

Registrars' and Users' Consultative Committees

—
Minutes of 18 October 2022

CONTENTS

1. Attendees

Users

11 persons representing 13 members of the college

- **BACHOLLET Sébastien, representing ISOC France**
- **JOLY-BACHOLLET Anne-Marie, representing Association E-seniors**
- **BOUTIGNON Antoine**
- **CHELLY David**
- **COFFRE Adrien**
- **LOUIS Benjamin**
- **PERPERE PAUL representing INPI**
- **PORTENEUVE Elisabeth**
- **PRET Charline, representing NOVAGRAAF**
- **RICHARD Jean-Benoit**
- **TAYER David-Irving**

Registrars

18 persons representing 16 members of the college

- **ALMIRON Sébastien representing NETIM**
- **BLAMEUSER Juliane representing MEYER & PARTENAIRES**
- **CANER Emma, representing OVHCloud**
- **DESSENS Emilie representing DOMAINOO**
- **DULAC Bernard, representing DATAXY**
- **DURIEUX Ludovic representing SAFEBRANDS**
- **ENGRAND Sophie, representing NORDNET**
- **FRANCK Philippe, representing DOMAINIUM**
- **FRANQUINET Arnaud, representing GANDI**
- **FRIGAULT Laurent representing SCALEWAY**
- **GEOFFROY Pierre, representing ONE2NET**
- **HAUSS Patrick, representing CSC**
- **JEAN-GILLES Sophie, representing OBS**
- **JUNG Scott, representing NORDNET**
- **KORN Jennifer, representing ORDIPAT**
- **MANCEC Gaël, representing GERMAIN MOREAU**
- **MICHOT Jean-Claude representing SCALEWAY**
- **WITTERSHEIM Arnaud, representing NAMESHIELD**

Afnic

- **AMPEAU Benoit, Partnerships and Innovations Director**
- **BENYELLES Lotfi, Head of Development for the Advisory and Training Offering**
- **BONIS Pierre, CEO**
- **CARRIERE Marie, Head of Marketing**
- **CANAC Sophie, Head of Associative Governance**
- **CASTEX Lucien, Representative for Public Affairs**
- **DAMILAVILLE Loïc, Market Intelligence Manager**
- **DAVOUST Clémence, Events Communication Manager**
- **GEORGELIN Marianne, Legal Affairs Director**
- **MASSÉ Régis, Director of Information Systems**
- **NAVAILLES Virginie, Head of Transversal CSR Approaches**
- **TURBAT Emilie, Marketing and Commercial Director**

2. Agenda

News

Points submitted for discussion with members:

- 2023 roadmap for the fight against abuse
- Operational Working Group on digital identity
- Afnic's CSR approach

Separate consultative committee meetings followed by feedback

Subjects of information and discussion items with members

- Switch-over of the .fr and French overseas TLDs on 1 October
- The fight against abuse, what changes on 1 January 2023
- Afnic training courses
- Market trends in domain names
- Report on international bodies

Upcoming diary dates

3. Welcome and news update

Pierre Bonis welcomed members.

He ran through the day's programme, which would be divided into a consultation phase and an information and follow-up phase.

News update

The Board of Trustees held a specific meeting in September to review the 2022-2022 strategy and to work on the new three-year strategy.

Two slightly out of the ordinary subjects had been addressed:

- There was some discussion of the importance of the Afnic association, the under-utilisation of its multi-stakeholder associative format and the desirability of developing it further as permitted by the articles of association. There had been discussion of the possible need to seek new members to broaden skills, use the articles of association as a basis to increase consultation and make better use of the tools at Afnic's disposal in the day-to-day operational aspects and for greater engagement with stakeholders. An exercise had been carried out on the mapping of allies, beyond stakeholders, to see which actors might have an influence, whether positive or negative, on Afnic. The subject addressed by the Board of Trustees had been the association as such rather than just as the holder of the .fr concession.
- The growth of Afnic as a business, its size relative to the critical mass needed in an environment peopled by giants such as Donut and Verisign. If Afnic has not reached critical size, how can it be reached? External growth? Purchase of technology? Development of new products? Diversification? The question being perhaps "is Afnic big and powerful enough to face the next ten years?"

Afnic's strategy for 2023-2025 will be validated by the Board of Trustees at the end of November.

Afnic's planned move was also discussed in the special format Board meeting.

The origin of this project was a concern with regard to the upkeep and maintenance of the building in the years to come.

One of the possibilities studied by Afnic was that of buying premises, which would allow financial reserves that currently generate low returns to be invested more profitably. It would also allow the establishment of a long-term asset in the form of purchased offices.

The market is not very liquid, resulting in few possibilities whether for purchase or rental. It is important to recall that there are almost no elements in the Afnic offices to do with production.

Afnic should be able to inform the Board of Trustees at the end of November which building had been chosen. Afnic will in any case remain in Saint-Quentin-en-Yvelines.

In **legislative news**, there were two important matters:

- Discussions in the European Parliament and the EC on a draft regulation on the **protection of geographical indications** (GIs): no problem was raised with the principle. As regards the engineering of the law, there are very serious problems in its construction where domain names are involved. The people who draft these laws seem to think that the registry's job is a simple one... and write what has to be done to protect geographical indications, with lists that are frankly absurd. This illustrates once again the need to approach the public authorities that put operational registry matters in laws as opposed to high level indications. It is necessary to make them understand that they can give us indications only; otherwise the law would have to be drawn up by specialists in domain names who really know how they work. This is a collective subject that all the domain name actors need to take up, not to thwart regulation, but to prevent legislators from including matters that are very specific to particular lines of business of which they have limited knowledge. The intellectual property lobbying firms that operate in this area do not know how a registry is run.
- **DNS4EU project**: this concerns a call for proposals launched by the EC for its own sovereign DNS **resolver**. Very little reaction from actors: could managing a resolver alone without any other activity be a viable business model? So not much progress with this. There could be some national motivation to mitigate the lack of progress at European level. Afnic will certainly be consulted on this matter. Afnic has already announced that it does not wish to operate a resolver, as it is already an authoritative name server. Afnic has however indicated to the authorities that it can help them with its technical expertise.

