
Public Comment Summary Report

PSR on Expired Domain Deletion and Expired Registration Recovery Policies

Open for Submissions Date:

Thursday, 15 May 2025

Closed for Submissions Date:

Monday, 30 June 2025

Summary Report Due Date:

Monday, 14 July 2025

Category: Policy

Requester: ICANN org

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Open Proceeding Link: <https://www.icann.org/en/public-comment/proceeding/psr-on-expired-domain-deletion-and-expired-registration-recovery-policies-15-05-2025>

Outcome:

In total, 10 Public Comments were submitted by a range of stakeholders across the community on the Policy Status Report (PSR) on the Expired Domain Deletion Policy (EDDP), which came into force in December 2004, and the Expired Registration Recovery Policy (ERRP), which came into force in August 2013.

Numerous suggestions for improvement, clarification, and additions were provided by both organizations and individuals. Each Public Comment received will be considered for inclusion in the updated version of the PSR. This PSR is intended to serve as a tool to support the Generic Names Supporting Organization (GNSO) Council in its review of policy- and implementation-related efforts regarding both policies.

Section 1: What We Received Input On

On 12 June 2024, the GNSO Council passed a [resolution](#) requesting the PSR on Expiration Policies stating:

“The GNSO Council requests a Policy Status Report (PSR) for the [Expired] Domain Deletion Policy (EDDP) and [Expired] Registration Recovery Policy (ERRP).

The GNSO Council notes immediate work is not needed on this PSR and would request either (i) delivery of the PSR or (ii) confirmation that work on the PSR has begun and an

updated estimate on when the PSR should be delivered, in one (1) year from the passage of this motion.

The GNSO Council leadership directs GNSO Policy Support Staff to notify ICANN org Global Domains & Services of the request for a PSR on the EDDP and ERRP.”

ICANN org has carried out the work on this PSR, and part of this work involved gathering community input through the Public Comment process. Therefore, ICANN org invited any individual or group with an interest in this PSR to provide comments to aid ICANN org in the evaluation and assessment of the EDDP and ERRP as they currently stand.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
At-Large Advisory Committee (ALAC)	At-Large Advisory Committee (ALAC) Policy staff	ALAC
ICANN Business Constituency (BC)	Business Constituency (BC)	BC
Intellectual Property Constituency (IPC)	Margaret Milam	IPC
Non-Commercial Stakeholders Group (NCSG)	Mesumbe Tomslin Samme-Nlar	NCSG
Registrar Stakeholder Group (RrSG)	Zoe Bonython	RrSG
Registries Stakeholder Group (RySG)	Registries Stakeholder Group (RySG)	RySG
Tucows Domains	Sarah Wyld	Tucows
WIPO (World Intellectual Property Organization) Arbitration and Mediation Center	Brian Beckham	WIPO

Individuals:

Name	Affiliation (if provided)	Initials
Alejandro Suca Concha		N/A
Mahmoud Nabil	icann ma	N/A

Section 3: Summary of Submissions

There were 10 submissions to the Public Comment proceeding. For the purpose of this summary, key themes from each comment are highlighted below. All comments are available in full on the Policy Status Report (PSR) on Expired Domain Deletion and Expired Registration Recovery Policies [Public Comment proceeding page](#).

At-Large Community (At-Large Advisory Committee, or ALAC)

The ALAC submission is in favor of revisiting the EDDP and ERRP, although it does point out several historical and contextual factors in its feedback on the PSR. It recommends a new policy development process (PDP) be initiated to:

- Consolidate the EDDP and ERRP into a single, comprehensive and enforceable policy reflecting current registrar and reseller practices;
- Amend the Registrar Accreditation Agreement to clearly define critical terms such as “delete”, “notify”, and “renewal” to prevent misinterpretation;
- Mandate that all registrar obligations are passed through to resellers and further down the reseller chain if applicable. Such obligations must ensure that the beneficial registrant is provided timely, consistent and accurate information; and
- Conduct a thorough review of domain expiration and renewal issues as experienced by registrants and propose resolutions.

Business Constituency (BC)

The BC’s comment expresses satisfaction with the comprehensive evaluation of both policies and their shortcomings in practice, based on available compliance data. The submission expresses the wish for the issue of domain warehousing practices to be highlighted and examined further in the PSR.

Intellectual Property Constituency (IPC)

The IPC’s submission states that it “is concerned about the growing business practices adopted by certain registrars related to expiring domain names or domain names set for deletion.” The IPC suggests that these business practices, where the EDDP and ERRP are often bypassed, effectively remove protections for registrants, by putting lucrative domains in the foreground and disregarding the regular ICANN domain reallocation process. The submission also suggests that the focus on compliance within the PSR overlooks cases where expiration and deletion were not reached, and recommends an updated PSR taking the above-noted practices into account.

