

## VERIFICATION POLICY

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### Verification – maintaining value for .coop registrants

.Coop is a restricted top level domain (TLD) that is only open for registration to cooperatives and related organizations. DotCoop, the sponsor of the TLD, is required by its contract with ICANN to ensure that registrants meet the defined Eligibility Requirements so that the domain retains its value to registrants.

Verification is the process of assuring that all organizations that register a .coop TLD name are eligible. It should be noted that .coop assumes no responsibility for trying to determine if the domain names that are registered are specific to the registrant business or organizational name. dotCoop does not consider trademark ownership or related naming restrictions but alerts registrants that registration of a particular name can be challenged through the dotCoop Dispute Policy which incorporates the UDRP. For dotCoop, the sole verification task is to determine the eligibility of the registrant to register a domain.

#### Eligibility Criteria

While hundreds of thousands of organizations worldwide operate as cooperatives, the definition of a cooperative varies from country to country and from culture to culture. In order to standardize the definition for .coop verification purposes, the following eligibility criteria which define what organizations are eligible for .coop domains were included in the **.coop Sponsored TLD Agreement**:

- members of the National Cooperative Business Association (NCBA) if otherwise eligible;
- members of the International Cooperative Alliance(ICA) if otherwise eligible;
- organizations formed as and/or considered cooperatives under applicable local law;
- associations comprised of cooperatives;
- organizations that are committed to the seven cooperative principles;
- organizations that are majority controlled by cooperatives;
- entities whose operations are principally dedicated to serving cooperatives; and
- for no more than 5,000 registrants, persons or entities whose use of a .coop domain name would, in the opinion of the DCLLC Board, advance the interests of the cooperative sector in general or would assist in the development of cooperatives worldwide.

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### Penalties for Falsification of Registration Application

Each .coop registrant must actively accept the Registration Agreement of the registrar where they purchase their .coop domain. The dotCoop Registration Agreement is part of whatever agreement is provided by the registrar for .coop domains from that registrar and clearly notes that **no refunds will be provided by dotCoop for registrants that are not eligible for .coop domains.**

### Verification Fees

The cost of verification is included in the cost of .coop domains. dotCoop will not pay any charges for COD mail or other similar charges related to delivery of verification information to prove eligibility.

## Verification Options

.coop registrants may select from two options for providing information needed by dotCoop for verification.

### Cooperative References

As part of the registration process, .coop registrants may choose to provide at least one "cooperative reference" when they register their first .coop domain.

This information is passed to the .coop registry system as part of the registration process. The cooperative reference data is not updated once the initial registration is accepted. Registrars may provide registrants information to assist them in identifying appropriate cooperative references based on information provided by dotCoop or from their own contacts in the cooperative community.

If the registrant is selected for Verification, then the cooperative references provided during registration may be contacted for confirmation of eligibility. If the cooperative references cannot provide that confirmation, dotCoop may request additional information as described in the Verification Process.

### Pre-Registration Verification (.Coop Verification Code)

DotCoop provides an integrated pre-registration verification process which provides new registrants with a .Coop Verification Code (CVC) that can be used during the .coop registration process with participating registrars. Co-ops that receive a CVC and want to use a registrar that does not accept the codes can then use dotCoop as their Cooperative Reference (see above).

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The CVC process requires that the .coop registrant provide contact name and address information as well as email and telephone information. Once the information is submitted to dotCoop, the registrant is sent an email that requires confirmation for the verification process to be activated. Once the verification request is confirmed, dotCoop will use the provided information to complete the verification process.

If the verification request is approved, dotCoop will provide a verification code (the CVC) that can be used within the registration process of participating .coop registrars. dotCoop will confirm the CVC when the actual registration is submitted by the registrar. The process requires that the CVC only be used by the eligible entity.

Organizations that are in the process of formation can request pre-registration verification and should be prepared to provide information such as draft Bylaws or other organizational information that may be available. dotCoop will periodically review the eligibility of registrants originally verified through this program until the cooperative or other eligible entity is operational. Organizations that do not appear to qualify for a .coop domain will then be evaluated as described in the Verification Process below.

## Community Assistance

In order to address varying standards as well as communication issues that could arise in dealing with global domain name registration, the dotCoop Verification process uses a variety of sources to assist in verification. These include:

- ICA Directorate Staff
- ICA member contacts
- Cooperative apex organizations
- Cooperative references provided by registrants

This assistance is very useful in dealing with varying criteria around the world, but DotCoop has sole responsibility for verification of registrants. Although registrars collect the data to assist in the verification process and dotCoop uses the above contacts to assist in confirming information on particular cooperatives, this does not mean that any organization providing information is guaranteeing the validity of the registration or has been in any way delegated the responsibility of verifying the eligibility of the registrant. This responsibility always remains with dotCoop.