At the moment something is going on with Afrinic, the regional registry for Africa. Their accounts have been suspended and it is likely that Afrinic will be ordered to pay more by the Mauritian courts. This situation limits Afrinic's ability to allocate IP addresses on the African continent. Beyond this problem, the international rules for allocating IP addresses are being called into question and there is no international judicial protection. This in turn raises the wider question of how to implement multi-stakeholder decisions when they were not backed by the force of law. Concerning Afrinic, the continuity of its operations is at risk; they are perhaps within €5,000 or €10,000 of the brink. If any members of the community can help them, they should not hesitate to contact them or us.

The trustees also welcomed members attending both in person and remotely. They recalled that they were the voice of the members on the Board of Trustees.

They stressed that the intake of new trustees elected during the Board meeting had given the association a new dynamic. The special meeting of the Board of Trustees had been very fruitful, with a useful discussion on Afnic's strategy, the re-election of the Chair of the association for three years and another guarantee of continuity for Afnic.

4. Report on subjects submitted for consultation

4.1. Registry policies & the fight against abuse – Calendar and presentation of commitments for 2023

4.1.1. Presentation by Afnic

Marianne Georgelin presented the commitments made by Afnic in terms of registry policies and the fight against abuse which would be worked on and implemented in 2023:

Commitment	Date	Registrars' and Users' Consultative Committees	Registry policy committee	Public Consultation
Abuse Report – Detection and action	01/07/2023	30/03/2023	t.b.d.	Q1 2023
Unified solution agreed with the registrars to validate holders' reachability	01/07/2023	30/03/2023	t.b.d.	Q1 2023
Mediation	01/07/2023	30/03/2023	t.b.d.	Q1 2023
Graduated sanctions for registrars / implementation of an ethics charter	31/12/2023	30/03/2023	t.b.d.	H1 2023

Public consultations will be launched starting in January 2023 for the first three projects. Afnic is starting work internally straight away and all three projects will be worked on in parallel.

Implementation of the Abuse Report solution for the .fr domain

Afnic will carry out a monthly identification of domain names involved in technical abuse using its **Abuse Report** solution and will provide the results to the registrars for them to take rapid action on the domain names detected.

Validation of the reachability and eligibility of holders in cooperation with the registrars

Unified solution allowing the verification of holders' particulars to be strengthened by capitalising on the solutions already used by the registrars.

This tool should allow better use to be made of holders' data at various levels. The work will be carried out in partnership with the registrars.

Opening of a pre-ADR Mediation service

- Implementation of a **mediation** service prior to the opening of ADR procedures where the principle is accepted by both parties. With a commitment to processing **in seven business days**.
- This would at least allow faster resolution of the more than 8% of cases that end with the holder's agreeing to transfer the DN.

Other registries are already using it, and it has been established that some of the disputes could be resolved in this way.

Improvement of registrars' compliance

- Establishment of a **graduated scale of sanctions** for registrars that do not fulfil their obligations to respond to legitimate requests from the authorities and investigators, culminating in withdrawal of accreditation.
- Establishment of a transparent system of **financial penalties** for registrars with significant numbers of abusive domain names.
- Implementation, in cooperation with all the registrars accredited to the .fr TLD, of an **ethics charter** relating to fraudulent registrations and domain name registration activities the main purpose of which is to resell them.

Certain registrars having greater online volumes than others, what different levels of sanctions could be envisaged? Good collective practice, all working together on this common charter of good practices.

The consultation placed before members concerned the planning itself, whether or not it was appropriate, and how to implement the projects.

Opinions are sought not on the opportuneness of these actions, which form part of the commitments made by Afnic vis-à-vis the State, but rather on the timing and the methods. Members can share general alerts and points for attention that can be signalled upstream and taken into account prior to implementation.

The discussions and questions-and-answers between the members and Afnic allowed the following points to be clarified:

- *Mediation should allow the Afnic teams to gain time and added value for the claimants and holders involved in ADR procedures.*
- *Mediation is likely to concern 10% to 15% of the volume of ADR procedures. This objective (including 8% corresponding to the holder agreements) should be easily attained bearing in mind 'non-explicit' agreements and the holders that do not respond in the context of an ADR procedure but would do in the context of a mediation.*
- *For Afnic this is an operational matter to reduce the number of ADR procedures.*
- *In response to the question as to the number of claimants represented by firms (CPI and Avocat) that have more interest in conducting procedures than in accepting mediation, it was indicated that this depends on their business model, since the preparation and invoicing of mediation is essentially the same.*
- *Abuse Report will rapidly focus on the .fr domain (by the end of 2022). Afnic will then report back to the registrars (perhaps informally at first). The question yet to be addressed is what subsequent actions will be expected of the registrars. This subject will also fuel certain cases of graduated sanctions.*
- *Implementing graduated sanctions for registrars entails an amendment to the contract, which is why it cannot be implemented before 1 January 2024*

4.1.2. Feedback from Registrars' and Users' Consultative Committees

4.1.2a/Users

User members agreed overall with Afnic's proposals, but raised questions or comments on a number of points:

- What is Afnic's position on the use of dummy names or men of straw?
- What is the precise definition of 'reachability'?
- If use is to be made of mediation, it is important not to limit its use to only the simplest cases. If mediation is activated, this will generate costs for Afnic, especially if third parties are brought in to manage it.
- Regarding graduated sanctions, several respondents had expressed fears of excessive severity in these arrangements. What changes do they represent relative to the current sanctions? Are they currently applied? Some wondered about how they would be replaced by an ethics code.

4.12.b/Registrars

Registrar members stressed the following points and alerts concerning the implementation of projects in 2023:

Concerning the planning:

- Overall calendar: concern as to the proliferation of discussions; the timing is ambitious given the parallel handling of subjects.
- Wish for policies for combating abuse to converge so as to avoid excessive disparity and proliferation of layers of attack.
- No indication of volumes; clarification needed.

Concerning Abuse Report:

- What will this change for registrars?
- Demand for stronger automation (EPP reason for example)
- Investigate whether it is possible to obtain a Certificate like other registries that can require (or have the authority to demand) the deletion of domain names
- What volume does this represent?
- Need to define abuse (only technical abuse as per ICANN definition (5 cases)? or same definition as the EU?)

Concerning validation of the reachability and eligibility of holders

- Not all registrars have the same expertise regarding reachability and eligibility, depending on volumes handled and resources. Would it not be appropriate for Afnic to propose a framework, a solution that would be applicable for all registrars? It would be useful to have an inventory of the automatic checks at the time of registration of domain names.
- On FR Check, give some idea of the iterative process. After the country, what other criteria will be taken into account?
- Request results of the public consultation on FR Check? URL to be shared.

