

● Registrars' and Users' Consultative Committee Meetings

Minutes of 27 March 2025

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1. Attendees

Users

14 persons representing 14 members of the college.

- BEAUVILLAIN Caroline, representing INPI
- BOUTIGNON Antoine
- CHAGNY Nicolas, representing ISOC FRANCE
- CHELLY David
- LE BLANSCH Joris
- LOUIS Benjamin, representing SPARKLING
- MELLET Marc-Emmanuel, representing NOVAGRAAF
- NGUYEN François
- NGUYEN Minh Ha, representing SIGNAL SPAM
- PAWLAK Nicolas
- PERPERE Paul, representing INPI
- PORTENEUVE Elisabeth
- SANSON Morgane, representing MADE IN IP
- TAYER David

Registrars

15 persons representing 15 members of the college.

- ALMIRON Sébastien, representing NETIM
- BERNARD Marc-Olivier, representing TERADOC

- CANER Emma, representing OVH Cloud
- CHUNG Lie Sue, representing NAMESHIELD
- DESSENS Emilie, representing DOMAINOO
- DULAC Bernard, representing DATAXY
- ENGRAND Sophie, representing NORDNET
- FRANQUINET Arnaud, representing GANDI
- GEOFFROY Pierre, representing ONE2NET
- JEAN-GILLES Sophie, representing ORANGE
- KORN Jennifer, representing ORDIPAT
- LANTONNET Eric, representing DIGITAL GROUP SERVICES
- MANCEC Gael, representing CABINET GERMAIN MAUREAU
- POUSSARD Jean-François, representing SOLIDNAMES
- WITTERSHEIM Arnaud, representing NAMESHIELD

Afnic

- AMPEAU Benoît, Partnerships and Innovations Director
- BONIS Pierre, CEO
- CANAC Sophie, Head of Associative Governance
- CASTEX Lucien, Adviser to the CEO Internet Governance and Society
- GEORGELIN Marianne, Legal Director, Head of Registry Policy & Public Affairs
- MASSE Régis, Information Systems Director
- PASSEREAU Mégane, Assistant to General Management
- PESQUER Maelle, Events Communication Manager
- SENTHILLINGAM Kaviya, Communication Officer
- TURBAT Emilie, Marketing and Commercial Director

2. Agenda

- Welcome and news update
- Subject submitted for consultation and discussion:
 - Amendment of the Naming Policy (LPM: French Military Programming Act)
 - Update on the common system for the verification of holders' data and on the graduated sanctions for registrars not fulfilling their obligations with regard to the fight against abuse
 - New asso.afnic.fr platform
- Separate consultative committee meetings followed by feedback
- Information update and discussion items
 - NIS 2
- Discussion on the subjects raised by the members:
 - Reasons for the 100% in-person format of the Legal Meetings and (if possible) switch to hybrid format
 - Possibility of introducing an authentication code recovery form for holders on the Afnic website, like the .be TLD
 - Use of WHOIS data for spamming purposes
 - Miscellaneous questions (not prepared by Afnic)
- Schedule of upcoming events and roadmap for the next Consultative Committee meetings
- Networking

3. Welcome and news update

Pierre Bonis and the co-chairs thanked the members for their attendance. He conveyed his apologies for his absence that morning, following the news update, to attend the CENTR General Assembly.

News update

- ICANN in Seattle from 8 to 13 March 2025:

ICANN met for the first time since the election of the new US President. Following the reforms of ICANN's governance ten or so years ago, the US government no longer controls the domain name root. Nevertheless, ICANN is still an international organisation subject to US law. The US administration was not in attendance at the meeting. Yet some believe there is a risk of greater intervention by the US government in the management of the domain name root.

There is a great deal of discussion surrounding the finalisation of the next round of the New gTLD Program, especially regarding the measures and procedures adopted by ICANN, such as Registry System Testing (RST) and the Registry Service Provider (RSP) Evaluation. Afnic submitted its own application at the end of 2024, and is one of the first operators to have obtained administrative validation.

Afnic held a stand in Seattle to publicise its Afnic Registry Services as a registry operator providing back-end solutions for new gTLDs. The aim was to demonstrate

the advantages of Afnic Registry Services for geographic and brand TLDs and protected geographical indications. Pierre Bonis thanked the Afnic teams and partners who contributed to raising the profile of this service.

- NDD Camp Alsace 21 March 2025:

NDD Camp Alsace was held in Strasbourg, with a high level of international participation. The day before the opening, Afnic helped run a workshop on universal acceptance, that is to say the changes to how domain names function so as to accept the use of non-Latin and diacritical signs.

- Upcoming events:
 - Forum on domain names and Internet Governance in Varzy, 17 and 18 April 2025.
 - 10th anniversary of BZH in Quimper, 24 April 2025.
 - CENTR Jamboree organised by Afnic in May: bringing together the CENTR General Assembly and working groups over three days, representing 200 attendees. The first two days, on 21 and 22 May, are open to the ccTLD ecosystem on registration, and to registrars and users in particular. CENTR works specifically on the implementation of regulations issued every two years in general. It also plays a coordinating role, and facilitates joint work and the standardisation of ccTLDs through cooperation made possible by the fact that the members are not in competition. It enables research and development projects, market intelligence and studies to be undertaken that Afnic would not be able to conduct alone.

Pierre Bonis gave a reminder of the day's programme and emphasised the importance of progress on these subjects with regard to the public authorities, and notably on NIS 2.

4. Consultation and discussion item

4.1. Amendment of the Naming Policy (LPM: French Military Programming Act)

4.1.1. Presentation by Afnic

Sophie Canac recalled that the amendments to the Naming Policy must be submitted to the members of the Consultative Committees before approval by the Afnic Board of Trustees.

The French Military Programming Act

- Act No. 2023-703 of 1 August 2023 on military programming for the years 2024 to 2030 and laying down various provisions relating to defence
- In force since 1 June 2024
- Affects registries and registrars
- ANSSI, the French Cybersecurity Agency, may require registries and registrars to suspend (block) or transfer (compulsory transfer) a domain name (digital injunction)

Marianne Georgelin presented an amendment resulting from the Military Programming Act (LPM) providing for the possibility for ANSSI to block or transfer domain names in the case of a potential threat to national security and defence. Afnic held numerous discussions with ANSSI before drawing up the amendments to the Naming Policy.

