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Draft Initial Report on the
Inter-Registrar Transfers Policy - Part A
Policy Development Process

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STATUS OF THIS DOCUMENT

12 This is the Initial Report on IRTP Part A PDP, prepared by ICANN staff for submission to the GNSO

13 Council on [TBC]. A Final Report will be prepared by ICANN staff following public comment.

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SUMMARY

21 This report is submitted to the GNSO Council and posted for public comment as a required step in

22 this GNSO Policy Development Process on Inter-Registrar Transfers Policy.

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1. Executive Summary

1.1 Background

- The Inter-Registrar Transfer Policy (IRTP) aims to provide a straightforward procedure for domain name holders to transfer their names from one ICANN-accredited registrar to another should they wish to do so. The policy also provides standardized requirements for registrar handling of such transfer requests from domain name holders. The policy is an existing community consensus policy that was implemented in late 2004 and is now being reviewed by the GNSO.
- The IRTP Part A Policy Development Process (PDP) is the first in a series of five PDPs that address areas for improvements in the existing transfer policy.
- The IRTP Part A PDP concerns three "new" issues: (1) the potential exchange of registrant email information between registrars, (2) the potential for including new forms of electronic authentication to verify transfer requests and avoid "spoofing," and (3) to consider whether the IRTP should include provisions for "partial bulk transfers" between registrars.
- A Working Group was formed on 5 August 2008.

1.2 Deliberations of the Working Group

- The Working Group worked in the three different issues in parallel to the preparation of constituency statements and the public comment period on this topic.
- In relation to Issue I - Is there a way for registrars to make Registrant E-mail Address data available to one another? Currently there is no way of automating approval from the Registrant, as the Registrant Email Address is not a required field in the registrar Whois. This slows down and/or complicates the process for registrants, especially since the Registrant can overrule the Admin Contact – the Working Group discussed the following topics; the Extensible Provisioning Protocol (EPP), Internet Registry Information Service (IRIS), Registrant vs. Admin contact approval, Thin vs. Thick registries, Whois and the AuthInfo code.

70   ▪   In relation to Issue II – Whether there is need for other options for electronic
71   authentication (e.g. security token in the Form of Authorization (FOA)) due to security
72   concerns on use of email addresses (potential for hacking or spoofing) – the Working
73   Group discussed the incidence of hijacking and the possibility of additional security
74   measures.
75   ▪   In relation to Issue III – Whether the policy should incorporate provisions for handling
76   partial bulk transfers between registrars – that is, transfers involving a number of
77   names but not the entire group of names held by the losing registrar – the Working
78   Group discussed whether partial bulk transfers concern transfers between registrars
79   or also include transfers between registrants and registrars, what would constitute a
80   partial bulk transfer and how the existing policy for a bulk transfer could potentially be
81   used for a partial bulk transfer,

82

83   **1.3   Preliminary Conclusions**
84   ▪   Issue I - Is there a way for registrars to make Registrant E-mail Address data
85   available to one another?
86   Based on the discussions in the Working Group and taking into account the current
87   phrasing of Issue I which limits it to a technical assessment of the issue, there
88   appears to be agreement that a policy change is not required. The WG noted that
89   WHOIS was not designed to support many of the ways in which it is currently used.
90   Some members suggested that finding a way to make the Registrant e-mail address
91   more readily available could be addressed as part of an overall technical
92   modernization of the WHOIS protocol. This could be through updates to the existing
93   protocol, modification of the Extensible Provisioning Protocol (EPP) or adoption of
94   the Internet Registry Information Service (IRIS) protocol. However, after review and
95   discussion none of these options received broad agreement.

96

97   The WG did note that, in the absence of a simple and secure solution for providing
98   the gaining registrar access to the registrant email address, future IRTP working
99   groups should consider the appropriateness of a policy change that would prevent a
100   registrant from reversing a transfer after it has been completed and authorized by the
101   admin contact. This option would not change the current situation whereby a losing

102	registrar can choose to notify the registrant and provide an opportunity to cancel a
103	transfer before the process is completed.
104	
105	It should be noted that the Working Group will not take a final decision on which
106	solution(s), if any, to recommendations to the GNSO Council before a thorough
107	review of the comments received during the public comment period and final
108	constituency statements has taken place.
109	▪ Issue II - Whether there is need for other options for electronic authentication?
110	Based on the discussion in the Working Group, there appears to be broad
111	agreement that there is a need for other options for electronic authentication.
112	However, opinions in the Working Group differ as to whether this should be an issue
113	for GNSO policy making or for market solutions. It should be noted that the Working
114	Group will not take a final decision on which solution(s), if any, to recommendations
115	to the GNSO Council before a thorough review of the comments received during the
116	public comment period and final constituency statements has taken place.
117	▪ Issue III - Whether the policy should incorporate provisions for handling partial bulk
118	transfers between registrars?
119	Based on the discussion in the Working Group, there appears to be broad
120	agreement that there is no need to incorporate provisions for handling partial bulk
121	transfers between registrars at this stage. The Working Group believes that these
122	scenarios can be addressed either through the existing Bulk Transfer provisions, or
123	through existing market solutions. It should be noted that the Working Group will not
124	take a final decision on which solution(s), if any, to recommendations to the GNSO
125	Council before a thorough review of the comments received during the public
126	comment period and final constituency statements has taken place.
127	
128	**1.4** **Initial Constituency Statements & Initial Public Comment Period**
129	▪ The public comment period ran from 5 September 2008 to 29 September 2008.
130	Apart from the Constituency statements, two other comments were received.
131	However, these two comments were deemed off-topic.
132	▪ Constituencies were requested to use the Constituency Statement Template the
133	Working Group developed to provide their feedback. Input was received from the

134		Intellectual Property Interests Constituency, gTLD Registry Constituency, Registrars
135		Constituency and the Business and Commercial Users' Constituency. Constituency
136		statements received are reflected per issue in chapter 6 of this report, and are set
137		forth in their entirety in Annex B
138		
139	**1.5**	**Conclusions and Next Steps**
140	▪	The Working Group aims to complete this section of the report in the second phase
141		of the PDP, following a second public comment period and the submission of the
142		final constituency statements.

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2. Objective and Next Steps

145 This Initial Report on the Inter-Registrar Transfer Policy (IRTP) Part A PDP is
146 prepared as required by the GNSO Policy Development Process as stated in the
147 ICANN Bylaws, Annex A (see http://www.icann.org/general/bylaws.htm#AnnexA).
148 The Initial Report will be posted for public comment for 20 days. The comments
149 received will be analyzed and used for redrafting of the Initial Report into a Final
150 Report to be considered by the GNSO Council for further action.

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3. Background

3.1 Process background

- Consistent with ICANN's obligation to promote and encourage robust competition in the domain name space, the Inter-Registrar Transfer Policy (IRTP) aims to provide a straightforward procedure for domain name holders to transfer their names from one ICANN-accredited registrar to another should they wish to do so. The policy also provides standardized requirements for registrar handling of such transfer requests from domain name holders. The policy is an existing community consensus policy that was implemented in late 2004 and is now being reviewed by the GNSO.

- As part of that review, the GNSO Council formed a Transfers Working Group (TWG) to examine and recommend possible areas for improvements in the existing transfer policy. The TWG identified a broad list of over 20 potential areas for clarification and improvement (see http://www.icann.org/en/gnso/transfers-tf/report-12feb03.htm).

- The Council tasked a short term planning group to evaluate and prioritize the policy issues identified by the Transfers Working Group. In March 2008, the group delivered a report to the Council that suggested combining the consideration of related issues into five new PDPs (see http://gnso.icann.org/drafts/transfer-wg-recommendations-pdp-groupings-19mar08.pdf).

- On 8 May 2008, the Council adopted the structuring of five additional inter-registrar transfers PDPs as suggested by the planning group (in addition to a recently concluded Transfer PDP 1 on four reasons for denying a transfer). It was decided that the five new PDPs would be addressed in a largely consecutive manner, with the possibility of overlap as resources would permit.

- The Council requested an Issues Report from Staff on the first of the new PDP issue sets (Set A – New IRTP Issues) that was delivered to the Council on 23 May 2008 (see http://gnso.icann.org/issues/transfers/transfer-issues-report-set-a-23may08.pdf).

- The three "new" issues in Set A address (1) the potential exchange of registrant email information between registrars, (2) the potential for including new forms of

183   electronic authentication to verify transfer requests and avoid "spoofing," and (3) to
184   consider whether the IRTP should include provisions for "partial bulk transfers"
185   between registrars.

186   ▪ The GNSO Council resolved on 25 June 2008 to launch a PDP ("PDP June-08") on
187   these three issues and adopted a charter for a Working Group on 17 July 2008.

188

189   **3.2   Issue Background (excerpt from Issues Report)**

190

191   **Issue I – Potential exchange of registrant e-mail information**

192   ▪ Issue I - Whether there could be a way for registrars to make Registrant Email
193   Address data available to one another. Currently there is no way of automating
194   approval from the Registrant, as the Registrant Email Address is not a required field
195   in the registrar Whois. This slows down and/or complicates the process for
196   registrants, especially since the Registrant can overrule the Admin Contact.

197   ▪ Section 1.1 of the Transfer Policy identifies the Registrant and the Administrative
198   Contact as parties who can authorize a transfer, and notes that the Registrant's
199   authority supersedes that of the Administrative Contact. Accordingly, an
200   authorization from the Registrant provides a reliable ground for executing a transfer,
201   while an authorization from the Administrative Contact can be contested by the
202   Registrant, in spite of being recognized as a valid ground for a transfer. A convenient
203   means to acquire Registrant authorization could thus enable a reduction of the
204   number of contested transfers.

205   ▪ During its deliberations, the Transfers Working Group noted that the issue is related
206   to the Whois provisions, since the email address of the Administrative Contact is a
207   required field in Whois, in contrast to the Registrant email address. However, in the
208   context of a PDP focused on the Transfer Policy, any proposed policy change
209   affecting Whois policy (for example requiring registrant email information in the
210   Whois) would be outside the scope of the PDP[1]. The issue to address is thus limited
211   to other means of keeping, maintaining and exchanging registrant email information

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[1] These two sentences draw a conclusion that has not been made by the GNSO Council or the Working Group, but are carried over from an earlier Staff Issues Report. See Section 5 regarding Whois below.

