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**Leap of Faith  
Financial Services Inc.**

July 31, 2022

## **ICANN Generic Names Supporting Organization (GNSO)**

**Subject: Initial Report on the Transfer Policy Review -  
Phase 1(a) - request for extension for public comment  
submissions**

**Submitted by: George Kirikos**

**Company: Leap of Faith Financial Services Inc.**

**Website: <http://www.leap.com/>**

Dear ICANN GNSO,

The current deadline of August 2, 2022 is unrealistic and not feasible. I request that it be extended to mid-September, to allow sufficient time to submit a quality analysis.

I have already invested more than 12 hours intensively reviewing the initial report, while making copious notes.

I have also invested numerous hours in discussions (phone and emails) on a related and novel proposal involving restricting the AuthInfo (now called TAC) code, so that it can only be used at a specific gaining registrar (mostly with Jothan Frakes, but also with Zak Muscovitch and Reg Levy), as a security improvement. This is unpublished work.

I also had a fresh proposal for a "Lockdown Mode" (or "Holiday Mode"), which would shut off the new TAC generator at the **registry** level for N days (say up to 28 days), at the request of the registrant (via the registrar). This would be an important security enhancement which would be trivial to implement. This too is unpublished work.

I estimate it will take another 20 to 30 hours to complete my submission.

You can read a brief preliminary analysis on my blog at:

<https://freespeech.com/2022/07/30/red-alert-icann-working-group-wants-to-make-it-easier-to-hijack-domain-names/>

at NamePros:

<https://www.namepros.com/threads/red-alert-icann-working-group-wants-to-make-it-easier-to-hijack-domain-names.1279715/>

or on Twitter:

[https://twitter.com/GeorgeKirikos/with\\_replies](https://twitter.com/GeorgeKirikos/with_replies)

(you can review my Tweets since Saturday)

A full submission will go through each recommendation in detail, as well as alternate proposals that the working group hasn't considered.

Volunteer burnout is a real thing, and I won't jeopardize my own health to meet your unrealistic deadlines.

The perspective of registrants is **severely underrepresented** in the working group, and that shows in its unbalanced recommendations that do not take into account the immense negative impacts that would take place if these proposals become policy.

Furthermore, there are **numerous** implicit security assumptions in the report which are not correct, or incomplete. They do not properly handle various attack scenarios. For example, the report emphasizes security of the TAC before it is generated, but ignores its security after it is generated (shifting the burden entirely on the registrant, and then making it worse by eliminating the Losing FOA). The report fails to even enumerate scenarios which are strengthened, and those which are made worse.

While there are a few good ideas in the report, they are on balance outweighed by the very bad ones. It'd be better to do nothing, than to adopt the report. To sift out in detail the good from the bad, I'll need more time to complete my submission.

Sincerely,

George Kirikos