

● Registrars' and Users' Consultative Committee meetings

Minutes of 12 May 2026

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1. Attendees

User Members

13 persons representing 12 members of the college.

- Sébastien Bachollet
- Antoine Boutignon
- David Chelly
- Nicolas Pawlak
- Elisabeth Porteneuve
- David Tayer
- Laurent Toutain
- Association www.BZH represented by David Lesvenan
- BNF represented by Vladimir Tybin
- INPI represented by Paul Perpère and Caroline Beauvillain
- Internet Society (ISOC) France represented by Nicolas Chagny
- NOVAGRAAF represented by Marc-Emmanuel Mellet

Registrar Members

15 persons representing 15 members of the college.

- Branshelter represented by Frédéric Guillemaut
- Cabinet Germain Moreau represented by Gaël Mancec
- Dataxy represented by Bernard Dulac
- DGS Monaco represented by Eric Lantonnet

- Domainoo represented by Emilie Dessens
- Namecare represented by Philippe Franck
- Nameshield represented by Arnaud Wittersheim
- Netim represented by Sébastien Almiron
- Nordnet represented by Sophie Engrand
- One2Net represented by Pierre Geoffroy
- OVHcloud represented by Emma Caner
- Ordipat represented by Jennifer Korn
- Scaleway represented by Cédric Leroy
- Teradoc represented by Marc-Olivier Bernard
- Viaduc represented by Ludovic de Nicolay

Afnic

- Benoit Ampeau, Partnerships and Innovations Director
- Gabrielle Apfelbaum, Communication Director
- Elodie Beliard, Customer Relations Manager
- Pierre Bonis, CEO
- Sophie Canac, Head of Associative Governance
- Linda Caplain, Head of Quality and Registry Services Improvement
- Lucien Castex, Adviser to the CEO Internet Governance and Society
- Marianne Georgelin, Legal Director, Head of Registry Policy and Public Affairs
- Régis Massé, Director of Information Systems
- Mégane Passereau, Assistant to the CEO
- Maëlle Pesquer, Events Communication Manager
- Emilie Turbat, Marketing and Commercial Director
- Mickael Vigreux, Sales Manager

Founding Members:

- INRIA represented by Luc Saccavini

2. Agenda

- Welcome and news update
- Information update and discussion items:
 - Update on the progress of the November CCUBE topics
 - Initial review of the new version of FRCHECK
 - Update on the implementation of the 2FA requirement for the use of Afnic web services by registrars
 - Follow-up on action items related to updated documentation and operational communication
 - Review of 2025 commercial operations
 - The Afnic Scientific Council (Laurent Toutain)
 - Election of a representative to the Board of Trustees by users and registrars at the next GA
- Consultation topics
 - Amendment of the Naming Policy: AMF injunctions
 - Preparations for aligning the registry policies of the French Caribbean overseas TLDs with Afnic's Naming Policy
- Discussion on the subjects raised by the members:
 - Anonymisation of individuals by default not happening consistently
- Schedule of upcoming events and roadmap for the next Consultative Committee meetings

3. Welcome and news update

Pierre Bonis welcomed participants to these consultative committee meetings, described as covering both a predominance of informational and follow-up items and an extraordinary session focused on French Caribbean overseas TLDs. The extraordinary session was open to non-Afnic members. Consultative committee members would also have the opportunity to hear from the candidates for Afnic's Board of Trustees, the outgoing trustees, and Laurent Toutain, who has served as Chair of Afnic's Scientific Council since its creation.

News update

The main update related to the French overseas TLDs, which were the subject of two sets of calls for tenders. One pertained to the Caribbean group and TLDs already managed by Afnic, and the other concerned only TLDs already managed by Afnic as well as Saint Barthélemy and Saint Martin, which had not been delegated by IANA previously. At this stage, there is no information available about this second call for tenders. The French government has until 27 May to reach a decision. The first group was awarded to Afnic, which is both a great source of pride and a great opportunity in light of the significant growth potential offered by the three French Caribbean TLDs. Considerable work still needs to be done with the local Internet community, particularly to avoid creating the impression of a recentralisation, given that these TLDs have been managed by local organisations prior to now.

Among the other updates, Afnic is still highly engaged in the opening of new generic TLDs as part of the ICANN round. Applications can be submitted until summer 2026. Afnic has received positive feedback, having successfully established partnerships with strong clients. Of course, information about the TLDs themselves is still confidential. It is expected that the TLDs are of high quality, meaningful, backed by original organisations and aligned with Afnic's positioning. There was hope that the number of applications would meet expectations and the diversity of business models under development was highly promising. In addition, whereas Afnic had positioned itself solely as a registry service provider (RSP) in previous rounds, it was now assisting some clients, at their request, with their applications for this new round as part of its efforts to build partnerships with registrars. This reflected a recognition of Afnic's expertise, while changing its strategy for 2026 involving the mobilisation of additional resources.

Key contacts had also been established with several ccTLD registries, at a time when regulatory pressure was increasing, the operating environment was becoming more complex and investment needs were growing, thereby creating opportunities for greater resource sharing. Afnic was already active in this market as the registry service provider for Gabon and Senegal and had begun discussions with other African registries, given its potential role in the ongoing market consolidation. As one of the few service providers in the ccTLD community, Afnic fully understands the challenges involved and is well positioned to provide registry services, including to peer registries. Afnic's core business remained the .fr TLD, accounting for 96–97% of its revenues and having been originally established for its management.

Afnic also participated in the CENTR Jamboree 2026 in Berlin, which took place on 6–8 May. DNS abuse remained a key topic, showing that the ecosystem is fully aware of the need to act and is taking action and evaluating the effectiveness of such actions. The industry is highly engaged and vested in the issue. The .fr TLD performed very well from that standpoint. The CENTR Jamboree also highlighted a similarity in

the approaches to tackling abuse, although local policies and registry strategies sometimes differed upstream. The tools being used were consistently based on analysing registrant data. Another topic discussed at the Jamboree was the impact of AI on the domain name market. On the plus side, AI appeared to be driving registration activity, a trend also observed for the .fr TLD, which reached record levels of new registrations alongside improved renewal rates. There appeared to be a true “AI effect”, whether through AI agents registering domain names or AI suggesting very long or highly specialised domain names that had previously attracted little interest. These trends prompted questions across the sector, with a goal of better understanding them and discussing them further with users and registrars. Notably, this increase in registrations did not appear to be driven by abuse but by a trend that was difficult to characterise because the purpose behind these domain name registrations was not easy to interpret. The third key topic at the CENTR Jamboree related to rules and regulations. Of course, the NIS2 Directive remained central as it affects both Afnic as a registry and the registrars. However, the DNS and domain names are being increasingly targeted by a wide range of sector-specific regulations, and it is difficult to predict how these regulations may develop over time. Many confidential regulations ultimately have provisions relating to digital issues added to them. For this reason, it is essential to continue monitoring regulations.

The same applies to developments within the United Nations, calling for significant attention from Afnic. Both at the UN and within international Internet governance bodies, the main concern is the weakening of the Western bloc in the face of the long-standing calls for change from China, Iran and Russia, all of which have historically been uncomfortable with an open Internet. It has become more difficult to secure a majority in support of the principles of an open Internet, even as conflicts have become more frequent and attacks have intensified. Discussions also covered satellite allocations, considering that Starlink is no longer complying with the rules despite being the dominant operator. Dissent within the Western bloc was therefore

significant. The world is experiencing profound change, and the European Commission's definition of "like-minded countries" is clearly outdated.

Pierre Bonis used the news updates as an opportunity to encourage participants to review the reports published by Afnic, including its report on mediation which demonstrates that the service has found its audience, meets a real need and has proven useful, with clear success. Afnic's teams continue to invest significant effort in producing technical and legal studies and in analysing market trends, with the goal of establishing these studies as authoritative references.

Gabrielle Apfelbaum presented the visual communication campaign for the .fr TLD, which is strongly committed to supporting small businesses, VSEs, SMEs, tradespeople and self-employed professionals. The objective was to support them in a successful digital transformation, using the Internet to bring tangible benefits to their businesses. To increase its support for VSEs and SMEs, Afnic launched a campaign at the end of 2025 targeting booksellers, florists, hairdressers, locksmiths and restaurant owners. The campaign adopted an upbeat tone, reflecting the view that, despite a relatively slow economic climate, 80% of net job creation comes from VSEs and SMEs and that the .fr TLD is meant to make things easier for businesses.