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212   between the relevant Registrars. This invokes procedural, administrative and security
213   aspects.
214

215   **Issue II – Options for Electronic Authentication**
216   ▪   Issue II - Whether there is need for other options for electronic authentication (e.g.,
217   security token in FOA) due to security concerns on use of email addresses (potential
218   for hacking or spoofing).
219   ▪   The original Transfers Task Force mentioned this issue as follows in its Final Report:
220   *19. In the event that the Gaining Registrar must rely on a physical process to obtain*
221   *this authorization, a paper copy of the Standardized Form of Authorization will suffice*
222   *insofar as it has been signed by the Registrant or Administrative Contact and is*
223   *accompanied by a physical copy of the Losing Registrar's Whois output for the*
224   *domain name in question.*
225   *a – b […references to physical documents, of no relevance here.]*
226   *c. The Task Force notes support for the concept that in the event of an electronic*
227   *authorization process, recommended forms of identity would include;*
228   *• electronic signature in conformance with national legislation, for instance, the*
229   *United States e-Sign Act*
230   *• Email address matching Registrant or Administrative Contact email address found*
231   *in authoritative Whois database.*
232   In relation to the first bullet point above, it can be noted that the current extent of
233   Registrars' use of digital signature means for transfers is unknown. Such information
234   could be useful to collect as background for deliberations in a future PDP covering
235   this issue.
236   ▪   The Transfers WG noted the issue in its report as follows:
237   *According to the policy, the Gaining Registrar is required to obtain the FOA from the*
238   *Registrant or Administrative Contact before initiating a transfer request. The*
239   *Registrar of Record also has the option to send an FOA to confirm the transfer*
240   *request. Policy issues relating to the FOA include:*
241   *1. Whether there is need for other options for electronic authentication (e.g., security*
242   *token in FOA) due to security concerns on use of email addresses (potential for*
243   *hacking or spoofing).*

244   ▪ Regarding the risk of spoofing mentioned by the Transfers WG, useful background
245   information is provided in the SSAC report on domain name hijacking, available at
246   http://www.icann.org/announcements/hijacking-report-12jul05.pdf. Recommendation
247   10 of this report states: "ICANN should consider whether to strengthen the identity
248   verification requirements in electronic correspondence to be commensurate with the
249   verification used when the correspondence is by mail or in person."

250   ▪ The SSAC report was produced in 2005 and it should be noted that, since then,
251   Extensible Provisioning Protocol (EPP) has been deployed by all gTLD registries that
252   have implemented the Transfer Policy. Since EPP requires an authorization
253   ("AuthInfo") code, EPP deployment may have had an impact from a security
254   standpoint and recent data in this respect could be useful as background for a future
255   PDP covering this issue.

256   ▪ It can also be noted that some ccTLDs do use electronic authentication methods for
257   transfers, for example through digital signatures for authentication of e-mail requests.
258   The .UK registry operator Nominet uses PGP as described at
259   http://www.nic.uk/registrars/systems/auto/pgp/. Another example is the .SE registry
260   operator, IIS, featuring a certificate-based web interface ("Domänhanteraren" – in
261   English "The Domain Handler") for the registrant, where the registrant can effectuate
262   changes of domain information, including change of Registrar, see
263   https://domanhanteraren.iis.se/start/welcome. There may be other such examples of
264   interest as references for this issue.

265
266   **Issue III - Provisions for partial bulk transfers between Registrars**

267   ▪ Issue III - Whether the policy should incorporate provisions for handling "partial bulk
268   transfers" between registrars – that is, transfers involving a number of names but not
269   the entire group of names held by the losing registrar.

270   ▪ This aspect was not touched upon by the Transfers Task Force, but identified as a
271   potential issue (under "Other") by the Transfers WG in its report.

272   ▪ Part B of the Transfer Policy governs bulk transfers, meaning transfer of all domains
273   sponsored by one Registrar to another Registrar, for example as a consequence of
274   one Registrar acquiring another. According to the policy, bulk transfers can only take

275   place under certain specific conditions, for further information see part B at
276   http://www.icann.org/transfers/policy-12jul04.htm.
277   ▪   While different from bulk transfers in the "complete" sense, i.e. transfer of a
278   Registrar's complete domain portfolio to another Registrar, the need for "partial" bulk
279   transfers can arise due to, for example, company takeovers, where the acquiring
280   company wishes to transfer some or all of the acquired company's domains to its
281   own Registrar of Record. There is no prescribed way of doing so in the Inter
282   Registrar Transfer Policy other than domain by domain, although Registrars are free
283   to accept, for example, fax lists with numerous domains to transfer, while still having
284   to follow the authentication/verification practices of the policy. The extent of such
285   "voluntary provisions to facilitate partial bulk transfers" in practice is unknown.
286   ▪   NeuLevel,Inc., the registry operator of .BIZ, has proposed the launch of a partial bulk
287   transfer service, which has been approved by ICANN through the Registry Services
288   Technical Evaluation Panel (RSTEP) procedure. This service proposal was
289   prompted by two Registrars' request for a partial bulk transfer between them. For
290   further information, see http://www.icann.org/registries/rsep/NeuLevel_request.pdf.
291   ▪   For information, there are provisions in place for partial bulk transfers in some
292   ccTLDs. The .UK registry, Nominet, has a procedure for "mass transfers", described
293   at http://www.nic.uk/registrants/maintain/transfer/mass/ and also for PGP-signed
294   "bulk" operations at the registrar level, described at
295   http://www.nic.uk/registrars/systems/auto/bulk/ (see especially Example 9 therein, of
296   relevance for partial bulk transfers). There may be other such examples of interest as
297   references for this issue.
298

298 # 4. Approach taken by the Working Group

299

300 The IRTP Part A Working Group started its deliberations on 5 August 2008 where it was

301 decided to continue the work primarily through weekly conference calls and e-mail

302 exchanges. The Working Group agreed to start working on the three different issues in

303 parallel to the preparation of constituency statements and the public comment period on this

304 topic. In order to facilitate the work of the constituencies, a template was developed for

305 responses (see Annex A).

306

307 ## 4.1 Members of the IRTP Part A Working Group

308

309 The members of the Working group are:

310

Name	Constituency / other	Affiliation
Paul Diaz (Chair of the Working Group)	Registrar	Network Solutions
James M. Bladel	Registrar	GoDaddy
Mike Rodenbaugh (Council liaison)	Business	Rodenbaugh Law
Barbara Steele	Registry	Verisign
Kevin R. Erdman	IPC	Baker & Daniels LLP
Sebastien Bachollet	ALAC	ISOC France
Mike O'Connor	Business	O'Connor Company
Marc Trachtenberg	IPC	Winston & Strawn LLP
Margie Milam	Registrar	Markmonitor
Mark Klein	Registrar	Sedo
Michael Collins	Business	Internet Commerce

		Association
Steven Vine	Registrar	Register.com
Adam Eisner	Registrar	Tucows
Avri Doria (GNSO Chair)	NCUC	Luleå Univ of Tech
Chuck Gomes (GNSO Vice Chair)	Registry	Verisign

311

312 The statements of interest of the Working Group members can be found at

313 http://gnso.icann.org/issues/transfers/soi-irtp-a-pdp-oct08.shtml.

314

315 The email archives can be found at http://forum.icann.org/lists/gnso-irtp-pdp-jun08/.

316

317

5.   Deliberations of the Working Group

This chapter provides an overview of the deliberations of the Working Group conducted both by conference call as well as e-mail threads. The points below are just considerations to be seen as background information and do not necessarily constitute any suggestions or recommendations by the Working Group.

Issue I - Is there a way for registrars to make Registrant E-mail Address data available to one another? Currently there is no way of automating approval from the Registrant, as the Registrant Email Address is not a required field in the registrar Whois. This slows down and/or complicates the process for registrants, especially since the Registrant can overrule the Admin Contact.

Extensible Provisioning Protocol (EPP)

- One idea discussed in the context of issue I was to extend or modify the Poll Message facility of the Extensible Provisioning Protocol (EPP) for this function (see Annex C for further details on EPP). EPP is currently used as an authenticated and secure channel of communication between the Registry and Registrar, which can also be used in the context of transfers (see figure 1).

- The Poll Message system has the advantage of being both an authenticated and secure channel of communication between the Registry and Registrar, but it is currently mostly unidirectional (Registrar does not create messages for Registry) and there is no means for registrars to communicate with each other. The Working Group considered whether EPP could be extended to allow registrars to create Poll Messages for each other, for those situations which require the sharing of registrant information. Issues such as security, costs of implementation and feasibility would need to be addressed in order to determine whether this is a suitable option, but overall the Working Group considers this a possible avenue to be further explored.

346 **Figure 1.**

Transfer in an EPP Registry
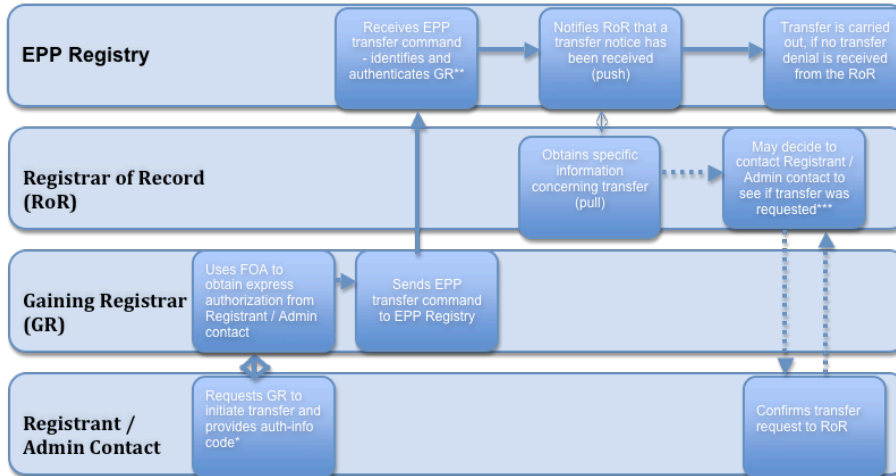
347 **Notes**

348 * Registrars must provide the Registered Name Holder with the unique "AuthInfo" code within five (5) calendar days of the
349 Registered Name Holder's initial request if the Registrar does not provide facilities for the Registered Name Holder to
350 generate and manage their own unique "AuthInfo" code.

351 ** EPP requires mutual authentication of clients/registrars and servers before a TLS connection can be made between the
352 two parties. Digital certificates, digital signatures, and PKI services are used to authenticate both parties. Certificates must
353 be signed by a CA that is recognized by the server operator. [RFC 4934, section 8]. Additionally, all EPP clients/registrars
354 are required to identify and authenticate themselves using a server-assigned user ID and a shared secret (a password)
355 that is sent to the server using a login command. The server must confirm the identity and shared secret before the client
356 is given access to other protocol services. [RFC 4930, section 2.9.1.1] Some EPP commands, such as the domain
357 transfer command, require additional authentication information that must be provided and confirmed before the
358 requested action is completed. The default authentication information service uses a shared secret that is known to the
359 registry, the registrar, and the registrant. Registrants are required to provide this secret to a second registrar when
360 requesting the second registrar to initiate a domain transfer on the registrant's behalf. The authentication information data
361 structure is extensible so that additional authentication mechanisms can be defined and implemented in the future. [RFC
362 4931, sections 3.2.1 and 3.2.4].