Article L2321-2-3 of the French Defence Code

I – When it is established that the use of a domain name without the knowledge of its holder who has registered it in good faith leads to a threat likely to harm national defence and security, ANSSI may require this holder to take appropriate measures to neutralise this threat within such period as it may decide, the said period having to take into account the nature of this holder and any related operational constraints. If the threat is not neutralised within the period stipulated, ANSSI may require:

1° The supplier of a domain name resolution system, within the meaning of Article L. 2321-3-1, to block the domain name;

2° **The registry**, as referred to in Article L. 45 of the Post and Electronic Communications Code, or a **registrar** established in French territory as referred to in Article L. 45-4 of said Code, to **suspend** the domain name.

II – When it is established that a threat likely to harm national defence and security arises from the use of a domain name registered for this purpose, ANSSI may require:

1° A person referred to in 1° of I to block or redirect the domain name to a secure ANSSI server or to a neutral server;

2° **The registry or a registrar**, referred to in 2° of I, to register, renew, **suspend** or **transfer** the domain name. At the request of the authority, the registration data are not made public.

Blocking in this case refers to suspension, and transfer to the compulsory transfer of the domain name, that is to say recovery of the domain name's holdership.

Amendments to the Naming Charter

Article 6.3 – Blocking of a domain name

A domain name may be subject to a blocking procedure in the following cases:

- a court decision ordering the blocking of the domain name and meeting the terms and conditions stipulated in the article entitled “Legal procedure”;
- a verification procedure as referred to in the article “Powers of the Registry”;
- on the order of the administrative authority responsible for competition and consumer affairs pursuant to section 2c) of Article L. 521-3-1 of the French Consumer Code;
- on the order of the national authority responsible for information systems security, pursuant to Article L. 2321-2-3 of the French Defence Code;
- when the domain name is an orphan and the holder has not chosen a new registrar within thirty (30) days following notification of this need by Afnic.

Article 6.5 – Compulsory transfer

Afnic carries out compulsory transfers of domain names further to:

- a transfer decision taken as part of an Alternative Dispute Resolution procedure managed by Afnic;
- a transfer agreement within the framework of a mediation procedure;
- a court decision ordering the transfer of the domain name and meeting the terms and conditions stipulated in the article entitled “Legal proceedings”;
- an order to the competent authority by the administrative authority responsible for competition and consumer affairs pursuant to section 2c) of Article L. 521-3-1 of the French Consumer Code;
- an order to the competent authority by the national authority responsible for information systems security, pursuant to Article L. 2321-2-3 of the French Defence Code;
- (...)

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

- ANSSI intervenes directly without the need for a judge. Its powers are comparable to those of the DGCCRF (General Directorate for Consumer Affairs, Competition Policy and Fraud Control) within the framework of the consumer protection regulation. The DGCCRF issues Afnic with digital injunctions (around thirty per year) in relation to consumption. These are

subject to administrative law and can be contested before the administrative court by the individuals concerned.

- The law concerns registrars on French territory, including overseas territories.
- The TLDs managed by Afnic as registry operator are not concerned.
- It is not a European regulation, each State is autonomous in its handling.

4.1.2. Feedback from the Registrars' and Users' Consultative Committees

4.1.2.a. Users

The users members expressed general concern regarding the proliferation of regulation in the sector and called for greater confidence in the sector's ability to self-regulate. The French Military Programming Act (LPM) states that ANSSI "may require" and not "demand", unlike the text on the DGCCRF. The users suggested replicating the terms used in the text of the law to avoid misinterpretation and any potential liability on the part of Afnic. Lastly, the Committee was concerned about the risks of espionage and infringement of individual freedoms ensuing from the obligations on registrars and the registry to accept these intrusions.

4.1.2.b. Registrars

The members of the Registrars' College did not have any specific comments and expressed their agreement with the proposed amendments.

Afnic responded in part to the committees' questions and observations and indicated that it would examine the rest later.

- The spirit of the law would appear to be an injunction (order) issued by ANSSI that must be complied with by Afnic. What is important to indicate in articles 6.3 and 6.5 of the Naming Policy is the authorisation this confers on Afnic to implement a blocking operation. The explicit reference to the articles of the French Code of Defence provides legal certainty. The legal department will check the precise legal

terms of the text and undertakes to replicate these in the articles of the Naming Policy if needed.

– Pierre Bonis clarified that the matter would be decided on by the Board of Trustees. With regard to self-regulation, he felt more comfortable that the registry not have to determine whether content or a domain name constitute a threat to national security. A decree of the French Council of State will specify the form that the request or injunction shall take.

– Pierre Bonis clarified that ANSSI must be able to contact a domain name holder in order to inform said holder that their website is compromised. Given the compromise rate for CMS, the majority of ANSSI's actions will likely focus on holders first and foremost, followed by registrars, with the registry in last place.

4.2. Update on the graduated sanctions for registrars not fulfilling their obligations with regard to the fight against abuse

4.2.1. Presentation by Afnic

Marianne Georgelin presented the graduated sanctions stemming from the State-Afnic Agreement.

State-Afnic Agreement

Paragraph 9: Fight against abuse (page 8)

- 1) The registry undertakes, after consultation with the governing bodies of the association, to put in place a system of graduated sanctions against registrars that are insufficiently responsive to legitimate requests from public authorities and that have a significant percentage of registrations involved in cases of technical abuse or that do not take sufficient action following indications of cases of technical abuse (...).

