

Post-Expiration Domain Name Recovery – Public Comments Review Tool – 8 June 2011

	Comment	Who/Where	WG Response	Recommended Action
General Comments				
1.	Could the ordering of recommendations be done in order of priority?	SFO meeting	The WG noted that in its view it would be important to highlight the level of support for each recommendation and to indicate whether recommendations are inter-dependent or not, but it does not consider it appropriate and/or relevant to prioritize the recommendations as almost all of them are for implementation and do not consist of additional work for the GNSO. The WG did agree that re-ordering the recommendations by grouping them together by related issue might be useful.	Add consensus levels to each of the recommendations and group them together by related issue.
2.	Certain recommendations listed in the Report require clarification and/or refinement before they can adequately address the identified concerns.	IPC	Noted.	
3.	The report misses a clear statement that during the Auto-Renew Grace Period and Redemption Grace Period a registrar has no right to transfer a domain name to another registrant without the explicit consent of the RNHaE at the time of transfer (exceptions may apply for arbitration and judicial orders).	Pieter van leperen	The WG notes that it considers this specific issue outside of scope of the Working Group (see charter questions), but it does consider that some of the concerns that relate to this comment have been addressed by the proposed recommendations such as providing the RNHaE with additional guarantees to be able to recover the registration following expiration.	

	Comment	Who/Where	WG Response	Recommended Action
4.	The ALAC supports most of the recommendations, but not all of them (see recommendation #2). In addition, it believes that some recommendations are missing from the report (see hereunder).	ALAC	Noted.	
5.	Resellers have often been associated with renewal problems raised by Registered Name Holders. The ALAC finds it unfortunate that the WG did not address this issue directly because at the present moment, not incorporating reseller problems leaves recommendations open for exploitation.	ALAC	The WG notes that ICANN accredited registrars are responsible for their respective resellers. Any issues identified should be raised with the responsible ICANN accredited registrar and/or ICANN Compliance. The WG also noted that the topic of resellers is wider than PEDNR and might therefore be considered in a different context as the WG does not consider it part of its scope. The WG would like to point out that it did discuss the issue of resellers extensively as part of its deliberations, but was not able to come to consensus on a recommendation related to this issue.	
6.	There is great value in moving forward with standardization of the overall process involving PEDNR, but the cost of such actions toward standardization should not be procedures that fail to adequately protect the rights of consumers and brand owners. As such, certain recommendations in the Report require further detail and clarification.	INTA	Noted.	

	Comment	Who/Where	WG Response	Recommended Action
7.	The RrSG supports the Final Report of the PEDNR PDP WG as it currently stands. The RrSG notes that it is its position that all 14 recommendations in the PEDNR Final Report are inter-dependent and should therefore be considered and adopted as a group by the GNSO Council.	RrSG	Noted and agreed.	Clarify in the report that all the recommendations should be considered as inter-dependent and should be considered as a group by the GNSO Council.
Charter Question 1 – Section 7 Deliberations of the WG				
8.	This section in the report implies that if the registration is deleted during the Auto-Renew Grace Period, the registrar is absorbing the extra costs from the auto-renewal charge following expiration. This should be clarified, because the registrar either (a) never charges the registrant in the first place, or (b) is reimbursed by the registry if the registrar deletes the domain during Auto-renew Grace Period and reimburses the registrant.	RySG	Following review of additional feedback provided by the RySG in relation to this comment (see http://forum.icann.org/lists/gnsopednr-dt/msg00808.html), the WT agreed that it should be possible to clarify this section by making sure that the terms ‘renewal’ and ‘redemption’ are used correctly.	Review section (and rest of the report) to make sure that the terms ‘renewal’ and ‘redemption’ are used correctly.