The campaign combined posters with targeted placements in specialised publications. It consisted of five visuals, each with a short text explaining the benefits of a .fr domain name in supporting businesses and improving online security.

Profession based-campaign



Afnic selected high-quality media outlets, including Métal Flash, Biblond, Tendances Restauration and Livres Hebdo, along with high-traffic locations for posters, beginning with billboards at the entrances to the flower and fruit and vegetable sections of Rungis International Market, the busiest access point for restaurateurs. A tactical poster campaign also targeted the Snack Show at Paris Expo at Porte de Versailles and the Paris Book Fair. The choice of these publications and these high-profile locations aimed to reinforce the .fr TLD's image as a trusted and well-established brand. The campaign will continue, with plans already in place for Afnic to attend the Novafleur trade show in Reims in October 2026 and possible participation in the Hair & Beauty exhibition in Montpellier. There are also plans to adapt the campaign for the online editions of targeted publications and expand it to three additional sectors.

One member welcomed the decision to use the trade press and asked whether the construction sector, which is active in domain name auctions, was among the sectors being considered for the campaign's expansion.

Gabrielle Apfelbaum confirmed that the construction sector is being strongly considered for its high potential. It was therefore short-listed for 2026.

Another member asked about the campaign's overall budget.

Gabrielle Apfelbaum explained that the poster campaign at Rungis cost €25,000 for a full year, while the Snack Show campaign cost approximately €6,000. For the trade press, Afnic benefited from opportunities that kept costs between €2,000 and €6,000 per issue. A consolidated summary of costs will be prepared.

Pierre Bonis added that Afnic's annual media budget has been relatively stable, with spending balanced between poster campaigns, press campaigns and television campaigns.

Gabrielle Apfelbaum emphasised the importance, for Afnic, of reaching professionals who are often very busy with little time to dedicate to their online presence. Although Afnic's media budget has been stable, it is quite modest compared with those of its competitors. The decision has therefore been made to diversify activities through a combination of television brand-awareness campaigns, targeted sector campaigns and media buys aimed at younger audiences. All three components are considered essential for boosting the .fr TLD.

One member asked whether Afnic also makes use of advertorials.

Gabrielle Apfelbaum explained that such campaigns are very rare because journalists do not regard them as highly as traditional editorial content. Alongside its advertising strategy, Afnic also has an active press relations programme covering topics like the continued strength of the .fr TLD, the fight against DNS abuse, cybersecurity and digital sovereignty issues. Each year, the thematic study provides an opportunity to engage with journalists who are focused on these topics, whether in the specialist press or in mainstream business and economic media.

Pierre Bonis stated that Afnic also uses channels other than the media to reach its target audiences, such as the “Réussir en .fr” (“Succeed with .fr”) and “Tous en ligne maintenant” (“All online now”) initiatives, supported by France Num. Afnic also works closely with chartered accountants, who serve as advisors for VSEs and SMEs.

Paul Perpère recommended that Afnic attend the annual conference for chartered accountants and strengthen its relationship with the Chambers of Commerce and Industry (CCIs) and the Chambers of Trades and Crafts (CMAs), noting that businesses tend to purchase their domain name when first getting established.

Pierre Bonis confirmed that the CCIs and CMAs have long been partners of Afnic, although some are more responsive than others. He thanked Gabrielle Apfelbaum for her top-quality presentation, which was her first for the consultative committee.

Gabrielle Apfelbaum noted that the campaign aimed at younger audiences would be presented at the next committee meeting.

Pierre Bonis also announced the creation of a new discussion group dedicated to Internet governance, and encouraged committee members to visit the asso.afnic.fr website regularly.

Sophie Canac added that additional discussion groups could be created in response to expressed member needs.

4. Information update and discussion items

4.1. Update on the progress of the November CCUBE topics

4.1.1. Initial review of FR Check (Q1 2026)

Marianne Georgelin suggested revisiting the FR Check system that was presented in November. The system is designed to automatically detect patterns involving domain names and suspend the publication of a domain name, while keeping the registration itself active. During the seven-day suspension period, the registrant is invited to confirm their registration data. According to the procedure, this is followed by a 30-day block period, after which the domain name is deleted if the data have not been corrected. Additional detection criteria were introduced on 1 January. Previously, FR Check verified only country codes (not eligible outside the EU), but now it also detects domain names containing the string "gouv", telephone numbers that do not follow a recognised numbering format, non-functioning email addresses, and the re-registration within one month of domain names that had previously been deleted following a data verification procedure.

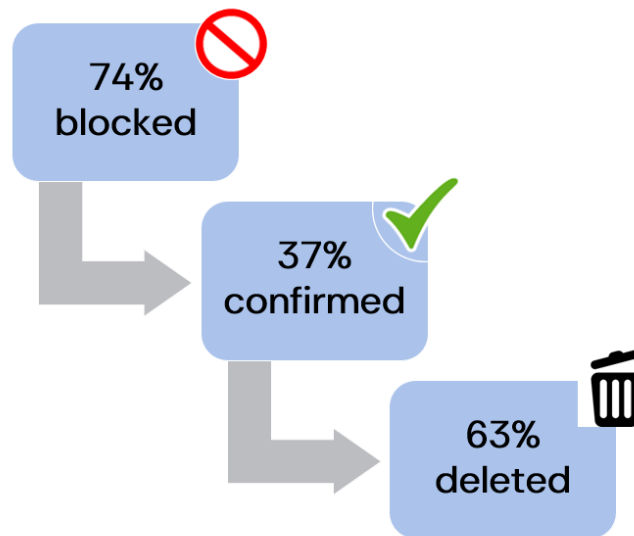
A registrar member asked why an application is not automatically rejected when the country code is not compliant.

Marianne Georgelin explained that the application is instead suspended while the registrant is given time to verify their registration data. During the first three months of 2026, a total of 1,600 domain names were suspended under the FR Check procedure. At the end of the seven-day suspension period, 52% of those domain names had been blocked, and 48% had been validated. Of the 52% that were blocked, 46% were ultimately deleted at the end of the 30-day blocking period, and 54% were confirmed. It was clear that a large proportion of domain names had been suspended due to incorrectly formatted telephone numbers. This led to a significant increase in the number of procedures without any identifiable abuse risk and without ultimately ending in the domain name being blocked or deleted. Telephone numbers therefore did not appear to be a meaningful targeting criterion. As a result, this criterion was removed as of 2 April, particularly because it had generated numerous complaints from registrar members. By comparison, between 1 January and 30 March 2026, procedures initiated by Afnic outside of the FR Check framework resulted in the suspension of 724 domain names, of which 91% were later blocked. Of those blocked domain names, 80% were ultimately deleted, and only 20% were confirmed. This demonstrated that the procedures were effective.

The effect of each FR Check criterion in the overall number of detections and suspensions was analysed. Country codes accounted for just 2.18% of all detections (35 cases), with few users providing an ineligible country code. Of those 35 cases, 74% were blocked, of which 37% were confirmed and 63% ultimately deleted.

Pierre Bonis stated that the registrant must not only correct the country code but also provide supporting documentation in order for the domain name to be confirmed.

