

# At-Large Proposed Implementation of GNSO PDP Recommendations on Inter-Registrar Transfer Policy (IRTP)

## Part C Workspace

Comment Close Date	Statement Name	Status	Assignee (s)	Call for Comments Open	Call for Comments Close	Vote Open	Vote Close	Date of Submission	Staff Contact and Email	Statement Number
09.05.2015	<a href="#">Proposed Implementation of GNSO PDP Recommendations on Inter-Registrar Transfer Policy (IRTP) Part C</a>	No Statement	n/a	n/a	n/a	n/a	n/a	n/a	Caitlin Tubergen <a href="mailto:caitlin.tubergen@icann.org">caitlin.tubergen@icann.org</a>	n/a

For information about this PC, please click [here](#) >>

- [Comments Forum](#)

### Brief Overview

The public comment proceeding seeks to obtain community input on the proposed implementation of the Generic Names Supporting Organization (GNSO) Policy Development Process (PDP) recommendations on the Inter-Registrar Transfer Policy (IRTP) Part C.

### Section I: Description, Explanation, and Purpose

In consultation with the GNSO Implementation Review Team, which was formed as directed by the GNSO Council to work with ICANN to ensure that the resultant implementation fulfills the intentions of the approved policy recommendations, ICANN reviewed the IRTP and has proposed revisions which include amongst others:

- adding a new provision which outlines the rules and requirements for a change of registrant of a domain name registration.
- updating to the IRTP to include time limiting the Form of Authorization (FOA) for inter-registrar transfer

The policy recommendations defined a "Change of Registrant" to be a material change to any of the following:

1. Registrant name
2. Registrant organization
3. Registrant email address

The policy recommendations contemplated the change of registrant process to involve multiple steps, which include:

1. The prior and new registrant must authorize the change by using a unique, "change of registrant credential".
2. The registrar confirms that the both registrants have authorized the change and that the name is eligible for change of registrant, i.e., there is no lock or restriction on the name.
3. The registrar performs the change.
4. The registrar notifies the prior and new registrant that the requested change has been made.
5. Following the change, the registrar places a 60-day inter-registrar transfer lock on the name.

The GNSO Implementation Review Team encountered the following challenges while discussing the change of registrant process, including,

1. What constitutes a "material change" that would trigger the change of registrant process?
2. How can the registrar transmit the change of registrant credential to the prior registrant?
3. What alternative methods can be used to provide the credential if the prior registrant can no longer access its email address?

For the material change question, the draft Transfer Policy provides some guidelines of what would be considered a material change, e.g., non-typographical corrections, any change to a registered name holder's email address, and other examples provided in Section II, 1.1(d) of the revised Transfer Policy.

With respect to transmitting the change of registrant credential, the draft Transfer Policy was drafted in a way to give registrars the freedom to adopt various secure methods of transmitting the change of registrant credential to the prior registrant while balancing security concerns mentioned during discussions with the GNSO Implementation Review Team. As a result, the draft policy provides that the credential cannot be transmitted via a control panel unless the prior registrant and account holder are the same. In the event the prior registrant can no longer access its email address, phone number or address, the Registrar would not be limited to the use of contact information on file in providing the change of registrant credential. Please note that as a result of the proposed revisions of the Transfer Policy, the numbering and heading scheme has also been updated to take into account the new sections.

ICANN Staff and the GNSO Implementation Review Team are now looking for input on the proposed revisions to the Transfer Policy, which aims to satisfy the intent of the GNSO Policy Recommendations. Furthermore, any feedback on the expected time needed for affected parties to implement the revised Transfer Policy before coming into effect, would be appreciated.

## Section II: 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 C Policy Development Process (PDP) is the third in a series of five PDPs that address areas for improvements in the existing transfer policy.

The GNSO Council resolved at its meeting on 22 September 2012 to launch a PDP to address the following three issues:

1. "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.
2. 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.
3. Whether the process could be streamlined by a requirement that registries use IANA IDs for registrars rather than proprietary IDs.

The IRTP Part C Working Group published its [Initial Report](#) on 4 June 2012 in conjunction with the opening of a public comment forum (see section 6 for further details) followed by its [Final Report](#) on 9 October 2012. The ICANN Board [adopted the recommendations](#) of the IRTP Part C Working Group on 20 December 2012. The Implementation Review Team in conjunction with ICANN staff worked together to develop a draft of the Transfer Policy. Community input is now sought on the updated Transfer Policy.

## Section III: Relevant Resources

- [Transfer Policy](#)
- [Final Report](#)
- [Inter-Registrar Transfer Policy](#)
- [Additional Whois Information Policy](#)

## Section IV: Additional Information

## Section V: Reports

### Staff Contact

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## FINAL VERSION TO BE SUBMITTED IF RATIFIED

*The final version to be submitted, if the draft is ratified, will be placed here by upon completion of the vote.*

## FINAL DRAFT VERSION TO BE VOTED UPON BY THE ALAC

*The final draft version to be voted upon by the ALAC will be placed here before the vote is to begin.*

## FIRST DRAFT SUBMITTED

*The first draft submitted will be placed here before the call for comments begins.*