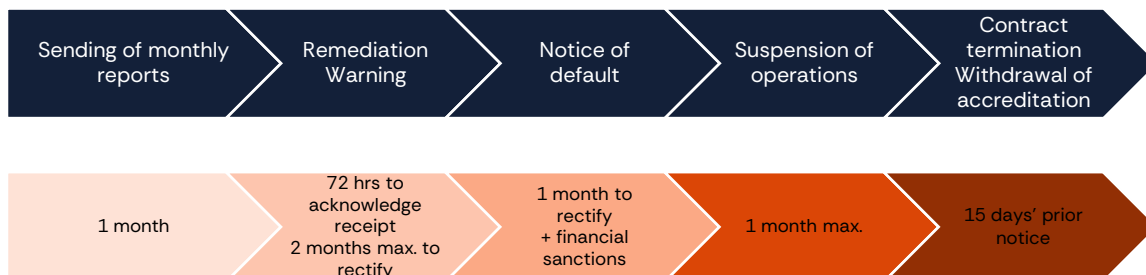
In application of this Agreement, Afnic has added an Annex 4 to the registration contract signed with the registrars in the form of a reference framework of good practices for managing abuse, setting indicators.

The breaching of the 0.24% threshold triggers the graduated sanctions procedure, the steps of which depend on the action plan put forward by the registrar to handle the abuse. As of the notice of default phase (formal notice), each verification procedure that Afnic is required to launch shall be invoiced to the registrar at a rate of €100, if these result in the deletion of the domain name.

Reminder of indicators

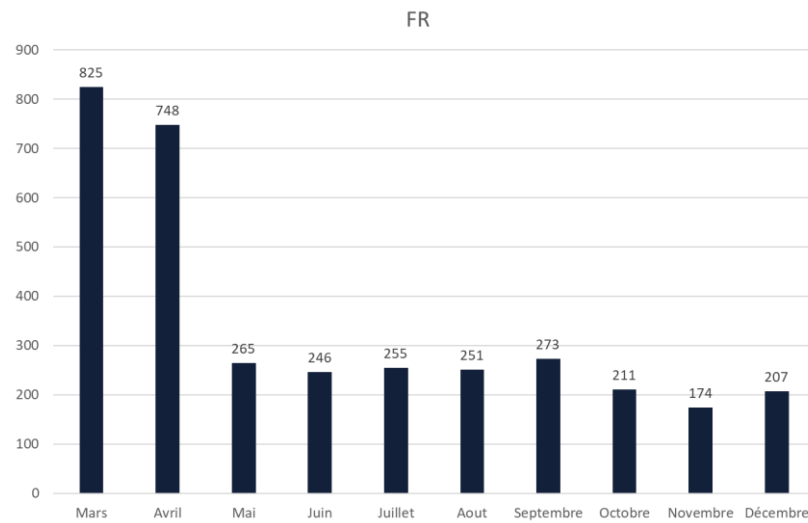
0.24% threshold	A key indicator, the rate of abusive incidents in registrars' portfolios > the rate and list of abuses detected are supplied to the registrars each month to allow them to identify any technical abuse in their domain name portfolio.
Repeated alerts and failings	Indicators of actions taken by registrars: > evaluation of reactivity following alerts of incidents of technical abuse by Afnic: registrars must handle incidents reported and send processing reports to Afnic. Repeated failings in their handling will trigger the procedure.
Body of evidence	Complementary indicators constituting a body of evidence: > reliability of registration data: substantiation procedures leading to deletion of domain names; > domain name disputes (ADR) leading to delete or compulsory transfer operations; > alerts, digital injunctions and identity theft.

The different phases of graduated sanctions

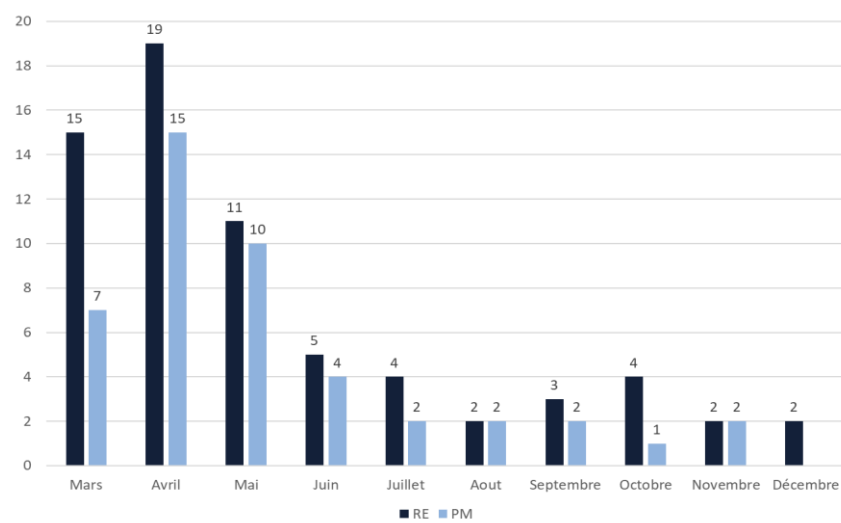


The data supplied by the service provider CleanDNS quantifies technical abuses, which are few in number. The sharp decline since May is explained on the one hand by the fact that commercial spam is no longer included, and by a change to the calculation method (CleanDNS) on the other hand.

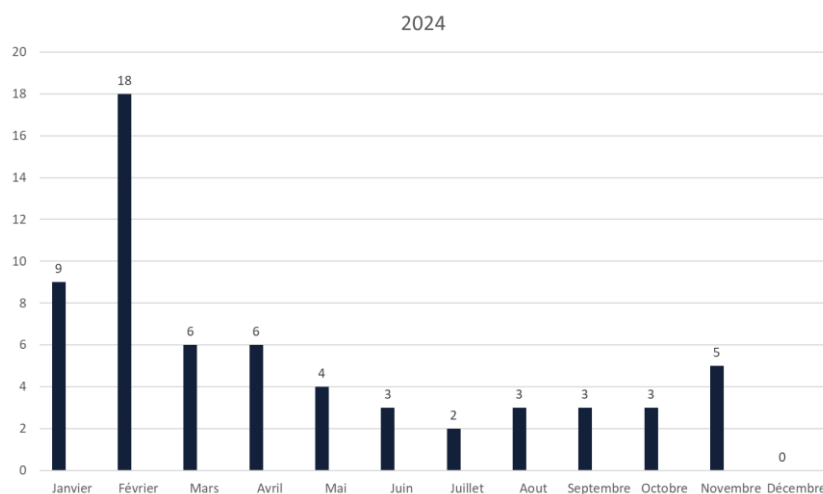
Number of domain names detected in technical abuse reports each month (.fr)