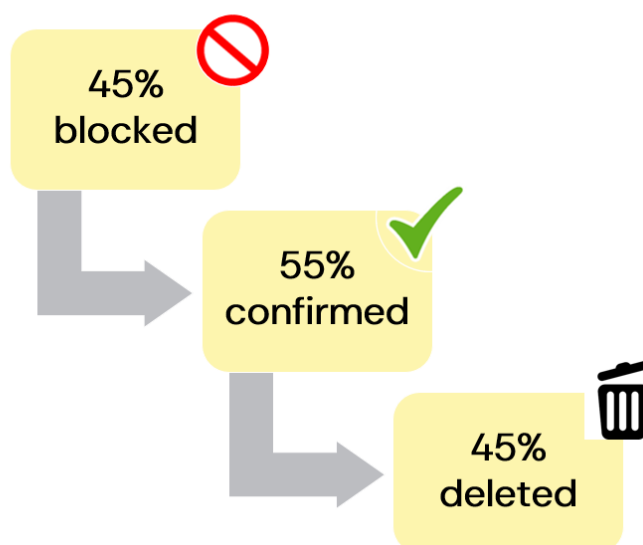
Total: 35, or 2.18% of detections



Country
code

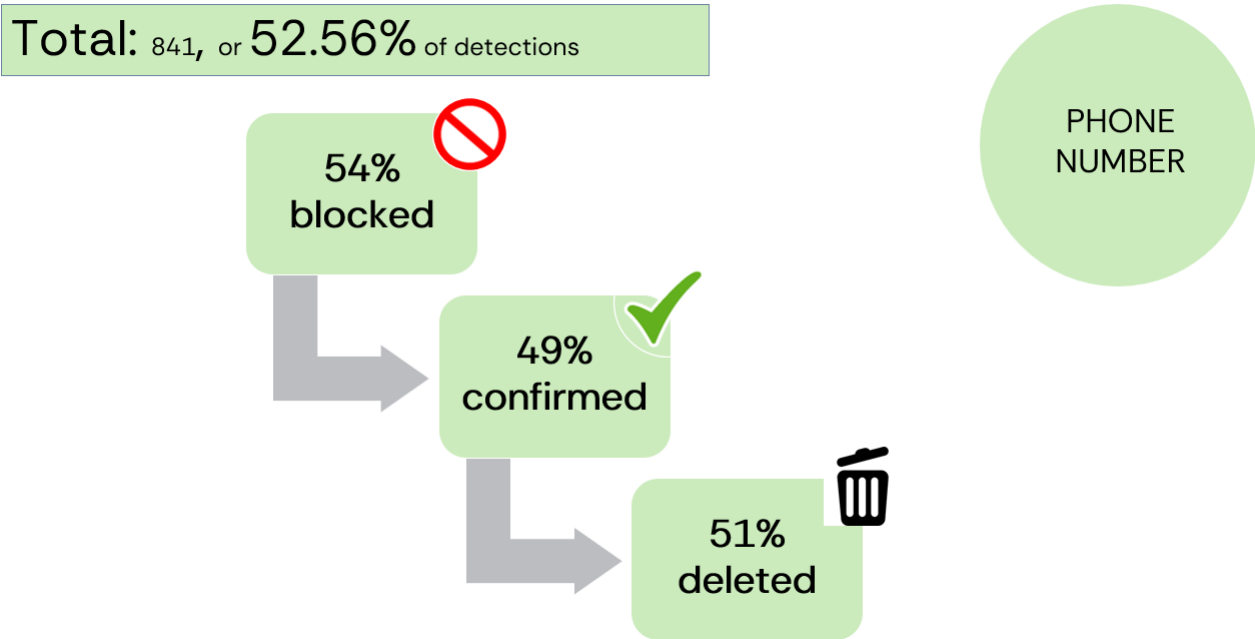
Marianne Georgelin explained that the inclusion of the string “gouv” in a domain name also led to relatively few detections, namely 40 cases, representing 2.50% of all detections. These cases were often linked to words like “gouvernante” or “gouvernail” appearing in the domain name.

Total: 40, or 2.50% of detections



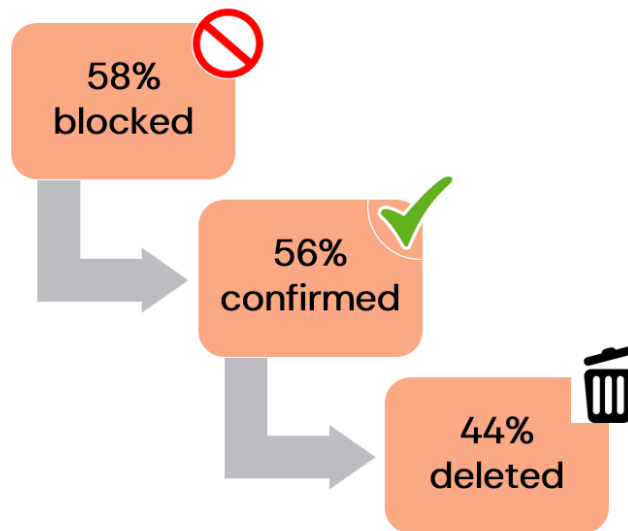
GOUV

Telephone numbers accounted for 841 cases, or 52.56% of all detections, while the final deletion rate was relatively low (51%). These verification procedures required interactions with registrants and placed a significant workload on Afnic’s teams, and this criterion was not particularly effective for tackling abuse. It generated more noise and operational constraints than benefits. Still, the trial was informative. In particular, the experience supports a campaign aimed at encouraging registrars to update their registration data and review their practices.



Email addresses accounted for 313 cases, or 19.56% of all detections. 58% of those detections were blocked, of which 44% were ultimately deleted. The issue may occur when the contact email address is created using the newly registered domain name. Therefore, it can not function.

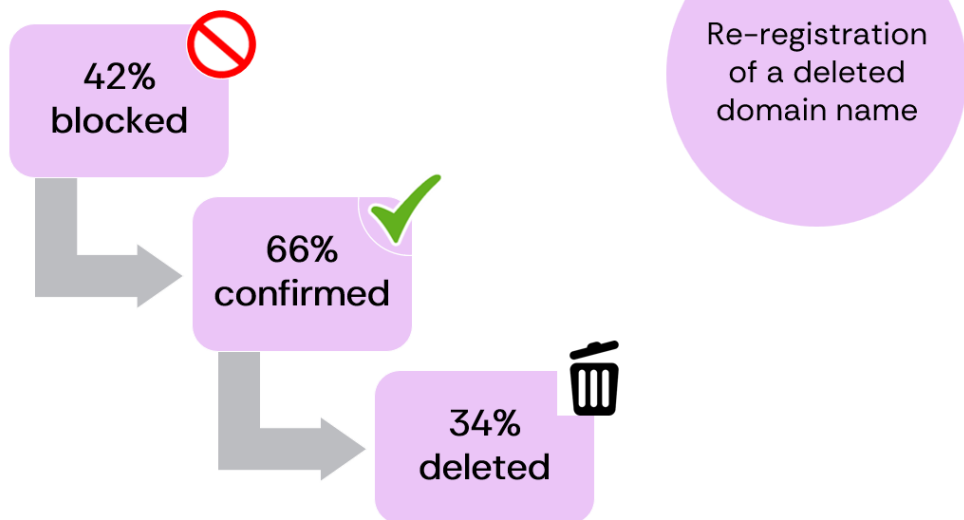
Total: 313, or 19.56% of detections



Pierre Bonis noted that the FR Check procedure highlights the circular dependency created when the contact email address relies on the very domain name being registered. Addressing this well-known issue should also help registrars avoid situations in which they are unable to contact such registrants.

Marianne Georgelin then discussed the final FR Check criterion, namely the re-registration (within one month) of a domain name that had previously been deleted following a verification procedure. After the telephone number, this criterion generated the second-highest number of cases, with 371 detections, or 23.18% of the total detections. 42% of those domain names were blocked, of which only 34% were ultimately deleted. This was considered logical, since the mere act of re-registering a domain name does not mean that the intended use is fraudulent or otherwise problematic. Nevertheless, the criterion remains valid as part of Afnic's monitoring activities, because verification procedures are never initiated at random.

Total: 371, or 23.18% of detections



Pierre Bonis noted that a 34% deletion rate for domain names not previously identified by Afnic was significant and justified a continuation of the initiative.

One member asked whether any patterns had been identified in requests to re-register domain names or whether the reasons varied.

Marianne Georgelin explained that patterns had been identified in how users respond to Afnic's requests to verify their registration data. That said, there is not enough historical data to draw conclusions at this time. The issue merits further analysis, as it is difficult to determine what is behind the re-registration requests. It also happens that proxy services are involved once registrants understand how Afnic verifies data.

Pierre Bonis confirmed that this is an important issue and noted that it echoes ongoing discussions within ICANN on the identification of patterns. Afnic is monitoring these discussions closely but has not yet incorporated those elements into the criteria used to inform its monitoring systems. This is a positive outcome because, otherwise, all .fr proxy services would end up having to go through the

verification procedure. Still, it requires Afnic to ask them to perform their role properly.

