

Transition Plan

Status – Staff Paper

CCNSO - PDP – Retirement of ccTLDs

2018-10-22

1 Background

One of the core elements identified to date has been the “transition” plan to ensure a predictable, structured approach to the removal of the country code Top Level Domain (“ccTLD”) from the DNS root zone database. In some cases the plan includes agreed upon actions between ICANN and the ccTLD manager.

For discussion by the WG is whether the requirement for such a plan should be included in the policy, and if so, how much detail should be included. One could also revert to include it as an expected, but not mandatory part of the recommended policy. One could argue that a mandatory requirement for such a plan is beyond the remit of the ccNSO policy, as it directly affects the ccTLD managers operations and registration policies (see Annex C of the ICANN Bylaws).

2 Process

The WG will identify and consider the possible elements of a transition plan prior to making a decision as if and how to include these in a policy.

The sections below will explore the various possibilities in detail to allow the WG to better gauge the impact of the elements which would be included in a policy.

3 Initiation and Types of Transition Plans

Triggering event is the removal of the 2 letter code from the ISO-3166 active list.

Public Technical Identifiers (“PTI”) is responsible for notifying ccTLD managers that their ccTLD will have to be retired because the two letter code associated with their ccTLD has been removed from the ISO-3166 active list.

The notice (“Notice of Retirement”) to the ccTLD Manager of the retiring ccTLD (“the Manager”) should indicate that the Default Transition Plan for Retirement (“DTPR”)

28 is in effect until it is replaced by a mutually agreed to Specific Transition Plan for
29 Retirement (“SPTR”) which respects the Transition Plan Guidelines for Retirement
30 (“TPGR”).

31 **3.1 Default Transition Plan for Retirement (DTPR)**

32 **3.1.1 Process summary**

33 PTI is advised the ISO3166-2 letter code for a ccTLD has been removed from the Active
34 List.

35 PTI sends a Notice of Retirement to the Manager which states the DTPR Date of Retirement of the ccTLD and requests that the Manager contact PTI to arrange for a mutually agreeable SPTR.

38 If an SPTR is agreed to prior to DTPR Date of Removal (less the Notice of Removal requirements) then the SPTR process succeeds the DTPR process.

40 If no SPTR is agreed to prior to the DTPR Date of Removal less the Notice of Removal requirements PTI will send a Notice of Removal to the Manager indicating that the ccTLD will be removed from the Root on the DTPR Date of Removal and post this information on its website. PTI will provide a final 24 hour notice (Final Notice of Retirement) prior to removing the ccTLD from the root and will remove the retiring ccTLD from the Root on the DTPR Date of Retirement.

super-seeds?

46 **3.1.2 Description**

47 The DTPR should be a public document posted on the PTI [website](#) which will identify the length of the period, after having notified the Manager, when PTI will remove the retiring ccTLD from the root unless an STPR is agreed to between PTI and the ccTLD Manager.

Specific URL?

51 The DTPR assumes that until a STPR is agreed to that the ccTLD manager cannot or will not cooperatively develop an STPR with PTI.

53 The DTPR will list the actions PTI will undertake between the time it notifies the Manager that the ccTLD must be retired and the time, as per the policy, it removes the ccTLD from the root.

56 It is expected that PTI will use best efforts to work with the ccTLD manager to establish an SPTR and may ask members of the ccTLD community to assist the ccTLD manager if necessary.

59 3.2 Specific Transition Plan for Retirement (STPR)

60 3.2.1 Process Summary

61 An SPTR is agreed to between PTI and the Manager

62 PTI monitors the SPTR to ensure the Manager is meeting the requirements of the
63 agreement.

64 If all the requirements of the SPTR are met by the manager PTI will send a Notice of
65 Removal to the Manager per TGPR and PTI will provide a final 24 hour notice (Final
66 Notice of Retirement) prior to removing the ccTLD from the root and will remove the
67 retiring ccTLD from the Root on the STPR Date of Retirement.

68 If there is a breach of the SPTR, PTI will send a Notice of Breach to the Manager re-
69 questing that the Breach be cured within a specific timeframe (Period to Cure - TGPR).
70 If the Breach is cured within the specified timeframe the SPTR resumes, if not PTI will
71 send a Notice of Termination of SPTR to the manager

72 3.2.2 Description

73 A SPTR is a transition plan that is cooperatively developed and agreed to between PTI
74 and the Manager.

75 The term (time period after which the ccTLD will be removed from root) in the SPTR
76 cannot exceed the maximum time to retire a ccTLD specified in the TGPR unless
77 approved by PTI (PTI would only do so in cases where following the maximums in
78 TGPR would significantly threaten the security and stability of the Internet).

