

The Global Name Registry, Limited
Report due July 15, 2002 pursuant to
Appendix U to the .name TLD Registry Agreement

This report presents the information required by Appendix U to the .name TLD Registry Agreement (the "Agreement") between the Internet Corporation for Assigned Names and Numbers ("ICANN") and The Global Name Registry, Limited ("Global Name Registry"). The information set forth below is required 180 days after the Commencement of Service Date (15 January 2002), specifically 15 July 2002. All information is correct as of 1 July 2002.

This report sets out the following information:

- The Appendix U reference, concept and description of required information.
- Response from Global Name Registry.

§5 *Concept: Registry Services can Effectively Be Provided by a Newly Accredited Registry Operator*

5.2 Ability to Attract and Maintain Registrars

5.2.1 *Total number of ICANN-Accredited Registrars who participated in the Registry OT&E certification during the Start-Up Phase.*

43 Registrars participated in the OT&E certification process (i.e. submitted the documentation necessary to arrange testing). As of 1 July 2002, 29 Registrars were actually tested for OT&E certification during the Start-Up Phase. OT&E certification is ongoing and will continue until all interested registrars are accredited to connect to the .name Live SRS.

5.2.2 *Total number of ICANN-Accredited Registrars who failed OT&E certification during the Start-Up Phase.*

Twenty-three Registrars failed first-round OT&E certification. In subsequent tests, 17 Registrars failed second-round OT&E certification. At the end of the Start-Up Phase, 14 Registrars had failed third-round certification.

5.2.3 *Total number of ICANN-Accredited Registrars re-tested for OT&E certification during the Start-Up Phase.*

Nineteen Registrars re-tested in a second round of testing. Two Registrars passed after the second round. Fourteen Registrars retested before the end of the Start-Up Phase in the third round of testing (and as noted in 5.2.2, all failed.)

5.2.4 *A summary of complaints received from ICANN-Accredited Registrars regarding the Start-Up Phase OT&E certification.*

Complaints received from Registrars can be summarised as follows:

Complaints concerning the length of time for feedback of OT&E test results: Although our Customer Services team made every effort to provide expedient feedback to registrars, limited resources and time constraints at certain times made it impossible to provide such feedback within the 24-48 hours aspired

to. Most registrars received feedback within 72 hours and were satisfied with the result. Many registrars left bookings until the end of the Start-Up Phase and expected to pass before the start of Live SRS. Customer Services worked around the clock in order to satisfy the required bookings.

The length of time for reviewing results depended on the amount of errors in a Registrar's results. The results from one Registrar contained such a large amount of errors that it made the test unintelligible for the purposes of marking. This Registrar was informed that they would have to re-sit the test with minimal feedback. This resulted in a complaint to Customer Services.

Complaints concerning the scheduling of accreditation tests:

Registrars were often dissatisfied with tests not being scheduled at their preferred time slot (as indicated by Registrars on accreditation documents). This often occurred as a result of Registrars failing to complete and return all necessary documents, particularly the amendment to the Registry-Registrar Agreement. As stated in Appendix J(12) to the Registry Agreement, one of the objectives of the OT&E process is to establish the contractual relationship between Global Name Registry and the Registrars. Therefore, it is Global Name Registry policy not to proceed with testing until the signed amendment has been returned and the contractual relationship has been finalized. Registrars often sent the amendment to outside counsel and presumed that testing would continue in the absence of the amendment being returned.

Complaints concerning the structure of the test: Several Registrars asked that the test be broken into segments i.e. that a Registrar should only re-test for the portion of the test failed in the last round. In order to ensure that the entire system and accreditation process was bug- and error-free, we opted for a more holistic approach and required all Registrars to re-sit for the entire accreditation process if there was a reason that they had failed previously.

- 5.2.5 *Provide a written report detailing the effectiveness of the Start-Up Phase OT&E certification. Include such items as lessons learned and methods of improvement.*

This report is incorporated into the report at 5.2.6 (below).

- 5.2.6 *Provide a written report of detailing the effectiveness of the OT&E process. Include such items as lessons learned and methods of improvement.*

Effectiveness

The OT&E Accreditation process was not as effective as had been anticipated. The accreditation package was sent out to all Registrars on 01 May 2002. The first Registrar was tested on 08 May 2002. By the end of the Start-Up Phase, out of the 43 Registrars that had submitted documentation, 29 Registrars had been tested and only 14 had been certified. An explanation of this relatively low number is outlined below.