A registrar member asked whether consideration had been given to listing domain names in the Whois database that had been deleted after being used for abusive purposes.

Pierre Bonis replied that this was not being considered, adding that registrants are informed during their discussions with the legal department when attempting to reuse a domain name that had previously been deleted due to abuse.

The same member asked whether FR Check could become a kind of “criminal record” for domain names.

Marianne Georgelin said she did not support such an approach, since it is not the domain name causing the issue but rather how it is used. In her view, creating lists of problematic domain names would therefore be more likely to produce negative side effects than actual benefits.

Pierre Bonis added that FR Check is an ever-changing process. The information is intended primarily for the registrant, who should be aware that the chosen domain name may expose them to difficulties. This does not apply to domain names whose wording is clearly problematic, such as a domain name that explicitly incites hatred. The simple act of verifying these domain names through FR Check has a beneficial effect and deters abuse. It is no longer possible to immediately re-register a domain name that was deleted as part of a verification procedure. All in all, the 34% deletion rate is relatively high. It means that 34% of the deleted domain names were the subject of a second, equally questionable registration attempt the following month. Afnic anticipates that this figure will decline over time as users learn that the system is firmly in place.

Marianne Georgelin presented the improvements being considered and invited the committee members to make additional suggestions. The main priority concerns the format of telephone numbers in registration databases, with the aim of preventing inaccurate data in future registrations. If a registrar fails to cooperate at all, available sanctions could be applied. This is because NIS2 requires registrars to confirm that contact email addresses and telephone numbers are valid. Afnic’s legal department learned a lot from the process and is counting on registrars to continue improving their practices over the coming months.

Proposed improvements to the system

Email	Telephone number	Re-registration
• Remove the detection of email addresses created from the suspended domain name.	• Work with registrars to update the database by providing a list of affected portfolios. • Share patterns of invalid telephone numbers with registrars to help prevent future registrations using invalid numbers. • Monitor the situation and initiate registrar compliance checks if necessary (article 2.3 of annex IV to the registration contract).	• Enhance/expand the detection of re-registered domain names by incorporating additional registration data, such as the registration data that are identical to the previous registrant’s data.

Pierre Bonis remarked that it may be useful to talk to registrars to gather their opinions on systems comparable to FR Check that have been implemented by Afnic’s European counterparts.

4.1.2. Update on the implementation of the 2FA requirement for the use of Afnic web services by registrars

Pierre Bonis explained that this topic refers to the connections between registrars and Afnic’s web services, excluding EPP and the API.

Elodie Belliard provided a refresher. That is, as part of its ongoing efforts to strengthen security, Afnic made two-factor authentication (2FA) mandatory from 7 April 2026 for access to extranet.fr accounts and for accounts associated with French overseas TLDs (.pm, .re, .tf, .yt and .wf). To support registrars, an initial announcement was issued on 2 December. This was followed by reminder notices sent out 30, 15 and 7 days in advance, targeting accounts for which two-factor authentication had not yet been enabled. After one month, the results were very positive. The roll-out had no operational impact and generated no complaints from registrars, thanks to early communication, targeted reminders and the accompanying tutorial. Plans are in place to analyse the impact on current usage patterns with a goal of determining whether registrars have moved from the extranet to EPP or the API.

Pierre Bonis noted that, if there is a significant move from the extranet to the APIs, those APIs would need to achieve the same level of security. This is not currently the case. The objective is to ensure that registrars have a level of security that helps prevent compromised accounts.

4.1.3. Follow-up on action items related to updated documentation and operational communication

Elodie Belliard noted that this topic was presented at the previous CCUBE meeting in November. The goal is to improve the clarity of documentation and communications relating to scheduled maintenance. A comprehensive review of the technical and operational documentation is currently in progress. An initial communication measure has already been introduced, with upcoming maintenance notifications being sent by email (and no longer on X). Feedback from users and registrars has been taken into account. It indicates that maintenance emails and web pages could be quicker to read, that real-time service status information would be useful and that certain tools (e.g. RSS feeds) are rarely used. As a result, a number

of actions have been launched, including reviewing the documentation, sending maintenance announcements by email, improving the readability of maintenance emails and updating the release notes in the extranet (with each new release note replacing the previous one). The next steps will focus on providing more accurate estimates of maintenance times (and ideally reducing them to less than 60 minutes). Providing real-time service status information will require development work, which will need to be assessed before being added to the roadmap.

Régis Massé explained that the goal of reducing maintenance to one hour applies to application maintenance, at which time the registry is unavailable. Other security and network maintenance operations will continue to require more than one hour of service time.

Pierre Bonis noted that the primary goal is to establish standard maintenance durations and provide registrars with downtime estimates that closely align with actual interruption.

Mickaël Vigreux took the opportunity to encourage registrars to respond to the satisfaction survey.

Pierre Bonis confirmed that the survey, which has also been simplified, is an important feedback tool for Afnic.

4.2. Review of 2025 commercial operations

Mickaël Vigreux pointed out that the agreement between the French government and Afnic provides that Afnic must return at least 2% of the previous year's .fr revenue to registrars, in the form of price reductions. The goal is two-fold. Regarding commercial operations, Afnic's approach is to prioritise operations that encourage good practices and promote the renewal of future domain names. The criteria

therefore focus on actual usage, domain name and hosting bundles and multi-year registrations, with the aim of maximising the likelihood that domain names will be renewed. Before 2023, the budget was large, but Afnic was unable to spend it in full. The situation has changed. Afnic now spends—or rather invests—more than 2% of .fr revenue. The figures highlighted in green show the invested amounts, excluding the visibility challenge. There are fewer commercial operations now than there were before 2023, but they are more effective.

	2021	2022	2023	2024	2025
Number of commercial operations	29	34	17	14	22
Number of domain names	27,563	47,367	86,988	73,612	+85,280
Annual invested amount (excl. challenge)	€131,285.36	€211,376.69	€396,665.28	€356,776.47	€432,869.60

+€40,000 for the challenge in 2024 and 2025

COMMITMENT MET in 2023, 2024, and 2025!

Of the 22 commercial operations carried out in 2025, six focused on multi-year registrations, offering three years for the price of two. One registrar even had success in testing a five-year registration period. Another registrar tested a three-year renewal for the price of two, yielding 4,000 retained .fr domain names. Eight three-way operations involving Afnic, a registrar and a reseller led to the creation of 12,475 .fr domain names. Afnic is particularly motivated to work with resellers, such as website developers, through registrars. This also enables registrars to better support their own distribution networks. Finally, seven .fr domain name and associated service bundle offers were launched during 2025. Over the course of the

year, 17 registrars carried out commercial operations with Afnic, which invested more than €432,000 in commercial operations and a further €40,000 in credits for the visibility challenge.

A total of 18 operations have already been launched in 2026, with 15 different registrars. Additional agreements are in the process of being finalised, making it very likely that the €500,000 budget will be exceeded. A registrar also proposed a new .fr + .paris bundle, priced at €17.07 (excl. VAT) instead of €32.07 (excl. VAT). More than 250 bundles were sold within a month and a half. The offer provides an excellent opportunity for registrars to increase their margins. It is also available to registrars that are not directly accredited for .paris but instead act as resellers for an accredited registrar.

Pierre Bonis reiterated the principle behind these commercial operations, which are negotiated between the registry and registrars for the benefit of end users. Especially during periods of significant price volatility, multi-year registrations protect end users. The situation remained unchanged for ten years, as there was little interest within the sector for offering end users stable pricing over a span of multiple years. Discussions eventually led to a shared interest between the registry and registrars, which also benefits end users.

Mickaël Vigreux added that Afnic had tested a number of other promotional approaches in addition to the ones that were presented. Anniversary offers featuring one-cent domain names did not prove successful, nor did offers at one euro. Worse still, when those offers did succeed, they contributed to an increase in abusive registrations. The goal is to encourage legitimate domain name registrations that will later be renewed. By contrast, incentive programmes have proven successful with registrars that have dedicated sales teams.

4.3. The Afnic Scientific Council

Pierre Bonis handed the floor over to Laurent Toutain to give the consultative committee the first presentation on the work of the Afnic Scientific Council.