There were no particular remarks about ADR procedures or mediation.

Concerning the implementation of graduated sanctions

- Will the number of failed cases depend on the volume handled?
- Why put a policy of sanctions in place and not a policy of incentives for “virtuous” registrars (scorecard with commercial incentive)
- Attention: registrars are not responsible for the theft of bank cards used for registrations; financial penalties might be inequitable.
- Buying with a view to re-selling: definition unduly vague. Malicious intent v. domaining v. snap-type activity. How will this be accounted for?
- Sharing domain names flagged for abuse with other registrars to anticipate and avoid their being registered elsewhere / a domain name blacklist system

Afnic responded in part to the committees' questions and observations and said it would study the rest later.

Concerning the calendar:

- *Overloaded planning: this feeling was shared internally. Afnic will start work on these subjects and if the discussions or the implementation take longer than expected, then Afnic will arrange things to fit, postponing the date if necessary.*

Concerning validation of the reachability and eligibility of holders

- *Dummy corporations or men of straw are authorised since they do not exist! If a name is considered a dummy name, Afnic considers that the holder is responsible for the domain name registered. The registrar's contract clearly indicates that the holder is legally responsible. This could have significant effects on entire portfolios. It is difficult to implement a prohibition of dummy names. Accepting dummy names with a different process is impossible.*
- *Using a dummy name weakens the position of any holder seeking to defend itself in an ADR procedure.*
- *When a dummy name is used to make holders anonymous, this is disrespectful since natural persons are anonymised by default under the .fr domain. This is a GDPR problem if it is posted as a paid service, when it is in fact the law.*
- *Definition of validity of data = accurate data, e.g. address verified as being that of the holder. Definition of reachability: the holder can be contacted, in other words replies to emails and letters.*
- *It would be useful to make an inventory of registrars' practices to ascertain their standards and whether they would be sufficient to avoid Afnic's having to check on holders already verified by their registrar.*
- *The fact that certain registrars that do not have the resources to carry out verifications of particulars but are willing to use a tool that would be given to them was noted.*

Concerning mediation:

- *In Afnic's commitment to the French State, there is nothing about reserving mediation for simple subjects, the basic idea being that anyone instigating an ADR procedure will be offered mediation. It will not be imposed. Subjects dealt with in mediation can therefore be complex.*
- *Concerning the participation of third parties in mediation, this is a possible idea. The first aim of mediation is to reduce the operational workload for Afnic. There is nothing at this stage to suggest that mediation will be only internal.*

Concerning graduated sanctions and Abuse Report

- *Afnic's commitment to the French State concerns graduated sanctions, not "good points".*
- *As regards repetitive problematic conduct, from what level is this a problem? This will be at the heart of the consultation discussions in 2023.*

- *At present, the only possible sanction for misconduct is withdrawal of accreditation, which is rather extreme and therefore not applied since it would create problems for holders (orphan domain names, etc.). So graduated sanctions would allow intermediate levels which would be applicable.*
- *Afnic expects registrars to comply with the contracts they have signed.*
- *Between two and four registrars would be susceptible to severe sanctions.*
- *The volume of abuse would indeed be calculated as a proportion of the volume of the portfolio.*
- *If public authorities (which can turn to either Afnic or the registrar in the event of abuse) indicate to Afnic that such and such a registrar has not responded, then Afnic would be able to take that as justification for removing the registrar from the distribution network.*
- *Concerning the desired convergence in the fight against abuse by the various registries, to facilitate automation for the registrars, it is necessary to recall that the EU 27 and the .eu have different laws or definitions of abuse.*
- *These subjects are also under discussion in the CENTR technical workshop, so there is some convergence among the ccTLDs.*
- *Good practices will also be part of the ethics charter to allow common and uniform attitudes among registrars and Afnic.*
- *Registrars see and know, better than Afnic, what other registries do. If they can feed back to Afnic what they find effective, this could allow the same things to be implemented within Afnic and thus allow some level of standardisation.*
- *It is not possible to wait for a consensus on the definition of technical abuse before moving ahead. Bodies of evidence, complaints, etc. would need to be found in order to get things started.*
- *Legally speaking, Afnic is entitled to act*
 - o *on holders' data (FR Check / substantiation);*
 - o *and on the domain name itself (ADR)*

It relies on external sources for descriptions of abuse (Abuse Report)

- *The reason why Afnic plans to send the domain names detected to registrars following the abuse report round is so that registrars put an end to the trouble by blocking or deleting, which Afnic cannot do itself. This does not mean, however, that there will be an immediate sanction. Afnic's powers are limited, but the registrars have other possible actions open to them. Working together allows a zone of trust to be maintained as regards the .fr domain.*
- *Technical abuse includes some cases that are not the holder's fault. This can have side effects. It will perhaps be necessary to move forward slowly in order to avoid false positives.*
- *The responsibility of the registrars will not change. Concerning the example of a stolen bank card, there will be no "punishment" but Afnic will nonetheless invoice it.*
- *Buying with a view to reselling is not a problem - domaining is not prohibited. What is prohibited is cybersquatting with a view to selling to someone with a right to the domain name.*