363 *** The Registrar of Record has 5 calendar days to respond to transfer notice from Registry
364

365 ▪ It should be noted that the RFC3730 - Extensible Provisioning Protocol (EPP) did not
366 foresee the potential use of poll messages in this way which may mean that a
367 modification of the RFC would be required in order to consider this as an option. Such a
368 modification could take a substantial amount of time. In addition, the implementation of a
369 modified EPP would bring with it certain costs. Both elements would need to be
370 considered prior to making a recommendation.
371 ▪ In relation to the security of EPP, it was noted that no security incidences with EPP have
372 been reported to date (or at least not to the knowledge of the Working Group members).
373

Internet Registry Information Service (IRIS)

374
375 ▪ The Internet Registry Information Service (IRIS) has been developed by the IETF Cross
376 Registry Internet Service Protocol (CRISP) working group with the objective to replace
377 Whois. IRIS offers the opportunity to set some enforceable standards around who has
378 access to specific registrant data fields and a way to control such access.
379 ▪ Not taking into account or providing any opinion on whether IRIS should or should not be
380 considered as a replacement for Whois, the Working Group discussed whether it would
381 be an option to consider IRIS as a secure means of communication between registrars.
382 In this circumstance, the only data that would be provided and shared between registrars
383 would be registrant e-mail data. The Authinfo code could be used as a means of
384 authentication to access IRIS.
385 ▪ As with EPP, the costs and time of implementation would need to be assessed in order
386 to determine whether this would be a viable option.
387

Registrant vs. Admin contact approval

388
389 ▪ While a registrant has the ultimate authority regarding an inter-registrar transfer, the
390 admin contact can initiate and approve a transfer without a registrant's involvement.
391 Most registrars, maybe all, will notify the registrant that a transfer has been initiated and
392 that the registrant can cancel it and that the transfer will go through if the registrant does
393 nothing. So, if a registrant finds that the admin contact has transferred a domain away
394 without registrant approval this can lead to a transfer dispute.
395 ▪ Any policy that allows one person to authorize a transfer and another person to dispute
396 the transfer after it is completed is a potential source of conflict.

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397 ▪ Taking this into account, one could consider requiring registrant approval before a
398 transfer occurs which would normally avoid most disputes.
399 ▪ Another option would be to give the admin contact the ultimate transfer authority.
400 However, this might result in additional security / hijacking risks as the admin contact
401 details are part of the public Whois.
402 ▪ Similarly, the registrant could be given the sole transfer authority. However, this brings
403 us back to the issue at hand, how to make the registrant e-mail address available to the
404 gaining registrar in order to confirm a transfer request.
405 ▪ Those registrars participating in the Working Group confirmed that normally the Gaining
406 Registrar sends the confirmation of a transfer to the admin contact since that is the
407 contact that they have on file. It could be considered to make it a requirement, instead of
408 optional, that the Registrar of Record confirms the transfer with the Registrant (instead of
409 the admin contact). This would add another approval into the process that could enable
410 a losing registrar to delay or prevent a transfer. When combined with other transfer
411 process items that a losing registrar controls and can use to cause difficulties and delay,
412 registrar lock removal and auth code retrieval, adding a requirement for the loosing
413 registrar to confirm the transfer has the potential of causing insurmountable difficulty and
414 delay for registrants especially when trying to transfer a large domain name portfolio.
415 However, it would resolve the problem of Registrant e-mail not being publically available
416 and it would resolve the problem of domain transfers being authorized by the admin
417 contact without the Registrant's consent.
418
419 **Thin vs. Thick Registries**
420 ▪ A "Thin" Registry is one for which the Registry database contains only domain name
421 service (DNS) information:
422 - Domain name
423 - Name server names
424 - Name server address
425 - The name of the Registrar
426 - Basic transaction data

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427   ▪   It does not contain any Registrant or contact information. Registrant or contact

428   information is maintained by the Registrar. Examples of Thin registries are .com, .net

429   and .jobs (see table 1 for a complete overview).

430   ▪   A "Thick" Registry is one for which the Registry database contains:

431   -   Registrant and contact information

432   -   Domain name

433   -   Name server names

434   -   Name server address

435   -   The name of the Registrar

436   -   Basic transaction data

437   ▪   All authoritative information is kept within the Registry.

438   ▪   Registrant Email is collected and maintained by all registrars, and submitted to all

439   "Thick" Registries. A check of gTLD WHOIS data shows that Registrant Email is also

440   displayed for all Thick Registries.

441   ▪   "Thin" registries do not maintain any registrant information.

442   ▪   It should be noted that "Thick" registries are not obliged to include the registrant e-mail

443   address in Whois data, so requiring all "Thin" registries to become "Thick" registries

444   would not change anything for the particular issue at hand, unless the inclusion of the

445   registrant e-mail address would be mandated.

446   ▪   If the registrant email address would be required for inclusion in Whois data, it should

447   not even matter whether it is the registry or the registrar that is required to maintain

448   whois data.

449

450   Table 1

gTLD	Thin	Thick	Special
.ARPA		✓	
.AERO		✓	
.ASIA		✓	
.BIZ		✓	
.CAT		✓	
.COM	✓		

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.COOP		✓	
.EDU		✓	
.GOV			✓ Private Registry
.INFO		✓	
.JOBS	✓		
.MIL			✓ Private Registry
.MOBI		✓	
.MUSEUM		✓	
.NAME	✓	✓[2]	
.NET	✓		
.ORG		✓	
.PRO		✓	
.TEL		✓	
.TRAVEL		✓	

451 **Whois**

452 ▪ The WG agreed that even tough Whois should not be the main topic of the discussion as

453 it is not specifically in the remit of this Working Group to make any recommendations for

454 Whois modification, it would not be off-limit to include in the discussion if deemed

455 appropriate for providing an insight into issue I.

456 ▪ Registrant email addresses are not a required WHOIS field. Registrars can publish it if

457 they choose. Requiring that this address be made publicly available would solve the

458 issue at hand, but at the same time it might raise privacy and security concerns - and is

459 possibly / probably beyond the mandate of this WG.

460 ▪ Members of the RyC who provided feedback also indicated that ICANN Registry

461 Agreements require that the registrant e-mail address field be displayed in the WHOIS of

462 most gTLDs and sTLDs and most of those registries make submission and display of

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[2] 'Thick' Whois information is available, but only after payment

463	registrant e-mail address mandatory. It should be noted that this only applies to 'thick'
464	registries.
465	
466	**AuthInfo Code**
467	▪ The Working Group also discussed whether the AuthInfo code, which is currently being
468	used to authenticate a transfer in EPP based registries, could be used as a means to
469	authenticate the transfer instead of the registrant or admin contact e-mail address.
470	▪ It was noted that this would not solve the issue at hand as the registrant could still
471	challenge a transfer, even if the AuthInfo code would be provided by the admin contact,
472	unless the submission of a valid AuthInfo code would be the only requirement to initiate
473	a transfer. However, this was not deemed a secure and viable solution compared to the
474	current system.
475	
476	**Preliminary Conclusion for Issue I**
477	▪ Based on the discussions in the Working Group and taking into account the current
478	phrasing of Issue I which limits it to a technical assessment of the issue, there appears
479	to be agreement that a policy change is not required. The WG noted that WHOIS was
480	not designed to support many of the ways in which it is currently used. Some members
481	suggested that finding a way to make the Registrant e-mail address more readily
482	available could be addressed as part of an overall technical modernization of the WHOIS
483	protocol. This could be through updates to the existing protocol, modification of the
484	Extensible Provisioning Protocol (EPP) or adoption of the Internet Registry Information
485	Service (IRIS) protocol. However, after review and discussion none of these options
486	received broad agreement.
487	
488	The WG did note that, in the absence of a simple and secure solution for providing the
489	gaining registrar access to the registrant email address, future IRTP working groups
490	should consider the appropriateness of a policy change that would prevent a registrant
491	from reversing a transfer after it has been completed and authorized by the admin
492	contact. This option would not change the current situation whereby a losing registrar
493	can choose to notify the registrant and provide an opportunity to cancel a transfer before
494	the process is completed.

495

496   It should be noted that the Working Group will not take a final decision on which

497   solution(s), if any, to recommendations to the GNSO Council before a thorough review of

498   the comments received during the public comment period and final constituency

499   statements has taken place.

500

501   **Issue II - Whether there is need for other options for electronic authentication (e.g.,**

502   **security token in the Form of Authorization (FOA)) due to security concerns on use of**

503   **email addresses (potential for hacking or spoofing).**

504

505   ▪ One of the issues raised by the Working Group was the actual incidence of hacking or

506   spoofing. One member of the Group shared that its Domain Services team has the

507   equivalent of 1-2 full-time employees dedicated to work on this specific issue. Since

508   January 2008, this team has received over 1000 claims of domain name "hijacking," and

509   has taken action to restore the original registrant in 533 of these cases, and upheld the

510   transfer in another 504. On average, the investigation of each claim takes 5-10 business

511   days. Some of these incidents are internal (e.g. Change of Registrant) transfers, not

512   transfers from other registrars. It should be noted that AuthInfo keys are only involved in

513   the latter case. The "vast majority" of disputed transfers involved compromised email

514   accounts. Typically, these are free accounts (Gmail, Yahoo, Hotmail, etc.). These figures

515   demonstrate that the prevention and remediation of domain name "hijacking" is a

516   significant operational burden for registrars.

517   ▪ The Working Group also noted that apart from these figures, the loss of even a single

518   domain name through "hijacking" can be personally and financially disruptive to a

519   registrant, and involve a conceivable liability potential for the involved registrar / may

520   result in significant potential liability for the involved registrar / could result in significant

521   potential liability for the involved registrar / conceivably might result in a claim for

522   damages against the involved registrar.

523   ▪ Additional security measures could be considered, but it should be noted that this would

524   result in additional costs. Furthermore, it is argued that any recommendation to this end

525   should not result in mandating certain technologies over others.

Comments:

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526   ▪   Some members of the Working Group considered that offering additional security
527   measures should be left as a service that a registrar can choose to provide as part of its
528   offering.