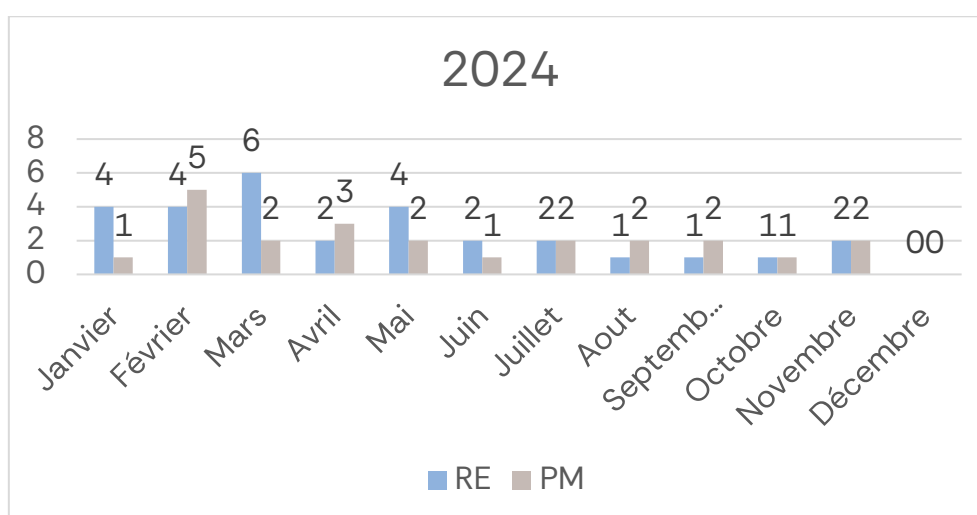
Number of domain names detected in technical abuse reports each month (.re, .pm)



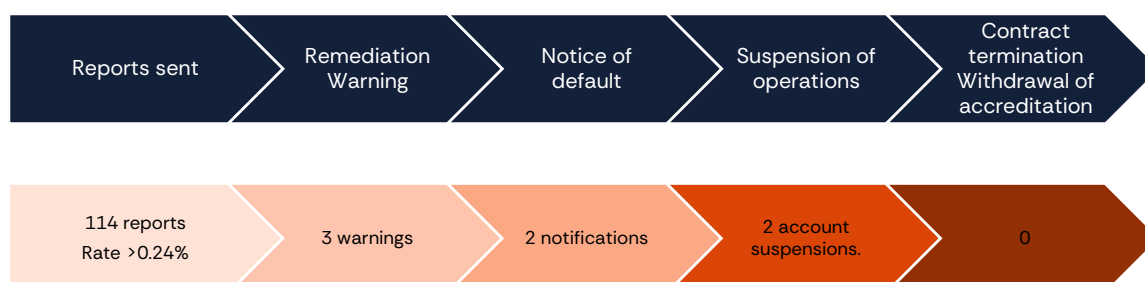
Number of registrars exceeding the abuse rate threshold set at 0.25% (fr)



Number of registrars exceeding the abuse rate threshold set at 0.25% (.re, .pm)



Overview 2024 (.fr, .re, .pm)



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

- The launch of sanctions is focused on large-scale actions and patterns, for example, registrars that allow for mass registration of problematic domain names. The legal department can detect anomalies more quickly, thus making it possible to shut down waves of abuse. It can pre-empt, initiate more actions and communicate more extensively.
- Graduated sanctions concern registrars. Holders will be concerned by the requests for verification. The legal department noted the production of fake documents sent by several holders all producing the same documents, thus enabling detection. It is more efficient to work off global trends than to check each domain name.
- Afnic has established an abuse average based on a sample of data provided by Clean DNS, resulting in the threshold of 0.24%. This currently allows for the identification of the largest problematic portfolios, but will be subject to change.

4.2.2. Feedback from Registrars' and Users' Consultative Committees

4.2.2.a. Users

The members of the Users' College questioned Afnic on:

- the weight of CleanDNS data in the decision: is it a decision-making aid, or is a non-negligible portion of the process based on their data?
- communication surrounding sanctioned registrars and the positive and negative impacts of this communication.

The Committee wished to know how specific cases of abusive domains in languages other than French are handled.

The Committee commended the initiative which is in line with lowering abuse and acts as a threat for the least integrated registrars.

4.2.2.b. Registrars

The Registrars' Committee had no specific feedback on this point, but came back to another point that had not been entirely settled by Afnic which was communication on the overall patterns detected, for .pm for example, so as to avoid groups of identified and blocked patterns spreading to other registrars.

Afnic responded in part to the committees' questions and observations and indicated that it would examine the rest later.

- Afnic has a Thematic Working Group on Abuse which addresses patterns such as .pm, which involved the registration of domain names composed of a series of digits, in considerable number, which redirected to websites themselves redirecting to online Chinese casinos. The registrars concerned were informed. It would be worth considering how to communicate more extensively on recurring patterns.
- Pierre Bonis stressed the monitoring work conducted by Afnic and indicated that Afnic has hired an employee to work on abuse. When something big is identified, Afnic could notify the registrars of this to help them with their detection. Change in the number of registrations is the first monitoring element in detecting abuse.
- Afnic uses CleanDNS data to calculate the 0.24% threshold which is the primary criteria. Next, it identifies the domain names concerned in order to notify the registrars of the list of problematic domain names each month. Afnic then goes one step further based on additional indicators, such as wide-scale patterns and the verifications requested within the framework of graduated sanctions.
- Pierre Bonis explained that the decision is partly based on objectivized data (CleanDNS figures), but nothing takes place automatically with regard to sanctions. The registrars sanctioned had not responded to Afnic's cooperation proposals. Afnic's aim is to adopt a cooperative approach that maintains good relations between Afnic and the registrars. For the moment, Afnic communicates

on the number of sanctions imposed, but does not disclose the names of the registrars sanctioned. Communicating on these sanctions is a means of demonstrating that the graduated sanctions systems works. Although a name and shame approach could be useful, it could also provide publicity to unscrupulous registrars that do not carry out verifications.