	Comment	Who/Where	WG Response	Recommended Action
Charter Question 1 - Whether adequate opportunity exists for registrants to redeem their expired domain names				
Recommendation #1 Define “Registered Name Holder at Expiration” (RNHaE) as the entity or individual that was eligible to renew the domain name registration immediately prior to expiration. If the domain name registration was modified pursuant to a term of the Registration Agreement authorizing the modification of registration data for the purposes of facilitating renewal, the RNHaE is the entity or individual identified as the registrant immediately prior to that modification.				
9.	The definition of RNHaE must be revised to reflect that the registrant of the domain name registration does not include a registrant that has lost a Uniform Rapid Suspension (‘URS’) proceeding. Such suspended domain names should follow a different set of processes.	IPC	The WG notes its agreement with the concept, but did wonder whether this issue should be addressed here or as part of the URS or possibly UDRP. It agreed to make a note in the report in relation to the implementation of this recommendation to ensure that this issue is addressed in the manner considered most appropriate by those responsible for the implementation.	Add note to recommendation to ensure that this issue is considered as part of the implementation.
10.	Support for this recommendation, but INTA notes that the second definition provided is less clear and therefore recommends clarifying the applicability of the second definition of RNHaE or the supporting rationale.	BC, ALAC, INTA	Noted. The WG agreed to review the second part of the definition as well as the rationale to ensure that the objective is clear.	Review second part of the definition as well as rationale and clarify if deemed appropriate.

	Comment	Who/Where	WG Response	Recommended Action
<p>Recommendation #2 For at least 8 consecutive days, at some point following expiration, the original DNS resolution path specified by the RNHAE, at the time of expiration, must be interrupted and the domain must be renewable by the RNHAE until the end of that period. This 8-day period may occur at any time following expiration. At any time during the 8 day period, the Registered Name Holder at Expiration may renew the domain with the Registrar and the Registrar, within a commercially reasonable delay, will cause the domain name to resolve to its original DNS resolution path. Notwithstanding, the Registrar may delete the domain at any time during the Auto-renew grace period.</p>				
11.	A minimum of 12 working days should be given after expiration when the RNHaE can renew.	G.P. Singh	The WG notes that the 8 days were the result of long discussions and should be considered a delicate found balance between the different viewpoints that exist within the Working Group. No further changes are therefore recommended at this stage.	
12.	If registrars are going to be required to hold domains for 8 days past expiration, then registries should not be allowed to collect auto-renewal fees until this 8 day period ends.	Michael Shout	The WG noted that registrars already have the right to delete a domain name registration immediately. If they chose not to, that is a business decision just as it is today.	
13.	'Must be interrupted' – clarify that this interruption is done by the registrar not the registry.	SFO meeting	Noted and agreed. The WG did discuss that in certain cases such as .tel it is actually the registry that is responsible for the interruption. The WG agreed to update the recommendation to 'by the registrar, to the extend it has the possibility to interrupt the DNS'.	Update recommendation and explain in rationale the updated wording.

	Comment	Who/Where	WG Response	Recommended Action
14.	The IPC agrees with this recommendation, but notes that it would appear reasonable to modify the floating 8-day term into a strict and easily identifiable term for the RNHaE.	IPC	The WG notes that it deliberately made it floating to allow for various registrar business models and potentially competitive business continuity services. The WG agrees that it might make it more confusing but suggests that this can possibly be addressed in the wording and/or rationale of the recommendation.	Review recommendation / rationale, and update if deemed appropriate.
15.	The recommendation should be revised to reflect that for a domain name suspended under the URS, the informational web page need not be interrupted or is exempt from this recommendation.	IPC	Noted and agreed.	Update recommendation accordingly.
16.	DNS interruption for only 8 consecutive days, at a random point in time after expiry, will create confusion instead of warning to the RNHaE. DNS interruption should start at expiry, continue through the whole Auto-Renew Grace Period, whole RGP, until the RNHaE renews or restores.	Pieter van leperen	See response above (nr. 14)	
17.	DNS interruption should be defined as total internet service interruption except for an informational web page (only one IP on which on port 80/443 is active).	Pieter van leperen	The WG notes that it might be appropriate to clarify this in a footnote.	Add footnote to clarify how DNS interruption is defined.

