

Registrant Domain Name Compliance Escalation and Suspension Policy

1.0 Title: Registrant Domain Name Compliance Escalation and Suspension Policy

Version Control: 1.0

Date of Implementation: 2023-01-01

2.0 Summary

This Policy outlines the compliance notification and escalation procedures the Registry Operator will follow to notify the Registrant about security vulnerabilities for <.TLD> domains that are out of compliance with the Registry Operator's Security Requirements. The procedures detailed in this Policy are designed to ensure timely action by the Registrant to resolve failures the Registry Operator detects through our security monitoring system.

3.0 Monthly Notification Process

Registry Operator will provide the Registrant with a report of non-compliance findings (i.e., failures and warnings) on a monthly basis. Compliance warnings are only **recommended actions** to the Registrant and are therefore not a subject of this Procedure. Registry Operator also provides email notification to the Registrar of record of the compliance failure(s) weekly.

4.0 Escalation Process

For all <.TLD> domains, compliance failures must be remediated within 60 days and the following steps will be followed:

- If issue(s) is not resolved within 30 days, the Registry Operator sends email escalation to Registrant and Verification Contacts, and Registrar of compliance failure(s).
- If issue(s) is not resolved after 60 days, the Registrar must place clientHold status on the domain(s). A clientHold status is a Registrar status similar to the Registry Operator's serverHold and takes a domain out of DNS (i.e., no web or email), and a domain not in DNS is not subject to compliance with the Registry Operator's Security Requirements.
 - o If a Registrant's domain is on clientHold and the Registrant wants to work on addressing the issues identified by the Registry Operator, then the Registrar should remove this status to put the domain back in DNS to enable the Registrant to make changes and once they confirm to the Registrar the issues are resolved, then the Registrar should ask the Registry Operator to confirm the domain has successfully passed all compliance tests.
- If clientHold is not placed and issue(s) is not resolved:
 - Registry Operator will place the domain(s) on serverHold. The serverHold status can be removed upon communication from the Registrant confirming this issue(s) has been

resolved or a commitment to resolve the findings within five (5) business days. At this point, Registry Operator will retest the domain(s) and confirm the result with the Registrant. If the domain(s) has successfully passed all tests, the compliance matter will be resolved and no further action will be required. If the domain(s) has not successfully passed all tests the Registrant will have 72 hours to resolve the outstanding issue(s) before the domain(s) is placed back on serverHold.

For any domain(s) that has recurring and/or persistent failures after the above Procedure is followed, Registry Operator, at its sole discretion, may accelerate application of the serverHold status.

5.0 Additional Information

Registry Operator acknowledges and appreciates that the Registrant and/or its vendors may implement security measures in various ways and that it's possible that non-compliance findings could be incorrect. In all cases, the Registry Operator will work diligently with the Registrant to reasonably confirm the validity of the results before any issue is escalated. Registrant questions about the compliance status of domain(s) registered in <.TLD> must be sent to compliance@fTLD.com and the Registry Operator will reply with a status report.

6.0 Amendment

Registry Operator reserves the right to modify this Policy at its sole discretion in accordance with its rights and obligations set forth in its Registry Agreement. Such revised Policy shall be posted on Registry Operator's website at www.ftld.com/policies/ at least 15-calendar days before its effective date.