Laurent Toutain explained that the Scientific Council, established under article 20 of the Afnic Articles of Association, is responsible for providing a critical assessment of Afnic's work related to the state of the art and developments in France and internationally. It is currently focusing on the contribution of artificial intelligence to the fight against DNS abuse, domain names identifiers, the Internet of Things, data structures and related topics. It is also responsible for identifying new research areas and helping to shape Afnic's strategy. It is composed of 12 members, appointed for three-year terms, who issue advisory opinions. It meets four times a year and can also be consulted by Afnic or by the Board of Trustees, as was the case for IPv8, DNS8 within IPv8 and blockchain.

The Afnic Scientific Council includes three categories of members:

- members from the academic community (preferably French-speaking, since the Council conducts its work in French), who ensure scientific rigour and provide strategic research monitoring;
- members from the business community, who contribute detailed knowledge of practical use cases, operational constraints and market developments; and
- representatives of institutional, public-sector and international organisations, who provide insight into policy as well as regulatory and governance issues.

Not all of the current members are seeking reappointment, so vacancies are available. The Scientific Council can have up to 20 members. Its current membership is as follows:

Name	
Laurent Toutain – Chair	Professor, IMT Atlantique
Valérie Schafer	Professor of Contemporary European History – University of Luxembourg
José Araujo	Directory of Cybersecurity, SNCF
Pierre Beyssac	CEO, Erionem
Gordon Lennox	President, TDRS. Former Internet ambassador for the European Commission
Kinda Khawam	Associate Professor, HDR – University of Paris-Saclay
Cristel Pelsser	Professor of Critical Embedded Systems, UCLouvain
Laurent Gydé	Chief Operating Officer, Renater
Simon Muyal	Chief Technical Officer, France IX
Samih Souissi	Chief of Staff – Expertise Sub-Directorate, ANSSI
Guillaume Sire	Associate Professor – University Toulouse 1, Capitole, Associate Researcher

Luc Saccavini (board member) serves as a liaison with the Board of Trustees.

The following Afnic employees work with the Scientific Council: Benoit Ampeau, Sandoche Balakrichenan, Stéphane Bortzmeyer, Lucien Castex and Régis Massé.

Benoit Ampeau stated that at least three members are expected to leave the Council.

Laurent Toutain emphasised that its role is to provide a critical perspective on Afnic's ongoing work, broaden its horizons, help shape its strategy, organise the JCSCA (Afnic's Scientific Council Day, which continues to be successful) and publish reports. The Council is not limited to representatives of the hard sciences, since it is important for it to be firmly rooted in the wider ecosystem while maintaining a technical perspective.

OVERVIEW OF THE SCIENTIFIC COUNCIL:

Role

- Critical perspective on ongoing work
- Broaden horizons
- Help shape strategy
- Organise the JCSEA
- Publish reports

Functioning

- 4 plenary meetings per year
- Consultation at the request of the Board of Trustees or Management
- Chair elected from among its members
- Formal meetings or any other means

Composition

- 3-year term
- France and international (French-speaking)
- Multidisciplinary
- ~ 12 active members
- From academia, industry and public institutions

Relationship with the Board of Trustees – ongoing dialogue with governance

- Members appointed by the Board of Trustees
- Chair of the Scientific Council invited to the Board of Trustees (advisory role)
- Representative of the Board of Trustees sits on the Scientific Council
- Proposed nominations

Recent editions of the JCSA have addressed topics that are closely aligned with Afnic's priorities (e.g. email security) and forward-looking subjects (e.g. communication with Mars). The next event's theme has not yet been set, but it is expected to focus on resilience.

ALL JCSA EDITIONS OVER THE PAST 15 YEARS

Year	Edition	Main Theme
2011	1 st	The Role of Identification, Naming and the DNS in the Internet of the Future
2012	2 nd	Is the Internet Resilient?
2013	3 rd	Identifiers in Networks
2014	4 th	The Internet of Things: challenges and opportunities
2015	5 th	Metrology for the Internet
2016	6 th	Cryptography for Internet Infrastructure and Services
2017	7 th	Security and Privacy on the Internet: What the DNS knows about you!
2018	8 th	Human Rights and Protocols
2019	9 th	Digital Protection: Are we really prepared?
2020	–	QUIC: A New Protocol for the Web and Beyond
2021	10 th	Monitor me if you can! Protect me if I want! The challenge of generalised encryption
2022	11 th	Digital Energy Consumption: infrastructures, services and uses
2023	12 th	Spam and Abuse in E-mailing: How to prevent and reduce them?
2024	13 th	Pushing the Internet Envelope (faster, more remote, intermittent, political and energy-efficient)
2025	14 th	Quantumageddon: the day the Internet had to start all over again... or not (post-quantum transition)
2026	15 th	T.B.D.

A list of potential candidates for the next Scientific Council is currently being drawn up and will be submitted to Afnic's Board of Trustees in June.

A user member regretted that the voluntary nature of this type of role tends to favour, as is clearly true at ICANN, large organisations, lobbyist groups and candidates seeking to promote particular messages. Nevertheless, the member said they intended to apply, as they considered the work carried out by the Afnic Scientific Council to be outstanding.

Pierre Bonis pointed out that Afnic is not ICANN and that appointments to the Scientific Council are made on an individual basis, with the Board of Trustees making the final decision based on the quality of candidate profiles. Originally comprised primarily of academics, the Scientific Council has gradually opened up to industry professionals. Yet participating in this type of organisation is considered part of a researcher's job.

Laurent Toutain agreed, noting that conference reviewers are not paid; they are only reimbursed for their expenses.

Benoît Ampeau added that the members of the Scientific Council are all experts in Internet infrastructure and that they learn from one another. The Council provides an opportunity to exchange ideas and advance their respective areas of work.

A registrar member observed that the Council is still highly scientific.

Pierre Bonis explained that members are not selected purely based on their academic careers. Still, the Scientific Council is exactly that—a scientific council—which means that discussions are naturally going to be highly technical.

Benoît Ampeau added that the expertise of practitioners is equally important; the exchange between academic foresight and practical expertise makes discussions within the Council highly valuable.

A user member suggested revisiting quantum technologies and post-quantum cryptography as themes for the next JCSA.

Laurent Toutain saw quantum technologies as a good example of a topic that has helped create momentum in an area where Afnic is now actively involved.

Pierre Bonis agreed, noting that since the last JCSA, Afnic has taken part in webinars and discussions with specialists and has co-organised events on post-quantum cryptography. The topic has therefore remained an area of sustained focus throughout the year.

Laurent Toutain emphasised Afnic's central position within a wide range of technical communities and organisations, facilitating collaboration.

Pierre Bonis said that he understood that Laurent Toutain's position might be one of the ones coming up for renewal on the Scientific Council. He added that Afnic very much hoped this would not be the case, given Laurent Toutain's contribution since the Council's inception and his ability to provide constructive support to Afnic's teams. He said Afnic thanks him for his contributions.

Benoît Ampeau described the atmosphere within the Scientific Council as both serious and welcoming, and he encouraged anyone interested to take a chance, describing it as a rewarding experience.

4.4. Election of a representative to the Board of Trustees by users and registrars at the next GA

Pierre Bonis stated that user representative Paul Perpère would not be seeking reappointment. He thanked the outgoing members for everything they had contributed to Afnic. In addition to the Board of Trustees' collective work, each

member brings their own perspective and individual contribution. Paul Perpère has made a significant contribution to the association on a number of important issues through both his role and his experience at the INPI. The shift from protecting Afnic's trademarks to protecting its works and its intellectual property represented a key development. The professional backgrounds of each of the board members are a considerable asset to the association. Pierre Bonis added that this was also an opportunity to thank everyone preparing to stand for election and dedicate their time to Afnic, adding that the association is primarily founded on the willingness of people to work together.

Sophie Canac suggested briefly discussing the technical aspects. The two outgoing members, INPI for the Users' College and NETIM for the Registrars' College, are both eligible to run for a second term. Like every year, a Nomination Validation Committee was appointed to review the applications received and prepare a report, which was made available to members, along with the statements of the candidates. The candidates are:

- For the Users' College: Internet Society (ISOC) France, represented by its chair, Nicolas Chagny;
- For the Registrars' College: NETIM, represented by its CEO, Sébastien Almiron.