	Comment	Who/Where	WG Response	Recommended Action
18.	Why should a registrar have the right to delete a domain at any time during the Auto-Renew Grace Period? Why not only in the last 5 days of that period?	Pieter van leperen	The WG notes that current provisions allow registrars to delete at any time, if for no other reasons than to allow them to control their costs or offer specific business models. The WG saw no need to alter this provision and believes that such a recommendation would be out of scope (see charter questions).	
19.	The BC supports this recommendation, with the exception that the 8-day period should be extended to 30 days.	BC	The WG notes that the 8 days were the result of long discussions and should be considered a delicate balance between the different viewpoints that exist within the Working Group. No further changes are therefore recommended at this stage. The WG notes that its recommendation to periodically review the complaints related to expiration recovery will help verify that either the 8 days is reasonable or that it needs to be adjusted.	

	Comment	Who/Where	WG Response	Recommended Action
20.	The ALAC commends the overall intent of the recommendation, but given that most registrars already offer a 30-40 day period, the ALAC strongly believes that the recommendation should guarantee no less than 30 days. Setting this guaranteed minimum to 8 consecutive days has the potential to be highly detrimental to users. It is unreasonable, especially considering the fact that prior to Registrars creating the post-expiration domain name re-assignment process, all Registered Name Holders had between 30 and 75 days to renew.	ALAC	The WG notes that the 8 days were the result of long discussions and should be considered a delicate balance between the different viewpoints that exist within the Working Group. No further changes are therefore recommended at this stage. The WG notes that its recommendation to periodically review the complaints related to expiration recovery will help verify that either the 8 days is reasonable or that it needs to be adjusted.	
21.	Request for clarification: the beginning of the 8 day period is not specified, rather stating that the period is at some point following expiration.	INTA	Noted. The WG agreed that it might be helpful to clarify in the recommendation and/or rationale that the 8 day period is considered a floating period.	Review recommendation / rationale and update if deemed appropriate.
22.	Request for clarification: the timeframe in which the registrar must have the domain resolve to its original DNS path is not specified, just stated 'within a commercially reasonable delay'.	INTA	The WG notes that 'within a commercially reasonable delay' was added at the request of registrars because "immediately" or a related term could set unreasonable expectations. The WG will consider whether there are other terms that might be more appropriate, recognizing that it should be realistic and measurable.	Review recommendation and update as deemed appropriate.

	Comment	Who/Where	WG Response	Recommended Action
23.	The recommendation fails to spell out the meaning of the 'original DNS resolution path', raising the question, at what point is the domain owner allowed to modify that DNS path.	INTA	The WG noted that 'owner' is not an accurate term in this context. In response to the comment, the WG notes that it meant the DNS resolution prior to the "interruption" which presumably is the one in effect just prior to expiration.	

	Comment	Who/Where	WG Response	Recommended Action
24.	<p>It is not clear whether and how these recommendations #1 and #10 would accommodate the option to renew that is available the complainant in an UDRP dispute pursuant to section 3.7.5.7 of the RAA which is part of the EDDP.</p> <p>(3.7.5.7 In the event that a domain which is the subject of a UDRP dispute is deleted or expires during the course of the dispute, the complainant in the UDRP dispute will have the option to renew or restore the name under the same commercial terms as the registrant. If the complainant renews or restores the name, the name will be placed in Registrar HOLD and Registrar LOCK status, the WHOIS contact information for the registrant will be removed, and the WHOIS entry will indicate that the name is subject to dispute. If the complaint is terminated, or the UDRP dispute finds against the complainant, the name will be deleted within 45 days. The registrant retains the right under the existing redemption grace period provisions to recover the name at any time during the Redemption Grace Period, and retains the right to renew the name before it is deleted).</p>	ICANN Staff	<p>The WG notes its agreement with the concept, but did wonder whether this issue should be addressed here or as part of UDRP. It agreed to make a note in the report in relation to the implementation of this recommendation to ensure that this issue is addressed in the manner considered most appropriate by those responsible for the implementation.</p>	<p>Add note to recommendation to ensure that this issue is considered as part of the implementation.</p>
<p>Recommendation #3 (now recommendation #4) The RNHaE cannot be prevented from renewing a domain name registration as a result of WHOIS changes made by the Registrar that were not at the RNHaE's request. [Final wording will need to exempt cases where renewal will not be disallowed due to fraud, breach of registration agreement or other substantive reasons.]</p>				
25.	Support for this recommendation.	IPC, BC, ALAC	Noted and appreciated.	