529

530   **Preliminary Conclusion for Issue II**
531   ▪   Based on the discussion in the Working Group, there appears to be broad agreement
532   that there is a need for other options for electronic authentication. However, opinions in
533   the Working Group differ as to whether this should be an issue for GNSO policy making
534   or for market solutions. It should be noted that the Working Group will not take a final
535   decision on which solution(s), if any, to recommendations to the GNSO Council before a
536   thorough review of the comments received during the public comment period and final
537   constituency statements has taken place.

538

539   **Issue III - Whether the policy should incorporate provisions for handling partial bulk**
540   **transfers between registrars - that is, transfers involving a number of names but not**
541   **the entire group of names held by the losing registrar.**

542

543   ▪   Some members of the Working Group argue that this issue relates to potential partial
544   bulk transfers between registrars, and not registrant initiated partial bulk transfers which
545   are in practice already possible and offered as a service by a number of registrars.
546   ▪   Several members of the Working Group noted that if there would be support for
547   incorporating provisions for handling partial bulk transfers, it is imperative to ensure that
548   these provisions do not blur the boundaries between Policy requirements and Product
549   development.
550   ▪   In order to consider this issue in its full depth, it will be important to define what would
551   constitute a partial bulk transfer. What would be a minimum, would these transfers be
552   treated as renewals, is there a fee involved? Also, this definition process would need to
553   take into consideration that partial bulk transfers should not be abused by those trying to
554   avoid the charge that currently applies for bulk transfers over 50,000 domain names.
555   ▪   There is a policy in place that defines how a bulk transfer process works (see ICANN
556   Policy on Transfer of Registrations between Registrars, 12 July 2004, Section B. ICANN-
557   Approved Transfers). When a registry executes a bulk transfer under the existing policy,

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558 the registries receive approval from ICANN to use the 'bulk transfer tool' to transfer all

559 domains under the management of one ICANN accredited registrar to another

560 designated ICANN accredited registrar. The registry then contacts both the gaining

561 registrar and the losing registrar to coordinate a time to complete the transfer. A script is

562 run that, in essence, only changes the registrar of record for the domain names - the

563 expiration date is not changed nor is a registration fee assessed.

564 ▪ It was suggested that a similar process could be considered for a 'voluntary partial bulk

565 transfer' request with the exception that the request would not be received from ICANN,

566 but instead, from one of the registrars. Therefore, the registries would receive the

567 request to initiate a voluntary partial bulk transfer from a registrar and, provided all

568 requirements are met, the registry would execute the command to move the designated

569 domain names from the losing registrar to the gaining registrar (without further

570 intervention by the registrars and without moving the expiration dates of the domain

571 names forward or assessing the standard registration fee to the gaining registrar). The

572 details surrounding the minimum requirements for submission of requests would need to

573 be addressed. Much work would need to be done by the WG to define the

574 requirements, fee structure, etc. The requirements should be limited to those relating to

575 registry and registrar responsibilities. How various registrars decide to develop products

576 (and establish their fee structure that they would charge for the service to their

577 registrants), as well as market the product to their registrants, should be left up to the

578 individual registrars.

579 ▪ It was noted that from a security perspective, provisions for a partial bulk transfer might

580 not be desirable as this would also allow miscreants to transfer a large number of

581 domain names at once.

582 ▪ Having taken into account the above considerations, the Working Group started

583 deliberations on the possible scenarios in which a partial bulk transfer might be

584 appropriate and found the following:

585 o Scenario I – Partial Bulk Transfer following ICANN accreditation of a reseller

586 A reseller becomes an ICANN accredited registrar and may decide to become the

587 registrar or record for those domain names for which it has been accredited.

588 o Scenario II – Partial Bulk Transfer between registrars

589 A registrar may decide to move a certain number of domain names to another

590		registrar, e.g. linked to one gTLD because there is agreement to no longer sell
591		domain names in the gTLD in question.
592	o	Scenario III – Partial Bulk Transfer in case of a (partial) merger or acquisition
593		between registrars
594		As a result of a partial merger or acquisition between registrars, a number, but not
595		all, domain names are transferred to the new registrar.
596	o	Scenario IV – Partial Bulk Transfer initiated by a registrant
597		A registrant decides to his/her domain name portfolio to a new registrar, but not all,
598		e.g. as a consequence of a merger or acquisition.
599	o	Scenario V – Partial Bulk Transfer following de-accreditation of a registrar
600		A registrar voluntarily abandons its accreditation, and instead becomes a reseller of
601		an accredited registrar transferring all domain names to that registrar.
602	▪	The existing bulk transfer provision reads as follow:
603		*"B. ICANN-Approved Transfers*
604		*Transfer of the sponsorship of all the registrations sponsored by one Registrar as the*
605		*result of (i) acquisition of that Registrar or its assets by another Registrar, or (ii) lack of*
606		*accreditation of that Registrar or lack of its authorization with the Registry Operator, may*
607		*be made according to the following procedure:*
608		*(a) The gaining Registrar must be accredited by ICANN for the Registry TLD and must*
609		*have in effect a Registry-Registrar Agreement with Registry Operator for the Registry*
610		*TLD.*
611		*(b) ICANN must certify in writing to Registry Operator that the transfer would promote*
612		*the community interest, such as the interest in stability that may be threatened by the*
613		*actual or imminent business failure of a Registrar.*
614		*Upon satisfaction of these two conditions, Registry Operator will make the necessary*
615		*one-time changes in the Registry database for no charge, for transfers involving 50,000*
616		*name registrations or fewer. If the transfer involves registrations of more than 50,000*
617		*names, Registry Operator will charge the gaining Registrar a one-time flat fee of US$*
618		*50,000."*
619		Even though the current bulk transfer provisions were originally not intended to cater to
620		the bulk transfer of domain names in only one gTLD, the Working Group recognises that
621		the current language might provide for this option and a clarification to this end by the

622 GNSO Council may be a useful approach. Taking this into account, the Working Group

623 found, after in-depth discussion, that existing bulk transfer provisions and/or market

624 solutions currently cover all scenarios.

625 ▪ As a result, the Working Group does not see a need to incorporate provisions for

626 handling partial bulk transfers between registrars at this stage.

627

628 **Preliminary Conclusion for Issue III**

629 ▪ Based on the discussion in the Working Group, there appears to be broad agreement

630 that there is no need to incorporate provisions for handling partial bulk transfers between

631 registrars at this stage. The Working Group believes that these scenarios can be

632 addressed either through the existing Bulk Transfer provisions, or through existing

633 market solutions. It should be noted that the Working Group will not take a final decision

634 on which solution(s), if any, to recommendations to the GNSO Council before a thorough

635 review of the comments received during the public comment period and final

636 constituency statements has taken place.

637

637

6. Initial Constituency Statements & Public Comment Period

640

641 This section features issues and aspects of the IRTP Part A PDP reflected in the statements
642 from the GNSO constituencies and comments received during the public comment period.

643

6.1 Initial Public Comment Period

645

646 The public comment period ran from 5 September 2008 to 29 September 2008. Three
647 comments were received of which only one (from the IPC constituency) responded to the
648 questions outlined in the announcement. The other two responses (from Malc McGookin
649 and Jeffrey A. Williams) were off-topic; they expressed concerns relating to the loss of a
650 particular domain name, the redemption grace period and warehousing. In addition, two
651 other comments, the constituency statements of the Registrar and Registry constituency,
652 were received after the deadline of the public comment period. The public comments on this
653 forum are archived at http://forum.icann.org/lists/new-irtp-issues/. A summary of the
654 constituency statements can be found in the next section.

655

6.2 Initial Constituency Statements

657

658 The Constituency Statement Template was sent to all the constituencies. Feedback was
659 received from the Intellectual Property Interests Constituency, gTLD Registry Constituency,
660 Registrar Constituency and the Business and Commercial Users' Constituency. These
661 entities are abbreviated in the text as follows (in the order of submission of the constituency
662 statements):

663

664 IPC - Intellectual Property Interests Constituency
665 RyC - gTLD Registry Constituency
666 RrC – Registrar Constituency

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667 BC – Business and Commercial Users' Constituency

668

6.3   Constituency Views

670

671 The three comments responding to the questions outlined in the announcement were

672 submitted by the Intellectual Property Constituency (IPC), the Registry Constituency (RyC)

673 the Registrar Constituency (RC) and the Business and Commercial Users' Constituency

674 (BC) . Annex A of this report contains the full text of the constituency statements that have

675 been submitted. These should be read in their entirety. The following section attempts to

676 summarize key constituency views on the issues raised in the context of IRTP Part A PDP.

677 This section also summarizes further work recommended by the various constituencies,

678 possible actions recommended to address the three issues part of the IRTP Part A PDP,

679 and the impact of potential measures on the GNSO constituencies.

680

681 **Issue I - Is there a way for registrars to make Registrant E-mail Address data available**

682 **to one another? Currently there is no way of automating approval from the Registrant,**

683 **as the Registrant Email Address is not a required field in the registrar Whois. This**

684 **slows down and/or complicates the process for registrants, especially since the**

685 **Registrant can overrule the Admin Contact.**

686

687 The IPC believes that the lack of an e-mail address for the registrant does not necessarily

688 delay the transfer of a domain name. However, it does emphasise that if registrant e-mail

689 address data is to be made available to other registrars, it should happen in the context of

690 an overall technical modernization of the Whois protocol.

691

692 The RyC notes that the question might need to be restated to clarify the scope as registrant

693 contact information such as the e-mail address is mandated in the case of thick registries;

694 the registry operator is required to display the registrant e-mail address in the registry's

695 WHOIS. In the case of thin registries, the RyC considers it too costly and time consuming to

696 require thin registries to add contact information. The RyC advocates that any change to

697 the policy should be limited to addressing the issue of obtaining authoritative information

698 relating to the administrative contact e-mail address. In this context, a tiered access

699 approach to proving WHOIS information could be considered for implementation by

700 registrars.

701

702 The RC highlights that no viable secure implementation is available which would allow

703 registrars to make registrant e-mail address data available to one another. In addition, the

704 RC believes the issue is more appropriate for a market based solution than for prescriptive

705 measures.

706

707 The BC does believe a policy change is required as the current situation creates potential

708 confusion as 'the Admin Contact email address is purportedly authoritative, yet can be

709 overruled by a Registrant'. The BC suggests that a potential solution could be to make the

710 Admin Contact email address authoritative for a transfer and in addition employ

711 authentication technologies to authenticate transfer requests and acknowlegments.

