Information Guide

DATA ESCROW FOR THE NEW gTLDs

Safeguarding Your Future

IRON MOUNTAIN®
As the new generic Top-Level Domains (gTLDs) become a reality, ICANN is carefully preparing applicants, such as yourselves, for your new role as Registry Operators.

One of the requirements of operating a new gTLD is to engage an independent entity to act as a data escrow agent. This neutral, trusted third party will provision your data escrow services as specified by the Registry Agreement.

Iron Mountain offers the most comprehensive and trusted Domain Name Registry Data Escrow Services in the industry. We make it as simple as possible to comply with ICANN’s escrow requirements. Plus, we’ve been escrowing registry data since 2001, so we know the ropes.

In many cases, new gTLD applicants will be assisted by Registry Service Providers during the application process – they may also manage the ongoing operation of your registry. Iron Mountain has partnered with several Registry Service Providers as their preferred escrow agent. You can learn more about our partners at www.ironmountain.com/gtld/partners. However, we can work with whichever Registry Service Provider you choose.

This information guide provides an overview of what you need to know about Registry Data Escrow.
The Importance of Registry Data Escrow

Escrow protects the data associated with your new gTLD. As a Registry Operator, you must comply with the provisions of ICANN’s Registry Data Escrow Agreement. This agreement requires registries to periodically transfer registry data for their gTLDs to a reputable escrow agent to be held securely in escrow. The purpose of Registry Data Escrow is to help safeguard registrar and registrant interests in the event of a registry’s business or technical failure.

Data escrow is one of the five critical registry functions and is a requirement for all new gTLDs. It is covered in question #38 of the application, and details are given in Specification 2 of the Registry Agreement. As a new gTLD applicant, you need to articulate that a plan to escrow your gTLD data is in place.
Q. What is data escrow for registries?
A. Registry Data Escrow is a specialized data protection service. It is designed to meet the compliance and best-practice needs of domain name registrars and registrants worldwide. The service ensures that up-to-date copies of domain name ownership and contact details are held in escrow by a trusted, neutral third party, such as Iron Mountain. This data can only be accessed and released under predefined and controlled conditions, such as the failure of a registry.

Q. Why is escrow needed?
A. As part of its strategic plan, ICANN established the Registry Data Escrow requirement to restore or continue operation of a registry due to either business or technical failures. Registry Data Escrow helps to safeguard registrar and registrant interests in the case of a registry’s failure.

Q. Does it matter which escrow agent I choose?
A. We think so! Iron Mountain is ICANN’s preferred escrow agent for Registry Data Escrow and is the vendor of choice for over 75 percent of gTLD Registry Operators. In fact, we protect over 99 percent of all domain names currently registered under all gTLDs worldwide. You can trust us to safeguard your data in compliance with ICANN’s requirements.

Q. What does escrow do for me and my new gTLD?
A. Data escrow is one of the stakeholder protection mechanisms for your new gTLD. Data in escrow with Iron Mountain may be used to help ensure continuity of service in the event of a natural disaster, a technical failure of the registry, or a security breach within the DNS system. By placing data in escrow with Iron Mountain, it instills trust within the registrar and registrant communities and ensures that the data associated with registered domain names is never at risk of being lost or inaccessible.

Q. Who sets up the escrow agreement?
A. The Registry Data Escrow Agreement is set up between the Registry Operator and Iron Mountain. The Registry Operator’s role is to deposit copies of their registry data on a regular basis. Iron Mountain is the escrow agent entrusted to hold the data. Iron Mountain will release the data to ICANN, as a beneficiary, under certain predefined conditions, such as if the registry cannot continue operations.

Q. How do I demonstrate that I have an escrow plan in place?
A. As part of the new gTLD application process, specifically question #38, you will need to show how your registry will comply with the Registry Data Escrow Specification, which is Specification 2 of the Registry Agreement. To do this, you will need to share your resourcing plans for implementing and maintaining the data escrow function. This includes an indication of how many employees will be required to support the data escrow function and a description of their roles. Lastly, data escrow must be included in detailed network diagrams showing the full interplay of the various registry elements. This information serves to demonstrate the understanding of the purpose for data escrow.

Q. What is expected of a Registry Operator once a data escrow account is set up?
A. A Registry Operator is expected to regularly deposit data into escrow – this includes full weekly deposits and daily differential deposits. These deposits must comply with the Registry Data Escrow Specification. All deposits are validated and protected by Iron Mountain in accordance with the retention schedules set forth under the Escrow Specification.
Q. What happens if I miss escrow deposits?
A. Missing escrow deposits are considered a breach of the Registry Agreement. As such, missing escrow deposits can invoke the remedies set forth under the Registry Agreement as well as the Registry Data Escrow Agreement if corrective action is not taken immediately. Iron Mountain is required to log escrow deposit activity, and we will contact you if we do not receive your deposit as scheduled or if there are problems with the deposit. All deposits – including missed and failed deposits – are reported to ICANN.

Q. What are the costs for establishing and maintaining a Registry Data Escrow Agreement with Iron Mountain?
A. There is a nonrecurring, one-time fee to set up the escrow account. This includes the agreement and the technical components of the deposit process. Monthly fees are then billed based on the number of domain names maintained by the registry. The Iron Mountain Registry Data Escrow fee schedule is available upon request.

Q. When is the escrow agreement set up?
A. The Registry Data Escrow Agreement is signed at the same time as the Registry Agreement and is required as part of the predelegation check before the official delegation of the gTLD is announced. The process can start any time – before or after you submit your application – and will take approximately 30 days. See the ICANN timeline, and where data escrow fits into the process.

Q. Can Registry Data Escrow services be subcontracted and paid through a Registry Service Provider managing the registry on behalf of the Registry Operator?
A. While registry services are likely to be outsourced by many Registry Operators, ICANN requires the Registry Operator to sign the Registry Data Escrow Agreement. This includes the obligation to pay for these services. Registry Service Providers may pay the escrow invoice as a part of their underlying services agreement with the Registry Operator, but ultimately, it is up to the Registry Operator to ensure that payments are made promptly to avoid any problems.

Q. How do I get started?
A. Just contact us, or have your Registry Services Provider contact us, and we’ll get you started with completing your data escrow requirements. We can be reached at +1-770-239-9200, Option 1, or via email at ipm_info@ironmountain.com.

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TIMELINE FOR RESERVING DATA ESCROW ACCOUNTS WITH IRON MOUNTAIN FOR YOUR NEW gTLD

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<td>ICANN’s Board of Directors approved the new gTLD program</td>
<td>Updated Applicant Guidebook published</td>
<td>User registration and application submission periods open</td>
<td>User registration period closes</td>
<td>Application submission period closes; new gTLD applications are considered</td>
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**SET UP REGISTRY DATA ESCROW WITH IRON MOUNTAIN**

- Contact Iron Mountain to obtain guidance on establishing a Registry Data Escrow Agreement
- Costs for three years’ worth of data escrow are incorporated into the new gTLD application
- Once approved, the Registry Data Escrow Agreement is signed, reserve your escrow account with Iron Mountain
- Deposits commence following the registration of the first domain name

Takes approximately 30 days, can start **before** or **after** you submit your application

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**RELATED INFORMATION**

Iron Mountain:
- Registry Data Escrow Service Data Sheet
- Frequently Asked Questions About Registry Data Escrow

ICANN’s Microsite for New gTLDs:
http://icann.org/newgtlds

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