	Comment	Who/Where	WG Response	Recommended Action
26.	WHOIS contact data after expiry must be the same as before expiry, so everyone can see who has to be warned about the expiration.	Pieter van leperen	The WG notes that it did not consider this issue as the WG saw no need to alter this provision to address this PDP and so believes that such a recommendation would be out of scope.	
27.	Modify this recommendation so that it is clear that the renewal is in the name of the RNHaE, not the registrar or a third party.	INTA	The WG notes that this recommendation talks about renewal BY the RNHaE. What are the normal rules (if any) regarding a Registrant changing the name of the owner, at renewal time or in fact, any time?	
28.	Remove 'post-expiration' from the rationale as it could also concern changes (just) prior to expiration.	ICANN Staff	Noted and agreed.	Remove 'post-expiration' from the rationale.
29.	Be more specific about when the RNHaE is entitled to renew as otherwise the recommendation could be read as meaning that the RNHaE should always be allowed to renew.	ICANN Staff	The WG notes that the recommendations are considered interdependent (see comment 7). If further clarification is required, the WG would appreciate concrete suggestions for changes.	
Recommendation #4 (now recommendation #13) All unsponsored gTLD Registries shall offer the Redemption Grace Period (RGP). For currently existing unsponsored gTLDs that do not currently offer the RGP, a transition period shall be allowed. All new gTLDs must offer the RGP.				
30.	The IPC agrees with this recommendation, but believes it should be revised to also recommend a standardized RGP implementation across all gTLDs (as the report notes that implementation details vary for RGP in different gTLDs).	IPC	The WG has requested feedback from ICANN Staff on whether implementation details vary for RGP in different gTLDs before considering this comment further.	

	Comment	Who/Where	WG Response	Recommended Action
31.	Recommendation #4 should be expanded to clarify the intent of the references to “sponsored” and “unsponsored” as such categorization no longer exists in the Applicant Guidebook for new gTLDs.	RySG	Noted and agreed.	Update recommendation accordingly.
32.	Support for this recommendation.	BC, ALAC	Noted and appreciated.	
33.	There is no requirement that the RGP be a standard time frame. Having the RGP time period and process at the discretion of the Registrar is likely to cause confusion to the consumer. INTA proposes that the RGP should be the same across all registrars and inquire as to whether there is a reason why it should only apply to unsponsored TLDs.	INTA	The WG has requested feedback from ICANN Staff on whether implementation details vary for RGP in different gTLDs before considering this comment further. ICANN Staff notes that the RGP is indeed implemented across registries in different ways, but also pointed out the following provision in the new gTLD program: ‘If Registry Operator implements Registry Grace Period (RGP), it will comply with RFC 3915 and its successors’ (From Spec 6 of new gTLD base agreement, see also http://www.ietf.org/rfc/rfc3915.txt).	
Recommendation #5 (now recommendation #14) If a Registrar offers registrations in a gTLD that supports the RGP, the Registrar must allow the Registered Name Holder at Expiration to redeem the Registered Name after it has entered RGP.				
34.	Support for this recommendation.	IPC, BC, ALAC	Noted and appreciated.	
35.	The same should apply to the Auto-Renew Grace Period, for example as follows: ‘If a Registrar offers registrations in a gTLD that supports the Auto-Renew Grace Period, the Registrar must allow the RNHaE to renew the Registered name until 5 days before the end of that period’.	Pieter van leperen	The WG notes that there is no wide support on in this WG for this suggestion. The WG considers the Auto-Renew Grace Period to be between the registrar and the registry and does not see any need to change that.	