Lessons Learned

Problems initially arose with drafting the documents that were to be distributed to Registrars in the Live SRS Accreditation package. In hard copy, the package comprised some 26 documents and several thousand pages. Maintaining the internal consistency between documents being edited by

different departments of Global Name Registry required close coordination between relevant departments. These departments included Operations, Development, Customer and Registry Services, Legal, Policy and Finance. Prioritising the structure of the overall package so as to make it readily accessible to Registrars was essential and was something that could only be done when most documentation had been completed. At this stage it often became apparent that many documents were not (a) cross-referenced properly or (b) failed to contain material referred to in other documents. The more apparent and overriding issue was that we had underestimated the sheer volume of the Accreditation documentation and did not give ourselves a sufficient timeframe in which to prepare. As one can imagine, the drafting of one document led to the need for another document, and so on; the final product was a result of continued works in progress, rather than a forward-looking and clearly structured plan of attack on the documentation.

These types of problems were not necessarily the result of the failure of systems within Global Name Registry, but rather reflected the complexity of the material being developed. A major lesson learned is an appreciation of the difficulty of coordinating large documents being developed by what are effectively different interest groups, albeit with a single final goal.

Another lesson learned is an awareness of the implications of slight errors of drafting, and misinterpretation of the accreditation documents by Registrars. In drafting documents, it is often the case that the author fails to explain concepts or principles thoroughly since in his/her own mind, those concepts or principles are logical and need no explanation. Such shortcomings in explanations and descriptions in the context of OT&E accreditation gave rise to misunderstandings and confusion on the part of some Registrars. For example, a date is a required field when testing the commands relating to the renewal of objects. Specified in an annex to the main test document was a provision stating that such dates would vary. Due to the positioning of this information, many Registrars entered fixed dates, causing their systems to return an incorrect expiry date resulting in failure of the test. Further problems resulting from the construction of the test document occurred in sections 7 and 8 of the Operational Test and Evaluation Technical Accreditation Guide. These sections contained tests relying on ROIDs (Registrar Object IDs). The examples of ROIDs given in the document did not define ROIDs or explain their function sufficiently, resulting in some confusion for Registrars.

One important and additional lesson learned is the necessity for Registrars' systems to be ready for testing and compatible with the Global Name Registry systems. It is often the case that documentation presumes all Registrars' systems to function identically and to exhibit similar levels of flexibility, aside from producing the standard list of results that determine whether a Registrar passes or fails. This is not always the case. For example, when a Registrar wishes to execute a command, a transaction ID is generated by the Registrar's system for the purpose of tracking the command process. Certain parts of the test require Registrars to enter an ID specified by Global Name Registry so that the Registry, not the Registrar, may track responses and assess them for the purposes of the test. Several Registrars had problems with their systems accepting the "enforced" ID. Their systems were designed without the ability to accept a transaction ID from "outside", and the systems refused to accept the Global Name Registry ID. In those circumstances we could not track the results from particular parts of the test. A further example arose when testing the Registrars in response to deliberately erroneous

entries. One Registrar had designed its system so that it was not possible to make incorrect entries. We could not, therefore, assess their response to an erroneous entry.

Methods of Improvement

Global Name Registry has revised and developed all business processes recently, including those relating to the drafting of documents for use by Registrars as well as internally. Business processes now require input and signoff from all parties at all stages of development. Current business processes, having been carefully devised into a step-by-step process, should alleviate many problems associated with developing large-scale documents and procedures of the sort that were developed for Live SRS. Also, knowing the intensity and comprehensive nature of such an endeavour, we are better poised to undertake such a behemoth task, understanding logistical issues, drafting requirements and resource limitations of the company.

In particular, in approaching a similar project, we believe that more time and attention should be committed at the very outset to determine what the processing needs will be in the most comprehensive manner possible. Delineating the drafting requirements, enumerating every single document that needs to be drafted and assigning a drafting, editing and finalization process to each such document during the early planning stages of development will be undertaken.

A more specific method of improvement is to identify accurately the core requirements of each testing or other procedure and to highlight these in the test document to avoid oversights by the Registrars. The test document should also accurately define, and if necessary, elaborate on any terms essential to correct performance of testing procedures by the Registrars. Global Name Registry must in future be aware that not all Registrars' system's will exhibit similar functionality. A Registrar may not be able to enter in, for example, deliberately erroneous entries, or a transaction ID not generated by the Registrar. Over time, Global Name Registry will gain greater familiarity with Registrars' systems, and these problems should not arise during testing when further functionality is added in updated toolkits.