- Afnic suggested referring the problem of foreign languages to the Working Group on Abuse, as Afnic works with EURid which has patterns in several languages.

4.3. Update on the common system for the verification of holders' data

4.3.1. Presentation by Afnic

Emilie Turbat presented the common system launched alongside the system of graduated sanctions. Afnic expects registrars to apply tags to the holders they create, thus informing the latter of their reachability and eligibility.

Reminder of the common system

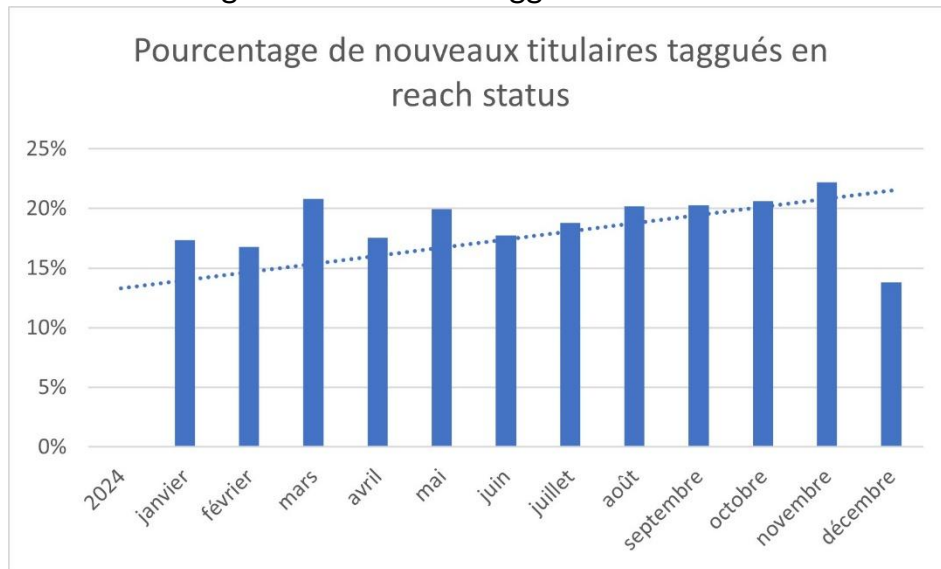
- Commitment under the State-Afnic Agreement (paragraph 9 – fight against abuse)
- Objectives of the project: Increase the number of holders evaluated in the registry database using existing procedures to verify holders' reachability and eligibility data
=> Strengthen the model of trust for users of the .fr TLD
- Entered into force 1 January 2024
- Method: Tagging by registrars in the month following the creation of new holder nic-handles:
 - Reach status
 - Elig status

2024 was marked by cooperation and exchanges between Afnic and the registrars to pave the way for the developments required to implement the system. The volume of reachability tags placed is below the desired Afnic targets. Regarding the tagging deadline, it is largely complied with as the average of 23.57 days is below the maximum limit of 30 days.

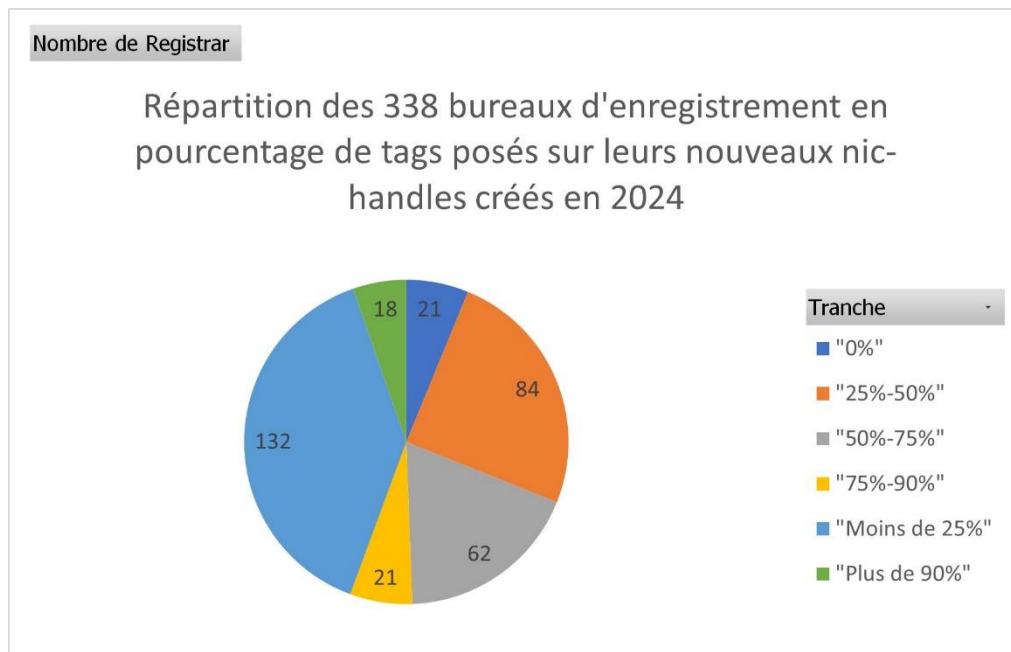
2024: implementation of the system, with a focus on the reach status

- 142,098 reachability tags applied
- 19% of new holders tagged for reach status in 2024
- Average time between creation of a NH and application of a tag = 23.57 days
- Percentage of NH tagged in stock:
 - 11.29% verified
 - 88.71% non-verified

Percentage of new holders tagged for reach status



Breakdown of the 338 registrars as a percentage of tags added to their new nic-handles created in 2024



In 2025, the common system is set to be fully rolled out and the ramp-up of the number of tags seen at the start of the year is set to continue. In 2024, Afnic supplied the registrars with data extraction tools to enable this ramp-up. The account managers are closely involved in the implementation of this system and are in contact with the registrars. They are at the latter's disposal.

