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AT-LARGE ADVISORY COMMITTEE
ALAC Statement on the PSR on Expired Domain Deletion and Expired
Registration Recovery Policies

Preamble

On 15 May 2025, the Public Comment proceeding opened for the PSR on Expired Domain Deletion and Expired Registration Recovery Policies. An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Consolidated Policy Working Group (CPWG) reviewed the PSR on Expired Domain Deletion and Expired Registration Recovery Policies and decided it would be in the interest of end users to develop and submit an ALAC Public Comment Statement.

Preamble.....	1
Ratification Record.....	1
ALAC and At-Large Community Comments.....	2
End-User Impact.....	2

Ratification Record

On 15 May 2025, the Public Comment proceeding opened for the [PSR on Expired Domain Deletion and Expired Registration Recovery Policies](#). On 19 June 2025, initial discussion points were shared with the CPWG and decided it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding. Alan Greenberg and Eunice Alejandra Pérez Coello drafted the initial ALAC statement for CPWG consideration and ALAC endorsement.

On 25 June 2025, the initial draft statement was shared with the CPWG for review and input. On 26 June 2025, the At-Large Public Comment Statement was finalized. The ALAC Chair, Jonathan Zuck, requested that the Public Comment Statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

On 30 June 2025, staff confirmed the online vote resulted in the ALAC endorsing the statement with 14 out of 15 votes in favor. 0 votes against, and 0 abstentions. Please note 93% of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Aziz Hilali, Bukola Oronti, Claire Craig, Eunice Alejandra Perez Coello, Emilia Zalewska-Czajczynska, Jonathan Zuck, Judith Hellerstein, Justine Chew, Lilian Ivette De Luque, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu, Shah Zahidur Rahman. You may view the results here:

The ALAC has been asked to vote on the "ALAC statement on the Policy Status Report on Expired Domain Deletion and Expired Registration Recovery Policies". Do you agree with this Statement?			
Total Voters:15			
Choice	View Raw Votes	Votes	Percentage
Yes		14	100.00%
No		0	0.00%
Abstain		0	0.00%

ALAC and At-Large Community Comments

The ALAC and At-Large Community (ALAC) appreciate the opportunity to comment on the Policy Status Report (PSR) on Expired Domain Deletion (EDDP) and Expired Registration Recovery (ERRP) Policies.

This ALAC statement includes the views of past members of the PDP WG that led to the ERRP as well as the Chair of that PDP.

The ALAC believes the PSR is a comprehensive review of the issues related to domain expirations and domain renewals but lacks historical awareness and contextual understanding which may undermine its value as a roadmap for reform. The PSR documents multiple cases where there is a lack of clarity in the policies or where inconsistencies are evident between the policies. The ALAC notes that some of the inconsistencies stem from the assumption that recommendations from the ERRP, which was completed after the EDDP, would supersede the EDDP where applicable. Furthermore, the lack of clarity with regard to these policies was often the inevitable result of not being able to achieve consensus on stronger or more specific and clearer policy.

The ALAC notes that Section 2.2 highlights the problematic interaction between reseller contact roles and the reduced contact fields under the new Registration Data Policy. This creates a situation where the real registrant may never receive notice of a pending domain expiration especially if the reseller assumes the communication role but fails to act. The report highlights a situation where Resellers are obliged to notify registrants of registrar renewal prices, but not their own renewal prices if they are higher. Transparent pricing practices are essential to prevent registrants, particularly non-expert end-users, from encountering unexpected fees that may hinder their ability to retain or recover their domain names.

The report also highlights the issue of best practices - a nice concept, but useless if, as mentioned in the report, they are not followed.

We take issue with possible multiple meanings of the undefined term “delete” in the Registrar Accreditation Agreement. In the ALAC’s view, and based on recollection, that of the ERRP WG, the term “delete” as used in the RAA refers solely to removal of the name from the TLD zone file. But the ALAC notes that the term is not actually defined within the RAA and it should be. The lack of a precise definition opens the door to potentially misleading practices.

Section 4.5 of the report says *“The obligation for the registrar to permit the RAE to renew their domain is not effective until the time of expiration, at which point the domain name could have been deleted or is already at risk of being either deleted or “lost” (e.g. auctioned off, sold to third party, etc.).”* This implies that a registrar might not allow a registrant to renew a domain name BEFORE expiration. If that is indeed not forbidden by the RAA, that would need to be rectified!

The report notes that some registrars have a practice in which they re-assign the rights to expired domain names to a third party during the auto-renew grace period (and then possibly auction the domain name) instead of simply deleting the name. The ALAC notes with some irony that the start of this practice was announced by ICANN on the same day as the EDDP was announced defeating the intent of part of the EDDP which had been described as “restoring the safety net” (see <https://archive.icann.org/en/registrars/eddp-21sep04-enp.htm> and <https://www.icann.org/en/announcements/details/advisory-registrar-expired-name-market-developments-21-9-2004-en>).

Given the overlapping provisions, ambiguity and persistent registrant harms still seen unfolding, the ALAC recommends that a new policy development process be initiated to:

- Consolidate the EDDP and ERRP into a single, comprehensive and enforceable policy reflecting current Registrar and Reseller practices;
- Amend the RAA to clearly define critical terms such as “delete”, “notify” and “renewal” to prevent mis-interpretation;
- 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.

End-User Impact

The EDDP and ERRP impact end-users who are also registrants and the reasons why this is important to end-users are the same reasons that were cited when the ALAC requested the 2008 Issue Report that led to the ERRP. The ALAC supports end-user registrants except and unless the needs of these registrants are at odds with the needs of the larger community of non-registrant users. Many end-users rely on domain names and the resources found through domain names. The expiration and deletion of resourceful domain names, whether intentionally

or unintentionally, can impact many end-users. Lastly, many end-user registrants have minimal Internet and DNS knowledge and financial resources and are thus more susceptible to behaviours which can lead to the loss of domain names. The domains are often non-commercial and public-service oriented and typically do not have the resources to use the UDRP or URS to protect their domains.