Global Name Registry decided against segmenting the test. Appendix J (12) to the Registry Agreement states that Registrar's must pass *all* tests. We felt that breaking the test into parts would increase the likelihood of Registrar's not being comprehensively tested, potentially leading to errors in the actual performance of registrations.

5.2.7 Total number of ICANN-Accredited Registrars who participated in the Registry LOT&E certification.

53 ICANN-Accredited Registrars participated in Registry LOT&E certification.

5.2.8 Total number of ICANN-Accredited Registrars who failed LOT&E certification.

45 ICANN-Accredited Registrars failed LOT&E certification on the first attempt.

5.2.9 Total number of ICANN-Accredited Registrars re-tested for LOT&E certification.

45 ICANN-Accredited Registrars re-tested for LOT&E certification and were successful.

5.2.10 A summary of the complaints received from ICANN-Accredited Registrars regarding the LOT&E certification.

Complaints received from Registrars concerned the quality of drafting of the LOT&E documents and lack of comprehension of essential sections of the test. This was in part related to the fairly complex nature of what should have been simple guideline documents that outlined the overall LOT&E accreditation process. More specifically, Registrars found that the documents described the concepts that were to be tested on a theoretical level but failed to give examples of actual test exercises.

An early complaint arose from one Registrar who wished to test at the same time as the first Land Rush. Due to resource constraints this was not possible. Another suitable time was subsequently agreed.

A common complaint by Registrars was that the test was unduly comprehensive. Some Registrars felt that they should only be tested on matters relating to the products they would eventually sell. Consideration of the Equivalent Access Policy and Non-Discriminatory Practice weighed against such an approach. It was determined that all Registrars would undergo the same testing relating to all products offered by Global Name Registry.

As in OT&E certification, several Registrars felt that the test should be segmented, with subsequent re-testing done only on parts of the test failed previously.

5.2.11 Provide a written report detailing the effectiveness of the LOT&E certification. Include such items as lessons learned and methods of improvement.

This report is incorporated into the report at 5.2.12 (below)

5.2.12 Provide a written report detailing the effectiveness of the LOT&E process. Include such items as lessons learned and methods of improvement.

Effectiveness

Initially, the LOT&E process and certification were not effective, with high rates of failure, presumably resulting from a lack sufficient guidance for Registrars through the testing procedure. This conclusion is based on the significant rise in pass rates following revision of documentation. Global Name Registry responded to complaints by Registrars and released a new version of the test documentation approximately seven weeks after the first version was distributed to Registrars.

Lessons Learned

The LOT&E process was initially not effective due to the quality of drafting of the test documentation. It was assessed that many of the initial failures of the test resulted from lack of comprehension by Registrars of the test documents. Only six Registrars passed during the first round of LOT&E certification.

The second round of testing added several features, including transaction IDs, the ability of Registrars to specify desired alternative domain names and the ability to perform various modifications during Land Rush. This added further complexity to the LOT&E process. This was offset by lessons learned from the first round of testing, after which an entirely new version of the LOT&E documentation was drafted.

Methods of Improvement

As described above, the comprehensibility of the test documentation was improved during the LOT&E process. Only eight Registrars passed under the first version of test documents. Under the revised version distributed 7 weeks later, all Registrars who had previously failed, passed. Current business processes as described in 5.2.6 (above) now ensure that documentation is comprehensible and comprehensive, avoiding the problems encountered during LOT&E process.

5.3 Concept: Effectiveness of Cooperative Marketing

[N.B. All monetary amounts are in US\$]

5.3.1 *Total number of ICANN-Accredited Registrars participating in the cooperative marketing plan during each calendar month ending in the year to which the report relates.*

The first number shows the number of Registrars participating in the cooperative marketing plan by virtue of having executed a Cooperative Marketing Agreement with Global Name Registry. The number in parentheses that follows shows the number of Registrars which actually *sold* .name registrations in each particular month.

Month	Number of Registrars
Jan 2002	16 (12)
Feb 2002	16 (12)
Mar 2002	16 (13)
Apr 2002	16 (13)
May 2002	16 (13)
Jun 2002	16 (9)

5.3.2 *Total amount of marketing dollars provided to each ICANN-Accredited Registrar under the cooperative marketing plan during each calendar month ending in the year to which the report relates.*