Each college will vote for its own representative. The separate committee meetings will provide an opportunity to ask the candidates questions more closely aligned with the expectations of each college. Given that there is only one candidate standing in each college, a single round of voting will be held, both in person at the General Assembly on 26 June 2026 and online prior to that. Online voting (18 to 25 June 2026) will not allow proxy voting or changes to the registered email address. In order to vote, members must have been a member for at least six months. Considering the importance of ensuring that the elected representatives have a strong mandate, it is important for each college to participate in the vote.

Luc Saccavini, in his capacity as chair of the Nomination Validation Committee, stated that the committee identified no issues affecting candidate admissibility. The only point raised was that Nicolas Chagny had been asked to ensure a clear separation between discussions within Internet Society France and the work of Afnic's Board of Trustees.

Pierre Bonis added that Sébastien Almiron had been asked whether he participated in ICANN bodies. Sébastien Almiron confirmed that he did not participate in any of them.

A registrar member asked whether ICANN participation would be a disqualifying factor.

Pierre Bonis answered that it would not but explained that the question had been necessary in the interest of transparency members. The declarations of interests are precisely what the committee chaired by Luc Saccavini examines, since the positions advocated by a candidate may be influenced by interests they hold in organisations outside of Afnic.

Sophie Canac then invited the candidates to speak, beginning with Nicolas Chagny for the users.

Nicolas Chagny introduced himself as the representative of Internet Society France. He thanked Paul Perpère for his work on the Board of Trustees and also expressed his appreciation to all of the board. He also recalled that Internet Society had served on Afnic's Board of Trustees several times in the past. Internet Society is an NGO founded in 1992; its French chapter was established in 1996. It has 166,000 members worldwide, including 1,000 in France, and shares many of Afnic's values and methods. Backed by an organisation funded through the .org domain, it is committed to representing, within the Users' College, everyone who depends on the Internet and domain names in an open, secure and reliable online environment.

Pierre Bonis noted that Internet Society France has been a long-standing partner of Afnic and that each of its representatives on the Board of Trustees has added a different perspective. He noted that Nicolas Chagny would likewise make his own contribution, drawing on his personal and professional experience. This, he said, is one of the strengths of the organisation, which continues over time to put forward a diverse range of candidates willing to serve.

Sébastien Almiron then spoke as a candidate for an additional four-year term representing the Registrars' College. He explained that his goal is to build on the work begun during his first term and continue ensuring that all categories of registrars are represented.

5. Consultation topic

5.1. Amendment of the Naming Policy: AMF injunctions

Marianne Georgelin explained that the topic pertained to an amendment to Afnic's Naming Policy required to incorporate a new injunction mechanism introduced by the AMF (the French Financial Markets Authority), following similar provisions previously introduced for the DGCCRF and ANSSI. The amendment arises from the MiCA regulation (Markets in Crypto-Assets Regulation), which aims to protect consumers and investors in cryptoasset markets while preventing regulatory fragmentation and distorted competition. This regulation, which has been applicable since December 2024, concerns both registries and registrars. As the competent authority, the AMF is empowered to order the deletion of a domain name or its transfer to the AMF. These provisions were incorporated into the French Monetary and Financial Code, without Afnic being informed at the time. However, Afnic has not received any request from the AMF that it would have refused through lack of awareness. The affected article is shown below:

Article L621-13-5 of the French Monetary and Financial Code

I. The President of the Autorité des marchés financiers shall send a formal notice, by any means capable of establishing the date of receipt, to the following operators:

[Operators offering online investment and collective investment management services, operating providing online financial instruments, operating offering annuity products to the public, etc.]

IV. The President of the Autorité des marchés financiers may also order **registry operators or registrars to delete or transfer to the relevant competent authority the domain name(s) corresponding to the online public communication service offered by the operators that have been served with a formal notice pursuant to points 5 and 6 of paragraph I.** The President of the Autorité des marchés financiers may apply to the President of the Paris Judicial Court, ruling under the expedited procedure on the merits, for an order requiring any person capable of taking such measures to delete or transfer the said domain name(s) to the relevant competent authority.

“The operators served with formal notice pursuant to points 5 and 6 of paragraph I”:

5. Operators providing digital asset services within the meaning of article L. 54-10-2 or cryptoasset services within the meaning of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in cryptoassets, which disseminate information containing inaccurate or misleading statements or use a name, company name, advertisement or any other means likely to give the impression that they are registered under the conditions set forth in article L. 54-10-5 or authorised in accordance with Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets;

6. Persons making a public offer of, or seeking admission to the trading of, cryptoassets other than asset-referenced tokens or e-money tokens within the meaning of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in cryptoassets, who disseminate information containing inaccurate or misleading statements;

The Naming Policy will be amended to allow for the deletion of a domain name or its transfer to the competent authority, namely the AMF. The procedure will be the same as the procedure already in place for the DGCCRF. Afnic is currently working

with the AMF to establish the process for receiving and implementing such injunctions, which will apply to all TLDs managed by Afnic.

The proposed amendments to the Naming Policy are as follows:

Article 6.8 – Deletion of a domain name

130. A domain name may be deleted:

- ✓ at the request of the registrar;
- ✓ further to a court decision ordering the deletion of the domain name and meeting the terms and conditions stipulated in the article entitled "Legal proceedings";
- ✓ further to a deletion decision taken as part of an Alternative Dispute Resolution procedure managed by Afnic;
- ✓ further to a deletion agreement in a mediation;
- ✓ further to an 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;
- ✓ further to an order issued by the President of the Autorité des Marchés Financiers (AMF) pursuant to paragraph IV of Article L621-13-5 of the French Monetary and Financial Code;
- ✓ after an unsuccessful verification procedure as referred to in the article "Powers of the Registry";
- ✓ (...)

Article 6.5 – Compulsory transfer

120. 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 in a mediation;
- ✓ 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 issued 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, for the benefit of the relevant competent authority;
- ✓ a request of the national authority responsible for information systems security, pursuant to article L. 2321-2-3 of the French Defence Code, for the benefit of the relevant competent authority;
- ✓ an order issued by the President of the Autorité des Marché Financiers authority for financial market (AMF) pursuant to paragraph IV of Article L621-13-5 of the French Monetary and Financial Code, for the benefit of the relevant competent authority;
- ✓ (...)

Pierre Bonis emphasised that, beyond the amendment to the Naming Policy, nothing would prevent the AMF from issuing injunctions to registries or registrars based in France concerning TLDs other than .fr.

5.1.1. Feedback from the user and registrar committees and Afnic's responses

5.1.1.a. Users

Nicolas Pawlak noted that the user committee had questioned whether it would be better to adopt more generic wording in order to avoid having to amend the Naming Policy each time new injunction powers are introduced. The committee also highlighted the fact that the injunction is issued by the President of the AMF and suggested that this should be clearly reflected in the wording. In addition, the relationship between the roles of the Judicial Court and the AMF is not entirely clear and would benefit from clarification, even if that meant referring explicitly to the Judicial Court in the text. Finally, could Afnic clarify that there is not necessarily systematic judicial review?

Pierre Bonis explained that the Judicial Court is never mentioned because it is already understood that Afnic complies with court decisions. Furthermore, it is not Afnic's role to verify whether the AMF has properly referred the matter to the competent court.

Marianne Georgelin added that Afnic is not in a position to determine whether a domain name issue justifies an injunction. As for adopting more generic wording, she acknowledged that this would be possible but would offer less protection for the association. Using precise wording prevents authorities that are not expressly listed from interpreting the provisions themselves.

Pierre Bonis went a step further, adding that explicitly identifying the competent authorities adds to the transparency of the Naming Policy for users and thus helps them assert their rights.

Marianne Georgelin also said that Afnic had obtained the contact details of the President of the AMF and of three individuals to whom the President has delegated authority. Article L. 621-13-5 of the French Monetary and Financial Code provides that the President of the AMF may refer the matter to the President of the Judicial Court, while Afnic will immediately comply with any court decision.

5.1.1.b. Registrars

Sébastien Almiron stated that the committee was in favour of the proposed amendment to Afnic's Naming Policy. He added though that it would be beneficial to receive detailed contact information for the relevant contacts (names, email addresses, etc.) to guard against possible fraudulent requests.