712

713 **Issue II - Whether there is need for other options for electronic authentication (e.g.,**

714 **security token in the Form of Authorization (FOA)) due to security concerns on use**

715 **of email addresses (potential for hacking or spoofing).**

716

717 The IPC believes that there is a need for further options for electronic authentication in order

718 to set a reasonable secure and basic standard to be used by every registrar, and that such

719 options should be independent of any other services offered by the registrar. However,

720 such a system should improve security without making the transfer process too

721 cumbersome. Possible solutions could include the requirement for the registrant to submit

722 with its request to unlock the name the IANA ID of the Gaining Registrar or the use of digital

723 certificates. The IPC believes that an analysis of various ccTLD registry policies such as the

724 Swedish registry (.se), the Swiss registry (.ch) and CoCCA (.cx, .mu, .na, etc), would benefit

725 the policy development process. The IPC does recognize that unexpected and increased

726 costs for registrants or at the registry level could be an issue.

727

728 The RyC supports the principle that market forces should handle this issue; registrars are

729 best placed to measure demand and decide whether they would like to differentiate

730 themselves from their competitors by making additional security measures available for their

731   customers. The RyC has identified a number of registrars that provide such additional

732   security methods to their customers such as Markmonitor, GoDaddy and Moniker. However,

733   if a need would be identified for other options of electronic authentication, the RyC

734   recommends that the EPP AuthInfo code be explored in further detail as this mechanism

735   already provides an automated way to authenticate transfer requests and could take the

736   place of both the Registrant and Admin contact e-mail addresses. The RyC notes that for

737   the use of AuthInfo codes to be effective, compliance with the requirement that AuthInfo

738   codes be unique by domain name must be enforced via the ICANN Registrar Compliance

739   Program and not the registry operator.

740

741   The RC also recommends that this issue be resolved based on market demand rather than

742   prescriptive measures and cautions against unintended consequences of technology

743   mandates.

744

745   The BC does believe there is a need for other options for electronic authentication such as

746   PGP or other authentication methods. In addition, it calls upon SSAC, GNSO and other

747   ICANN bodies to continue working to investigate and mitigate the risk of domain name

748   hijacking.

749

750   **Issue III - Whether the policy should incorporate provisions for handling partial bulk**

751   **transfers between registrars - that is, transfers involving a number of names but not**

752   **the entire group of names held by the losing registrar.**

753

754   The IPC believes that the transfer policy should incorporate provisions for handling partial

755   bulk transfers. It considers it particularly helpful in the context of corporate asset sales and

756   acquisitions in the context of a registrant or in case of the termination or non-renewal of a

757   registrar's accreditation agreement.

758

759   The RyC supports the incorporation of provisions to handle partial bulk transfers as long as

760   this would not require reengineering the existing bulk transfer functionality or new

761   development. Specific details of the product offerings by registries and registrars should be

762   left to the market.

763

764   The RC also believes that a partial bulk transfer option would be a useful tool for registrars,

765   as long as it is properly defined. It does note that many details still need to be refined such

766   as 'how many domain names constitute a bulk transfer' before a policy can be considered in

767   this area. It emphasizes that such a policy should be limited to partial bulk transfers between

768   registrars; partial bulk transfers for registrants should be left to market-driven innovation and

769   competition.

770

771   The BC supports that there should be such a provision to allow large domain portfolio

772   owners to transfer large chunks of domain names between registrars; provisions to facilitate

773   partial bulk transfers should not be limited to registrars only.

774

775

775

7. Conclusions and Next Steps

The Working Group aims to complete this section of the report in the second phase of the PDP, following a second public comment period and the submission of the final constituency statements.

780

781

781 # Annex A – Template for Constituency Statements

782 **Constituency Input Template Inter-Registrar Transfer Policy Set A**

783

784 The GNSO Council has formed a Working Group of interested stakeholders and

785 Constituency representatives, to collaborate broadly with knowledgeable individuals and

786 organizations, in order to develop potential policy options to address three new issues

787 associated with the Inter-Registrar Transfer Policy.

788

789 Part of the working group's effort will incorporate ideas and suggestions gathered from

790 Constituencies through this Constituency Statement.

791

792 Inserting your Constituency's response in this form will make it much easier for the Working

793 Group to summarize the Constituency responses. This information is helpful to the

794 community in understanding the points of view of various stakeholders.

795

796 For further background information on this issue, please review the GNSO Issues Report on

797 Inter-Registrar Transfer Policy Set A - New IRTP Issues

798

799 Process:

800 • Please identify the members of your constituency who participated in developing the

801 perspective(s) set forth below.

802 • Please describe the process by which your constituency arrived at the perspective(s) set

803 forth below.

804

805 **Issue I – Is there a way for registrars to make Registrant E-mail Address data**

806 **available to one another? Currently there is no way of automating approval from the**

807 **Registrant, as the Registrant Email Address is not a required field in the registrar**

808 **Whois. This slows down and/or complicates the process for registrants, especially**

809 **since the Registrant can overrule the Admin Contact**.

810

811   -   If you believe policy change is needed, what options could be explored for registrars

812   to make Registrant E-mail address data available? For each option, please identify
813   how this would benefit automating approval, and, if any, what potential problems
814   might be associated with this option.
815   -   Please identify examples or best practices of email address use to facilitate and/or
816   automate approval from a Registrant for a transfer.
817   -   Although it is not the purpose of this Policy Development Process (PDP) to
818   recommend changes to WHOIS policy, it conceivably could be an option to require
819   registrant email addresses in WHOIS. The Working Group is interested in your views
820   on that potential option, without regard to the broader WHOIS issues of availability
821   and accuracy of WHOIS data. The Working Group is more particularly interested in
822   your views about any other options not involving WHOIS.
823
824   **Issue II – Whether there is need for other options for electronic authentication (e.g.,**
825   **security token in the Form of Authorization (FOA)) due to security concerns on use of**
826   **email addresses (potential for hacking or spoofing)**.
827
828   -   What security concerns can you identify related to current ways of authenticating
829   registrants. Note, the Security and Stability Advisory Committee (SSAC) has
830   identified a risk of email spoofing for purposes of domain name hijacking, see link.
831   We are interested in your views on this and any other concerns.
832   -   Do you think there is a need for other options for electronic authentication? Please
833   state the reasons for your answer.
834   -   Do you know of any Registrars using additional means for electronic authorization
835   (e.g. security token, digital signatures, etc.)? If so, what are they and who offers
836   them?
837   -   If a need would be identified for other options of electronic authentication, what other
838   options could be explored?
839   -   Of those other options to be explored, please identify the potential benefits but also
840   any potential problems.
841   -   Do you have or know of any data in relation to the impact of the Extensible
842   Provisioning Protocol (EPP) deployment on security in relation to authentication? If
843   so, please describe the source and type of data.

844   -   Do you know of any further examples, apart from those mentioned in the issues
845   report (.uk registry and .se registry), of electronic authentication methods? If so, what
846   are they and who offers them?

847

848   **Issue III – Whether the policy should incorporate provisions for handling "partial bulk**
849   **transfers" between registrars – that is, transfers involving a number of names but not**
850   **the entire group of names held by the losing registrar**.

851

852   -   Should the policy incorporate provisions for handling "partial bulk transfers" between
853   registrars? Please state the reasons and use-cases for your answer.
854   -   Are you aware of any voluntary provisions to facilitate partial bulk transfers? If so,
855   could you please provide further details on those provisions (apart from those
856   already identified in the issues paper – NeuLevel (.biz), Nominet (.uk)).

857

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Annex B - Constituency Statements

857

858 IPC Comments On Inter-Registrar Transfer Policy (IRTP) Issues

859 Part A 'New IRTP Issues'

860 September 26, 2008

861

862 Issue I - Is there a way for registrars to make Registrant E-mail Address data available to

863 one another? Currently there is no way of automating approval from the Registrant, as the

864 Registrant Email Address is not a required field in the registrar Whois. This slows down

865 and/or complicates the process for registrants, especially since the Registrant can overrule

866 the Admin Contact.

867

868 COMMENTS

869

870 The lack of an e-mail address for the Registrant generally does not delay the transfer of

871 domain registrations, for the simple reason that, to our knowledge, when the Admin Contact

872 e-mail is functioning, no registrar even attempts to obtain approval by any other means. In

873 most cases, furthermore, the Registrant or an authorized employee's e-mail address is listed

874 as the Admin Contact, so the Registrant in fact consents to the transfer. Nevertheless, the

875 value judgment implicit in the Issue - that it would be preferable to be certain that the entity

876 listed as the Registrant consents to the transfer - is sound. In cases where the Registrant

877 and the Admin Contact are not the same, it seems plausible that confusion could result over

878 whether the Registrant actually consented to a transfer, or whether a Registrant's purported

879 authorization (or rejection) of a transfer from an e-mail address not listed in the Whois was

880 authentic.

881

882 However, if Registrant E-mail Address data is to be made available to other registrars, it

883 should happen in the context of Whois. One purpose of the Port 43 protocol was to provide

884 information necessary for inter-registrar transfers, so developing a separate protocol to

885 provide certain pieces of information necessary to that process would be superfluous. If

886 Registrant E-mail Address data is to be made available, it should be done as part of an
887 overall technical modernization of the Whois protocol.
888
889 The need for inter-registrar communication of registrant information speaks to the legitimate
890 need for Port 43-like access to Whois data (in addition to the public's need and the need of
891 intellectual property owners for open access to Whois data, such as can be obtained
892 through web interfaces). Other parties with needs for Port 43-like automated access include
893 information providers, such as those who provide research services for non-marketing
894 purposes such as trademark availability clearance and searching, audits of domain
895 portfolios for corporate mergers and acquisitions, and investigations of intellectual property
896 infringement and fraud. The need for Registrant E-mail Address data in Whois is just one of
897 many reasons why ICANN should address, rather than avoid the need to modernize the
898 Whois protocol.
899
900 Issue II - Whether there is need for other options for electronic authentication (e.g., security
901 token in the Form of Authorization (FOA)) due to security concerns on use of email
902 addresses (potential for hacking or spoofing).
903
904 COMMENTS
905
906 Yes, we believe that there is a need for further options for electronic authentication in order
907 to set a reasonable secure and basic standard to be used by every registrar, and that such
908 options should be independent of any other services offered by the registrar. It is important
909 that ICANN sets out the requirements for this basic standard in its IRTP. The challenge is to
910 find a way to improve security without making the transfer system too cumbersome.
911
912 The weakness in almost every current system for electronic authentication is that too much
913 depends on information and confirmation via e-mail (of the registrant's and/or the Admin
914 Contact). Even with partial off-line authentications (e.g. in the form of a signed fax from the
915 Registrant) in combination with an e-mail confirmation, it is necessary to rely on the
916 presumption that the registrant's e-mail address is correct because any additional
917 documentation requiring signature is sent via that e-mail address.