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36.	This feature would benefit the domain holder if the domain holder is not required to pay the RGP fee in addition to the PEDNR fee.	INTA	ICANN Staff confirmed that the only way a name can be redeemed during the RGP is by renewing it. Therefore the RGP fee includes the renewal for one year. As a result, this comment is moot (assuming that the PEDNR fee means the renewal fee).	
Charter Question 1 – Section 7 Deliberations of the WG				
37.	The RySG representative suggested that a WHOIS indication of ‘Auto-renew grace period’ was feasible. While it is not as clear as might be desired, the suggestion was an improvement in consistency across WHOIS implementations. Furthermore, it should be noted that the complexity in adjusting WHOIS to address this issue involves (a) coordinating relevant EPP adjustments to reflect these additional clarifications, and (b) a lack of standardization in existing WHOIS standards.	RySG	The WG agreed to request a clarification from the RySG with regard to this comment as it was not clear what was meant.	

	Comment	Who/Where	WG Response	Recommended Action
Charter Question 2 - Whether expiration-related provisions in typical registration agreements are clear and conspicuous enough				
Recommendation #6 (now recommendation #5) The registration agreement must include or point to any fee(s) charged for the post-expiration renewal of a domain name. If the Registrar operates a website for registration or renewal, it should state, both at the time of registration and in a clear place on its website, any fee(s) charged for the post-expiration renewal of a domain name or the recovery of a domain name during the Redemption Grace Period.				
38.	The IPC agrees with this recommendation, but would further suggest that Registries and Registrars are prohibited from using, even if disclosed, a pricing model based upon an auction or similar transaction whereby the RNHaE's price is subject to the demand of third-parties bidding on the domain name.	IPC	The WG notes that this was the intent of the recommendation. A possible clarification, proposed by ICANN Staff, could be "Any such fee charged for renewal must be a priori determined fixed amount stated in applicable currency".	
39.	ICANN must limit [Note – commenter uses word 'maximize', which I have interpreted as meaning 'set a maximum'] the fees for post-expiration renewal and post-delete restoration.	Pieter van leperen	The WG considers setting prices outside of the scope of this WG.	
40.	Support for this recommendation.	BC, ALAC, INTA	Noted and appreciated.	
Recommendation #7 (now recommendation #17) In the event that ICANN gives reasonable notice to Registrar that ICANN has published web content providing educational materials with respect to registrant responsibilities and the gTLD domain life-cycle, and such content is developed in consultation with Registrars, Registrars, who have a web presence, shall provide a link to the webpage on any website it may operate for domain name registration or renewal clearly displayed to its Registered Name Holders at least as clearly as its links to policies or notifications required to be displayed under ICANN Consensus Policies.				
41.	Support for this recommendation, but suggestion that the WG should also recommend that registrars be required to include a reasonable prominent link to the "Domain Life-Cycle" document in question within renewal reminder emails to registrants.	IPC, INTA	The WG agrees with the intent of the recommendation, but would instead encourage registrars to adapt the materials to fit with their own practices and policies, in addition to linking to ICANN developed content.	