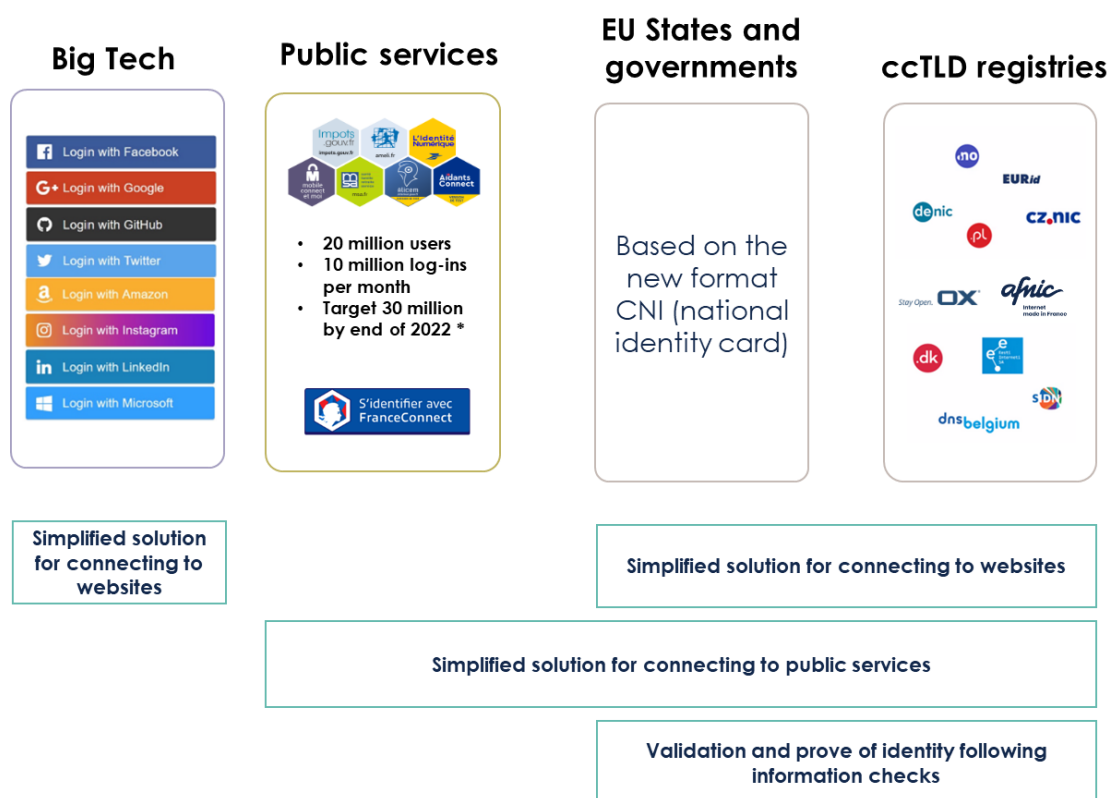
- *Flagging dubious domain names could be a good idea, but it is not possible to create a blacklist.*

4.2. Operational Working Group on Digital Identity

4.2.1. Presentation by Afnic

Marie Carrière presented the year's work of the operational working group and the proposed roadmap for the continuation of the project:

A range of digital identity solutions for a wide variety of purposes



Discussions and workshops with members of Afnic and Salient Points

Registrars' and Users' Consultative Committee Meetings, October 2021

- Presentation of the ID4me digital identity solution

Operational Working Group February 2022

- Presentation of the PoC for ID4me, Afnic
- Value chain: security, simplification of identification.

Salient points:

- Digital identity is a functionality that **can add value to the domain name**.
- This new service **is designed to respond to the problems of users' security and simplicity of connection and the management of their personal data**.
- This project should **allow adoption by a large community of users to counter the use made by Big Tech of users' personal data**.
- The simpler the user journey, the easier it will be to get this connection tool adopted.

Operational Working Group March 2022

- Simplification of the user journey
- Agents' needs to integrate the solution

Salient points:

- **The user (holder) journey needs to be simplified**, especially for the activation of DNSSEC and the integration of the DNS zone to allow adoption of the solution.
- **The level of security of digital identity can be a differentiating factor** vis-à-vis digital identities offered by Big Tech (as well as complying with the GDPR)
- **Provision of API or web services is essential** to allow implementation of the solution with registrars.

Operational Working Group August 2022

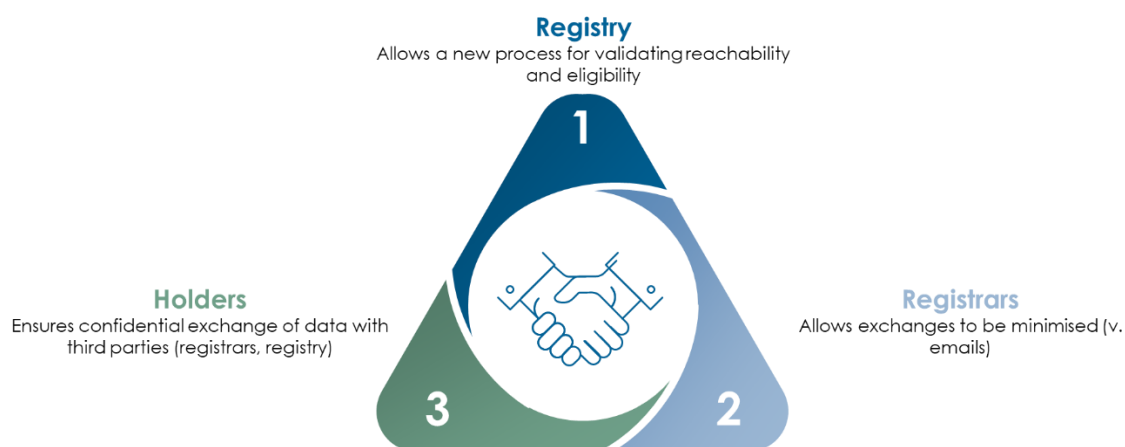
- Discussions around three use cases

Salient points:

- Various digital identity projects based on the CNI (national identity card) are being run by the French State and Europe. **Afnic's solution should concentrate on the value contributed to the .fr domain and its ecosystem**.
- **A digital identity system interoperable among European ccTLDs could allow verification of holders' data and their eligibility and support the efforts to combat abuse**.

Users' and Registrars' Consultative Committee Meetings October 2022

A unified digital identity solution brings value to the .fr ecosystem



Deployment plan for digital identity

Commissioning

Allow holders to create their digital identity and give information on reachability and eligibility

Deployment of 3R

Integration by the registrars in their systems so that holders can associate their identity with their customer information

Application

Use of the digital identity in order to carry out the process of verifying holders

Feedback

Balance sheet of use of the system by the stakeholders.

Extension of use

Identification of new applications for Afnic's digital identity.

Consultation

In the context of its commitment to strengthen the procedures for verifying data, following the Operational Working Group meetings on digital identity, Afnic submitted the following consultation:

Target: Implementation of the digital identity solution to allow holders to create a verified identity and to share information with registrars and Afnic

- ⇒ **Is the implementation of the digital solution discussed in the Operational Working Group and as presented in the roadmap from 2023 compatible with your expectations?**

If we want to forward, we need to be certain that a reasonable number of registrars are in agreement on the subject. Registrars need to be ready to move ahead from a technical point of view with Afnic on the subject.

