



COMPLIANCE STATEMENT – ADD GRACE PERIOD LIMITS POLICY FOR THE TLDS .KOELN / .COLOGNE

A. Purpose of this document

The purpose of this document is to provide a public statement by dotKoeln GmbH regarding our intention to comply with the ICANN Add Grace Period Limits Policy and to define the process by which a registrar may seek an exemption.

B. Explanation of the Add Grace Period

The Add Grace Period is the period following the initial registration of a domain name, and is intended to allow for the 'no-cost' cancellation of domain name registrations resulting from errors by registrars and registrants.

Details about dotKoeln's Domain Name Lifecycle for the TLD .koeln and .cologne can be found in the policy section of the registry's website located at the following link www.nic.koeln.

In providing an Add Grace Period, ICANN requires that both dotKoeln GmbH in the management of the TLD .koeln/.cologne and registrars comply with the Add Grace Period Limits Policy.

The life cycle of a .koeln/.cologne domain name includes a 5-day Add Grace Period (AGP) during which a newly created domain name may be deleted with a refund of the domain fee. This is common practice and corresponds to the policies of almost all existing generic top level domains.

C. Prevention of Abuse of the Add Grace Period

However, in the past the Add Grace Period has been abused for practices such as domain name tasting and domain name front running. Domain name tasting means that domains were created simply for the purpose of testing whether revenue can be generated by e.g. creating a web page with advertisements for the domain; if this was found feasible within the first few days, the domain was retained, otherwise it was deleted within the add grace period for a full refund, i.e. the domain was "tasted" for potential revenue without any payment to the registry. Domain name front running refers to the practice of pre-registering domain names somebody has merely expressed interest in (e.g. by searching for them on the WHOIS web frontend of a registrar) with the purpose of reselling the domain to that person (at an inflated price) afterwards; again, the Add Grace Period has been abused for this purpose, since a registrar could do that without any cost (if the unsold domain was deleted before the end of the add grace period).

In 2008, ICANN introduced the so-called "AGP Limits Policy" (<http://www.icann.org/en/tlds/agp-policy-17dec08-en.htm>) which addresses these and other issues resulting from the Add Grace Period.



As the registry operator for the .koeln and .cologne TLD, RyCE GmbH will fully implement this policy by restricting Add Grace Period refunds to registrars according to the limits specified by the policy. At the end of every month, the registration system's billing module will determine every registrar's net domain adds and check whether the add grace period refunds granted during that month exceed the permissible number according to the policy; if this is the case, additional charges to the registrar's account will be initiated to effectively revert the excessive refunds.

D. Add Grace Period limits

Add Grace Period limits (as given by ICANN in the link named above) were introduced to provide an upper limit on the number of refunds a registrar can request for domain names created in error. This limit was needed to protect against potential abuse of this functionality.

Where the limit is exceeded, any additional cancelations may not be eligible for a refund.

The limit in the Add Grace Period Limits Policy is applied on a monthly basis.

E. Exemptions to the Add Grace Period Limits Policy

In the application of the Add Grace Period Limits Policy dotKoeln GmbH may grant a registrar an increase to the threshold imposed for a particular month. An increase may be granted where a registrar has applied to dotKoeln GmbH to request such, and may or may not be granted at our sole and reasonable discretion.

The request for increase must (amongst other things) describe why the surrounding circumstances were not known, or could not have been reasonably known by the registrar, at the time the domain names were deleted; and how these extraordinary circumstances were outside of the Registrar's control.

a. Exemption requests

At the conclusion of any month, a registrar has until the end of the following month to supply a request for exemption. A request must include the following information:

- Registrar Name
- IANA ID number
- Date of request
- Date names were deleted
- Number of names deleted
- List of names affected
- Extraordinary circumstance/reason for request
- A statement that the information in the Exemption Request is true to best of the Registrar's knowledge.

The exemption request must also be accompanied by the relevant fee, if any.



Information relating to the particular extraordinary circumstance must be described and provided with supporting documentation. dotKoeln GmbH may from time to time require additional information to process a request for exemption.

b. Record keeping and reporting

Any exemption requests by registrars, whether they were granted (as permitted by the policy) or rejected, are documented, and such documentation will be maintained and made available for review by ICANN on request. The registry's monthly report to ICANN will contain per-registrar information on the granted add-deletes, as well as additional columns regarding the exemption requests.

The related report columns are (with column header names in parentheses):

- Number of AGP deletes ("domains-deleted-grace")
- Number of exemption requests ("agp-exemption-requests")
- Number of exemptions granted ("agp-exemptions-granted")
- Number of names affected by granted exemption request ("agp-exempted-domains")

F. Definition and review

This document has been prepared and published to represent our policy regarding the administrative and technical management of the TLD .koeln and .cologne.

dotKoeln GmbH may discontinue or amend any part or the whole of this compliance statement from time to time at its absolute discretion.