	Jan	Feb	Mar	Apr	May	June
Ascio Technologies	-	-	-	-	-	-
BulkRegister	-	-	-	-	-	-
CORE	-	-	-	-	-	-
Directnic	-	-	-	-	-	-
Domain People	-	-	-	532.06	-	-
DomainProcessor	-	-	-	-	-	-
DotRegistrar	-	-	-	-	-	-
Global Media Online	-	-	-	-	-	-
Hangang Systems	-	-	-	-	-	-
Internet Domain Registry	-	-	-	-	-	-
NameEngine	-	-	-	-	-	-
NameScout	-	-	-	-	-	-
Nominalia Internet	-	-	-	-	-	-
Register.com	-	-	-	-	-	-
Total Registrations	-	1,815.34	-	3,098.43	-	-
VeriSign Mass Market	-	-	-	-	-	-
Total	-	\$1,815.34	-	\$3,630.49	-	-

5.3.3 *Total amount of marketing dollars raised under the cooperative marketing scheme during each calendar month ending in the year to which this report relates.*

Month	Amount Raised
Jan 2002	\$103,579.85
Feb 2002	\$30,855.30
Mar 2002	\$18,130.04
Apr 2002	\$7,192.81
May 2002	\$4,592.56
Jun 2002	\$4,350.53

5.3.4 *Total amount of unused cooperative marketing funds placed into the Marketing Development Fund.*

\$163,256.06 has been placed into the Marketing Development Fund.

5.3.5 *Total amount of cooperative marketing dollars raised broken down by geographic area (North America, Europe, Asia, Africa, Latin America/Caribbean) during each calendar month ending in the year to which the report relates.*

	Jan	Feb	Mar	Apr	May	June
Africa	-	-	-	-	-	-
Asia Pacific	-	-	1,671.80	903.95	417.79	4.29
Europe*	16,468.65	1,696.60	686.71	732.01	388.83	431.95
Latin America/ Caribbean	-	-	-	-	-	-
North America	87,111.20	29,158.70	15,771.53	5,556.85	3,785.94	3,914.31
Total	\$103,579.85	\$30,855.30	\$18,130.04	\$7,192.81	\$4,592.56	\$4,350.53

* including Israel

5.3.6 *Total amount of cooperative marketing dollars expended broken down by geographic area (North America, Europe, Asia, Africa, and Latin America/Caribbean) during each calendar month ending in the year to which the report relates.)*

	Jan	Feb	Mar	Apr	May	June
Africa	-	-	-	-	-	-
Asia Pacific	-	-	-	-	-	-
Europe	-	1,815.34	-	532.06	-	-
Latin America/ Caribbean	-	-	-	-	-	-
North America	-	-	-	3,098.43	-	-
Total	\$-	\$1,815.34	\$-	\$3,630.49	\$-	\$-

§10. Concept: Registrations Restrictions Can be Implemented by a Registry Operator in a Cost Effective and Timely Manner.

10.1 UDRP Violations.

10.1.1 *A statement of the total number of UDRP challenges filed.*

No UDRP challenges involving .name domains or email addresses have been filed.

10.1.2 *A tabulation of the number of names subject to multiple UDRP challenges (i.e. x names were subject to exactly two challenges, y names were subject to exactly two challenges, etc.).*

Not applicable. See 10.1.1 above.

10.1.3 *A statement of how many names sponsored by each Registrar were subject to at least one UDRP challenge.*

Not applicable. See 10.1.1 above.

10.1.4 *A breakdown by country of the registration offered by the domain-holder of the number of successful and unsuccessful UDRP challenges.*

Not applicable. See 10.1.1 above.

10.1.5 *A statement, broken down by sponsoring Registrar, of the number of names involved in UDRP challenges where the holder fails to submit any materials after notification of the challenge.*

Not applicable. See 10.1.1 above.

10.1.6 *A statement, broken down by the region of the holder's address as described below, of the number of names subject to successful UDRP challenges.*

Not applicable. See 10.1.1 above.

10.1.7 *A statement, broken down by the region of the successful challenger's address as described below, of the number of names subject to successful ERDRP challenges:*

Not applicable. See 10.1.1 above.

10.1.7 *A statement of the number of successful UDRP challengers broken down by priority of the challenger (i.e. x first-priority challengers chose not to register the challenged name; y second priority challengers were offered the opportunity to, but did not, register the challenged name, etc.).*

Not applicable. See 10.1.1.

10.1.8 *A statement of the number of successful UDRP challengers that did not register the challenged name, broken down by priority of the challenger (i.e. x first-priority challengers chose not to register the challenged name; y second priority challengers were offered the opportunity to, but did not, register the challenged name, etc.).*

Not applicable. See 10.1.1.

10.1.9 *A summary of the complaints received from Registrars regarding the UDRP.*

Not applicable. See 10.1.1.