Increasing the number of holders tagged

- Afnic has provided registrars with tools to allow them to extract their holders' portfolio with the reachability and eligibility tag information;
- The account managers are providing support to registrars with their tagging operations. They are regularly calling registrars to keep up-to-date with their level of tagging;
- In Q1 2025, new registrars began tagging;
- But this is not yet sufficient. Efforts need to be stepped up to demonstrate the solidity of the response provided by our model to the challenges of NIS 2!
- And after the focus on the reachability tag in 2024, the eligibility tag will be next target in 2025.

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

- A suggestion was made to provide for the possibility to apply batch tags via an Extranet export, as is possible in EPP.
Régis Massé indicated that it should be possible to do so via APIs by means of a programme to be added.
- Tagging of new holders is carried out at the time of creation, which allows for comprehensive verification of the data. As things stand, no update rule is planned. Verification of holder's data is carried out within the framework of the usual verification procedure, more centred on data that pose a problem throughout the life cycle of a domain name.

4.3.2. Feedback from Registrars' and Users' Consultative Committees

4.3.2.a. Users

The members of the Users' College questioned Afnic's ability to launch an autotag via, for example, a token to verify an email address, or a phone number via an SMS token. This would increase portfolio qualification without the intervention of the registrars.

Regarding the verification of holders' data, they asked what the ideal verification frequency – annual or other – would be and if these regular checks should be decided upon.

4.3.2.b. Registrars

The members of the Registrars' Committee reiterated the request for a bulk update via the Afnic interface.

Afnic responded in part to the committees' questions and observations and indicated that it would examine the rest later.

- Régis Massé responded that, in the information system, batch update of contacts is not an option on the Extranet, which does not allow for the sending of batch emails to contacts. This is possible via EPP and especially via an API deployed by the registrars. For the Extranet, this had been discussed by a design and operation Steering Committee. To date this has not been put in place, but remains possible.
- Before undertaking developments on the Extranet, Pierre Bonis wished to examine the proportion of contact updates concerned, given that Afnic already provides three interfaces: EPP, Extranet and API. He promised to report back to the Consultative Committees once this had been determined.

- It is possible to go through the Afnic Account Manager in order to obtain a referral to the Information Systems Department who can help registrars with automation via the API.
- Rather than a technical issue, Régis Massé pointed to a problem of traceability in the case that Afnic intervenes on behalf of the registrars. A tool on using APIs already exists. He proposed creating a kit in one or two languages to save registrars time when it comes to updating contacts.
- For Pierre Bonis, the common system is more focused on creation than renewal, as with everything put in place by registries, as there is a concern over side effects on stock. The common system needs to be taken into account in the mechanism. Data verification can be discussed, but is not currently deployable as it is not a planned component.
- There are two autotag approaches.

The holder portal: the holder adds a strong identity that allows them direct access to the Afnic portal without the intermediary of a registrar. Thought could be given to this option. In some countries, like Denmark, this system already exists. The EU is lagging behind in the implementation of a strong electronic identity. As such it is possible that this will be demanded by the market in the future, and should therefore be anticipated. Currently, an electronic identity is not accessible to all citizens, which would make it complicated to render it mandatory.

Self-certification: Pierre Bonis expressed his view that autotag does not comply with NIS 2: data are already supplied under the responsibility of the holder, in other words the holder guarantees its identity. An autotag would not provide greater security.

- Afnic is conscious that the quality of the holder database needs to be enhanced, while avoiding overloading procedures which could result in loss of customers.
- Afnic recalled that data verifications are carried out regularly on stock by registrars or by Afnic itself.

4.4. Launch of the new asso.afnic.fr platform

4.4.1. Presentation by Afnic

Sophie Canac presented the new collaborative platform resulting from the renewal of the Association's promise last year. The platform is less based on a descendant model than the current members' area, allowing for more interaction and collaborative work. User accounts will be created on 7 April 2025.

Aims of the new platform

- Improve interaction on content
- Facilitate exchanges between members
- Enhance discussions between events
- Centralise all of the Association's resources as well as the latest news from Afnic, invitations and more informal discussions
- Allow each member to choose the frequency of email notifications

The launch of the platform is part of the renewal of the Association's promise.

Attention: membership administration (new, renewal, payment, etc.) is still managed on <https://membres.afnic.fr>

What you can do with Asso Afnic

- Discuss within groups: college, working group, etc.
- Share and access resources and information on the Association's meetings
- Respond to and comment on content
- Work on shared documents
- Network and chat with the Association's members and employees
- Keep up with the latest news from Afnic
- Register for and participate in events organised by the Association

Sophie Canac submitted the following suggestions for opinion: including ecosystem event calendars, allowing members the possibility to indicate their events in which Afnic could participate.

How is the Asso Afnic platform structured?

- Group-based structure
- Wall to view group content and a personalised wall
- Document bank (per group)
- Messenger and calendar
- Option to choose the frequency of email notifications for publications in the different groups
- Flexible and scalable

Roll-out schedule

- > Before 27 March – Information email sent to members and the Scientific Council
- > 27 March – Presentation of the platform to the User and Registrar members at the Consultative Committee Meetings
- > 2 April – Presentation of the platform to the Board of Trustees
- > 3 April (TBC) – Presentation of the platform to the members of the International College during a webinar
- > 28 March to 3 April – Discussion with members on the accounts to be created
- > 7 April – Launch of the asso.afnic.fr platform. Email sent out for members' first log-on
- > 7 April onwards – Platform used for Association discussions
- > 29 April – Members' webinar, presentation of the platform, Q&A, etc.

Sophie Canac will be in contact with the members regarding user account creation. For the initial configuration, the decision was made to only display users' last name, first name, company and photo. The other information provided will only be visible to the administrator. This decision was made in the interest of personal data protection. However, it is possible for information entered to be made visible to users. The opinion of the Consultative Committees is sought on this point.

