

URS Complaint Process and Metrics Overview

This document outlines the Uniform Rapid Suspension (URS) compliance mechanism and was drafted in response to the implementation of URS Final Recommendation #8 from the [first phase](#) of a Policy Development Process (PDP) on a Review of All Rights Protection Mechanisms in All gTLDs.

URS Final Recommendation #8: The Working Group recommends that the ICANN org establishes a compliance mechanism or mechanisms to ensure that URS Providers, Registries, and Registrars operate in accordance with the URS rules and requirements and fulfill their role and obligations in the URS process. The Working Group recommends that such compliance mechanism(s) should include an avenue for any party in the URS process to file complaints and seek resolution of noncompliance issues. As **implementation guidance**, the Working Group recommends that the IRT consider:

1. Investigating different options for potential compliance mechanism(s), such as ICANN Compliance, other relevant department(s) in ICANN org, a URS commissioner at ICANN org, a URS standing committee, etc.
2. Developing metrics for measuring performance of URS Providers, Registries, and Registrars in the URS process.

1. Compliance Mechanisms

The URS compliance mechanisms outlined below offer a pathway for any party involved in the URS process – including URS complainants, respondents, and URS Providers – to submit complaints to ICANN and seek resolution of instances of perceived non-compliance by URS Providers, registrars, or registry operators.

These mechanisms are designed to enhance transparency concerning the steps ICANN takes to investigate and address reported issues. By establishing an accessible and structured approach, these mechanisms aim to provide clarity for stakeholders and support timely and effective responses to reports of non-compliant behavior within the URS system.

ICANN utilizes distinct processes to evaluate and respond to two types of URS-related complaints:

1. Complaints related to URS Providers' compliance with URS processes, and
2. Complaints regarding registrars' and gTLD registry operators' compliance with URS processes.

Complaint Process for URS Provider Non-Compliance

This compliance mechanism allows parties in the URS process to submit complaints to ICANN concerning non-compliance by URS Providers with their procedural obligations under the URS processes. This complaint process provides a consistent, predictable, and transparent pathway for stakeholders to raise concerns when they believe a URS Provider has failed to meet its responsibilities. **Before submitting a complaint to ICANN, parties are encouraged to first attempt to resolve the issue directly with the applicable URS Provider. Providers may have designated contacts or published guidance to assist with inquiries or concerns. Parties should consult the respective URS [Provider's website](#) for more information.**

The steps for submitting a complaint through this process are outlined below.

Step 1: Submission of Complaint

Complaints regarding URS Providers may be submitted through the URS [homepage](#) on ICANN.org, or directly via the Global Support [Center](#).

Any complaints submitted through other avenues (e.g., direct emails to ICANN staff, web forms, or public sessions) will be forwarded to the appropriate internal team for handling. Complainants should provide as much relevant detail as possible, including the nature of the reported non-compliance, the specific URS rule or procedure allegedly violated, relevant URS case number and information, and details of the parties involved, along with any supporting documentation.

Step 2: Internal Routing and Review

Upon receipt, ICANN will perform an initial assessment of the complaint. ICANN will first evaluate whether the issue appears to be one that could be readily addressed by ICANN engaging with the URS Provider.

If the matter cannot be resolved through direct engagement, ICANN will engage a standing committee to assess the issue.¹

Step 3: Resolution and Follow-Up

Once the issue has been addressed, ICANN will notify the reporter of the resolution of the matter.

Additional Notes:

- ICANN expects URS Providers to operate in accordance with the URS Procedure and Rules, in accordance with the Memorandum of Understanding each URS Provider has entered into with ICANN.

¹ This committee, comprising representatives from relevant ICANN org departments, will assess whether the issue constitutes a violation of the URS processes or the MoU between ICANN and the Provider. The committee will investigate as necessary and work to resolve the issue in coordination with the Provider. In cases of serious or repeated violations, the committee may also consider recommending the revocation of the Provider's approval.

- This complaint process is part of ICANN org’s broader effort to ensure accountability, consistency, and transparency in the administration of the URS system.
- Relevant metrics related to complaints about URS Providers – such as the number of complaints received, nature of the issue, and complaint outcomes – will be compiled by ICANN and published on the URS homepage at [ICANN.org](https://www.icann.org/urs).