The discussions and questions-and-answers between the members and Afnic allowed the following point to be added:

- *The State has launched a solution based on the CNI with 2,500 testers to date. The objective is to reach 10,000 testers by year-end.*

4.2.2. Feedback from Registrars' and Users' Consultative Committees

4.2.2.a/ Users

Now that Afnic has replied to the questions on interoperability and the speed of implementation of the system envisaged, the user members can follow its proposed roadmap for the project.

Several questions were asked and observations made:

- How to raise website publishers' awareness of this new ID?
- What would be the registrars' basic position on this matter?
- There are still some questions as to whether it is a good idea to go for this new ID in view of the government initiatives and in terms of the single ID (CNI/Passport) and in view of the example implemented with France Connect

4.2.2.b/ Registrars

Registrar members

They stressed the following points:

- Clarify the subsequent associated usage and the purpose, as this is not completely clear.
- Digital identity with associated services: list of advantages for clients and registrars?
- Transparency of services is needed in order to assess the complementarity with the registrars' services: some services might be in competition with certain registrar services (e.g. protection). The notion of added-value services needs to be clarified.

- What does this service involve in the implementation for registrars?
- A harmonised solution among all registries would be ideal.
- Volunteers need to be sought out for next steps.

Afnic responded in part to the committees' questions and observations and said it would study the rest later.

- *Taking account of the feedback from members, this confirms that this project should not be pursued further in the form of an Operational Working Group. It would be better to launch an implementation on the basis of a partnership with such registrars as are willing and for volunteer members to follow for testing.*

Continued discussions with and among members allowed new points to be raised:

- *The government project and that of Afnic's Operational Working Group are different and the information of a different order (for example for a company, as an employee).*
- *The rival of ID4ME is Facebook Connect, not France Connect*
- *Numerous user and registrar members agree that a concrete solution is needed with services being associated with it. The POC and trial phases need to be launched.*
- *A candidate for a future TLD would have great use for this solution. Corporate-oriented registrars need to be contacted.*
- *The volunteer registrars for this project should contact Afnic.*
- *Afnic will seek out beta testers; if no registrar takes the plunge then Afnic will not either.*

The CEO thanked the participants in the Operational Working Group and the coordinators within Afnic. The context and perimeter are sufficient to move on to a trial with those that have the time and resources to devote to it.

4.3. Afnic's CSR approach

4.3.1. Presentation by Afnic

Virginie Navailles presented Afnic's CSR approach.

What is CSR?

Definition of Corporate Social Responsibility

According to the EC: ***a concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis.***

CSR is **the contribution made by businesses to the sustainable development goals** and thus seeks to have a positive impact on society while at the same time being economically viable.

The 17 Sustainable Development Goals of the UN

The 17 SDGs were adopted by all the UN Member States in September 2015 as part of the Agenda 2030, which defines a 15-year plan aimed at attaining them.



They are interconnected, applying to all countries and must be attained by all stakeholders: administrations, private sector, civil society, etc. under a collaborative partnership.

The benefits of a CSR approach

- Differentiation from competitors
- Improved image as employer
- Better risk management

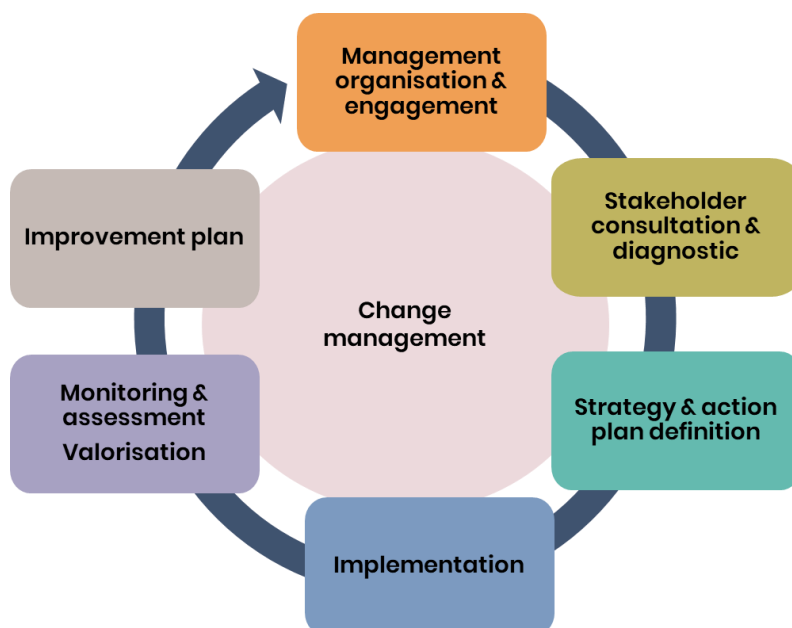
- Improved economic performance
- Ability to attract partners
- Enhanced capacity for innovation
- Enhanced reputation
- Regulatory anticipation
- Stakeholder satisfaction
- Giving new meaning to business

ISO 26000

Why a management system based on ISO 26000?

- ISO 26000 is the best known CSR reference, a standard emerging from consultation with 90 countries, published in 2010.
- It provides guidelines to assist organisations in implementing a CSR approach regardless of their size and their maturity in this area.
- It is thus not meant for certification but there are several global, thematic and sectoral labels.
- It rounds out Afnic's Excellence approach.
- Afnic has determinedly carried out a number of actions since its creation, notably as regards the quality of working life, and others have been added with each agreement. It had become necessary to put in place a structuring framework that would allow us to monitor and advance our actions.

An approach based on continuous improvement



A brief overview of ISO 26000

1 pre-requisite

- Integrate CSR throughout the organisation

2 fundamental CSR practices

- Identification of social responsibility
- Identification, prioritisation and dialogue with stakeholders

7 key principles

- Accountability
- Transparency
- Ethical conduct
- Respect for stakeholders' interests
- Respect for the law
- Respect for international norms of societal behaviour
- Respect for human rights

7 central questions

1. Corporate governance
2. Human Rights
3. Labour relations and working conditions
4. Environment
5. Fair practices
6. Questions relating to consumers
7. Communities and local development

Broken down into **36 areas of action** among which each organisation identifies its priorities

What are the areas of action for Afnic's CSR?