Non-Commercial Stakeholder Group (NCSG)

The NCSG’s comment appreciates the effort made to evaluate the EDDP and ERRP, and offers the following additional recommendations as feedback on both policies, to ensure they continue to serve the interests of non-commercial users effectively:

- Enhancing the transparency and accessibility of renewal and redemption fees. Non-commercial registrants, often operating with limited resources, may find it challenging to locate, comprehend, and even pay renewal and especially redemption fees.
- Strengthening communication channels for expiration notices. The requirement to use email for expiration notices may not suffice, and the submission suggests that registrars employ multiple communication channels, multiple alerts, and click-through warnings in user dashboard, to ensure registrants cannot overlook pending expirations.
- Clarifying and standardizing the Redemption Grace Period (RGP) process. The NCSG comment advocates for a standardization of the RGP process, including uniform duration and a cap on redemption fees. Further, it suggests a tiered RGP

system, granting non-commercial registrants 60 days to reclaim expired domains, while maintaining the 30-day window for commercial registrants, where eligibility could be verified through tax-exempt status or a self-certification process for informal groups, with penalties for misuse.

- Addressing potential exploitation in the domain aftermarket. The existing 30-day redemption window may allow domain speculators to swoop in and acquire expired domains for resale or adversarial purposes, and therefore the NCSG proposes a 90-day re-registration hold for high-priority domains (e.g., .ORG, .NGO, domains used by humanitarian organizations, for crisis response, or for independent journalism) to prevent exploitation after expiry, with enhanced recovery efforts for original registrants. In those cases, direct registrar outreach attempts, such as phone calls, are proposed before deletion.

Registrar Stakeholder Group (RrSG)

While acknowledging that the PSR raises valid concerns regarding clarity and lack of uniformity in the policies as they currently stand, the RrSG does not see the need to update the ERRP or EDDP at this time. Reasons cited include what the RrSG perceives to be a low number of complaints and the opinion that priority should be given to more pressing policy work.

Registries Stakeholder Group (RySG)

While appreciating the work done on the PSR, the comment notes what RySG perceives to be a low level of complaints to ICANN Contractual Compliance related to the EDDP or ERRP, indicating that the policies appear to be functioning as they should be. Therefore, the RySG believes there are more urgent work items for the ICANN community, such as DNS Abuse.

Tucows

The submission from Tucows states that regular community reviews of policies are useful to ensure they are achieving their goals. However, the submission opines that the requirements are sufficient to ensure appropriate notice and access to renew domains, and the community's valuable policy development time could more usefully be focused on other topics.

World Intellectual Property Organization (WIPO) Arbitration and Mediation Center

The submission by WIPO suggests that domain names rarely seem to reach expiration or deletion. It points to multiple court cases where registrars may be liable for contributory cybersquatting when they circumvent the EDDP or ERRP by asserting control over the registration before it officially expires or becomes deleted. WIPO recommends that an updated PSR should investigate this practice and its implications.

Alejandro Suca Concha

Alejandro Suca Concha's submission underlines the lack of uniformity and clarity in how the policies are applied across different registrars, and generally aligns with many of the issues raised in the PSR. This comment includes a proposal for a series of recommendations to

improve both policies in future work:

- A common, mandatory section for definitions (such as “Redemption Grace Period”, “auto-renew”, “RAE”, “deletion”, “expiration”).
- Minimum mandatory requirements for expiration notices, ensuring they are sent directly to the registrant (not to intermediaries), in the language of the contract, and with confirmation of delivery or reading by reasonable means.
- Clarification of timelines and prohibition of abusive practices, such as early auctions of expired domains. A minimum grace period of at least 30 days before expiration before any irreversible action should be included in the registrant’s contract.
- All registrars should be required to display a clearly visible section on their websites explaining their expiration and recovery policies.
- An ICANN public monitoring tool allowing registrants to check the status of their domains, upcoming deadlines, and possible actions based on the current phase in the domain’s lifecycle.
- Policies should be explicitly linked to digital rights principles; nobody must lose a domain simply due to a lack of understanding or because clear information was not received, especially in the case of users from vulnerable or underserved communities.
- Suggestion that ICANN implement random audits and annual compliance reports from registrars on the implementation of these policies. ICANN could publish data on how many expired domains were recovered by original holders versus auctioned without fair recovery opportunity.

Mahmoud Nabil

The submission of Mahmoud Nabil lauds the goal of providing remote places the right and the opportunity to access communication with the rest of the world.

Section 4: Analysis of Submissions

It should be noted that while some submissions were not in favor of the GNSO Council revisiting the policies, others were in favor of carrying out further policy work, and some of this feedback was substantive in suggesting direct policy changes and improvements that could be considered.

Several comments focused on common themes which correspond to relevant sections of the PSR, including:

- **Sections 3.1 and 4.4:** Exploring issues around registrar practices that potentially bypass the EDDP or ERRP. Domain name warehousing and an ICANN advisory on registrar expired name market developments were also mentioned in relation to this point, in addition to court cases where registrars may be liable for contributory cybersquatting.
- **Section 2.2:** Ensuring that notices and notifications are delivered in due time before irreversible actions are performed upon domain names, and more checks to ensure that registrant receives notices with sufficient information.
- **Section 2.1:** Extending grace periods and cooling off periods, particularly for “high-priority” domains. One comment also echoed the PSR’s findings by highlighting the lack

of uniformity around the “auto-renew grace period” which can be set by the registrar anywhere between 0-45 days.

- **Section 3.1:** Implementing clearer definitions of key terms.
- **Section 2:** Ensuring processes are followed by all registrars uniformly.

Section 5: Next Steps

ICANN org will work to update the PSR to integrate feedback received and to reflect the proposals from the relevant submissions. The updated PSR will then be submitted to the GNSO Council to inform its consideration on next steps.