



EN

AL-ALAC-ST-0722-01-00-EN

ORIGINAL: English

DATE: 21 June 2022

STATUS: Ratified

AT-LARGE ADVISORY COMMITTEE
ALAC Statement on Initial Report on the Transfer Policy - Phase 1 (a)

Ratification

On 21 June 2022, the Public Comment proceeding opened for the [Initial Report on the Transfer Policy Review - Phase 1\(a\)](#). On the same day, an At-Large [workspace](#) was created for their Public Comment submission. The At-Large Consolidated Policy Working Group (CPWG), decided it would be in the interest of end users to develop and submit an ALAC statement. Steinar Grøtterød, At-Large representative to the Transfer Policy Review Policy Development Process (PDP) Working Group volunteered to draft the ALAC statement.

On 1 July 2022, Steinar Grøtterød drafted the initial ALAC statement, which was posted to its workspace by ICANN Policy staff in support of the At-Large community. The recommendations and At-Large positions were discussed during weekly CPWG calls in July. At-Large members were invited to provide input during the CPWG calls and via email.

On 25 July 2022, the CPWG finalized the At-Large Public Comment submission. The ALAC chair, Maureen Hilyard, requested that the statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

On 29 July 2022, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favor, 0 votes against, and 0 abstentions. Please note 100% of ALAC Members participated in the poll. The ALAC Members who participated in the poll are (alphabetical order by first name): Carlos Aguirre, Dave Kissoondoyal, Greg Shatan, Holly Raiche, Joanna Kulesza, Jonathan Zuck, Laura Margolis, Marita Moll, Matthias Markus Hudobnik, Maureen Hilyard, Pari Esfandiari, Rao Naveed Bin Rais, Raymond Selorm Mamattah, Sarah Kiden, Sindy Obed. You may view the results [here](#).

Introduction

The At-Large community and the At-Large Advisory Committee (ALAC) appreciate the opportunity to submit comments on the Transfer Policy Review Policy Development Process (TPR PDP) Phase 1a Initial Report. The At-Large community is focused on the Registrant and End-User perspective, and supports processes and policies that make an Inter-Registrar Transfer and a Change of Registrant simple, safe and secure.

The At-Large representatives have actively participated in the TPR PDP Working Group meetings. In addition, the representatives have provided regular progress updates to the At-Large Consolidated Policy Working Group (CPWG). These updates have included verbal reports and informal polls connected to essential questions.

At-Large representatives have received valued feedback from CPWG. The At-Large perspective has also been taken into consideration during working group discussions.

At-Large Comments to the Preliminary Recommendations

At-Large supports a transfer policy that makes an Inter-Registrar transfer of a registered domain name as secure and fast as possible. At-Large believes that the charter questions and the work done in the TPR WG, as written in the Initial Report for Phase 1a, mostly support this position.

At-Large has comments on some of the preliminary recommendations and sections related to this Public Comment proceeding, which are described below:

Section 2 - Preliminary Recommendations 1-4 on Losing and Gaining Forms of Authorization (FOAs)

For **Preliminary Recommendations 1 and 2**, the changes seem to be positive and indicate a more streamlined process.

Question for Community Input: *Should the Gaining Registrar's IANA ID be provided by the Registry Operator to the Losing Registrar so that it may be included in the Notification of Transfer Completion sent by the Losing Registrar to the Registered Name Holder? Why or why not? Please explain.*

At-Large believes adding the IANA ID for the new sponsoring Registrar enhances the security of the transfer process. The "Transfer Complete Notification" is sent by the Losing Registrar based on their contact data for the Registrant. If there is an unauthorized transfer, the information about the new sponsoring Registrar is of great value for the Registered Name Holder (RNH).

At-Large recommends that the IANA ID connected to the new sponsoring Registrar should be included in the “Transfer Complete Notification” (Recommendation #4), which the Losing Registrar is required to send to the RNH. We are aware that information about the new sponsoring Registrar can also be queried using WHOIS/RDAP and thereby added to the “Transfer Complete Notification” by the Losing Registrar.

If technically feasible, information regarding the Gaining Registrar IANA ID should be provided by the Registry Operator in the Extensible Provisioning Protocol (EPP) notification to the Losing Registrar. In our opinion, this will enhance the process completed by the Losing Registrar.

Section 3: Preliminary Recommendations 5-13 on Transfer Authorizations Codes (TAC)

For **Preliminary Recommendation 13.1**, the At-Large community appreciates the proposal to set a Time To Live (TTL) for the Transfer Authorization Code (TAC). However, there are some concerns that the recommendation of 14 calendar days set in preliminary recommendation 13.1 is too long.

We are aware that the 14 days TTL was recommended by the Contracted Parties House (CPH) Tech Ops Group. However, seen from an end-user perspective, a reduced TTL will still enhance the security and be sufficient time for the RNH to initiate the transfer.

At-Large recommends that the 14 days TTL for the TAC be returned for discussion by the TPR PDP WG.

Question for Community Input: *Who is best positioned to manage the standard 14-day TTL – the Registry or the Registrar, and why? Are there specific implications if the TTL is managed by the Losing Registrar?*

From an end-user/RNH point of view, the entity to manage the TAC TTL does not matter. Since it will be the sponsoring Registrar that creates the TAC (Recommendation 9) and thereby sets the TTL, it makes sense that the Registrar should manage the TTL for the TAC.

The Registry has the obligation to verify the TAC, and hereby also confirm that the TAC has not expired.

Section 6: Other Comments and Submission

Additional comments from At-Large

At-Large would like to emphasize the responsibility ICANN Accredited Registrars have to implement the Inter-Registrar Transfer policy. Once adopted as a consensus policy, Registrar obligations should be passed onto resellers.

We believe this is of importance and would like additional wording inserted into the final policy underlying the Registrar's responsibility in regards to implementation of the Inter-Registrar Transfer Policy to resellers. We are aware that ICANN does not have a contractual relationship with the Resellers. However, we believe that the policy should include a direct order and request to the Registrars to make sure the updated transfer policy is policed towards the Registrars' reseller chain.