Registry Services Evaluation Policy (RSEP) Request

September 15, 2023

Registry Operator
VeriSign, Inc.

Request Details
Case Number: 01247586

This Registry Services Evaluation Policy (RSEP) request form should be submitted for review by ICANN org when a registry operator is adding, modifying, or removing a Registry Service for a TLD or group of TLDs.

The RSEP Process webpage provides additional information about the process and lists RSEP requests that have been reviewed and/or approved by ICANN org. If you are proposing a service that was previously approved, we encourage you to respond similarly to the most recently approved request(s) to facilitate ICANN org's review.

Certain known Registry Services are identified in the Naming Services portal (NSp) case type list under "RSEP Fast Track" (example: "RSEP Fast Track – BTAPPA"). If you would like to submit a request for one of these services, please exit this case and select the specific Fast Track case type. Unless the service is identified under RSEP Fast Track, all other RSEP requests should be submitted through this form.

1. PROPOSED SERVICE DESCRIPTION

1.1. Name of proposed service.

Modified Verification Code Extension for Extensible Provisioning Protocol Service and Modified Domain Name Registration Validation per Applicable Law Service

1.2. Provide a general description of the proposed service including the impact to external users and how it will be offered.

On 27 May 2016, Verisign submitted the Verification Code Extension for Extensible Provisioning Protocol RSEP, which was authorized by ICANN on February 27, 2017, with a subsequent modification authorized on February 14, 2022. The approved service enables registrars to demonstrate compliance with verification requirements in applicable local law via an optional EPP extension enabling the submission of XML codes ("Verification Codes"). The Verification Codes are generated on behalf of registrars by a third-party "Verification Service Provider" or "VSP" that performs validation services required under applicable local law.
On July 25, 2022, Verisign submitted the Domain Name Registration Validation Per Applicable Law RSEP, which was authorized by ICANN on September 8, 2022. The approved service supports local law requirements, including enabling Verisign to perform additional verification checks on domain name registration requests to determine if the validation requirements under applicable local law have been completed, and to respond accordingly.
ICANN's approval of both services acknowledges that the services may be operated in accordance with the criteria required by the applicable law in the jurisdiction. Local laws regarding domain name registration validation continue to evolve, and the validation processes and criteria must evolve in order to remain compliant with applicable local laws.
Accordingly, Verisign is now seeking authorization to modify the above referenced RSEPs to allow for the receipt of EPP commands and responses by applicable registrars through a Supplemental Registration Proxy ("SRP"), in order to support local law requirements. By way of example, this approach is consistent with guidance from local regulatory authorities on applicable regulations in the People's Republic of China.

1.3. Provide a technical description of the proposed service.

As stated above, the proposed modifications to the previously approved services will allow Verisign to support the receipt of EPP commands and responses by applicable registrars through a Supplemental Registration Proxy to Verisign's authoritative shared registration system in accordance with the criteria required to comply with applicable local law in the jurisdiction.
The SRP will be responsible for implementing domain name validation requirements and performing the services of a VSP provider on behalf of the registrars in the manner previously approved by ICANN. Verisign's authoritative shared registration system will remain the authoritative source of all registry data under the .com and .net Registry Agreements.

1.4. If this proposed service has already been approved by ICANN org, identify and provide a link to the RSEP request for the same service that was most recently approved.

ICANN has previously approved the ability for Verisign to contract with a VSP provider to perform validation services and take other related actions under the referenced RSEPs without the registrar's use of a SRP. In order to support compliance with applicable local law, Verisign is requesting to modify the prior referenced RSEPs to support the receipt EPP commands and responses by applicable registrars through a SRP. The receipt of such commands by a registry operator from a SRP has been approved by ICANN as part of its broader approval allowing registry operators of over 400 gTLDs operating under the Base Agreement to perform validation services.

1.5. Describe the benefits of the proposed service and who would benefit from the proposed service.

The proposed modification to the services allowing for Verisign's support of a SRP will approve the framework by which registrars in applicable jurisdictions will be able to continue to conduct transactions with the .com and .net registries in a manner that complies with applicable local law.

1.6. Describe the timeline for implementation of the proposed service.

Upon approval of the request, the timeline for implementation will be determined by the timing required for compliance with applicable local law and any applicable registrar notice periods.

1.7. If additional information should be considered with the description of the proposed service, attach one or more file(s) below.

1.8. If the proposed service adds or modifies Internationalized Domain Name (IDN) languages or scripts that have already been approved in another RSEP request or are considered pre-approved by ICANN org, provide (a) a reference to the RSEP request, TLD(s), and IDN table(s) that were already approved or (b) a link to the pre-approved Reference Label Generation Rules (LGR). Otherwise, indicate "not applicable."

N/A

2. SECURITY AND STABILITY

2.1. What effect, if any, will the proposed service have on the life cycle of domain names?

The proposed service will not have an effect on the registry's domain name registration lifecycle.

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

The proposed service will not alter the storage and input of Registry Data at the authoritative Registry.

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

The proposed service will have no impact on the throughput, response time, consistency, or coherence of responses to Internet servers or end systems of the DNS.

2.4. Have technical concerns been raised about the proposed service? If so, identify the concerns and describe how you intend to address those concerns.