918 Email-based authentication does not appear to be sufficient to secure the identity of the
919 registrant.

920

921 A current risk point is that there is a period after a registrant has unlocked a domain name
922 during which malicious transfer requests might accidentally be accepted. One possible
923 solution could be to require the registrant to submit with its request to unlock the name the
924 IANA ID of the registrar to which the name is intended to be transferred. Transfer requests
925 coming from any other registrar would then be automatically rejected.   Another solution is
926 the use of digital certificates.

927

928 However, we appreciate that certain registrants and certain areas of business - the financial
929 sector, for example - may require an even higher standard and level of security. We see
930 these classes of registrants and business sectors are best served by additional services that
931 are created and offered by the registrars without involvement of ICANN.

932

933 The IPC believes an analysis of various ccTLD registry policies would benefit the policy
934 development process. Examples include the Swedish registry system which uses an
935 application called Domain Manager ('DomÃnhanteraren'), and features a certificate-based
936 web interface to effectuate transfers. In the Swiss Registry (SWITCH), authentications are
937 performed either via e-mail or by signed fax only. CoCCA (a grouping of small ccTLD
938 registries) uses a password generated by electronic token for allowing access to the
939 registrar account, but does not authenticate a registrant's right to a transfer.

940

941 The benefits of improved electronic authentication are safer communications and transfers.
942 Potential problems could be unexpected and increased costs for Registrants - either by
943 demands for certain software or by increased costs at the Registry level (which will
944 ultimately raise the price for domain name administration), as well as a more time-
945 consuming process whenever a certification of the Registrant's ID is needed.

946

947 Issue III - Whether the policy should incorporate provisions for handling 'partial bulk
948 transfers' between registrars - that is, transfers involving a number of names but not the
949 entire group of names held by the losing registrar.

950
951   COMMENTS
952
953   Yes, the policy should incorporate provisions for handling partial bulk transfers. Any
954   mechanism to facilitate the smooth transfer of a registrant's domain names is welcomed.
955   Partial bulk transfers would be particularly helpful in connection with corporate asset sales
956   and acquisitions. For example, a registrant may be selling only one of its business lines to a
957   third party or an acquiring company may wish to have only some of the acquired company's
958   domain names transferred to its own registrar. Furthermore, in the cases of termination or
959   non-renewal of a registrar's Registrar Accreditation Agreement, a partial bulk transfer policy
960   would enable the de-accredited registrar to transfer domains in bulk to numerous 'gaining'
961   registrars, further protecting the rights of registrants.
962
963   Submitted by,
964
965   Claudio DiGangi, on behalf of IPC
966

966 **GNSO gTLD Registry Constituency Statement**

967 **Issue: Inter-Registrar Transfer Policy Set A Request for Constituency Statements**

968 Date: 2 October 2008

969 Issues Report URL: http://gnso.icann.org/issues/transfers/transfer-issues-report-set-a-

970 23may08.pdf

971 General RyC Information

972

973 ▪ Total # of eligible RyC Members[3]: 15

974 ▪ Total # of RyC Members: 15

975 ▪ Total # of Active RyC Members[4]: 15

976 ▪ Minimum requirement for supermajority of Active Members: 10

977 ▪ Minimum requirement for majority of Active Members: 8

978 ▪ # of Members that participated in this process: 12

979 ▪ Names of Members that participated in this process:

980   1. Afilias (.info)

981   2. DotAsia Organisation (.asia)

982   3. DotCooperation (.coop)

983   4. Employ Media (.jobs)

984   5. Fundació puntCAT (.cat)

985   6. mTLD Top Level Domain (.mobi)

986   7. Museum Domain Management Association – MuseDoma (.museum)

987   8. NeuStar (.biz)

988   9. Public Interest Registry - PIR (.org)

989   10. RegistryPro (.pro)

990   11. The Travel Partnership Corporation – TTPC (.travel)

991   12. VeriSign (.com & .net)

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[3] All top-level domain sponsors or registry operators that have agreements with ICANN to provide Registry Services in support of one or more gTLDs are eligible for membership upon the "effective date" set forth in the operator's or sponsor's agreement (Article III, Membership, ¶ 1). The RyC Articles of Operations can be found at http://www.gtldregistries.org/about_us/articles .

[4] Per the RyC Articles of Operations, Article III, Membership, ¶ 4: Members shall be classified as "Active" or "Inactive". A member shall be classified as "Active" unless it is classified as "Inactive" pursuant to the provisions of this paragraph. Members become Inactive by failing to participate in a Constituency meeting or voting process for a total of three consecutive meetings or voting processes or both, or by failing to participate in meetings or voting processes, or both, for six weeks, whichever is shorter. An Inactive member shall have all rights and duties of membership other than being counted as present or absent in the determination of a quorum. An Inactive member may resume Active status at any time by participating in a Constituency meeting or by voting.

992
993 ▪ Names & email addresses for points of contact
994 o Chair: David Maher, dmaher@pir.org
995 o Vice Chair: Jeff Neuman, Jeff.Neuman@Neustar.us
996 o Secretariat: Cherie Stubbs, Cherstubbs@aol.com
997 o RyC representative for this statement: Barbara Steele, bsteele@verisign.com
998 Regarding the issue noted above, the following positions represent the views of the ICANN
999 GNSO gTLD Registry Constituency (RyC) as indicated. Unless stated otherwise, the RyC
1000 positions were arrived at through a combination of RyC email list discussion and RyC
1001 meetings (including teleconference meetings).
1002
1003 1. **Issue 1 - Is there a way for registrars to make Registrant E-mail Address data**
1004 **available to one another? Currently there is no way of automating approval from**
1005 **the Registrant, as the Registrant Email Address is not a required field in the**
1006 **registrar Whois. This slows down and/or complicates the process for registrants,**
1007 **especially since the Registrant can overrule the Admin Contact.**
1008
1009 2.1 If you believe policy change is needed, what options could be explored for registrars
1010   to make Registrant E-mail address data available? For each option, please
1011   identify how this would benefit automating approval, and, if any, what potential
1012   problems might be associated with this option.
1013
1014 2.1. The members of the Registries Constituency recommend that Issue 1 be
1015   edited to clarify the scope of the issue.
1016
1017   Specifically, it should be noted that registry WHOIS is authoritative which
1018   would include, in the case of thick registries, the registrant contact information
1019   such as e-mail address. Also, in the case of thick registries, the registry
1020   agreements mandate that the registry operator display the registrant e-mail
1021   address in the registry's WHOIS.
1022
1023   At least one thick registry which is subject to privacy laws has implemented a

1024   tiered access approach to publishing WHOIS information.

1025

1026   Any changes to the policy and/or practice should be limited to addressing the

1027   issue of obtaining authoritative information relating to the administrative

1028   contact e-mail address in those instances where it is not available via the

1029   registry WHOIS. In the case of thin registries, the contact information for a

1030   domain name in the registrar WHOIS (including the registrant e-mail address)

1031   is authoritative. In this case, registrars could implement a tiered access

1032   approach to providing WHOIS information that would permit the private

1033   provision of Registrant e-mail address and thereby satisfying various privacy

1034   law requirements.

1035

1036 2.1 Please identify examples or best practices of email address use to facilitate and/or

1037   automate approval from a Registrant for a transfer.

1038

1039   2.1.   The members of the Registries Constituency agree that authentication of the

1040   identity of the registrant, as stipulated by the IRTP, is the responsibility of the

1041   Gaining Registrar. Therefore, aside from EPP AuthInfo authentication which

1042   is systematically enforced when an EPP Registry processes a transfer

1043   command, Registrars are best able to address this item.

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1044

1045 2.1 Although it is not the purpose of this Policy Development Process (PDP) to

1046   recommend changes to WHOIS policy, it conceivably could be an option to

1047   require registrant email addresses in WHOIS. The Working Group is interested in

1048   your views on that potential option, without regard to the broader WHOIS issues

1049   of availability and accuracy of WHOIS data. The Working Group is more

1050   particularly interested in your views about any other options not involving

1051   WHOIS.

1052

1053   2.1.   As previously indicated, thick registries are already publishing registrant e-

1054   mail addresses in WHOIS. For thin registries to add contact information

1055   would be a major change resulting in significant cost and time to deploy.

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1056   Registrars are already dealing with this requirement and thus extending this
1057   requirement to their local WHOIS operations for use with thin registries does
1058   not seem to extend a further burden on registrars and their handling of
1059   privacy issues than already exists.
1060
1061   1.4. **Level of Support of Active Members**: Supermajority
1062
1063   1.4.1. # of Members in Favor: 12
1064
1065   1.4.2. # of Members Opposed: 0
1066
1067   1.4.3. # of Members that Abstained: 0
1068
1069   1.4.4. # of Members that did not vote: 3
1070
1071   1.5. **Minority Position**: None
1072
1073   1.6. **General impact on the RyC**: Minimal
1074
1075   1.7. **Financial impact on the RyC**: Minimal
1076
1077   1.8. **Analysis of the period of time that would likely be necessary to implement the**
1078   **policy**: Not applicable as those registries that currently have registrant contact
1079   information are already publishing the e-mail address. For thin registries to add
1080   contact information would be a major change resulting in significant cost and time to
1081   deploy.
1082
1083 2. **Issue 2 - Whether there is need for other options for electronic authentication**
1084   **(e.g., security token in the Form of Authorization (FOA)) due to security concerns**
1085   **on use of email addresses (potential for hacking or spoofing)**.
1086
1087   2.1 What security concerns can you identify related to current ways of authenticating

1088   registrants. Note, the Security and Stability Advisory Committee (SSAC) has
1089   identified a risk of email spoofing for purposes of domain name hijacking, see
1090   link. We are interested in your views on this and any other concerns.
1091

1092   2.1.1.   The members of the Registries Constituency recognize that use of the
1093   e-mail address has certain weaknesses, but the merits and costs of
1094   implementing other methods should be judged in their own right and
1095   not against any inadequacies and inefficiencies of email.
1096

1097   2.2.   Do you think there is a need for other options for electronic authentication?
1098   Please state the reasons for your answer.
1099

1100   2.2.1.   The members of the Registries Constituency support allowing market
1101   forces to operate freely in this area. Registrars can measure demand
1102   to determine if they want to implement additional security methods for
1103   authenticating transfer requests. Registrars should be permitted to
1104   differentiate themselves from their competitors by determining what
1105   offerings they make available to registrants, including the level of
1106   security they employ in protecting the contact information of the
1107   Registrants of domain names.
1108

1109   2.3.   Do you know of any Registrars using additional means for electronic
1110   authorization (e.g. security token, digital signatures, etc.)? If so, what are they
1111   and who offers them?
1112

1113   2.3.1.   The Registries Constituency believes that some registrars have
1114   implemented additional security methods to authenticate transfers of
1115   domain names. Specifically, Markmonitor, GoDaddy and Moniker
1116   have products available to provide additional security. More
1117   information relating to these products can be found at the following
1118   websites, respectively:
1119   http://www.markmonitor.com/products/domain_management.php,

Comments (right margin):

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1120   https://www.godaddy.com/gdshop/protect/landing.asp?isc_prg001&ci

1121   =9004 and http://www.domainmaxlock.com/. We also have

1122   confirmation that CSC will issue some customers Secure ID tokens

1123   (RSA) for additional validation.

