IRTP Part C – Public Comments Review Tool
9 January 2012

For complete overview of comments received, please see https://community.icann.org/display/gnsoirtppdpwg/Public+Comments.

#	Comment	Who / Where	WG Response	Recommended Action
Charter Question A - "Change of Control" function, including an investigation of how this function is currently achieved, if there are any applicable models in the country-code name space that can be used as a best practice for the gTLD space, and any associated security concerns. It should also include a review of locking procedures, as described in Reasons for Denial #8 and #9, with an aim to balance legitimate transfer activity and security.				
1.	Transferring domain name registrations between Registrants is inconsistently handled by registrars and other service providers. The IRTP Part C Working Group should seek to strike a balance between domain name security and domain portability.	GoDaddy		
2.	Support for conducting a more detailed study of the best practices used by the various country-code TLD operators.	RySG		
3.	Supportive of the WG recommending that appropriate best practices be implemented by gTLDs in this area. Since registrars own the relationship with the registrant, and change of control is directly related to the registrant, only the registrar should be permitted to effect a change of control (even in the case of a UDRP directive).	RySG		
4.	With regard to reason for denial #8, many registries have a systematic restriction on the transfer of domains within 60 days of the creation	RySG		

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	date. As a result, it is the view of the RySG that measures are in place to reduce fraud in the early days of a domain's existence and no further clarification is therefore needed.			
5.	In relation to reason for denial #9, since some transfer disputes are raised as a result of a registrar's practice of locking down a domain when modifications are made to the registrant details, the RySG recommends that additional clarification be added to specifically state that registrars are prohibited from restricting transfers for 60 days after changes to registrant details. To the extent that a new policy is developed to address the 'change of control' function, then that policy could also address any specific restrictions / impacts that a change of registrant details would have on inter-registrar transfers.	RySG		
Charter Question B - Whether provisions on time-limiting Form Of Authorization (FOA)s should be implemented to avoid fraudulent transfers out. For example, if a Gaining Registrar sends and receives an FOA back from a transfer contact, but the name is locked, the registrar may hold the FOA pending adjustment to the domain name status, during which time the registrant or other registration information may have changed.				
6.	Practical limits on the effective term of a Form of Authorization should be considered. Sixty (60) days would be a reasonable time frame. To inform its work, the IRTP Part C WG should gather and consider scenarios in which a registrar receives an FOA from the Registrant but does not submit the transfer request to the Registry.	GoDaddy		
7.	Support for the concept of time-limiting the FOA but defers to the registrar community to	RySG		

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	determine what a reasonable time limit should be.			
Charter Question C - Whether the process could be streamlined by a requirement that registries use IANA IDs for registrars rather than proprietary IDs.				
8.	GoDaddy anticipates that this might become a greater burden for all registrars with new gTLDs when hundreds of new gTLDs are active in the DNS. A move to uniformly employ IANA ID numbers in gTLD Registry systems would therefore be favored to the extent practical.	GoDaddy		
9.	It is general agreed that registrar name changes often do make it difficult to ensure that the correct registrar is identified and use of the IANA ID may be helpful in confirming registrar identification. It is reasonable to think that all registries do maintain the IANA ID for each registrar in their registration systems.	RySG		
In relation to Charter Question A, the Issue Report notes that 'data on the frequency of hijacking cases is a pivotal part of this analysis. Mechanisms should be explored to develop accurate data around this issue in a way that meets the needs of registrars to protect proprietary information while at the same time providing a solid foundation for data-based policy making. Data on legitimate transfer activity benefitting from the current locking policy wording needs to be collected'.				
10.	Registries do not have a comprehensive view of hijacking cases as very few cases ever reach the registries for action. It is agreed that data relating to the frequency of hijacking instances is critical to understanding the extent of the issue. The RySG is hopeful that registrars may be able to propose a mechanism by which to gather and provide information in a manner that will protect the proprietary nature of the data.	RySG		

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In addition to the ccTLDs described in the Issue Report that do have a procedure or process for a 'change of control' (.ie, .eu and .uk) are there any other ccTLDs that have similar procedures or processes which the WG should review in the context of charter question A? Furthermore, the WG would be interested to receive feedback on the experiences with these or other ccTLD procedures or processes for a 'change of control' as well as identifying potential benefits and/or possible negative consequences from applying similar approaches in a gTLD context.				
11.	The RySG defers to the registrar community for feedback on this issue.	RySG		
In relation to Charter Question B and C, the WG would be interested in further input or data in relation to the incidence of this issue to determine its scope and the most appropriate way to address it.				
12.	The RySG defers to the registrar community for feedback relating to Charter Question B since the RySG has little to no information relating to age of FOA used in the transfer of domain names from one registrar to another.	RySG		
In relation to Charter Question C, Registries and Registrars are asked to provide specific information as to where proprietary IDs are currently being used by registries and whether the use of IANA IDs instead would be preferred / beneficial.				
13.	At least two registries have been identified as using proprietary IDs instead of the IANA assigned IDs. In the case of at least one of these registries, proprietary IDs are used in all registrar/registry communications. The primary driver behind the use of proprietary IDs vs. IAN IDs is security. The registries that currently use proprietary IDs have indicated that the use of proprietary IDs aids in the prevention of mining of Whois data based on publicly available IANA IDs. There would need to be a compelling reason for these registries to transition to the use of IANA IDs as the level of effort involved would be significant given that all systems would be impacted.	RySG		