Marianne Georgelin explained that the AMF had contacted Afnic to obtain the contact details of registrars.

Éric Lantonnet observed that registrars expected the same in return.

Pierre Bonis noted that, as with the DGCCRF, Afnic always strongly encourages the authority to contact the registry rather than registrars where .fr or French overseas TLDs are concerned.

5.2. Preparations for aligning the registry policies of the French Caribbean overseas TLDs with Afnic's Naming Policy

Marianne Georgelin outlined the approach for incorporating the new French overseas TLDs into the Naming Policy. When responsibility for managing the .gf, .mq and .gp TLDs is transferred to Afnic, the Naming Policy will automatically apply to each of those, in accordance with article 1.1, unless otherwise decided. The Naming

Policy will then be amended to include a chapter dedicated to this transition, allowing time for the registry policies governing each of these TLDs to be updated and their specific characteristics to be incorporated (e.g., permitting 1- and 2-character domain names).

Pierre Bonis summarised the proposal by explaining that, on the date of the transfer, there would be no need to amend the Naming Policy, since it already applies to all Afnic-managed TLDs. However, it will be necessary to prepare the arrangements for introducing 1- and 2-character domain names across all French overseas TLDs. This will require consultation and some time.

Marianne Georgelin added that the registration rules for the three Caribbean TLDs do not necessarily align with Afnic's registry policies. Aligning them would also take some time.

Paul Perpère said he would like the purpose of the consultation to be clarified.

Marianne Georgelin explained that the consultation concerns the process as a whole, namely the automatic application of Afnic's Naming Policy when the transfer takes place and also the subsequent amendment of the Naming Policy to take account of the specific characteristics of the French Caribbean overseas TLDs.

Pierre Bonis stressed that it was very important for Afnic to get feedback from its members on the principle of automatically integrating the French Caribbean overseas TLDs into the Naming Policy.

5.2.1. Feedback from the user and registrar committees and Afnic's responses

5.2.1.a. Users

Nicolas Pawlak explained that the user committee had questioned the need to retain the wording "unless otherwise specified" in article 1.1 of the Naming Policy, given that the objective is for the same rules to apply across all TLDs. The committee also found that it was not in a position to speak on behalf of users in the French overseas territories, who would have an opportunity to provide feedback during the extraordinary session. The committee requested clarification regarding the duration of the transitional arrangements and asked how domain names that had been registered already but did not comply with Afnic's Naming Policy would be handled. It also asked about the status of users from the United States.

Pierre Bonis recalled that Afnic had undertaken, in its commitments to the French government, to apply the same rights and obligations to registrants throughout the national territory under a single Naming Policy. The key issue was whether the user committee supported that approach or would instead prefer a separate Naming Policy. In addition, in principle, there should be no fundamental differences, since article L. 45 of the French Post and Electronic Communications Code applies to the three French overseas territories concerned.

5.2.1.b. Registrars

Sébastien Almiron said that registrars were requesting a transitional period (two years were mentioned) for domain names that would no longer comply with Afnic's Naming Policy. They also requested confirmation that the French Caribbean overseas TLDs would be brought within the scope of Syreli/Parl Expert ADR procedures.

Pierre Bonis confirmed that the mediation and dispute resolution procedures would take effect on the date of the transfer, with Afnic's registry policy remaining unchanged. The right for applicants to access those procedures would therefore apply as soon as Afnic became the registry operator for their TLDs. The Naming Policy would apply in its entirety, with the exception of non-compliant situations, where transitional provisions would be established. Instead of setting a fixed transition period, Afnic anticipates transitional provisions that would make it possible to deal with legacy situations. If the registrant is not eligible, the situation would not fall within the scope of those transitional provisions. It would either be covered by a grandfather clause, or it would be rejected. Those topics will be decided at a later time.

A registrar member requested more detailed figures on the existing portfolios for the three French Caribbean overseas TLDs and asked how many domain names were not managed through a registrar.

Pierre Bonis explained that those cases were currently being identified. In general, the current management models for these TLDs are closer to a 2R model than a 3R model. With the registry becoming accredited as a registrar and the existing resellers often already acting as .fr registrars, the number of orphaned domain names should be reduced to almost zero. A problem could arise if the outgoing operators chose not to become registrars.

Régis Massé referred to portfolios of around 700 .gf and .mq domain names and approximately 2,000 .gp domain names.

Éric Lantonnet asked how the final clarification of the rules would be formalised.

Pierre Bonis stressed that the rules are clearly set out in the .fr Naming Policy. Nothing will change for registrars. The only points still being discussed concern the

transitional arrangements for 1- and 2-character domain names, which are expected to remain relatively limited in scope.

Marianne Georgelin added that it would also be possible to create a table explaining the character rules. At the present time, there is not yet a detailed breakdown of the domain names to be transferred, but this is not a problem. In addition, domain names registered in the United Kingdom before Brexit, which would no longer be eligible today, are still present in the database. Prior to that time, domain names could also be registered on the basis of granted trademark rights. This explains why the database includes Canadian and US registrants, as changes to the eligibility rules are not applied retroactively.

Éric Lantonnet asked whether a domain name verification procedure could lead to a review of the registrant's eligibility and to the potential loss of the domain name.

Marianne Georgelin explained that this is exactly what is happening for domain names registered in the United Kingdom before Brexit. Registrants are not being asked to change their address or relocate to Europe but rather to verify the registration data held in the database.

Pierre Bonis called for the discussion not to explore all aspects of the issue before the extraordinary consultative committee meeting, noting that it was important for these discussions to include stakeholders from the French Caribbean overseas TLDs. He deduced from the registrars' position that they were in support of integrating the three TLDs on the date of the transfer.

Sébastien Almiron confirmed that this was true, explaining that when the issue was first mentioned, it had not been clear to registrars that the law allowed the existing rights of current registrants to be maintained.

5.3. Other feedback from user and registrar committees and Afnic's responses

Sébastien Almiron, for the Registrars' Committee, said that registrars would like domain names benefiting from promotional offers to be invoiced directly at the promotional rate, avoiding the need for registrars to invoice Afnic for reimbursement.

Pierre Bonis answered that this request would be better addressed through the commercial channel.

Mickaël Vigreux asked the chair of the committee to clarify the request. For example, in the case of multi-year promotions, registrars would like Afnic to invoice a 3-year domain name registration at the 2-year promotional rate, rather than invoicing 3 years in full and subsequently being invoiced by the registrar for the value of the promotional year.

Pierre Bonis added that this appeared to be complicated considering Afnic's commitment to the French government to return at least 2% of .fr revenue in the form of promotional operations. In terms of accounting, this means that the promotion must be recorded as an expense rather than as lost revenue. Therefore, it could not simply be deducted from the sale price on the original invoice. This point will be verified with Caroline Duval-Favre.

Nicolas Pawlak, for the Users' Committee, returned to the topic of the commercial operations. The users especially appreciated the discounted multi-year registrations and wondered if these offers could become a permanent feature and what the cost would be to Afnic.

Pierre Bonis acknowledged that this is a legitimate question. This will become an even more relevant question once all commercial operations involving sponsored

multi-year registrations exceed the allocated budget, which is not presently the case. It would therefore make little sense right now to give up a valuable negotiating tool with registrars. Sponsored multi-year registrations should remain reserved for specific commercial operations.

A registrar member added that making discounted multi-year registrations a permanent offering would also require registrars to adjust their processes to manage three-year registrations charged at the price of two for a single TLD.

Another member noted that many registrars also work with resellers whose pricing they do not control. There would therefore be a real risk of pricing becoming disconnected.

6. Discussion on the subjects raised by the members

Anonymisation of individuals by default not happening consistently (choice or error)

Pierre Bonis invited Nicolas Pawlak to present a question concerning the way registrars apply anonymisation by default when domain names are registered by natural persons.

