Report of Public Comments

Title:	Inter-Registrar Transfer Policy Part C Policy Development Process
Publication Date:	3 January 2012
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Section I: General Overview and Next Steps

The Inter-Registrar Transfer Policy Part C Policy Development Process Working Group requested input on its Charter Questions to help inform its deliberations. The Charter Questions are:

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.

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.

C) Whether the process could be streamlined by a requirement that registries use IANA IDs for registrars rather than proprietary IDs.

In addition, the Working Group identified a number of additional questions for input. The Working Group will now review the comment received and consider it as part of its deliberations while developing its Initial Report.

Section II: Contributors

At the time this report was prepared, a total of 1 (one) community submission had been posted to the Forum. The contributor is listed below. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
GoDaddy.com	Tim Ruiz	GD

Section III: Summary of Comments

In relation to Charter Question A, GD notes that 'there is an absence of policy in this area' and that changes of registrant have not been handled consistently by those involved. GD recommends that the Working Group aims 'to strike a balance between domain security and domain portability'.

In relation to Charter Question B, GD observes that 'ICANN policy is also unclear in this area' and is of the view that time-limiting FOAs should be considered. GD suggests that a time-limitation of sixty (60) days could be considered and encourages the Working Group to 'gather and consider scenarios in which a registrar receives and FOA from the Registrant but does not submit the transfer request to the Registry'.

In relation to Charter Question C, GD notes that although the use of proprietary IDs does not have seem to have caused many issues, with the launch of new gTLDs approaching, this might change. GD therefore would 'favor a move to uniformly employ IANA ID numbers in gTLD Registry systems to the extent practical'.

Section IV: Analysis of Comments

The IRTP Part C Working Group is responsible for analyzing and evaluating the comments received. Its review of the comments should be available in due time on the Working Group's workspace (see https://community.icann.org/display/gnsoirtppdpwg/Home).