

# Transfer Policy Changes

September 2024

**ICANN | RrSG**

Registrar Stakeholder Group

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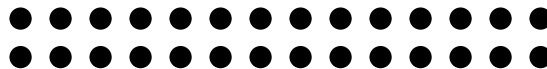
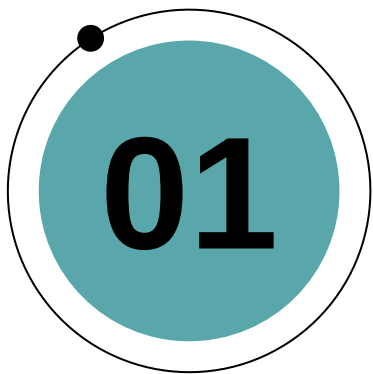


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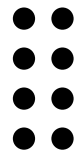
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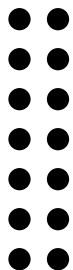




# Introduction

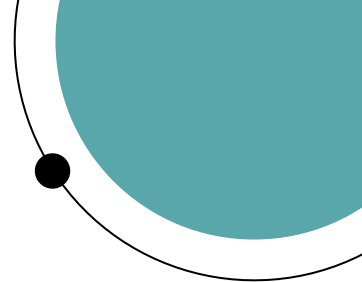


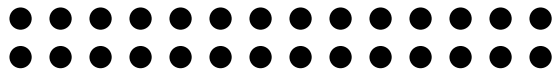
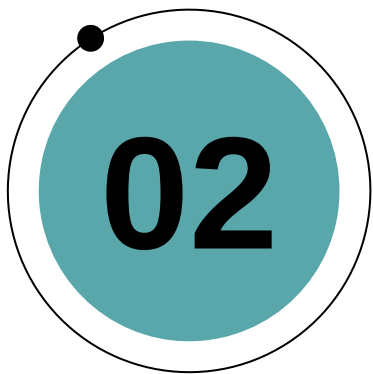
# Introduction



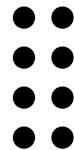
## Transfer Policy Review PDP WG Initial Report ([PDF](#))

- The RrSG supports the recommendations in the Initial Report:
  - Increased **security** for domain name registrants
  - Improved registrant **experience** with domain transfers
  - More **efficient** transfer processes for all gTLD registrars

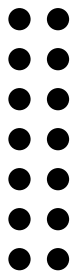
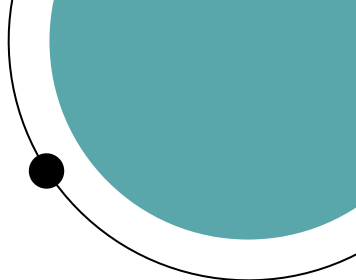




# Overview

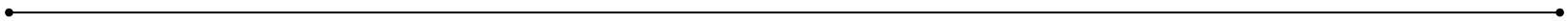


# High Level Overview

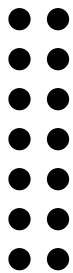
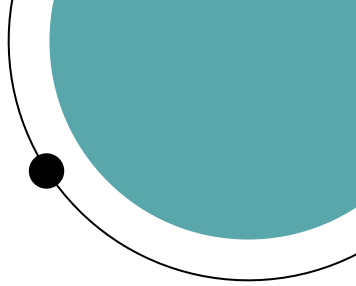


## Why make changes to the Transfer Policy?

- The Transfer Policy (formerly known as the Inter-Registrar Transfer Policy or IRTP) details the **processes required to transfer domain names between registrars and registrants.**
- Certain requirements of the transfer policy were difficult or caused problems because registrar operations and the legal landscape changed, including:
  - Requiring a change of registrant (COR) lock for removing or enabling a privacy or proxy service
  - Requirement to send a form of authorization (FOA) to the gaining registrar (impossible under the GDPR and not required under the Temp Spec)
  - 60-day lock following a domain transfer between registrars