URS Complaint Process for gTLD Registrar or Registry Operator Non-Compliance

This compliance mechanism enables parties in the URS process to report perceived instances of non-compliance by registrars and registry operators in fulfilling their obligations under the URS, the URS Rules and Technical Requirements.² Complaints submitted through this mechanism are handled through ICANN’s Contractual Compliance processes. The steps for filing a complaint are outlined below to help stakeholders understand how to submit a report and what to expect during the resolution process.

Step 1: Submission of Complaint

The URS-related Contractual Compliance complaint should be submitted using the appropriate form available on the ICANN Contractual Compliance website:

- **Complaint about Registrars:** Use the Generic Registrar Complaint Form at <https://icann-nsp.my.site.com/compliance/s/generic-registrar>
- **Complaint about Registry Operators:** Use the Uniform Rapid Suspension System Complaint Form at <https://icann-nsp.my.site.com/compliance/s/urs>

Both forms are accessible via ICANN’s Compliance [webpage](#) and are routed to the appropriate ICANN Compliance team for handling and resolution.

Step 2: Review of Complaint

As with any complaint received by ICANN Contractual Compliance, ICANN first reviews the complaint to determine whether it falls within scope of the Registry Agreement or Registrar Accreditation Agreement, including the domain name dispute resolution mechanisms and ICANN Consensus Policies incorporated into those agreements. This may require follow-up with the complainant to ensure all relevant documentation or evidence is obtained. Once all information is collected, ICANN can determine whether an investigation is appropriate, or close the complaint and provide the complainant with the appropriate explanation, which might include direction on other available avenues to raise the concern. A complaint may also be closed if

² This compliance mechanism is intended to provide a clear and structured process for raising concerns when these contracted parties fail to take required actions, such as providing full registration data, locking, unlocking, suspending domains, or coordinating the implementation of URS Determinations. URS obligations apply to most gTLD registry operators through their [Registry Agreement](#), Specification 7, and to registrars through their [Registrar Accreditation Agreement](#), Section 3.8, as well as Registry-Registrar Agreements.

further information is required of the complainant to proceed, but such information is not provided upon request.

Any clear action required of a registrar or registry operator that is described in the URS, the URS Rules, or Technical Requirements could be subject of a complaint and subsequent enforcement by ICANN. For example, in the case of registry operators, should they fail to lock a domain within 24 hours of receiving notice of a URS Complaint or suspend the domain name following notice of the remedy, then a complaint may be filed with ICANN using the form above. Similarly, in the case of registrars, the respective form above may be used when, for example, a registrar fails to offer the option for the URS Complainant to extend a URS Suspended domain name's registration for up to one additional year in cases where the URS Complainant prevailed.

Step 3: Enforcement

ICANN Contractual Compliance divides enforcement of obligations into two phases: Informal Enforcement and Formal Enforcement. Generally, all investigations begin with the Informal Enforcement phase, during which ICANN's contractual compliance team works closely with registrars and registry operators to help them understand their contractual obligations and overcome any contractual compliance challenges and issues they may have. ICANN attempts to resolve contractual compliance matters informally before pursuing formal remedies available under the agreements. ICANN does not provide details regarding contractual compliance activities in the informal resolution phase, in the interest of facilitating open dialogue and resolution. However, metrics are still published to provide high-level records about compliance cases.

The time it takes a contracted party to respond to contractual compliance matters in the informal resolution process varies. Depending on the type of complaint, a contracted party will have a certain number of days to respond to the complaint. The majority of complaint types follow a 5-5-5 business day deadline for each of the first three notices, respectively. In other words, there is a first notice with a five business day deadline to respond; if not resolved, there is a second notice with a five business day deadline to respond; and if not resolved, there is a third notice with a five business day deadline to respond.

There are exceptions to the 5-5-5 business day structure for the first three notices based on timelines set by ICANN's agreements and consensus policies, and sometimes by other facts and circumstances. For instance, under Section 4.1 of the URS Procedure, a registry operator is required to lock the domain name subject of the URS Proceeding within 24 hours of having received notice of the Complaint. Should ICANN receive a complaint about this type of failure and confirm its validity, ICANN Contractual Compliance will send a notice with an expected response time of 24 hours, rather than the standard five business days.