Corporate governance

Human Rights

- Discrimination & vulnerable groups

Labour relations and working conditions

- Employer/employee relations
- Working conditions & social protection
- Health & safety at work
- Social dialogue
- Development of human capital

Environment

- Sustainable use of resources
- Mitigation of and adaptation to climate change

Fair practices

- Fair competition
- Promotion of social responsibility in the value chain
- Respect for physical and intellectual property rights

Questions relating to consumers

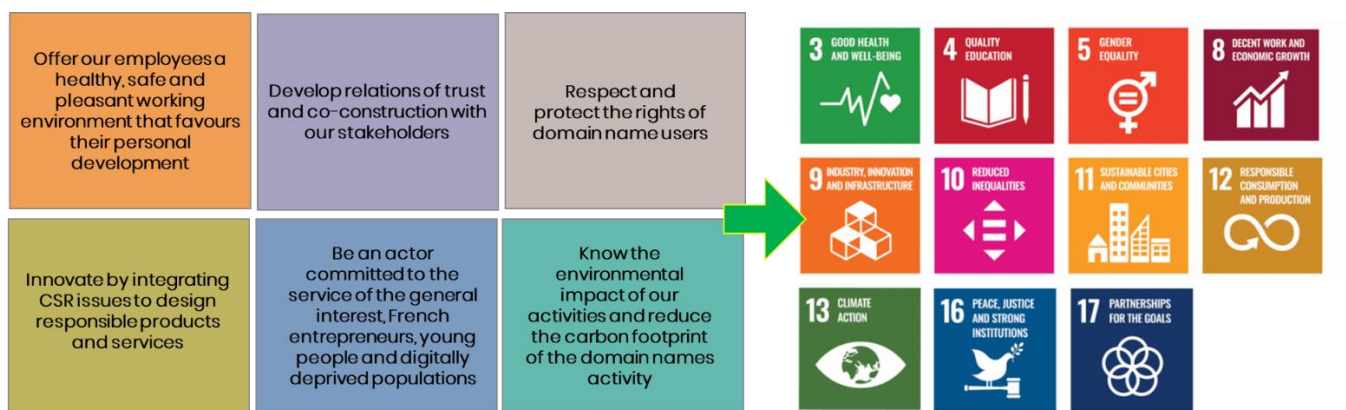
- Fair practice in marketing, information & contracts
- After-sales service, assistance and resolution of claims complaints & disputes
- Protection of consumers' data and privacy
- Access to essential services

Communities and local development

- Development of technologies & access to technology
- Investment in society

Afnic's CSR policy

In 2021-2022



CSR commitments under the 2022/2027 State-Afnic Agreement

- Accessibility of Afnic's public digital systems
- At least 10% of revenues allocated to R&D, in particular to the priority themes: Low-carbon DNS, Secure DNS, Development of digital identities on the DNS, Combating abuse

- Local, national and international skills transfer based on our Qualiopi certification
- All systems and technical commitments, for combating abuse, resolving disputes and ensuring the security of the .fr domain are integrally and systematically applied to the overseas French TLDs managed by Afnic (.pm, .re, .tf, .wf and .yt.)
- Carbon neutrality through the implementation of a plan to reduce GHG & a carbon offsetting policy
- Implementation of a system for managing sustainable development meeting the requirements of ISO 26000
- Supporting at least 10,000 French businesses in creating their online presence and allocation of 2% of revenues to joint promotional operations with the registrars
- Setting up, after public consultation and discussion within the association's bodies, of a free of charge mediation procedure between claimant and holder, prior to the instigation of an ADR procedure
- 11% of annual revenues allocated to actions in the general interest
 - A minimum of €1.3 million a year to the actions of the Afnic Foundation for Digital Solidarity
 - Also, validation every two years, with the granting Authority and after consultation with the bodies of the association, of the priority themes to which these disbursements are allocated. For the years 2022 to 2024, these priority themes are:
 - Digital transformation of businesses and private individuals' mastery of digital technology
 - Contribution of digital technology to the reduction of the overall carbon footprint, and reduction of the carbon footprint of digital technology itself
 - Transfer of skills in subjects relating to digital transformation, the domain name system, IT security and Internet governance at national and international levels
 - Accession to the Cyber Campus and organisation of training sessions focusing on security

Consultation:

What are the five main areas of action inherent in Afnic's purpose and mission?

Those with the most impact or the most urgent.

To find out more:

Members and Clients Webinar

Thursday 17 November 2022 from 11:30am to 12:30pm

<https://visio.afnic.fr/b/vir-7vr-utp-ppi>

4.3.2. Feedback from Registrars' and Users' Consultative Committees

4.3.2.a/ Users

User members chose the following five areas to look at more in depth (not in any particular order as regards priority or importance):

- Protection of consumers' data and privacy
- Sustainable use of resources
- Working conditions & social protection
- Discrimination & vulnerable groups
- Corporate governance

4.3.2.b/ Registrars

The registrar members chose the following five areas to look at more in depth:

- Corporate governance
- Fair practices (all) -> this strikes a chord with the registrars
- Questions relating to consumers (all but above all protection of data and privacy) - > this also strikes a chord with the registrars
- Labour relations and working conditions -> important as a central actor of the Internet system and Operator of Essential Services
- Digital sobriety under the environmental heading

The Chief Executive Officer thanked members for their valuable feedback on the three subjects addressed in consultation.

5. Report on subjects of information and discussion items with members

5.1. Switch-over of the .fr TLD, feedback on a large-scale operation

Pierre Bonis thanked Régis Massé, who had acted as project manager throughout the project. The .fr TD now has the world's most modern SRS by construction. It is a matter of immense pride to have achieved this total overhaul, which very few registries have done.

Régis Massé indicated that this switch-over of the .fr and the overseas French domains marked the end of the Avenir programme which had been less linear than initially envisaged, but the teams had managed to overcome the obstacles and complete the project on 1 October.

A large-scale operation

The teams had been preparing the switch-over operation for several months:

- Definition of the timed switch-over plan and checkpoints at each key stage
- Functional and technical tests of the code developed to validate the correct taking account of the specificities linked to these zones (life cycle rules, registry policies)
- Simulation of the export and import of data from the .fr and overseas French domains
- Load testing of target infrastructures as regards number of operations
- Validation of infrastructure security: load limitation, checks on the number of connections by IP addresses, etc.