# High Level Overview

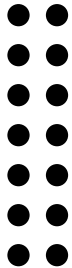
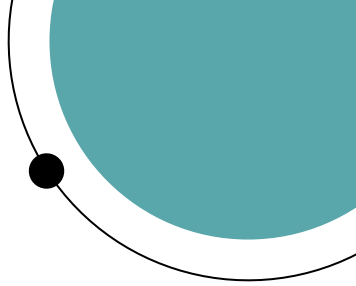


## Summary of the Review

- The working group conducted a holistic review of the Transfer Policy to address these issues and other potential concerns in the Transfer Policy, divided into three phases:
  - Group 1(a)
    - Form of Authorization (FOA), AuthInfo Codes, Denying (NACKing) transfers
  - Group 1(b)
    - Change of Registrant (COR)
  - Group 2
    - Transfer Emergency Action Contact (TEAC) and reversing inter-Registrar transfers, Transfer Dispute Resolution Policy (TDRP), ICANN-approved (bulk) transfers



# High Level Overview

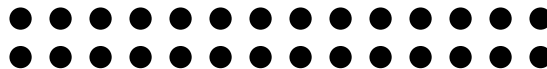
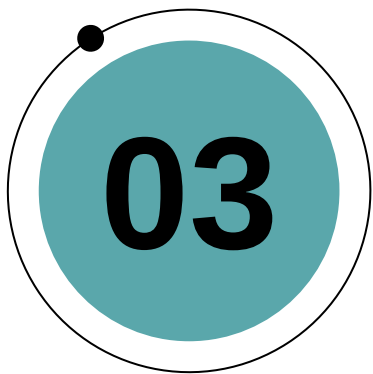


## Current Status

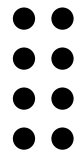
- The Initial Report is out for public comment until 30 September 2024.
- The RrSG has drafted our comments, which members can find [here](#). Further input to the SG's comment is welcome until 24 September.
- The RrSG is supportive of the updates overall, with a few specific changes suggested.



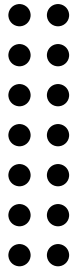
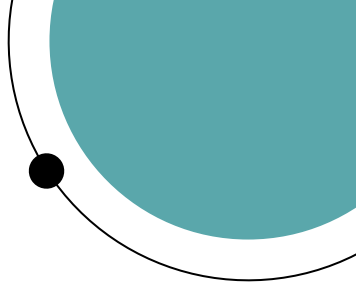




# Specifics



# Summary of Changes



## Group 1(a)

- Transfer lock for new registrations reduced from 60 to 30 days
- Renaming the “AuthInfo Code” to “Transfer Authorization Code” (“TAC”), enhancing security requirements of TAC composition, maintenance, and notifications of the TAC, and the addition of a Time to Live (TTL)
- Eliminating the Gaining Form of Authorization (FOA)
- Minor changes to the Losing Form of Authorization (FOA)
- A mandatory 30 day lock for transfers between registrars. This lock can be removed by the registrar upon a specific request from the registrant
- Losing registrar must send a “Notification of Transfer Completion” after the completed transfer

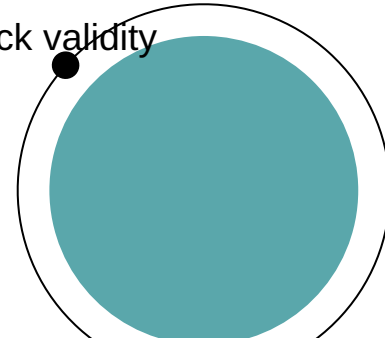
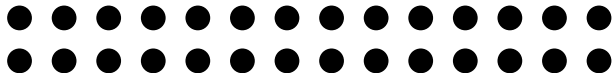




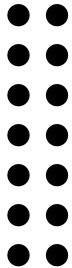
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## What do we think?

