RrSG Public Comment: [Transfer Policy Review Working Group Final Report for ICANN Board Consideration](#)

16 June 2025

The Registrar Stakeholder Group (RrSG) thanks the Transfer Policy Review Working Group members, leadership, and ICANN Staff for their many hours of dedicated work on this important project, and appreciates the opportunity to comment on this Final Report.

The security and availability of domain transfers is a crucial aspect of the Domain Name System. This Working Group has issued Recommendations to support these goals, improving security while ensuring that domains can be moved among registrars and standardizing communications to ensure the right information is provided at the right time in the process. The RrSG appreciates the level of attention to the transfer process and registrant experience that the Working Group has demonstrated.

The RrSG appreciates that the Working Group addressed many of the concerns expressed in our Public Comment on the Initial Report and included our suggested changes in many modified Recommendations.

As previously indicated, implementation of these Recommendations will present significant technical & operational changes for Registrars and Registries, as well as changes to the registrant's experiences. Following the conclusion of the IRT's work, the RrSG proposes an 18 month implementation buffer period due to the extent of the changes that will be required, including coordination between Registrars and Registries (possibly even more than with the Registration Data Policy).

We further note that portions of this Policy may be affected by obligations coming out of the PPSAI IRT work and so those interactions must be carefully considered. Regarding our other specific comments on the Initial Report,

Finally, the RrSG notes the change to Recommendation #26 "Standalone Policy and Updates to Section II of Transfer Policy." However, this update did not address the concern expressed in our comments to the Initial Report. Specifically, by eliminating Section II.B. from the future standalone Change Of Registrant Data Policy, the Working Group inadvertently removed a restriction on Change of Registrant Data for domains that are currently in the middle of a dispute, including UDRP. The Final Report failed to take into consideration the potential harm from losing this requirement.

Once again, the RrSG thanks the Transfer Policy Review members, leadership team, and ICANN Staff for all their hard work, and looks forward to contributing to the Implementation Review Team.

Thank you,

Owen Smigelski
Chair, Registrar Stakeholder Group