) is close to the annual Registrar fee payable to ICANN.” (CB)

“Yes.” (BC)

5. If ICANN eliminates the CGL requirement, should the elimination apply to all registrars or should "waivers" be granted only on a case-by-case basis?

The comments summarized in this section generally addressed the question mentioned here.

Comments Supporting Across-the-Board Waiver

“Any changes to requirements on registrars should be applied to all registrars equally. There are multiple reasons for this: domain services are global in their nature, registrants will assume that all registrars are the same and registrars compete across national boundaries all the time; managing ‘waivers’ is time consuming and costly for both ICANN and the registrars; what criteria could be applied? Any attempt to change the rules around something like this would be open to ‘gaming’ if not applied uniformly.” (MN)

“Any changes to requirements for registrars should be applied to all Registrars globally. Registrars should be treated equally and have the same contractual obligations regardless of their geographic location and remain in compliance with all applicable national laws. Domain name services are global and majority of active Registrars operate within multiple countries.” (RrSG)

“Managing and implementing waivers will place extra burden on Registrars and ICANN staff. The current waiver process with respect to data retention has been slow, cumbersome and costly for both Registrars and ICANN.” (RrSG)

“If ICANN decides to eliminate the CGL requirement, it should be applied to all registrars. The insurance should be replaced by another mechanism to protect registrant and user rights.” (ALAC)

Other Comments

“Either - as long as I’m part of the case-by-case waiver group.” (ME)

“The BC believes the CGL requirement should not be eliminated. For registrars in underserved regions where the cost of the CGL requirement may be unduly burdensome, the BC recommends that ICANN consider providing a credit against registrar fees to help pay CGL liability premiums. These credits should be granted on a case-by-case basis based on a concrete and mutually agreed definition of Underserved Regions.” (BC)

Section IV: Analysis of Comments

General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.

ICANN has analyzed and will continue to consider community input as it explores mechanisms to eliminate unnecessary barriers to registrar accreditation.

CGL insurance is common in the United States, but is rarer, more expensive, and in some cases nonexistent in other jurisdictions. Also in other countries, the neutral role of insurance companies as an objective third party is seen differently than the role is understood in the United States.

Many commenters reiterated, as ICANN has heard in various forums, that the required CGL insurance is a substantial concern for potential registrars, particularly in regions outside North America. Some stated that the requirement is the most critical barrier for legal entities to participate in the domain name industry. Commenters from Africa supported elimination of or changes to the insurance requirement, stating that the requirement is [difficult](#) or [impossible](#) to meet. For example, a commenter from Nigeria noted [that the value](#) of the required CGL policy would be approximately one hundred million Naira. Purchasing such a policy would not only be difficult and expensive, but would also put any registrar operating in that region at a great disadvantage compared to competitors in developed economies because costs would ultimately be passed down to clients, the commenter said.

This substantial burden, combined with ICANN’s assessment that the current requirement does little to further its intended policy goals, seems to support the need to modify the current CGL insurance requirement. Though some commenters opposed a waiver of the CGL requirement, no commenter provided an example of how the current requirement has furthered its original purpose of providing domain name holders with a remedy in the event of a registrar’s wrongful covered acts. This seems to affirm the hypothesis that the requirement could be modified or waived without harming the interests the requirement was intended to protect. Nevertheless, alternative mechanisms for protection of registrants should be considered.

When asked for valid reasons to continue the insurance requirement, commentators expressed doubts whether the requirement provides any concrete benefits to the end-user, building upon ICANN’s preliminary conclusion to that effect.

Pursuant to ICANN's Statement of Registrar Accreditation Policy, domain name holder interests in obtaining reasonable compensation for losses caused by a registrar's wrongful acts should be provided through some mechanism. Some commentators think the original reasons for the insurance requirement have been superseded by current changes for registries, registrars, and ICANN operations (e.g. new requirements for data escrow and transfer of domain name registrations). It is unclear from the comments received whether any registrar has ever successfully made a claim related to its registrar operations under this type of insurance policy. Some registrars have reported that having this type of insurance coverage is useful to some extent in contexts separate from the provision of domain name registration services, such as when required to participate in trade shows.

Some commentators suggested that ICANN should replace the existing CGL insurance requirement with one that would provide more meaningful protections for registrants. ICANN notes that, although the Accreditation Policy presently authorizes ICANN to reduce the CGL requirement, substitution of a new insurance requirement might require modification of the Accreditation Policy through the policy development process. Other commenters suggested ICANN make arrangements with insurance providers around the world or create a fund with registrar contributions based on the volume of domain names. Another suggestion is for registrars to not have worldwide insurance coverage, but to arrange insurance covering jurisdictions where the registrar is active.

The amount of US \$500,000 is considered excessive by many in the community. Those commenters said that the requirement (1) could be reduced significantly to an amount that the registrar can demonstrate would provide registrants reasonable compensation to cover potential losses, or (2) should be linked to the number of gTLD domain name registrations. ICANN's Business Constituency disagreed and proposed that the \$500,000 minimum be maintained.

Many in the community said that potential changes should apply evenly to all registrars on a global scale. Domain name services are global in their nature, as registrars compete across national borders and are active within multiple countries and jurisdictions. The idea for a formal waiver application and evaluation process was not seen as a positive development, taking into account the extra burden on registrars and ICANN staff, and negative experiences in the past obtaining waivers for data retention.

Some in the community expressed that they would see an initiative to review the Accreditation Policy, generally, as a worthwhile exercise.

ICANN acknowledges the comment from the Registrar Stakeholder Group urging ICANN to clearly articulate and define what constitutes an "underserved region." [Research is currently planned and underway](#) to aid in this effort. To date, ICANN's work in assisting "underserved regions" has been aimed at identifying unnecessary barriers to entry (irrespective of "region") such as the CGL insurance requirement, and improving access to ICANN's services, such as by improving and translating more registrar accreditation materials.

ICANN will take all of these concerns into account in proceeding with the exploration of any potential modification of the CGL insurance requirement.