



Public Comment Report

Proposed Registrant Domain Name Compliance Escalation and Suspension Policies for .BANK and .INSURANCE

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Public Comment Dates

Publication Date: June 10, 2022

Close Date: June 17, 2022

Report Date: July 1, 2022

Important Links

Announcements: [fTLD.COM](#); [REGISTER.BANK](#); [REGISTER.INSURANCE](#)

Public Comment Proceeding: [Posting & View Comments Submitted](#)

I. Overview of the Public Comment Proceeding

fTLD Registry Services (fTLD) held this Public Comment Proceeding (the “Proceeding”) to seek comments on Proposed Registrant Domain Name Compliance Escalation and Suspension Policies for .BANK and .INSURANCE. The purpose of these Policies is to provide compliance escalation notifications to impacted Registrants and ensure the transparency and predictability of the timeline for curing compliance findings. These Proposed Amendments are the result of consultations with fTLD’s [Advisory Council](#) (the “Council”) and its Board of Directors (the “Board”), and a majority of the Council and Board voted in favor of implementing these Policies.

In this Report fTLD has considered and/or addressed all comments received during this Proceeding.

II. Contributors

The below list of organizations contributed comments to this Proceeding and are listed in reverse chronological order of posting date (i.e., starting with the most recent posting):

Business affiliation	Submitted by
Bridge Community Bank	Adam Sandberg, IT Officer/Customer Service
Vanksen.com	Steve Gobin, IP Expert

III. Summary of Comments

General Disclaimer: This section intends to broadly summarize the comments submitted to this Proceeding, but does not address every specific position stated by contributors. For further details and context of the comments, please refer directly to the contributions at the link referenced above (Posting & View Comments Submitted).

Supportive Comments

The only bank contributor was supportive of the Proposed Amendments and agreed with the intent of the Amendments to ensure compliance with the mandatory Security Requirements and the integrity of the more secure top-level domains, .BANK and .INSURANCE. The logical outcome of the Amendments of holding Registrants accountable to their registration agreement was well understood by this contributor who is also a Registrant and uses .BANK as their primary website.

Potential Concerns

One contributor was concerned about the fTLD's in-zone name server requirements, and expressed concern about the security versus a Registrar's own infrastructure, and cited that using name servers in-zone is akin to putting all your eggs in one basket. However, fTLD does not find this comment to be relevant to the purpose of this Proceeding.

Other Comments

One contributor noted fTLD should rely more on Registrars to contact Registrants and this comment was also not relevant to the Proceeding.

IV. Analysis of Comments

There were only two contributors to this Proceeding, and only one contributor's comments were relevant to it. Despite the apparent lack of engagement on this Proceeding, we communicated about the opportunity to participate extensively to a broad range of members of the banking and insurance communities in addition to Registrants of .BANK and .INSURANCE.

V. Conclusion & Next Steps

fTLD made multiple, broad announcements about this Proceeding including to Registrants, Registrars, other stakeholders, as well as on its websites and via email campaigns. Given fTLD's Council, Board and Operating Manager, who are all members of the global banking and insurance communities, voted to approve the Proposed Amendments, there is no need for fTLD to make further adjustments to them.

In accordance with its Policy Development Process Policy, fTLD will publish this new Policy on its websites with an effective date that provides sufficient time for Registrants and their Registrars to ensure compliance with the new Policy and provide notifications about the new Policy to Registrants and Registrars in advance of the effective date.