79 Additionally and SPTR will should usually contain the dates when the Manager will
80 stop accepting new registrations, transfers and renewals.

a SPTR
will
usually

81 A SPTR will also specify the actions PTI will undertake, as per the TPGR, in cases where,
82 according to PTI, the Manager fails to meet the conditions set out in the SPTR (“Breach
83 of SPTR conditions” or “Breach”).

84 3.3 Breach of SPTR

85 PTI will monitor SPTRs.

86 If the Manager fails to meet the conditions spelled out in the SPTR, according to PTI,
87 PTI will undertake the following process:

88 1. PTI will advise the Manager that it is in Breach of the SPTR (“Notice of Breach”),
89 identifying which part(s) of the SPTR is in breach and documenting why a deter-
90 mination of a Breach has been made by PTI.

are?

91 2. The Notice by PTI will request that the Manager remedy the Breach within a set
92 period (Period to Remedy) as described in the TPGR (90 days?).

- 93 3. The Notice will also request that the Manager contact PTI to identify the causes
94 for the Breach.
- 95 4. If the Manager does not contact PTI within 7 days PTI will resend the Notice of
96 Breach to the Manager and will continue doing so every 7 days until the Manager
97 contacts PTI or the Period to Remedy expires.
- 98 5. If the Manager has not responded or contacted PTI within 28 days of receiving
99 the first Notice of Breach PTI will attempt with best efforts to contact the Manager
100 by telephone.
- 101 6. Possible outcomes to a Notice of Breach
- 102 6.1. Cure of Breach within the Period to Remedy – For the Breach(es) to be con-
103 sidered remedied the Manager must:
- 104 6.1.1. Cure the Breach(es) identified in the Notice of Breach by the specified
105 deadline.
- 106 6.1.2. Formally advise PTI it has done so and describing how it has done this
107 by the specified deadline.
- 108 6.1.3. Obtain a formal confirmation from PTI that the Breach was cured in
109 accordance with the requirements in the Notice of Breach.
- 110 6.2. All other outcomes (no cure or no contact with the Manager)
- 111 6.2.1. Within 30 days (?) after the end of the Period to Remedy, PTI will formally
112 advise the Manager that the SPTR has been revoked for failure to remedy
113 the Breach(es) identified in the Notice of Breach and that the ccTLD will
114 be removed from the root on (DATE - according to the TGPR).

115 3.4 Derelict Manager

116 At any point in the retirement process it is possible that the Manager cannot or will
117 not continue to operate the ccTLD which is different from a Manager who continues to
118 operate the ccTLD but does not wish to initiate discussions with PTI on establishing an
119 SPTR.

120 BT: (need to explore options here)

121 3.5 Transition Plan Guidelines for Retirement (TPGR)

122 DTPR Removal Date Date at which the ccTLD will be removed from the Root under
123 a DTPR. This should be a fixed period from the time PTI noti-
124 fies the Manager that the ccTLD will have to be removed from
125 the Root. The DTPR Removal Date period is TBD

- 126 SPTR Removal Date Date at which the ccTLD will be removed from the Root under
127 an SPTR. This should specify an absolute maximum period
128 but should not impose any minimum period. The SPTR Re-
129 moval Date maximum period is TBD
- 130 Notice of Removal A Notice of Removal must be sent by PTI to the Manager X
131 days (TBD) prior to the removal of a ccTLD from the Root and
132 state the date and time of the removal.
- 133 Final Notice of Removal Must be sent by PTI to the Manager 24 hours prior to removing
134 the ccTLD from the Root.
- 135 Days All days unless otherwise stipulated are calendar days and
136 counting of days for a notice begin at 00:01 UTC the day after
137 a notice is sent.
- 138 A notice being sent by PTI shall be considered delivered to the Manager if sent to the
139 email addresses listed in the IANA Database unless the Manager has made other formal
140 arrangements with PTI.
- 141 Standard Delay for the Manager to cure the Breach(es) and formally advise PTI (90
142 days?).
- 143 Standard delay for PTI to provide the Manager a response. If the Manager responds
144 to PTI with regards to the Notice of Breach stating the Breach(es) have been cured
145 PTI shall respond to the Manager within 30 days of receiving the Manager's response
146 formally stating if PTI considers the Breach(es) cured.
- 147 Retirement time due to failure to remedy Breach(es). Obviously the failure of a Manager
148 to remedy a Breach creates a difficult situation for PTI which can no longer adhere to
149 the SPTR developed with the Manager. As such PTI must now advise the Manager when
150 it will remove the ccTLD from the Root. Obviously this period should not be shorter
151 than the minimum time provided for in the DTPR and should also respect a minimum
152 notice period to the Manager. If the minimum notice period to remove a ccTLD from
153 the Root is X days (90?) and the default date to remove a ccTLD from the Root as per
154 the DTPR is Y then the following situations may occur:
- 155 • If the PTI Notice of Removal of a ccTLD from the Root (Notice of Removal) is sent
156 to the Manager more than X days prior to Y then the ccTLD can only be removed
157 on Y.
 - 158 • In all other cases the PTI Notice of Removal of a ccTLD from the Root (Notice of
159 Removal) sent to the Manager shall provide the Manager with a minimum notice
160 of X days (90?) prior to removing the ccTLD from the Root.