No technical concerns have been raised about the proposed service.

2.5. Describe the quality assurance plan and/or testing of the proposed service prior to deployment.

Verisign has demonstrated the ability to deliver scalable and reliable registry services. The rigorous processes and extensive suite of quality assurance tests and performance testing will be applied to maintain the functionality, data integrity and data accuracy of the proposed service, including, where appropriate, deployment of any necessary changes into an OT&E environment prior to release into Verisign's production systems.

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

The proposed service will comply with all applicable RFCs specified in the .com and .net Registry Agreements.

3. COMPETITION

3.1. Do you believe the proposed service would have any positive or negative effects on competition? If so, please explain.

This proposed service will have a positive effect on competition by providing the necessary framework to support local law requirements.

3.2. How would you define the markets in which the proposed service would compete?

Initially, the service will apply to registrars licensed to operate within the People's Republic of China and will be implemented as necessary to comply other applicable local laws.

3.3. What companies/entities provide services or products that are similar in substance or effect to the proposed service?

More than 400 gTLDs support registrar transactions via a SRP.

3.4. In view of your status as a Registry Operator, would the introduction of the proposed service potentially affect the ability of other companies/entities that provide similar products or services to compete?

No.

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

Yes. With regard to the People's Republic of China, Verisign will support subject Registrar's use of China Internet Network Information Center ("CNNIC") as an approved SRP. CNNIC, a currently approved VSP provider by Verisign, will continue to be responsible for the verification of registrant contact information on behalf of registrars in the same manner approved by ICANN under the referenced RSEPs and may operate as the sole approved VSP provider within the People's Republic of China in accordance with applicable local law. As a SRP, CNNIC will pass EPP commands and Verification Codes and responses between the registrar and Verisign's authoritative SRS.

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

Verisign has and will continue to engage in, discussions with registrars subject to applicable criteria for compliance with local law, including registrars located within the People's Republic of China.

3.7. If you have any documents that address the possible effects on competition of the proposed service, attach them below. ICANN will keep the documents confidential.

4. CONTRACTUAL PROVISIONS

4.1. List the relevant contractual provisions impacted by the proposed service. This includes, but is not limited to, Consensus Policies, previously approved amendments or services, Reserved Names, and Rights Protection Mechanisms.

N/A

4.2. What effect, if any, will the proposed service have on the reporting of data to ICANN?

The service will have no effect on reporting of data to ICANN.

4.3. What effect, if any, will the proposed service have on Registration Data Directory Service (RDDS)?*

The service will have no effect on RDDS for registered domain names.

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

The service will have no effect on registry fees for domain name registrations.

4.5. Will the proposed service result in a change to a Material Subcontracting Arrangement (MSA) as defined by the Registry Agreement? If so, identify and describe the change. Please note that a change to an MSA requires consent from ICANN org through the MSA change request process. The RSEP request must be approved prior to submitting the MSA change request.

No.

5. AUTHORIZATION LANGUAGE

5.1. A Registry Agreement (RA) amendment is required when the proposed service: (i) contradicts existing provisions in the RA or (ii) is not contemplated in the RA and, therefore, needs to be added to Exhibit A of the RA and/or as an appropriate addendum/appendix. If applicable, provide draft language (or a link to previously approved RA amendment language) describing the service to be used in an RA amendment if the proposed service is approved. If an RA amendment is not applicable, respond with "N/A" and provide a complete response to question 5.2.*

For examples or for IDN services, you may refer to the webpage for standard RA template amendments for commonly requested Registry Services.

ICANN determined in the prior referenced RSEPs that no amendment was necessary. The approval for the modification requested herein will simply recognize that Verisign will support the use of a SRP for local law compliance.

5.2. If the proposed service is permissible under an existing provision in the Registry Agreement, identify the provision and provide rationale. If not applicable, respond with "N/A" and provide a complete response to question 5.1.

Implementation of the proposed service is consistent with Verisign's authority to address non-compliance with applicable local law as set forth in Sections 2.7(b)(ii) and 2.14 of the .com and .net Registry-Registrar Agreements.

6. CONSULTATION

6.1. ICANN org encourages you to set up a consultation call through your Engagement Manager prior to submitting this RSEP request. This is to help ensure that necessary information is assembled ahead of time.

Identify if and when you had a consultation call with ICANN org. If you did not request a consultation call, provide rationale.

Verisign verbally consulted with ICANN on August 10, 17 and 24, 2023 regarding the submission of this RSEP.

6.2. Describe your consultations with the community, experts, and/or others. This can include, but is not limited to, the relevant community for a sponsored or community TLD, registrars or the registrar constituency, end users and/or registrants, or other

constituency groups. What were the quantity, nature, and results of the consultations? How will the proposed service impact these groups? Which groups support or oppose this proposed service?

N/A

7. OTHER

7.1. Would there be any intellectual property impact or considerations raised by the proposed service?

No

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

No

7.3. Provide any other relevant information to include with the request. If none, respond with "N/A."

N/A

7.4. If additional information should be considered, attach one or more file(s) below.

Affected TLDs

Current Registry Operator	Top Level Domain	Registry Agreement Date
VeriSign, Inc.	.com	2012-12-01
VeriSign, Inc.	.net	2023-07-01