

Potential Steps for Verification of Whois Data

DRAFT for discussion purposes

Summary: Listed below are various steps that have been identified a possible mechanisms to achieve the verification of Whois data as requested in the Law Enforcement Recommendations. This list is not intended to be comprehensive, but to help guide conversation on where the line should be drawn in potential verification/accuracy processes.

1. All required fields are complete and are not obviously missing information (e.g., telephone numbers, zip codes, etc. contain data).
2. Email addresses are in the proper format (RFC 5322).
3. Telephone / fax numbers (if provided) are in the proper format (ITU-T E.123 international notation).
4. Postal addresses of all the name holders and contacts are in the proper format for the applicable country (UPU S42 address templates).
5. Email addresses for name holders and contacts are active and do not bounce.
6. Telephone numbers provided for name holders and contacts are functional.
7. Postal addresses are valid and mails can be delivered to. For example, in the U.S., this is called CASS-Certified Address. In the G7 countries, there are ways to do similar things to CASS-Certification.
8. Evaluate all required fields for patently false information.
9. Name holders and contacts are reachable through the registered email addresses. (A unique code could be first provided to the contact via a web site, and then an email is sent to the related email address. To validate the transaction, the contact has to provide the unique code through email.)
10. Name holders and contacts are reachable through the registered telephone numbers. (For example, in order to activate a credit card, some banks require a call from the phone number provided.)
11. Name holders and contacts are reachable through the registered postal addresses. (Some banks, send a letter in the mail containing PIN number, users have to enter this PIN number on the website to complete the registration process.)
12. Name holders are associated in some way with the registered postal address. (For example, searching phone listings, business directory listings, or other records to obtain any independent association.)
13. Evaluation of the billing information provided against Registration Data. If the latter is obviously inconsistent with the billing information used in the account, additional verification steps shall apply.
14. Authenticate the identity of the person submitting on behalf of the Registered Name Holder, whether the registration is in the name of a person or an entity, by reviewing driver's license, passport, or other governmental issued

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- identification with regard to individuals associated with the registrar's account, or listed as either of the technical or administrative contacts.
15. If the Registered Name Holder is not an individual, confirm the existence of the entity, through review of copies of formation documents, business license, filings for doing business as (DBA), notarized statement or other similar document identifying an entity's existence.
 16. The Registered Name Holder has consented to the registration. This could be done through the review of Secretary Certificates, notarized statements, power of attorney's, letters of authority, or other documents that evidence such consent.
 17. [ADD ADDITIONAL PROCESSES IDENTIFIED IN CONSULTATION WITH LEA, REGISTRARS, AND OTHERS]