161 4 Elements of a Transition Plan

- 162 1. Communication plan with the local internet community.
- 163 2. Due Dates

- 164 NRSD Date when the retiring ccTLD Registry (the Registry) will stop accepting
- 165 new registration: New Registration Stop Date
- 166 RRSD Date when the Registry will stop accepting renewals: Registration Renewal
- 167 Stop Date
- 168 RTSD Date when the Registry will stop accepting transfer requests between
- 169 registrants: Registration Transfer Stop Date
- 170 DRSD Date when the Registry will stop accepting dispute requests: Dispute Re-
- 171 quest Stop Date

172 **5 Questions to be considered**

- 173 1. Are special considerations required if merging registrations from the retiring
- 174 ccTLD into an already existing ccTLD with registrations (dropping names?)
- 175 2. Will PTI be able to identify the new Internet Community?
- 176 3. If the registrations of the retiring ccTLD are being transferred to an existing
- 177 registry (ies) do these new registries support the same IDN functionalities?
- 178 3.1. Does the transition plan have to consider this?
- 179 4. What happens if the Manager stops operating the ccTLD before the DTPR or STPR
- 180 dates of removal from the root?
- 181 • Policy has to address the need for PTI to be able to transfer the ccTLD manager
- 182 if necessary.

add: "technologically similar to Emergency Back-End Registry Operators ("EBERO") in the gTLD space".

- 183
- 184 5. Trademark issues?
- 185 6. Can PTI remove the ccTLD from the root per DTPR or STPR if a court has seized
- 186 the registrations as an asset?
- 187 7. Can PTI remove the ccTLD from the root per DTPR or STPR if a court requests
- 188 that it not do so?

BT
(from break-out session on 2018-10-20)

what does ies mean?

BT
(new – not from 2018-10-20)

BT
(new – not from 2018-10-20)

BT
(new – not from 2018-10-20)

189 A Historical Cases

190 A.1 YU case

191 A.1.1 Content of the Plan

192 The plan recognizes the need to freeze registrations in the .YU zone so as not to disadvan-
193 tage either existing or prospective registrants, and also charts a clear and predictable
194 process so that the Internet community is fully informed on how the transition is to
195 occur. All this is to be done on a schedule that provides reasonable time for registrants
196 to prepare and transition to the new ccTLDs.

Source?

197 Following the delegation of .RS, the registry took a staged approach to the decommis-
198 sioning of the .YU ccTLD. In the first phase, all names registered within .YU had their
199 respective .RS domain reserved. This was conducted as part of a sunrise process that
200 involved other rights-based allocations prior to general availability.

201 During the first six months of .RS operations, only existing .YU domain holders were
202 able to obtain domains corresponding to the reservations. As the domains have a
203 hierarchical model (.CO.RS, .ORG.RS, etc.) rights were also awarded for domains directly
204 under .RS on a first-come first-served basis.

had

205 By September 2008, after the six month period, unredeemed .RS reservations expired,
206 and general availability started for .RS domains. The .YU registry was then curated, with
207 inactive and unused .YU domains being identified. 2,769 .YU domains deemed as still
208 active, and all remaining .YU domains were removed in March 2009. Between March
209 and May 2009, 1,236 domain holders appealed to have their domains re-instated.

210 See: <https://www.iana.org/reports/2010/yu-report-01apr2010.html>

211 A.2 .AN case

212 In January 2011, the University of the Netherlands Antilles presented its initial appli-
213 cation to ICANN for delegation of the .CW ccTLD. Subsequently, over the course of the
214 year the application was expanded and revised.