1124

1125   2.4.   If a need would be identified for other options of electronic authentication,

1126   what other options could be explored?

1127

1128   2.4.1.   The EPP AuthInfo code provides an automated mechanism to

1129   authenticate transfer requests and could take the place of both the

1130   Registrant and Admin Contact e-mail addresses.

1131

1132   2.5.   Of those other options to be explored, please identify the potential benefits

1133   but also any potential problems.

1134

1135   2.5.1.   Use of the AuthInfo code to authenticate transfers is already in place

1136   and required by all EPP registries or the transfer command will fail.

1137   There is no additional cost or development required to implement this

1138   method of authentication. The IRTP addresses the potential problems

1139   associated with obtaining the AuthInfo code for a domain name in

1140   Section 5.

1141

1142   However, for the use of AuthInfo codes to be effective, the members

1143   of the Registries Constituency agree that compliance with the

1144   requirement that AuthInfo codes be unique by domain name must be

1145   enforced via the ICANN Registrar Compliance Program. Enforcement

1146   of unique AuthInfo codes by domain name should not be done by the

1147   registry operator as such enforcement would create a negative

1148   response for conflicting AuthInfo codes thus creating a mechanism to

1149   test for in-use AuthInfo codes which could result in a security

1150   exposure.

1151

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1152   While the use of security tokens by the Registrant to authenticate a
1153   transfer would bring additional security to the transfer process, the
1154   members of the Registries Constituency agree that market forces
1155   should be allowed to work freely in this regard and demand should
1156   dictate whether a Registrar elects to employ this method since the
1157   expense and logistics of providing tokens to all Registrants may not
1158   make this a feasible option for all registrars and registrants.
1159

1160   2.6.   Do you have or know of any data in relation to the impact of the Extensible
1161   Provisioning Protocol (EPP) deployment on security in relation to
1162   authentication? If so, please describe the source and type of data.
1163

1164   2.6.1.   No members of the Registries Constituency are aware of any security
1165   issues relating to the deployment of EPP or AuthInfo codes. All
1166   indications are that the RFC is stable and EPP and AuthInfo codes,
1167   when properly implemented, are secure.
1168
1169   It should be noted that EPP requires mutual authentication of
1170   clients/registrars and servers before a Transport Layer Security (or
1171   TLS) connection can be made between the two parties. Digital
1172   certificates, digital signatures, and PKI services are used to
1173   authenticate both parties. Certificates must be signed by a CA that is
1174   recognized by the server operator. [RFC 4934, section 8]
1175
1176   Additionally, all EPP clients/registrars are required to identify and
1177   authenticate themselves using a server-assigned user ID and a
1178   shared secret (a password) that is sent to the server using a login
1179   command. The server must confirm the identity and shared secret
1180   before the client is given access to other protocol services. [RFC
1181   4930, section 2.9.1.1]
1182
1183   Some EPP commands, such as the domain transfer command,

1184   require additional authentication information that must be provided
1185   and confirmed before the requested action is completed. The default
1186   authentication information service uses a shared secret (or AuthInfo
1187   code) that is known to the registry, the registrar, and the registrant.
1188   Registrants are required to provide this secret to a second registrar
1189   when requesting the second registrar to initiate a domain transfer on
1190   the registrant's behalf. The authentication information data structure is
1191   extensible so that additional authentication mechanisms can be
1192   defined and implemented in the future. [RFC 4931, sections 3.2.1 and
1193   3.2.4]

1194

1195   2.7.   Do you know of any further examples, apart from those mentioned in the
1196   issues report (.uk registry and .se registry), of electronic authentication
1197   methods? If so, what are they and who offers them?

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1198

1199   2.7.1.   The members of the Registries Constituency are unaware of any
1200   methods of electronic authentication currently in use other than those
1201   indicated in section 2.3.1 of this Issue #2.

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1202

1203 2.8. **Level of Support of Active Members**: Supermajority

1204

1205   2.8.1. # of Members in Favor: 12

1206

1207   2.8.2. # of Members Opposed: 0

1208

1209   2.8.3. # of Members that Abstained: 0

1210

1211   2.8.4. # of Members that did not vote: 3

1212

1213 2.9. **Minority Position**: None

1214

1215 2.10. **General impact on the RyC**: To be determined.

2.11. **Financial impact on the RyC**: To be determined.

2.12. **Analysis of the period of time that would likely be necessary to implement the policy**: The period of time to implement other security methods could range from no time required to many months depending on which methods implemented. More information is needed to determine this.

3. **Issue 3 - Whether the policy should incorporate provisions for handling "partial bulk transfers" between registrars – that is, transfers involving a number of names but not the entire group of names held by the losing registrar.**

   3.1. Should the policy incorporate provisions for handling "partial bulk transfers" between registrars? Please state the reasons and use-cases for your answer.

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      3.1.1. The members of the Registries Constituency support the incorporation of provisions for handling partial bulk transfers between registrars provided that the provisions would not require reengineering of the existing bulk transfer functionality or new development. Specifically, the transfer of the specified domain names would not extend the term of the registration by an additional year and the registration fee would not be assessed. Specific details of the product offerings by registries and registrars should be left up to the individual registries and registrars and should be driven by market demand.

   3.2. Are you aware of any voluntary provisions to facilitate partial bulk transfers? If so, could you please provide further details on those provisions (apart from those already identified in the issues paper – NeuLevel (.biz), Nominet (.uk)).

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      3.2.1. The only voluntary provisions to facilitate partial bulk transfers that the members of the Registries Constituency are aware of are those that have been identified (i.e., NeuStar and Nominet).

1248

1249   3.3. **Level of Support of Active Members**: Supermajority

1250

1251   3.3.1. # of Members in Favor: 12

1252

1253   3.3.2. # of Members Opposed: 0

1254

1255   3.3.3. # of Members that Abstained: 0

1256

1257   3.3.4. # of Members that did not vote: 3

1258

1259   3.4. **Minority Position**: None

1260

1261   3.5. **General impact on the RyC**: Minimal

1262

1263   3.6. **Financial impact on the RyC**: Minimal

1264

1265   3.7. **Analysis of the period of time that would likely be necessary to implement the**

1266   **policy**: If current technology is used, there would be no system / software

1267   development time required at the registries. However, implementation time to

1268   develop requirements / products involving submission by the registrar of partial bulk

1269   transfer requests could take 3 to 12 months.

1270

1271

1271

1272 **October 3, 2008**

1273

1274 **Registrar Constituency Position on Inter-Registrar Transfer Policy Issues**

1275

1276 **BACKGROUND**

1277 In September 2008, the Registrar Constituency ("RC") was asked to provide feedback

1278 regarding three Inter-Registrar Transfer Policy ("IRTP") issues. This Position Paper captures

1279 the overall sentiment expressed by the RC Members who provided feedback about this

1280 matter and seems to reflect the general sense of the RC. Due to time constraints, however,

1281 no formal vote regarding this Position Paper was taken.

1282

1283 **RC POSITION**

1284 The RC's position regarding each of the three IRTP issues is as follows:

1285 1. Is there a way for registrars to make Registrant E-mail Address data available to one

1286 another?

1287

1288 No viable secure implementation of this proposal has been advanced that would enable a

1289 policy to require registrars to make Registrant E-mail Address data available to one another.

1290 Additionally, the RC believes that regulatory intervention is not necessary to address this

1291 issue. This issue is more appropriate for market based solutions rather than regulatory

1292 intervention.

1293

1294 2. Whether there is need for other options for electronic authentication (e.g., security token

1295 in the Form of Authorization (FOA)) due to security concerns on use of email addresses

1296 (potential for hacking or spoofing).

1297

1298 The RC does not believe that a regulatory approach to authentication is necessary. The RC

1299 recommends that the questions of whether additional authentication technology is needed,

1300 and if so which technology to implement, be decided based on market demands rather than

1301 regulation.

1302

1303 To that end, the RC cautions ICANN about the unintended consequences of technology

1304 directives. Specifically, any mandated technology is guaranteed to become the target of

1305 hackers who seek to circumvent its security. Having the option of a variety of technologies

1306 which may be developed and implemented based on market demands offers greater

1307 security in the long-run.

1308

1309 3. Whether the policy should incorporate provisions for handling "partial bulk transfers"

1310 between registrars – that is, transfers involving a number of names but not the entire group

1311 of names held by the losing registrar.

1312

1313 The RC believes that, properly defined, a "partial bulk transfer" option would be a useful tool

1314 for registrars.

1315

1316 There are at least three scenarios in which this option may be helpful to registrars, including:

1317 • A private business transaction between registrars, in which a subset of the domains /

1318 customers from one registrar are transferred to the other;

1319 • A registrar's reseller becomes an accredited registrar, and seeks to change the registrar of

1320 record at the registry; or

1321 • A registrar discontinues retail registrations in a given TLD, or is involuntarily deaccredited

1322 by ICANN.

1323

1324 However, many questions remain unanswered. For example, the RC questions how many

1325 domain names would constitute a "bulk" transfer. Also, does the term "partial" indicate that

1326 the losing registrar would maintain some remaining registrations in the TLD? Furthermore,

1327 what is the method for assessing fees? Should this be a flat fee, or sliding scale? Should an

1328 additional registration year be included or omitted from the transfer?

1329

1330 Also, the RC opposes any recommendations or language that extends this option to

1331 registrant-initiated transfers for large portfolio holders on the basis that this is better

1332 characterized as product development, not policy development. A consensus policy would

1333 not take into account the variety of registrar business models, and would impose the same

1334 terms, restrictions and limitations on all registrars regardless of its applicability to their

1335   customers. Additionally, there are several services available now that address this need.

1336

1337   The RC suggests that ICANN continue to let market-driven innovation and competition

1338   address the needs of registrants who manage large domain name portfolios, and limit the

1339   discussion of partial bulk transfers to situations arising "between registrars."