Inter-college groups are private and only visible to members of the group, while other groups are public, such as the Consultative Committees, the content of which is visible to all. Other groups are request to join, such as the Thematic Working Group on Abuse.

The platform authorises likes and comments. There is also a mobile app.

The solution chosen was Jamespot, hosted on SecNumCloud. It is highly customisable and already provides environments for several well-known networks. If members wish, there is the possibility to create a sandbox group to get to grips with the new platform. A quick start guide is also available to members.

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

- Afnic chose Jamespot in particular because it is a French solution with French hosting and a SecNumCloud, which will not diminish the members' environment of trust surrounding data. Jamespot is ISO 27001 certified and used by actors known to Afnic, which is an indicator of confidence.
- Régis Massé confirmed that the guarantees in terms of the solution's security with SecNumCloud, an ANSSI-certified French data centre, weighed heavily in the decision.

4.4.2. Feedback from Registrars' and Users' Consultative Committees

4.4.2.a. Users

The feedback from the Users' Committee was that the tool has been well received. The Committee commended its introduction and raised the following points: is it Afnic or the individual members that choose which profile fields are visible to the public? What is the versioning visibility for shared documents? What are the image rights for photos and videos uploaded to the platform? What undertaking do members registered with the platform take regarding non-disclosure of the information contained thereon?

The Committee was in favour of the idea of a sandbox group.

4.4.2.b. Registrars

The Registrars' Committee was in favour of creating a sandbox group. It asked if the new platform would replace the current Afnic Members area, with a focus on the question of multiple interfaces. The platform will improve meeting organisation. The Committee appreciated the fact that phone numbers and email addresses would not be displayed, as this removes the risk that members become a help desk for their companies. It suggested providing for a space where Afnic and the registrars can exchange. The Committee requested clarifications on Afnic's moderation of and access to the content of the different groups.

Afnic responded in part to the committees' questions and observations and indicated that it would examine the rest later.

Pierre Bonis emphasised the diverse sharing possibilities given that the platform is designed to allow for discussions between members only.

- Afnic responded that non-disclosure of data is essential and is set out in the general conditions of use. Image rights are covered by the platform's contents rights.
- Regarding the collaborative tools, a response would be provided at a later stage.
- Afnic opted for the approach that was most respectful of personal data: data sharing is currently limited to last name, first name, company and photo (if uploaded). If the Committees so choose, other fields could be made public, leaving each user the choice whether to enter the information visible solely by the administrator with the initial configuration.
- To plan ahead, a future broadening of the number of public fields needs to be provided for with regard to publication of all of the pre-completed fields. The quick start guide would consequently be modified before opening of the platform, along with the user field visibility section.

- Afnic will examine the possibility of adding a pop-up reminder that this is a confidential space between members.
- The platform allows for several accounts to be attached to the same registrar: the legal representative of the legal person and the individuals active on the platform.
- The individuals with access to all discussions on the platform are Sophie Canac and Pierre Bonis, in their capacity as platform administrators. Access will subsequently be granted to the Afnic personnel qualified in the subjects addressed in the groups. The college-based groups are solely accessible to the college in question. Public groups and descendant groups, like the groups for meetings of the Consultative Committees or the General Assembly, do not allow comments.
- The advantage of college-based groups is to foster discussions between the members concerned by the same subjects rather than to create confidential groups. To allow the colleges to debate among themselves, Afnic undertakes not to intervene in the discussions.
- Afnic trusts the members to self-moderate and self-regulate by reporting misconduct. If needed, the administrator will intervene to moderate or delete content.
- The platform is designed to promote the life of the Association, allowing for topics to be identified to be addressed in the Consultative Committee meetings and does not concern registrars' individual operational topics, which are covered by the commercial channels.
- The membres.afnic.fr interface will only be retained for annual membership.

5. Information update and discussion items: NIS 2

Pierre Bonis specified that the discussions recorded on NIS 2 and NDD Camp d'Alsace had been interesting.

NIS2: where are we now?

- Discussion and adoption in the Senate
- Submission to the NA
 - Special commission created and currently awaiting the appointment of rapporteurs
 - Examination of the text by the commission scheduled for April
 - Not included on the agenda before 5 May (expected end of May)

The constitution of a special commission by Parliament demonstrates that some believe they have expertise to contribute or have an interest in the subject.

- No significant change regarding Afnic was made to the bill in the Senate. With the exception of the amendment to Article 20 concerning the duration for which holders' data are retained:

Replace: "as long as the domain name is used"

By: "during the duration of use of the domain name and up to expiry of one year as of cessation of use of the domain name"

The Senate introduced amendments to the articles concerning essential entities and important entities: local authorities are not concerned by the obligations on essential entities.

Article 28 is now Article 20. An amendment has been made to the duration for which holders' data are retained, which Afnic already applies as part of the GDPR. The notion of use corresponds to a domain name registered, published and having a holder, as long as it has not been deleted.

One proposal would be that this retention be carried out at minimum at registry level, which would simplify matters.

This would appear to be covered by the wording: *"Registries collect, through registrars and agents acting on behalf of the latter, the data required to register a domain name."* This also indirectly covers the obligation of registrars to provide registries with holder data.

The drafting of Article 19 brought to a close the discussion on registrars refusing to provide data on the grounds of NIS 2 or the GDPR. The particular issue was provision of address data. The list of data required to register a domain name will be published by decree and, for France, these will include the holder's identity, one or two means of contacting the holder and their address, which is necessary to apply the principle of geographic eligibility.

- Issues at stake before the National Assembly:

Obtaining the definitive amendment of Article 19 (the principle of which has been established, but for now nothing has been enacted at the Senate level):

"To this end, they establish procedures, accessible to the public, allowing for these data to be verified ~~on collection~~ and ensuring the security of their database"

Pierre Bonis explained that the most complex part of NIS 2 concerns the security obligations imposed on registrars as essential entities. This is a significant issue in the implementation of NIS 2. Afnic has training programmes in its catalogue that can be offered to registrars to help them implement these security obligations. The notion of proportionality remains the primary challenge, as the directive provides for the fact that holding an authoritative DNS server for a zone gives registrars the status of an essential entity, regardless of their size.