D-day

- 23:00: Launch of the operation (external communication/services cut off)
- 0:00: Official "go" for the operation launch
- 0:00 – 11:00: export operations, checks and import of data
- 9:00 – 16:00: functional and technical tests
- 16:30: decision to extend the maintenance period by 90 minutes
- 18:25: Official "go" for opening of services

- 18:30: opening of services on all six ccTLDs
- 18:30 – 23:00: registrar support

Real team cohesion

Four teams to see this operation through:

- Night Team: 4 persons
- Day Team: 17 persons
- Backup Day Team: 4 persons
- Support Day Team: 4 persons

Employees of the ISD, the Marketing & Sales Division, the Communication Division, and our CEO

The switch-over in figures

The following points should be taken away from this operation:

- Registration services cut off for 19 hours
- 31 employees, motivated and working together in solidarity
- 409 hours of weekend work (support actions on Sunday too)
- 498 domain names registered on Saturday 1st, 1,304 on Sunday 2nd
- Operations 4 to 10 times faster for the .fr TLD (create operations in 400 ms)

Some post-switch-over actions

A problem arose with a set of domain names in transfer (about one thousand):

- Identification of domain names affected
- Corrective actions on the data to resolve the problem (resolution completed 6/10, very little impact for the registrars except for the impossibility of modifying certain data)

Evolution of the Whois server on port 43 to mitigate an undocumented specificity of the Whois client developed by RIPE for the .fr domain

Re-opening of the FrRush service on the .fr domain Wednesday 5 October:

- Communication to the 10 registrars using this service
- Activation of their specific account and the associated connections

Enhanced surveillance of the system by the I&T team: no incident from re-opening of the services to the time of writing

18 days later no incident on the system; as with gTLDs for one year and corporate TLDs for a year and a half.

And now ... what are we going to do ...

The customer service department is continuing to support registrars in providing update links for passwords and take-up of interfaces, answering questions, etc.

The development teams are working to consolidate and extend certain services, mainly for Registry employees

The technical teams are preparing the switch-over of the .sn domain (Senegal) to the new environment in order to say goodbye definitively to the old system, and are also working on the delivery of the environment for .ga (Gabon)

Not forgetting the many new projects in the framework of the new agreement.

Pierre Bonis thanked the successive Afnic trustees who, thanks to their many and varied skills, understood the details, advances and problems throughout the project. The support of the Chair and the trustees had been invaluable to Afnic, which had always been able to have frank exchanges with its Board of Trustees and had always received support and operational advice with which in turn to support its teams.

The discussions and questions-and-answers between the members and Afnic highlighted the following points:

- *Congratulations on this project, which from the point of view of a trustee has been a great success compared with other major IT projects even those of large companies.*
- *Responding to the question on the reduction of the technical deficit, Afnic said that this had been one of the objectives that had been attained. The new system had been commented of and described and this would be a strong point for future evolutions on the system which should make it possible to delay the onset of another technical deficit.*
- *In committee, the registrars addressed the technical aspect of the migration. They pointed out some problems that had yet to be resolved.*
- *For example, the emails previously sent at the end of operations no longer arrive.*
- *They also complained about the lack of public information from Afnic on the problems still being resolved following the switch-over. This would have accompanied the information of the registrars who felt rather alone when faced with their customers, even though these problems were not of their making.*
- *Afnic replied that the majority of the problems that had arisen post-switch-over had come from the registrars not having changed their passwords and Afnic saw no reason to publish information about this. The problem of the transfers had not been*

identified immediately after the switch-over. At present, everything is working normally, as well as or better than the old system.

- Afnic's teams are prioritising resolving bugs. Some reports prove not to be bugs but rather planned evolutions that were perhaps badly explained.

5.2. Registry policies & the fight against abuse Calendar and follow-up of 2022 commitments applicable at 1 January 2023

Marianne Georgelin reminded those present that these projects had been submitted for consultation to the May committee meetings.

Commitment	Date	Registrars' and Users' Consultative Committees	Registry policy committee	Public Consultation
Publication of the daily list of domain names in open data format	01/07/2022	12/05/2022		
FR CHECK (verification prior to publication)	01/01/2023	12/05/2022	17/10/2022	June / Sept 2022
RDAP: Access to the WHOIS database for public authorities with a right of communication	01/01/2023	12/05/2022	17/10/2022	Sept / Oct 2022
End of reimbursement of SYRELI procedures	01/01/2023	18/10/2022	17/10/2022	

The **daily publication of the list of domain names** in open data format has been in effect since 1 July. Some people use them to detect abuse.

FR Check: verification of holders' particulars after registration and before publication.

The public consultation received about ten responses: The project had been well received; some people who were particularly competent on the subject had replied to the consultation. This had allowed the collection of ideas that could enrich the process. The verification of the country code would allow part of the registrations to be eliminated and this met no opposition from the respondents. Afnic was also asked to go further in view of the evolving online abuse. The risk of circumvention to be able to continue with fraudulent registrations was also raised.

Afnic presented the impacts of the implementation of FR Check on registry policies in a meeting of the Board committee on registry policies. These changes will need to be validated by the Board of Trustees meeting at the end of November and then published on 1 December in order to be applicable from 1 January 2023.

RDAP: Access to the WHOIS database for public authorities with a right of communication

The public consultation gave rise to very few reactions - only three to be precise: The subject is not really contentious, being broadly supported. Feedback encouraged Afnic to put in place technical and legal safeguards.

This RDAP access concerns the data of natural persons that cannot be seen in Whois. Requests for disclosures are in the order of 1,000 per year, 20% of which come from the authorities.

Afnic is also working with the CNIL (French Data Protection Agency) on this project; recommendations were still awaited to be able to frame the project properly.

A contract will be signed with each authority that might connect and conduct searches on the basis of the domain name and the NIC handle. They will not be able to conduct a search on the basis of a name or to conduct a global consultation of the database.

Afnic will publish statistics to assess the effectiveness of the system (this will be quicker for authorities' investigations) and with a view to transparency as to the use made thereof.

Afnic presented the impacts of the implementation on registry policies in a meeting of the Board committee on registry policies. These changes will need to be validated by the Board of Trustees meeting at the end of November and then published on 1 December in order to be applicable from 1 January 2023.

End of Syreli reimbursement

The increase in the volumes of cases filed, with the time frames being constrained by law, has led Afnic to propose ending partial reimbursement (for cases in which Afnic rules in favour of the claimant) rather than increasing the cost of the procedure.

