



**July 31, 2022**

**RE: Public Comments on Initial Report on the Transfer Policy Review - Phase 1(a)**

**Submitted by: Brad Mugford**

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**To: ICANN**

The most valuable assets many companies own are their domain names. This is true with everyone from small end users, large corporate end users, investors, organizations, non-profits, etc.

Some of the proposed changes seem like a terrible idea when it comes to domain security. All it would do is lead to a more rampant problem with domain theft than already exists.

It would be giving an extra bag of tools to those with the most nefarious intentions enabling them to inflict massive potential damage.

ICANN should be looking at changes to make domain transfers more secure, not changes to make domain theft far easier.

The process should be simple -

- 1.) The current registrant should be notified of a pending transfer.
- 2.) The current registrant should have the option of approving or rejecting the transfer.

Instead, ICANN is considering going down the path of removing this process. Removing the ability for the registrant to reject the transfer is a terrible idea.

The registrant would be notified **AFTER** the domain transfer has already completed.

A domain thief could have already made the transfer before the registrant was even aware of it.

How does that make sense?

I apologize for the brevity, but with a quickly approaching public comment deadline, I didn't have time to dig deeper into this.

Additionally, I have emailed Emily Barabas of ICANN and Roger Carney of GoDaddy (chair of working group) to request an extension to the deadline for public comments until early September.

Thanks,

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