Afnic will seek to convince the National Assembly of the legal uncertainty arising from the obligation to verify data on collection, something that is not indicated in the directive and therefore corresponds to gold-plating. The text is relatively stable with few amendments tabled. The level of transposition in other European countries is similar to that of France, with the exception of those that have chosen to copy-paste rather than transpose the text, the interest of the latter being to remove ambiguities in the directive.

6. Discussion on the subjects raised by the members

Reasons for the 100% in-person format of the Legal Meetings and (if possible) switch to hybrid format

Afnic explained that it was a deliberate choice, as the event brought together actors with an interest in domain names. An in-person format fosters richer discussions than a remote format. Events will be proposed in Guyancourt and in Paris alternately, and the dates will be sent out in advance to facilitate travel. In 2025, the Legal Meetings will be held in Paris. However, the documents are accessible, as they are not confidential.

Pierre Bonis explained that Afnic's Association events are held in hybrid format, but that this does not apply to the Legal Meetings which take on a whole other dimension in face-to-face format.

Possibility of introducing an authentication code recovery form for holders on the Afnic website, like the .be TLD

After having requested clarifications to understand the importance of this request, Afnic explained that the auth code is a subject rarely raised with the Afnic support department (12 cases in 2024 concerning 9 registrars), as the .fr Naming Policy requires the auth code to be provided. Afnic has procedures to help holders obtain

this code, and even substitute for the registrar. This problem is generally resolved without difficulty. If the holder provides evidence of the registrar's non-reachability or refusal, Afnic becomes the last resort and supplies the holder with the auth code. Even in the case of commercial disputes, the registrar cannot refuse to provide the auth code. If Afnic is required to substitute for the registrar, it shall carry out a check on its accreditation for non-compliance with the rules. This question therefore appeared to specifically concern the .be TLD.

Pierre Bonis emphasised that Afnic has operated on the basis of delegation of trust with the distribution network for many years. Allowing the registrars to directly convey auth code makes them accountable, and Afnic is able to identify problematic practices.

Use of WHOIS data for spamming purposes

Afnic recalled that it committed, in the previous agreement with the French State prior to the latest agreement, to publish the list of domain names registered over the past rolling 7-day period in a usable format. Idem for open data. The legal department suggested improving and updating the legal framework with reference to the conditions of use of data in the WHOIS base, which are more detailed, and with a reminder of sanctions. This will be published online shortly.

Pierre Bonis added that these data are not public, and that use for commercial purposes of personal data published for other purposes was prohibited. The legal use of open data is relevant to the creation of domains and to the detection of abuse, such as the redflag tool.

There is already a legal notice concerning the WHOIS database on the website, which is based on the database rights. Idem for open data and the daily list of domain names.

In response to a member, Pierre Bonis reiterated that, for .fr, responsibility is shared between Afnic and the registrar for the processing of holders' data. It is the contract concluded between the holder and the registrar on the use of data that applies. The registrars are liable to Afnic with regard to compliance with regulations on personal data.

Miscellaneous questions (not prepared by Afnic)

– A member asked if it was possible to regularly share successful commercial operations via asso.afnic.fr.

Afnic responded that it is possible to draw up an annual review of commercial operations as part of the life of the Association.

The account managers regularly contact registrars to understand their needs with regard to this matter. All commercial operations are tailored: each operation is devised with the registrar based on their activity, their needs, and their targets for the year.

When actions are effective, the account managers suggest them to the registrars. The goal for 2025, incidentally, is to increase the proportion of commercial operations on multi-year registrations in the proposals made to the registrars.

Pierre Bonis was in favour of opening a discussion thread between Afnic and the registrars on the efficacy of commercial operations. Within the framework of the public service concession, commercial operations are financed by Afnic and remain its intellectual property, even if they are devised with a registrar.

– A member asked if it was possible to have an offering similar to that of EURid: selected days to apply a commercial operation.

Afnic expressed its faith in sticking to the Afnic model – customisation with usage included – for the .fr community, the results of which have proven its success. It

would be best to continue with this model while making improvements, rather than adapting the EURid model.

In conclusion, Pierre Bonis was open to commercial operation proposals which would be examined by the marketing and commercial department teams. He recalled that Afnic has a commitment (State-Afnic Agreement) to invest at least 2% of revenues from the .fr TLD in commercial operations – this threshold is a minimum not a maximum.

7. Schedule of upcoming events and roadmap for the next Consultative Committee meetings

Upcoming Consultative Committee meetings

Continued improvement of joint planning of the agenda

- Inform your representatives of topics you wish to submit for consultation or information at the upcoming committee meetings.
- The representatives will inform Afnic and jointly plan the agenda 3 months ahead of the meeting date.
- A 30-minute slot will be allocated for Q&As on current topics.
- Deadline for submission of requests to Afnic for the Committee meetings in October 2025: end of July.

Upcoming diary dates

- 8 April 2025: Webinar – Report on international bodies, presented by Lucien Castex
- 24 April 2025: 10th anniversary of .bzh and presentation of the Foundation's projects in Quimper

- 6 May 2025: Webinar – Market trends in domain names, presented by Loïc Damilaville
- 6 June 2025: General Assembly at Campus Cyber and Annual Afnic Dinner in Paris
- Date to confirm in October 2025: Registrars' and Users' Consultative Committee meetings

Pierre Bonis added that there will also be an NDD Camp in Paris on 12 and possibly 11 September, attended by 150 people.

He reminded participants that the General Assembly would be held on 6 June and underscored the important changes to come in terms of governance of the Board of Trustees. As such, the term of office of Godefroy Beauvallet, who had been a pioneering Chair at Afnic, would come to an end. The same would be true of Souleymane Oumtanaga's office for the International College. He thanked the remaining trustees who would continue to embody the Afnic spirit during this period of change.

Pierre Bonis thanked all of the participants present both physically and online for their participation.