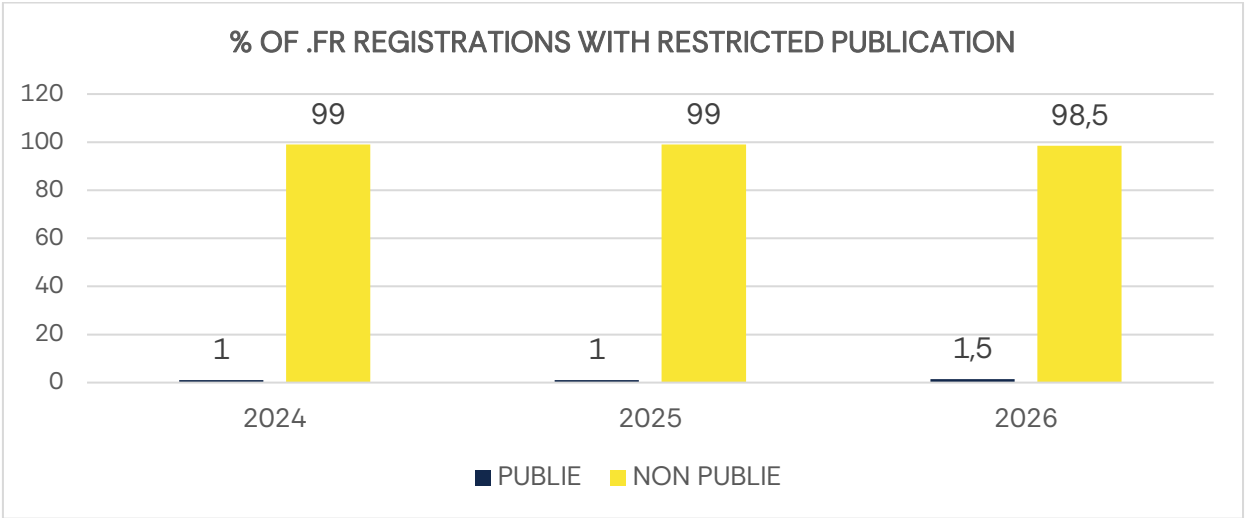
Nicolas Pawlak said he had noticed that, in a number of .fr and French overseas domain name registrations, natural person registrants were not being anonymised. Registrants may request that their anonymity be lifted, but this would be unlikely within less than 48 hours, given that the reported cases concern very recently registered domain names. The situation may also occur as a result of errors when a domain name is transferred from one registrar to another. Because Afnic regularly communicates that natural person registrants undergo default anonymisation in the Whois database, such cases could potentially lead to disputes.

Pierre Bonis considered it important to provide a quick refresher on the registration rules.

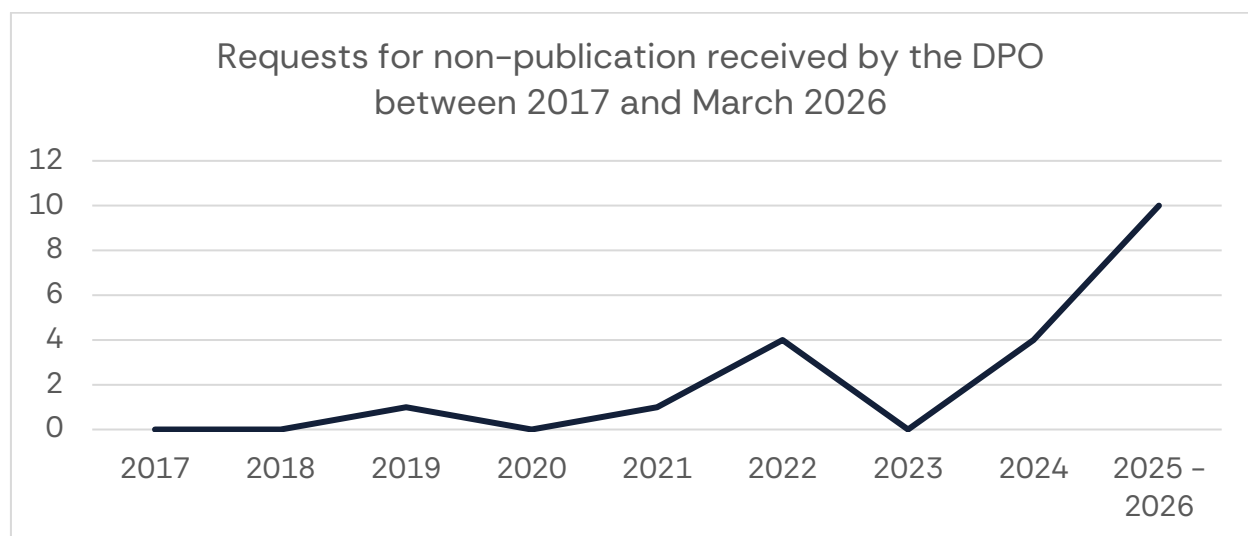
Marianne Georgelin explained those rules. That is, if a domain name is registered by a natural person, the restricted publication option applies by default. For a transfer

between two registrars, the issue appears to lie with the second registrar, which failed to comply with the requirement for default anonymisation. No personal data is then published in the Whois database unless the registrant requests otherwise. Such a request may be made within less than 48 hours of registration. Marianne Georgelin also noted that Afnic ran a campaign on restricted publication between November 2020 and September 2021 in connection with the work as part of the SRS migration. In November 2020, a total of 1,417,357 domain names were registered by natural persons, and of those, 124,289 (8.77%) involved the publication of contact details. By September 2021, that figure had fallen to 2%, or 30,419 domain names out of 1,489,502 registered by natural persons. The campaign showed that most registrars were familiar with the rules and applied them correctly. In cases where the data of natural person registrants is published, this is either because they had given prior consent (e.g. some domain investors want to be contactable) or because of identity theft, in which case the matter is dealt with through Afnic’s abuse remediation process.

Since 2024, Afnic has performed an annual review of domain names for which the data of natural person registrants is published. The review is organised by registrar, making it possible for Afnic to target its actions towards registrars whenever an unusual deviation is identified.



When a domain name is registered as a legal person (e.g. by a tradesperson or self-employed professional), the registrant's personal data is published in the Whois database. This may lead to complaints submitted to Afnic's support team and DPO. The number of such complaints has increased over the past 12 months, although it remains limited (total of 10 over the period), signalling a higher level of dissatisfaction.



In 2026, Afnic will work with registrars to ensure the following:

- Individuals will be informed by registrars (when their Nic Handle is created) of the implications of choosing Legal Person rather than Natural Person for the publication of their data.
- Individuals seeking to stop the publication of their data will receive prompt assistance and support.

Afnic may carry out documentary audits of registrars to verify compliance with these two requirements for complaints submitted to Afnic by registrants.

A registrar member pointed out that publishing the data of legal persons reflects the principle of transparency towards those companies' customers.

Pierre Bonis noted that the main issue concerns sole traders, for whom the legal framework is ambiguous and who, like self-employed professionals, are treated as both natural persons and legal persons.

Paul Perpère added that 75% of new businesses are created by natural persons, making this a highly significant issue.

Marianne Georgelin confirmed that the increase in complaints from zero to ten in the space of a year had attracted attention from Afnic's teams, who are eager to reinforce the rules governing the publication of registrant data, noting that the flexibility of the system makes it possible to change a registrant's status to Natural Person so that their data is anonymised.

Pierre Bonis noted that Afnic performs every possible check to avoid falling short in the user experience. Issues such as the one raised by the Users' College make it possible to investigate matters with registrars and head off widespread problems.

7. Upcoming diary dates

Upcoming diary dates

- **Wednesday 24 and Thursday 25 June:** Annual sessions of the International College, Afnic HQ, Guyancourt
- **Friday 26 June:** Annual General Meeting – *User and Registrar College Elections* – Cyber Campus
- **Friday 26 June:** Afnic Annual Dinner – Pavillons des Etangs, Paris
- **Thursday 24 September:** Legal meetings
- **Wednesday 14 or Thursday 15 October (TBD):** CCUBE – Paris
- **Tuesday 3 November:** IGF France (co-organised by Afnic)
- **Wednesday 4 November:** JCSA

A survey will be conducted on Asso Afnic to determine the date of the next User and Registrar Consultative Committee meetings to be held in Paris in October.

Pierre Bonis thanked the members for their participation, both in person and remotely. He then invited them to meet again soon for the extraordinary consultative committee meeting on the French Caribbean overseas TLDs.