Should a contracted party fail to sufficiently collaborate during the Informal Enforcement process or otherwise continue to be noncompliant after attempts at informal resolution, then the matter

may escalate to Formal Enforcement. This is when a formal Notice of Breach may be issued to the contracted party, as well as any subsequent escalations, such as Suspension for registrars or Termination for both registrars and registry operators. Metrics for these cases will be similarly published, but with the addition of the actual formal Notices that detail the reasons behind issuance.

More details about ICANN's Contractual Compliance approach and processes may be found [here](#).

Notices sent during the Formal Resolution process are published [here](#).

2. Performance Metrics for the URS Process

The following metrics for measuring performance of registrars and registry operators are published monthly on the [ICANN Compliance page](#). These metrics will include relevant URS-related complaint data for the month, when available, and any complaints received will be posted within a month of receipt:

Registrars (current metrics)

- **Number of Complaints Received** - Total number of complaints submitted to ICANN in the month, with additional breakdown that include the complaint type (e.g., Abuse, URS, UDRP, etc) and those involving GAC Category 1 Safeguards.
- **Number of Complaints Closed before 1st Inquiry / Notice** - Total number of complaints closed without initiating with the contracted party. These typically represent complaints that are out of scope for enforcement or did not contain sufficient evidence to proceed despite requests for additional information.
- **Number of Complaints Closed by Closure Code, which is the reason for closing a complaint. Closure Code Description** - Total number of complaints closed within the month because they were out of scope or invalid, and number of those closed after conducting an investigation broken down by the specific reason for closing it. Brief explanation of why a complaint was closed. This could include scenarios where a registrar corrected its noncompliance, demonstrated it was compliant in the first place, the reason why a complaint was never initiated with the registrar, etc.
- Twelve-month Monthly Trends reports - these reports will include URS-related complaint data in the “Top Five Registrar and Registry Complaints by Volume” and the “Reporter Type Detail for Top Five Complaint Types Received”, if URS is one of the top five complaints in volume for the month.³

Registry Operators (current metrics)

- **Number of Complaints Received** - Total number of complaints submitted to ICANN in the month with additional breakdown that include the complaint type (e.g., Code of Conduct, URS, etc.) and those involving GAC Category 1 Safeguards.

³ As of 26 February 2026, URS-related complaints have never been identified as one of the top five complaints in volume in a Monthly Trend report.

- **Number of Complaints Closed before 1st Inquiry / Notice** - Total number of complaints closed without initiating with the contracted party. These typically represent complaints that are out of scope for enforcement or did not contain sufficient evidence to proceed despite requests for additional information.
- **Number of Complaints Closed by Closure Code, which is the reason for closing a complaint** - Total number of complaints closed within the month because they were out of scope or invalid, and number of those closed after conducting an investigation broken down by the specific reason for closing it. This could include scenarios where a registry operator corrected its noncompliance, demonstrated it was compliant in the first place, the reason why a complaint was never initiated with the registry operator, etc.
- Twelve-month Monthly Trends reports - these reports will include URS-related data in the “Top Five Registrar and Registry Complaints by Volume” and the “[Reporter Type Detail for Top Five Complaint Types Received](#)”, if URS is one of the top five complaints in volume for the month.⁴

Additionally, ICANN Contractual Compliance’s dedicated dashboard of the [Reporting on Disclosure Request Obligations](#) will include URS-related data where disclosure requests were submitted by URS Providers (it will be grouped by URS/UDRP Provider).

URS Providers (new metrics)

The following metrics for measuring the performance of URS Providers will be published on the URS [homepage](#) at ICANN.org as they become available.

- **Number of Complaints Received** - Total number of complaints submitted to ICANN alleging URS Provider non-compliance.
- **Reason for Complaint / Nature of Issue** - Categorization of complaints (e.g., procedural delay, incorrect application of rules, etc.)
- **Outcome of Complaint** - Resolution type (e.g., URS Provider found compliant, URS Provider corrected process, issue unresolved, escalation required, etc.)

⁴ As of 26 February 2026, URS-related complaints have never been identified as one of the top five complaints in volume in a Monthly Trend report.