This measure will take effect from 1 January 2023.

The discussions and questions-and-answers between the members and Afnic highlighted the following points:

Concerning RDAP – access to the WHOIS database for public authorities with a right of communication

- To the question as to whether a holder whose data were requested by the authority would be informed, Afnic replied that no, the holder would not be informed. It has been ten years since requests for the lifting of anonymity were put in place, Afnic has not done so and the law does not oblige it to do so. However, holders can make identity disclosure requests. It is balanced.*
- To the question on the limitation of requests, Afnic replied that there will be a daily limitation and that furthermore Afnic will keep a particular watch on the risks of changes in conduct.*

Concerning FR CHECK

- The registrars voiced concerns on the invoicing of domain names blocked by FR CHECK. Afnic explained that with FR CHECK, it is the substantiation procedure that is applied to the domain name concerned. The holder and the registrar are therefore informed as soon as the procedure is initiated. This will allow the substantiation to be launched more quickly than at present, and the registrar to choose to delete the domain name immediately before the end of the five-day grace period in order not to be invoiced.*
- The registrars had questions as to what extent they had the power to delete domain names. Afnic reminded them that the registrar is responsible for guaranteeing compliance with the naming policy and can therefore delete any domain name registered in breach of that policy (which would be the case since the holder's country was not eligible in the case of FR CHECK) and the registrar can do so during the five-day grace period.*
- Concerning the technical implementation of the domain name suspension, Afnic explained that the blocking will be different from the current one in its configuration.*
- There is no risk of another holder being able to register the domain name blocked by FR CHECK since it has already been registered (it just has not been published), so it is not a pending request.*
- A system of notification will need to be put in place in the EPP but also in the API. Otherwise this will be by email for the time being.*

5.3. Update on 2022 training activity

Lotfi Benyelles recalled that Afnic had obtained Qualiopi approval in January 2021 on the basis of a limited catalogue which had since been developed.

Training courses in the catalogue and activity figures for 2022

5 training courses in the catalogue

<https://www.afnic.fr/en/products-and-services/training/>

Training courses open to the general public:

- The basics of the DNS and the domain name industry; 4 sessions in 2022
- Domain names from A to Z (Partnership with INPI); 2 sessions in 2022

Expert training courses:

- DKIM, DMARC, SPF: Secure your email thanks to the DNS; 2 sessions in 2022
- Secure your DNS infrastructure with DNSSEC; 1 session in 2022
- From success to deployment of the IPv6 protocol; 2 sessions in 2022 (postponed to early 2023)

11 sessions in 2022: 5 intra & 6 inter

62 persons trained (4 with OPCO financing)

Overall satisfaction rate: 4.6 / 5

>€30,000 forecast revenues

Communication on marketing of the training activity

12 e-mailshots in January

- **6 sponsored mailshots to IT decision-makers**
- **6 “house” mailshots to major Afnic accounts + registrars**

Purchase of web space

- Sponsored banner for the training course on basics of the DNS
- Sponsored insert in a newsletter for an ISD/IT Security audience
- Article published in the magazine Digital Solutions and reference in a dedicated newsletter

Organic/inbound

- 1 blog article published (DKIM, DMARC, SPF) and referenced on Afnic’s social media

- 1 agenda page per session created on Afnic.fr referenced on Afnic's social media
- 1 newflash (launch of DKIM, DMARC, SPF) referenced on Afnic's social media
- Posts on social media prior to closure of registration

Actions envisaged in 2023

- **Strengthen promotion with the development of the emailing base and the production of expert content (blog articles or mini online training sessions)**
- **Expand the training offering around the following themes:**
 - Management of abuse
 - Configuration of the DNS (or advanced DNS)
 - Training on DNSSEC for registrars
 - Managing a portfolio of domain names as a business
- **Work with partners**
- **Strengthen our production capacity with skills building for new trainers**

Massive Open Online Courses (MOOCs) run by universities act as loss leaders for the training activity. Afnic therefore plans to launch MOOCs.

Several people within Afnic have trained to become trainers; the challenge is how to free these people up so that they can do some training and so that training sessions can be planned.

Beyond the training sessions in the catalogue, Afnic has expertise in the digital transformation of businesses, notably in the person of Michael Vigreux and supports and trains VSEs/SMEs in different ways ("Tous en ligne maintenant", 'Foliweb' workshops, "Connecte ta boîte", etc.).

5.4. Market trends in domain names

Loic Damilaville presented the market trends in domain names to members.

As a reminder, this presentation was reserved exclusively to the consultative committee members present.

5.5. Report on international bodies

Lucien Castex reported on Afnic's participation in international bodies through various employees.

The detailed presentation is available online to members in the members' space. It concerned in particular Afnic's participation in the following meetings:

- IETF 114: 23 to 29 July 2022 (Philadelphia)
- DNS-OARC 38: 30 to 31 July 2022 (Philadelphia)
- RIPE 84, 16 to 20 May, Berlin
- ICANN75, Annual General Meeting, 17 to 22 September 2022, Kuala Lumpur
- ITU Plenipotentiary Conference, 26 September to 14 October 2022, Bucharest

Pierre Bonis added that there was a new generation of engineers in the IT and R&D departments who also take part in these meetings and give presentations. The names of Afnic participants are available in the presentation. These people can give further explanations to any members who so wish.

Lastly, it should be noted that as well as Afnic staff, numerous members of Afnic and of its Board of Trustees also take part in these various meetings.

At the last ICANN conference, Benjamin Louis gave a presentation at the GAC meeting on behalf of the GEOTLDs. This is important in order to educate public actors who are not sufficiently familiar with our industry.

In 2022, Afnic joined the International Telecommunication Union: ITU-T and ITU-D. ITU-D (D = development) is a very highly regarded North-South knowledge transfer body.

Lastly, Pierre Bonis reiterated the position of Afnic concerning Ukraine and Russia: our responsibility is to keep the Internet running in accordance with the established rules and protocols. To change protocols would be to admit that China and Russia were right in saying that the Internet is not neutral. For Afnic, it is important that the Internet remain neutral and open.

6. Upcoming diary dates

The next **Registrars' and Users' Consultative Committee** meetings will be held in Paris on **Thursday, 30 March 2023**.

The Afnic General Meeting and annual dinner will take place on Friday 9 June 2023.