

At-Large Inter-Registrar Transfer Policy Part C Policy Development Process Initial Report Workspace

Inter-Registrar Transfer Policy Part C Policy Development Process Initial Report

Comment/Reply Periods (*)		Important Information Links	
Comment Open:	4 June 2012		
Comment Close:	4 July 2012		
Close Time (UTC):	23:59 UTC	Public Comment Announcement	
Reply Open:	5 July 2012	To Submit Your Comments (Forum)	
Reply Close:	25 July 2012	View Comments Submitted	
Close Time (UTC):	23:59 UTC	Report of Public Comments	
Brief Overview			
Originating Organization:	GNSO Working Group		
Categories /Tags:	Policy Processes		
Purpose (Brief):	The Generic Names Supporting Organization's (GNSO) Inter-Registrar Transfer Policy (IRTP) Part C Working Group has published its Initial Report and is looking for community input on its proposed recommendations for changes to the existing IRTP.		
Current Status:	As a required step of the GNSO Policy Development Process, the IRTP Part C Working Group has now published its Initial Report for public comment.		
Next Steps:	Following review of the public comments received, the Working Group will continue its deliberations and finalize its report for submission to the GNSO Council.		
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Detailed Information			
Section I: Description, Explanation, and Purpose			

In addition to background information, an overview of the WG's deliberations and community input received to date, the [Initial Report](#)^[PDF, 1.23 MB] contains the following four preliminary recommendations:

- Recommendation #1 (Charter Question A) – The IRTP Part C WG recommends the adoption of change of registrant consensus policy, which outlines the rules and requirements for a change of registrant of a domain name registration. At this point in time, the WG is of the view that such a policy should follow the five steps as outlined in the section 5 of the Initial Report under the heading 'proposed change of control process for gTLDs', but recognizes that there are additional details and/or steps that may need to be added and therefore requests community input on the proposed process and related notes.
- Recommendation #2 (Charter Question B): the WG recommends Section 2 of the IRTP be revised to insert the following section: 2.1.4 Once obtained, an FOA is valid for (45 or 60¹) calendar days, or until the domain name expires, or until there is a Change of Registrant, whichever occurs first. The WG recorded rough consensus for the above recommendation, but some noted that support was conditional on a second recommendation related to this charter question being considered by the WG, which recommends that:
- Recommendation #3 (Charter Question B): the Standard FOA is enhanced to support FOAs that have been pre-authorized or auto-renewed by a Prior Registrant who has chosen to opt out of this time-limiting requirement after having received a standard notice as to the associated risks. This enhancement would introduce a modified FOA, which would serve exclusively as a notification to the Prior Registrant that their pre-authorized domain transfer had occurred. The implementation of this recommendation should be accompanied by the appropriate security measures to protect Registrants from hijacking attempts using pre-approval as the attack vector. The WG is planning to discuss the details of such security measures in further detail in the next phase of its work.
- Recommendation #4 (Charter Question C): The WG recommends that all gTLD Registry Operators be required to publish the Registrar of Record's IANA ID in the TLD's thick WHOIS. Existing gTLD Registry operators that currently use proprietary IDs can continue to do so, but they must also publish the Registrar of Record's IANA ID. This recommendation should not prevent the use of proprietary IDs by gTLD Registry Operators for other purposes, as long as the Registrar of Record's IANA ID is also published in the TLD's thick Whois.

In addition to input on these preliminary recommendations, the WG is specifically requesting feedback on a number of open items such as, amongst others: whether the proposed change of registrant policy should be accompanied by a restriction that would prevent a change of registrar immediately following a change of registrant for 60 days; whether this change of registrant policy should be incorporated as a stand-alone policy or as part of the existing IRTP; which changes to registrant information should qualify as a 'change of registrant', and; whether there are any other expected impacts of the proposed recommendations in addition to those already anticipated by the WG.

Those interested in providing input are strongly encouraged to especially review section 5 of the Initial Report in further detail in order to obtain further understanding concerning the WG's thinking and rationale with regards to these recommendations.

The WG appears to have rough consensus for all the above recommendations, but it should be noted that no formal consensus call was undertaken. Such a formal consensus call will be conducted once the recommendations are finalized following review of the public comments received on this Initial Report.

The WG would like to encourage all interested parties to submit their comments and suggestions so these can be considered as the WG continues its deliberations in view of finalizing its report and recommendations in the next phase of the policy development process.

¹ The WG has not decided yet on the exact timeframe and would welcome community input.

Section II: Background

The aim of the Inter-Registrar Transfer Policy (IRTP) is to provide a straightforward procedure for domain name holders to transfer their names from one ICANN-accredited registrar to another. The GNSO Council is reviewing and considering revisions to this policy through a series of Working Groups it has established to conduct these efforts. The IRTP Part C PDP Working Group has been tasked to consider the following three questions:

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.

Section III: Document and Resource Links

- [IRTP Part C Initial Report](#) [PDF, 1.23 MB]
- [IRTP Part C Final Issue Report](#) [PDF, 625 KB]
- [Inter-Registrar Transfer Policy](#)

Section IV: Additional Information

None

() Comments submitted after the posted Close Date/Time are not guaranteed to be considered in any final summary, analysis, reporting, or decision-making that takes place once this period lapses.*

Draft ALAC Comment

<<Drafted by Alan Greenberg and submitted to the ALAC on 25 June 2012.>>

The ALAC supports the general direction that the IRTP C PDP WG is heading. Specifically, the ALAC strongly supports all measures that will reduce the possibility of domain hijacking while still providing legitimate registrants the ability to change registrars.

The ALAC similarly supports all efforts to formally define the process by which the registrant of record can be changed, with implicit safeguards to inhibit hijacking. The ALAC does not have strong views as to whether this needs to be a separate consensus policy or not, but the overall results and benefits to registrants should not be diminished by this decision.

The ALAC supports the requirement to have all gTLDs use the IANA Registrar IDs (in addition to any proprietary ones if desired).

Lastly, the report could benefit from a clearer overview describing the change of registrar and registrant processes.

[Please click here to download a copy of the final Statement.](#)