## **Verification Policy**

### **Verification Types**

DotCoop relies on a combination of technical and operational processes to support the verification of .coop registrants.

#### **Statistical Verification**

As a registrant is added to the registry system, a statistical sampling of registrants is selected for verification. This selection is done by the registry maintenance system. This selection is based on the Country information contained on the registration transaction that is received by the registry. Statistical verification selection does not imply that the eligibility of the registration is suspect.

These domain registrations are set to a status of Pending and cannot be activated until the verification process is completed.

An email is sent to the Registrant Contact alerting them that their eligibility for registration is being reviewed based purely on statistical sampling that helps to maintain the value of their .coop domains.

#### **Sampling Verification**

DotCoop also actively reviews registrations on a frequent basis as domains are registered and renewed and performs random "spot checks" of registrations that have inconsistent or incomplete information or appear to be registered by organizations that are not cooperatives.

These domain registrations are set to a status of Under Investigation, which does not affect the activation or ongoing use of the domain during the verification process.

An email is sent to the Registrant Contact alerting them to the initiation of the verification process.

#### **Inquiry-Based Verification**

In addition, dotCoop can initiate a review of a registrant based on inquiries that question the eligibility of a particular registrant. dotCoop will do an initial eligibility check and will update the status to Under Investigation to initiate the formal verification process if eligibility is not confirmed.

An email is sent to the Registrant Contact alerting them to the initiation of the verification process.

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### Verification Process

The basic process for all types of verification is the same. Throughout the process dotCoop uses its resources and any additional information and contacts provided by the registrant to determine eligibility. Please note that all emails noted below are sent to the Registrant Contact email.

1. An initial evaluation is done using information included with the registration including existing web sites of the registrant, email address domains and address information. If additional information is sent by the registrant, then that is also used.
2. If the registrant is determined to be eligible, then the registrant status is set to **Verified**. An email confirming eligibility is automatically sent to the registrant by the system confirming this determination. If this was a statistical verification, the domain names can then be activated. If this was a sampling verification, the registrant will be notified by email that dotCoop has reconfirmed eligibility as there is no effect on the domains.
3. If dotCoop cannot confirm the registrant as eligible, then the registration is set to a status of **Able to Appeal**.

When a registrant status is set to Able to Appeal, any active domains are inactivated until eligibility can be re-confirmed.

The registrant is sent another email that notifies them that they have 30 days in which to provide other information to help confirm their eligibility such as:

- a. Additional cooperative references that can confirm their cooperative status
  - b. A copy of the organization's bylaws that reflect cooperative principles
  - c. A copy of the organization's most recent annual report or the most recent past two years of audited financials which reflect cooperative principles
  - d. The last two financial statements provided to members
  - e. A sample of the organization's membership application forms and/or membership materials which reflect cooperative principles
  - f. Promotional, sales or informational material that reference the organizations status as a cooperative and reflect cooperative principles
  - g. A copy of the cooperative act in the country of origin or other legal definition of a cooperative of the jurisdiction in which the applicant operates and to which it conforms along with the legal documents confirming cooperative organization within the country
  - h. A listing of the organization's board of directors with contact information.
4. If dotCoop does not get a response to the Able to Appeal email request for information within the 30 day response period, an attempt will be made to contact the registrant via telephone.

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Since both valid email and telephone numbers are required at time of registration, if the email address and the telephone number are not operational then dotCoop will immediately terminate the registration at the end of the 30 day Appeal period.

5. If additional information is supplied within the 30 day response period, then dotCoop will re-evaluate the eligibility decision. The registration will continue in force during any evaluation period. If it is then confirmed that the registrant is eligible, then the registrant status is set to Verified and the domain(s) associated with the registrant can be re-activated. A confirmation of eligibility email is sent to the registrant.
6. If the information provided does not provide sufficient information for dotCoop to confirm eligibility, then additional information may be requested. After all information provided by the registrant is reviewed and dotCoop determines that the registrant is ineligible, then dotCoop will notify the registrant of this determination by email.
7. If there is no dispute by the registrant to this determination of ineligibility by dotCoop within 10 calendar days, the registration status is set to **Refused** and any names registered are revoked with **no refund of registration fees** regardless of any other grace period. An email notifying the registrant of the revocation is sent to the current registrant contact email address.
8. Once the registrant status is set to Refused, the registrant record is marked as deleted and the names that were registered by that registrant are available for registration by others.

## Appealing a Denial of Eligibility

Registrants may appeal denial of eligibility. Eligibility appeals are governed by the dotCoop Dispute Policy. Disputes for eligibility reasons must be sent to dotCoop within 30 calendar days of the date that the registrant status was set to Refused and the notification of ineligibility was emailed. Once a dispute is initiated, the domain will be placed on reserve until the dispute is settled based on the processes defined in the Dispute. DotCoop will abide by the results of the Dispute Resolution Process and implement any decisions as directed from that process.