	Comment	Who/Where	WG Response	Recommended Action
42.	Support for this recommendation.	BC, ALAC	Noted and appreciated.	
Recommendation #8 (now recommendation #16) ICANN, with the support of Registrars, ALAC and other interested parties, is to develop educational materials about how to properly steward a domain name and how to prevent unintended loss. Once developed, Registrars are expected to link to or host that information on its web site, and send to the registrant in a communication immediately following initial registration as well as in the mandated annual WHOIS reminder. Such information should include a set of instructions for keeping domain name records current and for lessening the chance of mistakenly allowing the name to expire. [Need to refine wording: expression “include a set of instruction“ to include pointing to appropriate location where instructions can be found; pointing to ICANN registrant education site.]				
43.	Support for this recommendation, but proposal that the recommendation should be revised by deleting the wording “are expected to” and inserting the term “must” instead.	IPC, INTA	Noted and agreed.	Update the recommendation accordingly.
44.	Support for this recommendation.	BC, ALAC	Noted and appreciated.	
45.	In relation to the bracketed wording, to ensure consistency and that best practices are updated, it would be best to have registrars include a link to a web page at the ICANN site as opposed to their linking to their versions of the document.	INTA	In order to clarify the recommendation and address the comment, the WG agreed to take out ‘or host’ from the recommendation.	Update the recommendation accordingly.
46.	It is not clear what ‘with the support of’ means. Might be helpful to provide further details.	ICANN Staff	The WG agreed to update the recommendation to change ‘with the support of’ to ‘in consultation with’.	Update the recommendation accordingly.
Recommendation #9 (now recommendation #6) The registration agreement and Registrar web site (if one is used) must clearly indicate what methods will be used to deliver pre- and post-expiration notifications, or must point to the location where such information can be found. What destination address/number will be used must also be specified, if applicable.				
47.	Support for this recommendation.	IPC, BC, ALAC, INTA	Noted and appreciated.	

	Comment	Who/Where	WG Response	Recommended Action
48.	INTA suggests that the notification method explanation should include a suggestion that registrants save the registrar's notification email address as a 'safe sender' to avoid notification emails being blocked by spam filter software.	INTA	When the WG discussed this type of issue, the WG determined that it might be difficult for some registrars to do this, and moreover, the WG does not want to imply that at some point in the future, the 'From' address used by a registrar could not change. However, the WG notes that it might be worthwhile adding a best practice saying that to the extent possible, the registrar should give notice to the registrant what address will be used.	Add as a best practice recommendation.
Charter Question 3 - Whether adequate notice exists to alert registrants of upcoming expirations				
49.	A third party should be required to provide notice to a registrant of any and all rules applicable to the domain transfer by the registrant at any point during the registration period.	Charles Mason	The WG notes that it did not consider this issue as the WG does not consider it relevant to address this PDP and so believes that such a recommendation would be out of scope.	
Recommendation #10 (now recommendation #7) Subject to an Exception policy, Registrar must notify Registered name Holder of impending expiration no less than two times. One such notice must be sent one month or 30 days prior to expiration (± 4 days) and one must be sent one week prior to expiration (± 3 days).). If more that two alert notifications are sent, the timing of two of them must be comparable to the timings specified. It is the intention to have an exception policy, allowing the Registrar to substitute alternative notification patterns, but this still needs to be defined.				
50.	Support for this recommendation, but the IPC notes it has no opinion with regard to the proposed exception policy.	IPC, BC, ALAC, INTA	Noted The WG did discuss whether an exception policy is actually needed.	
51.	Allowing exceptions for registrar business models that do not allow for the notification timeframes suggested in this recommendation is acceptable in theory, but needs further fleshing out as to application.	INTA	Noted. The WG did discuss whether an exception policy is actually needed.	

	Comment	Who/Where	WG Response	Recommended Action
52.	Simplify language by changing 'If more than two alerts are sent, the timing of two of them must be comparable to the timings specified' to 'This does not preclude Registrar from sending additional notices'.	ICANN Staff	Noted and agreed.	Update recommendation accordingly.
Recommendation #11 (now recommendation #9) Notifications of impending expiration must include method(s) that do not require explicit registrant action other than standard e-mail receipt in order to receive such notifications.				
53.	Support for this recommendation.	IPC, BC, ALAC, INTA	Noted and appreciated.	
54.	Clarify language by changing 'must include method(s) that do not require' to 'must be by method(s) that include those that do not require'	ICANN Staff	The WG does not agree that this is a simplification and supports leaving the recommendation as is.	
Recommendation #12 (now recommendation #8) Unless the Registered Name is deleted by the Registrar, at least one notification must be sent after expiration.				
55.	The IPC agrees with this recommendation, but suggests that the recommendation be revised to state that any such post-expiration notice must contain explicit information setting forth the proper procedure for the RNHaE to renew the domain name.	IPC	Noted and agreed.	Update recommendation to 'at least one notification, which includes renewal instructions, must be sent after expiration.'
56.	Support for this recommendation.	BC, ALAC	Noted and appreciated.	
57.	INTA recommends that the final notification sent by a registrar prominently indicate "FINAL NOTICE" to make clear that it is the registrant's final opportunity to recover the domain name.	INTA	The WG considers that this is too much detail as part of the policy, but notes the registrar has the option to include such heading if so desired. Some members of the WG pointed out that the term 'final notice' may mean different things in different jurisdictions.	