1340

1341   **CONCLUSION**

1342   The opinions expressed by the RC in this Position Paper should not be interpreted to reflect

1343   the individual opinion of any particular RC member.

1344

1344 **BC Constituency Statement**

1345 **Constituency Input Template Inter-Registrar Transfer Policy Set A**

1346

1347 The GNSO Council has formed a Working Group of interested stakeholders and

1348 Constituency representatives, to collaborate broadly with knowledgeable individuals and

1349 organizations, in order to develop potential policy options to address three new issues

1350 associated with the Inter-Registrar Transfer Policy.

1351

1352 Part of the working group's effort will incorporate ideas and suggestions gathered from

1353 Constituencies through this Constituency Statement.

1354

1355 Inserting your Constituency's response in this form will make it much easier for the Working

1356 Group to summarize the Constituency responses. This information is helpful to the

1357 community in understanding the points of view of various stakeholders.

1358

1359 For further background information on this issue, please review the GNSO Issues Report on

1360 Inter-Registrar Transfer Policy Set A - New IRTP Issues

1361 Process:

1362 • Please identify the members of your constituency who participated in developing the

1363 perspective(s) set forth below.

1364 Mike Rodenbaugh, Rodenbaugh Law

1365 Michael Collins, Internet Commerce Association

1366 Mike O'Connor, The O'Connor Company

1367

1368 • Please describe the process by which your constituency arrived at the perspective(s) set

1369 forth below.

1370 This request for input was circulated for comment from BC Members on two occasions. A

1371 draft response was created by Mike Rodenbaugh and circulated for comment. This final

1372 draft was submitted.

1373 _____

1374 **Issue I – Is there a way for registrars to make Registrant E-mail Address data**

1375 **available to one another? Currently there is no way of automating approval from the**

1376 **Registrant, as the Registrant Email Address is not a required field in the registrar**

1377 **Whois. This slows down and/or complicates the process for registrants, especially**

1378 **since the Registrant can overrule the Admin Contact**.

1379 • If you believe policy change is needed, what options could be explored for registrars

1380 to make Registrant E-mail address data available? For each option, please identify

1381 how this would benefit automating approval, and, if any, what potential problems

1382 might be associated with this option.

1383 BC: We believe policy change is needed. The current system is inconsistent and insecure.

1384 The Admin Contact email address is purportedly authoritative, yet can be overruled by a

1385 Registrant who need not even provide an email address. Buyers of domain names need

1386 better assurance that they are purchasing from an authorized seller, this has been an

1387 important function of the WHOIS database since the Admin Contact email address can be

1388 verified by a buyer. The buyer has no way of knowing, however, if there is a superior

1389 registrant who can disrupt the transaction.

1390 Yet today, this situation also seems to provide a security layer because registrars often have

1391 Registrant email addresss and other contact info that is not public in WHOIS, and they can

1392 use this information to confirm suspicious transfers. This may be a security benefit, but also

1393 causes confusion. We should find a way to increase security and decrease confusion.

1394 One answer may be to further clarify that the Admin Contact email address is authoritative,

1395 and consent from that address is assurance for a legitimate transfer that cannot be undone

1396 by the prior registrant. In that event, PGP or some other authentication method should be

1397 deployed to authenticate transfer requests and acknowledgments, because traditional email

1398 is blatantly insecure and easily spoofed.

1399 • Please identify examples or best practices of email address use to facilitate and/or

1400 automate approval from a Registrant for a transfer.

1401 • Although it is not the purpose of this Policy Development Process (PDP) to

1402 recommend changes to WHOIS policy, it conceivably could be an option to require

1403   registrant email addresses in WHOIS. The Working Group is interested in your views
1404   on that potential option, without regard to the broader WHOIS issues of availability
1405   and accuracy of WHOIS data. The Working Group is more particularly interested in
1406   your views about any other options not involving WHOIS.

1407 BC: We think the above solution, making the Admin Contact clearly authoritative, is a better
1408 solution than to add another piece of contact data to the WHOIS database. The Registrant
1409 email address could be different from the Admin Contact email and thereby create confusion
1410 as to which is authoritative.

1411 **Issue II – Whether there is need for other options for electronic authentication (e.g.,**
1412 **security token in the Form of Authorization (FOA)) due to security concerns on use of**
1413 **email addresses (potential for hacking or spoofing)**.

1414   •   What security concerns can you identify related to current ways of authenticating
1415   registrants. Note, the Security and Stability Advisory Committee (SSAC) has
1416   identified a risk of email spoofing for purposes of domain name hijacking, see link.
1417   We are interested in your views on this and any other concerns.

1418 BC: It is a frightening risk that important domain names can be hijacked via email spoofing,
1419 hacking and otherwise. There are countless ways in which businesses and their users can
1420 be harmed financially, reputationally and even physically when a critical domain is overtaken
1421 by hostile and/or criminal actors. We encourage SSAC, GNSO and other ICANN bodies to
1422 continue working to investigate and mitigate this risk.

1423   •   Do you think there is a need for other options for electronic authentication? Please
1424   state the reasons for your answer.

1425 BC: Yes. Traditional email is inherently insecure. Some domain names are critical for
1426 business and government infrastructure, and it is proven that they can be hijacked. PGP or
1427 other authentication methods could be devised to impose minimal burden on registrants or
1428 registrars, yet ensure much more effective security than is standard today.

1429 • Do you know of any Registrars using additional means for electronic authorization
1430   (e.g. security token, digital signatures, etc.)? If so, what are they and who offers
1431   them?

1432 • If a need would be identified for other options of electronic authentication, what other
1433   options could be explored?

1434 • Of those other options to be explored, please identify the potential benefits but also
1435   any potential problems.

1436 • Do you have or know of any data in relation to the impact of the Extensible
1437   Provisioning Protocol (EPP) deployment on security in relation to authentication? If
1438   so, please describe the source and type of data.

1439 • Do you know of any further examples, apart from those mentioned in the issues
1440   report (.uk registry and .se registry), of electronic authentication methods? If so, what
1441   are they and who offers them?

1442 **Issue III – Whether the policy should incorporate provisions for handling "partial bulk**
1443 **transfers" between registrars – that is, transfers involving a number of names but not**
1444 **the entire group of names held by the losing registrar**.

1445 • Should the policy incorporate provisions for handling "partial bulk transfers" between
1446   registrars? Please state the reasons and use-cases for your answer.

1447 BC: Yes. Large domain portfolio owners should have freedom and ability to move large
1448 blocks of domains freely among registrars. Today, some registrars make the transfer
1449 process difficult or impossible to do in bulk, and there is much inconsistency among the
1450 various registrars. There ought to be a standard mechanism for large portfolio owners to
1451 move large blocks of names among registrars. It would be particularly disturbing if the
1452 registrars were to have such a policy for partial bulk transfers among themselves, but did
1453 not offer that functionality to bulk registrants.

1454   •   Are you aware of any voluntary provisions to facilitate partial bulk transfers? If so,

1455   could you please provide further details on those provisions (apart from those

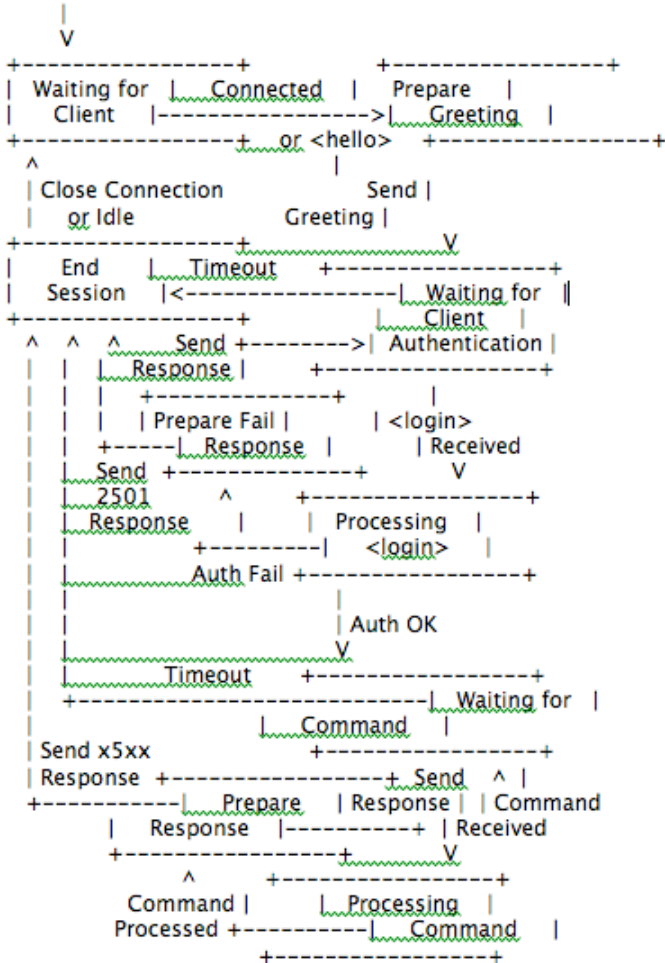1456   already identified in the issues paper – NeuLevel (.biz), Nominet (.uk)).

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Annex C – EPP

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```
What is EPP?

              |
              V
   +-----------------+          +-----------------+
   | Waiting for  |   Connected  |   Prepare   |
   |   Client     |------------------>|  Greeting   |
   +-----------------+  or <hello>  +-----------------+
        ^                        |
        | Close Connection   Send |
        |   or Idle        Greeting |
   +-----------------+            V
   |   End     |  Timeout  +-----------------+
   |  Session  |<---------------|  Waiting for  |
   +-----------------+            |    Client   |
     ^  ^  ^  Send +-------->| Authentication |
     |  |  | Response |       +-----------------+
     |  |  |  +---------------+       |
     |  |  | | Prepare Fail |       | <login>
     |  |  +-----| Response  |       | Received
     |  | Send +---------------+       V
     |  | 2501       ^        +-----------------+
     |  | Response    |      |   Processing  |
     |  |         +---------|    <login>    |
     |  |      Auth Fail +-----------------+
     |  |              |
     |  |              | Auth OK
     |  |              V
     |  |   Timeout  +-----------------+
     |  +---------------------------|  Waiting for  |
     |            Command  |    Command    |
   | Send x5xx            +-----------------+
   | Response +----------------+ Send  ^ |
   +-----------|   Prepare   | Response | | Command
         |   Response  |----------+ | Received
         +-----------------+      V
           ^      +-----------------+
      Command |     |  Processing   |
    Processed +----------|   Command   |
              +-----------------+

Source: http://www.ietf.org/rfc/rfc4930.txt
```

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