- Rec 5 (TAC definition) should be clear that there are some times when the domain cannot be transferred and the TAC would not authorize the transfer in those circumstances. The RrSG provides two options for revision for the Working Group's consideration
- In Rec 6, SLA is not the right term, we propose "Required Timing for TAC Provision"
- Rec 8 (TAC TTL) should include cases where the Rr needs to NULL the TAC immediately and cannot wait for RNH approval in order to protect the security of the domain and prevent invalid transfer.
- Rec 13 (TAC is one-time use) would disrupt operations for those who check validity before initiating transfer; a read-only check of the TAC should not count as 'use'



# Summary of Changes



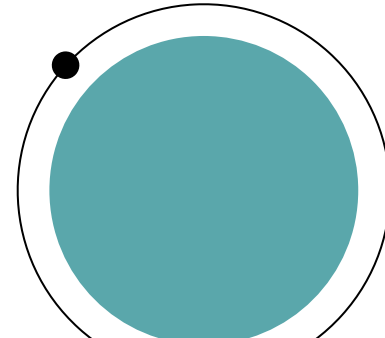
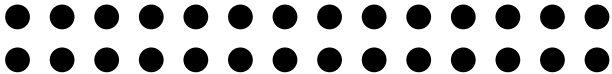
## Group 1(b)

- Change of Registrant (COR) does not include adding or removing a privacy or proxy service
  - Through the implementation phase, move “Change of Registrant Data” to a policy separate from Transfer Policy, which will include:
    - Rename to “Change of Registrant Data” (“CORD”)
    - Remove Designated Agent role
    - Remove requirement to obtain confirmation from Prior and New Registrant
    - Remove post-change 60-day lock
    - Registrars may let the RNH opt out of COD notifications
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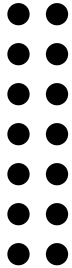
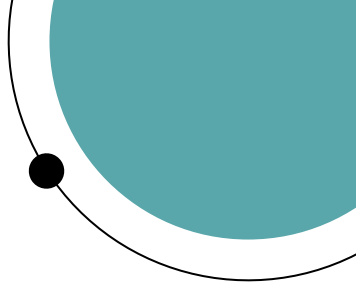


## What do we think?

- We support Recommendation 26 (Change of Registrant Data should become its own Policy) but want to confirm the intent of removing restrictions to the availability of the Change of Registrant Data. With this change, a domain in the middle of a dispute (e.g. ownership concerns or UDRP) could still be updated to show new Registrant Data, we're not sure if that was intended.



# Summary of Changes

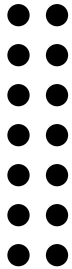


## Group 2

- Updating and including new Transfer Emergency Action Contact (TEAC) time requirements, including:
  - Initial response time increase from 4 hours to 24 hours/1 calendar day
  - TEAC communications must occur no more than 30 days after alleged unauthorized loss
  - Once communication begins, the Gaining Register must update the Losing Registrar at least every 72 hours/3 calendar days



# Summary of Changes



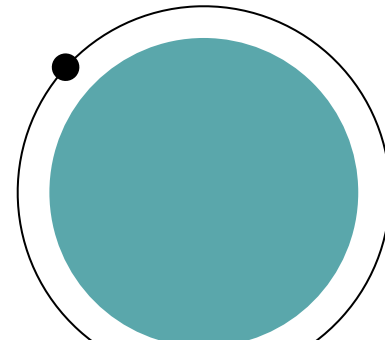
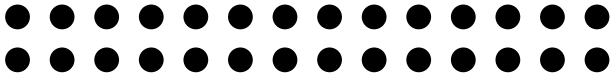
## Group 2 (continued)

- Recommends the GNSO request an Issue Report to consider opening the Transfer Dispute Resolution Policy (TDRP) to registrant filers, or creating a mechanism for registrants to challenge improper transfers.
  - Change portfolio transfers from 50,000 names per TLD to 50,000 total per transfer, and that the collective fee will not exceed \$50,000 total. If a registry waives its fee, other registries cannot adjust their fees higher.
  - Update the Transfer Policy to include Bulk Transfer After Partial Portfolio Acquisition (BTAPPA) for all registries, and to allow for resellers to transfer to a new registrar via BTAPPA.
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## What do we think?

- The RrSG strongly supports research into and consideration of either expanding the Transfer Dispute Resolution Policy or creating a new dispute resolution method that would be available to registrants who wish to challenge a transfer which, despite following the Policy, is still improper, such as in cases of stolen domain names.







# Thank you

[www.rrsg.org](http://www.rrsg.org)