	Comment	Who/Where	WG Response	Recommended Action
Charter Question 4 - Whether additional measures need to be implemented to indicate that once a domain name enters the Auto-Renew Grace Period, it has expired (e.g., hold status, a notice on the site with a link to information on how to renew, or other options to be determined)				
Recommendation #13 (now recommendation #3) If at any time after expiration when the Registered Name is still renewable by the RNHaE, the Registrar changes the DNS resolution path to effect a different landing website than the one used by the RNHaE prior to expiration, the page shown must explicitly say that the domain has expired and give instructions on how to recover the domain. [Wording must make clear that “instructions” may be as simple as directing the RNHaE to a specific web site.]				
58.	The IPC agrees with the rationale of this recommendation, but would caution that the landing website should not be permitted to be additionally used for advertising purposes, click-through monetization or otherwise generating traffic to the benefit to the registrar, affiliates or third parties.	IPC	The WG considers this out of scope as the inclusion of advertising does not reduce RNHaE’s ability to renew.	
59.	Support for this recommendation. In addition, INTA suggests that the Registrar include a link on the changed page to connect to the renewal site for the domain name.	BC, ALAC, INTA	The WG noted that this could be one of the options that the registrar has at its disposal. The WG agreed to take out the square brackets from the recommendation to make clear what ‘instructions’ means.	Remove the square brackets from the recommendations so that ‘wording must make clear that “instructions” may be as simple as directing the RNHaE to a specific web site’ becomes part of the recommendation.
Recommendation #14 (now recommendation #10) Best Practice for Registrars: If post-expiration notifications are normally sent to a point of contact using the domain in question, and delivery is known to have been interrupted by post-expiration actions, post-expiration notifications should be sent to some other contact point associated with the registrant if one exists.				
60.	Support for this recommendation.	IPC, BC, ALAC, INTA	Noted and appreciated.	

	Comment	Who/Where	WG Response	Recommended Action
61.	In addition, ALAC recommends that a secondary point of contact should be supplied by all potential registered name holders during their registration process. This should be systematic and mandatory for all registrations.	ALAC	The WG noted that it discussed this issue at length, but did not agree that this should be a mandatory practice, instead the WG agreed to add it as a best practice recommendation.	Add providing a secondary point of contact during the registration process as a best practice recommendation.
62.	Notification should be sent to all other points of contact associated with the registrant if more than one other alternative point of contact exists in the record.	INTA	The WG notes that given the complaints about spam, this is probably going too far. The WG already suggests that if the primary address is known not to work due to registrar DNS disruption, a secondary be used.	
Charter Question 5 - Whether to allow the transfer of a domain name during the RGP				
Charter Question 5 No recommendation. (now recommendation #15)				
63.	The registrant should be able to transfer the domain to another registrar during the RGP. The main reason for this is to enable a registrant to move a domain if it is not satisfied with the service provided or differences in price for the renewal.	Charles Mason	The WG noted that it discussed this issue at length and taking into account the potential complications a transfer might involve did not consider it beneficial to allow a transfer at this point in the process.	
64.	Given the rationale provided, the RySG is of the opinion that there should be a proactive recommendation that transfers during the RGP process are not permitted.	RySG	The WG agrees with this comment and will develop a recommendation accordingly.	Develop a proactive recommendation that transfers during the RGP process are not permitted.
65.	The BC supports no action at this time.	BC	Noted.	