215 In March 2011, the University and SX Registry SA executed a “grand-father agree-
216 ment”.

217 In September 2011, the University entered into a revised agreement with SX Registry
218 SA B.V. in regards to the transitional arrangements concerning the .AN ccTLD,

219 .AN Delegation of the .CW ccTLD representing Curacao and transitional arrangements
220 for the .AN ccTLD representing the Netherlands Antilles [https://www.iana.org/re-](https://www.iana.org/reports/2011/cw-report-20111003.html)
221 [ports/2011/cw-report-20111003.html](https://www.iana.org/reports/2011/cw-report-20111003.html)

222 SX Delegation of the .SX ccTLD representing Sint Maarten [https://www.iana.org/re-](https://www.iana.org/reports/2011/cw-report-20111003.html)
223 [ports/2011/cw-report-20111003.html](https://www.iana.org/reports/2011/cw-report-20111003.html)

224 A Transition Plan was in place. This included inter alia:

- 225 • to move registrations from the .AN ccTLD to new ccTLDs .CW and .SX,
- 226 • the University of the Netherlands Antilles continuing to act as manager of the .AN
- 227 ccTLD until transition is complete

228 See [https://www.icann.org/resources/board-material/resolutions-2011-10-11-](https://www.icann.org/resources/board-material/resolutions-2011-10-11-en#1.3.rationale)

229 [en#1.3.rationale](https://www.icann.org/resources/board-material/resolutions-2011-10-11-en#1.3.rationale)

230 From the decision

231 Whereas, there is a transition plan to move registrations from the .AN do-

232 main to new domains .CW and .SX, with the University of the Netherlands

233 Antilles continuing to act as manager of the .AN domain until transition is

234 complete,

Ver-
batim
quote?

235 From the rationale

236 The matter of the timeline for the transition from the .AN domain to its

237 successor domains is being addressed in conjunction with the evaluation

238 of the delegation of the .CW and .SX domains, in order to give clarity to the

239 communities involved the timeline upon which the transition will occur.

240 This will allow the communities to prepare and plan appropriately for the

241 transition.

Ver-
batim
quote?

242 The proposed sponsoring organisation for .CW intends to continue to oper-

243 ate the .AN domain while transitional arrangements are executed. These

244 transitional arrangements include provisions for registrants in Curaçao to

245 transfer registrations to .CW; and for registrants in Sint Maarten to transfer

246 registrations to .SX. The applicant calls for a phased transition to be con-

247 cluded over a period of three years, after which time the .AN domain will be

248 fully retired.

249 Delegation report .CW, see [https://www.iana.org/reports/2011/cw-report-](https://www.iana.org/reports/2011/cw-report-20111003.html)

250 [20111003.html](https://www.iana.org/reports/2011/cw-report-20111003.html)

251 Progress .AN Case

Not
sure
what
this
means

252 **A.3 .ZR case**

253 In June 2002, Key Systems and Interpoint SARL entered into a contract to take "mea-

254 sures necessary" to transfer the registry data for the .CD and .ZR ccTLDs to Key Systems,

255 and to support redelegation of the ccTLD to Key Systems.

256 See: <https://www.iana.org/reports/2011/cd-report-07jan2011.html>

257 Given that "ZR" was being removed from the ISO 3166-1 list, the manager performed a

258 transition, populating the .CD ccTLD and emptying the .ZR ccTLD. By an 11 March 2001

259 message to the IANA, the .ZR manager stated that the .ZR ccTLD had been emptied in

260 preparation for its deletion from the root zone. .ZR was removed in 2001

261 See: <https://www.iana.org/reports/2001/zr-report-20jun01.html>

262 A.4 Owner of Plan

263 YU. was re-delegated (transferred in terms of FoI) to RNIDS. RINDS:

264 See: 11 September 2007 [Board Decision](#)

265 the .YU domain be redelegated to the Serbian National Registry of Internet
266 Domain Names in a temporary caretaker capacity.

Ver-
batim
Quote?

BT: New concept that needs to be defined: Temporary Caretaker, Concept also used in other contexts

267

268 A.4.1 Notes from discussion

- 269 • Temporary Caretaker needs to be included in Glossary.
- 270 • Has been mentioned in different documents.
- 271 • First used in case .VI.
- 272 • Registry/caretaker: needs to be voluntary
- 273 • Can not be mandatory. Why is a caretaker needed? Need to find a way that is
274 voluntary.
- 275 • Do you believe that some language that addresses it along lines described?
- 276 • Eberhard: Should be ccTLD manager
- 277 • Caretaker can be appointed. Technically can be difficult
- 278 • In case .CW and .AN, transition was executed manually. If it is voluntary offer
279 assistance.