

## GNSO gTLD Registries Stakeholder Group Statement

**Issue:** Proposed Implementation of GNSO PDP Recommendations on Inter-Registrar Transfer Policy (IRTP) Part C

**Date:** 5 May 2015

**Ref:** <https://www.icann.org/public-comments/irtp-c-2015-03-30-en>

The Registries Stakeholder Group (RySG) appreciates the opportunity to comment on the Proposed Implementation of GNSO PDP Recommendations on Inter-Registrar Transfer Policy (IRTP) Part C.

The RySG generally supports the proposed modifications to the Inter-Registrar Transfer Policy (“Transfer Policy”), including expanding it to include Part II. Inter-Registrant Transfer (Change of Registrant) with the goal to thwart domain name hijackings. However, the RySG is concerned that the definition of “Change of Registrant Credential” is overly narrow and may not give registrars the latitude and flexibility to implement more streamlined and effective means by which to gain authorization to change the registrant. It is the view of the RySG that the mechanism by which a registrar achieves this authorization should be left fully to the registrar’s discretion, so long as it provides specific authorization for the transfer in question. Although the proposed change provides one mechanism for limiting the risk of hijacking, other technologies may actually provide stronger security and ICANN should be wary of building specific implementation details into contract language. Just as registries have the option of developing supplemental rules relating to their implementation of the Transfer Dispute Resolution Policy, it seems appropriate that registrars have the option of developing supplemental rules relating to their implementation of the Transfer Policy.

Because the addition of the section governing a change of registrant constitutes a significant change to the Transfer Policy and how registrars will conduct business, it is recommended that the registrar community provides feedback on the time required to implement the new requirements. It is also recommended that a review of the impacts and effectiveness of the changes to the Transfer Policy be conducted 12 months post implementation.