

Tucows Public Comment: [Final Report on the Transfer Policy Review Policy Development Process](#)

Tucows thanks the Transfer Policy Review Working Group members, leadership team, and ICANN Staff for all their hard work and dedication over the past few years. Tucows is pleased to have the opportunity to comment on the Working Group's Final Report.

The Transfer Policy is of critical importance to Registrars as it has a direct and significant effect on the security of the domain name system as well as on our registrant customers' experiences. Tucows participated in this Working Group in order to advocate for a streamlined and secure transfer process which readily allows registrants their choice of registrar while ensuring that illicit domain name transfers ("hijacks") are guarded against and easily undone.

The outcomes in the Working Group's Recommendations generally meet this goal, although we would have been pleased to see further changes such as full removal of the Losing FOA and a robust transfer reversal process including a low-cost dispute process available directly to registrants.

We appreciate the Working Group's consideration of our input to the Initial Report and the updates to the Recommendations in the Final Report. While some of our concerns remain unaddressed, in general the Final Report promotes clarity of Policy requirements and security of the transfer process. We were especially pleased with the updates to Recommendation #17: Losing Form of Authorization (FOA) which will significantly improve security in this part of the transfer process.

We note again our support for Recommendation #33 which would have the GNSO Council "request an Issues Report or other suitable mechanism to further research and explore the pros and cons of (i) expanding the TDRP to registrant filers and (ii) creating a new standalone dispute resolution mechanism for registrants who wish to challenge improper transfers, including compromised and stolen domain names". The updated TDRP or new dispute resolution mechanism should have a low price tag, allow Registrants to file, and promote the expansion of criteria to cover invalid transfer due to compromised RNH data. This will still present time and financial costs to registrants and registrars but will overall enhance the security, stability, and resilience of the DNS.

Tucows continues to believe that the transfer lock following inter-registrar transfer should not be in any way made optional, though we do appreciate the additional guardrails added into Recommendation 18.2.

For Recommendation 41, we understand that the qualifying circumstances currently required for BTAPPA remain required under the new ICANN BTAPPA process even with the new addition in the Recommendation.

Tucows looks forward to continuing to support the work of this Working Group and future Implementation Review Team, and again thanks the Working Group members, leadership team, and ICANN Staff.