Report of Public Comments

Title:	Inter-Registrar Transfer Policy (IRTP) Part C Policy Development Process (PDP) Recommendations for Board Consideration
Publication Date:	21 November 2012
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Comment Period:			Important Information Links
Open Date:	22 October 2012		**Announcement**
Close Date:	12 November 2012		**Public Comment Box**
Time (UTC):	23:59 UTC		**View Comments Submitted**

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Section I: General Overview and Next Steps

The Generic Names Supporting Organization (GNSO) unanimously approved at its meeting on 17 October the recommendations of the IRTP Part C PDP Working Group. The recommendations, which are pending for Board action, propose:

- **Recommendation #1** – The adoption of change of registrant consensus policy, which outlines the rules and requirements for a change of registrant of a domain name registration. Such a policy should follow the requirements and steps as outlined hereunder in the section 'proposed change of registrant process for gTLDs'. (**Note**: further details concerning the rules and requirements for the change of registrant policy are detailed in the IRTP Part C Final Report [PDF, 1.93 MB] under the heading 'Proposed "Change of Registrant"Process for gTLDs' on page 4-8).

- **Recommendation #2**: Forms of Authorization (FOAs), once obtained by a registrar, should be valid for no longer than 60 days. Following expiration of the FOA, the registrar must re-authorize (via new FOA) the transfer request. Registrars should be permitted to allow registrants to opt-into an automatic renewal of FOAs, if desired. In addition to the 60-day maximum validity restriction, FOAs should expire if there is a change of registrant, or if the domain name expires, or if the transfer is executed, or if there is a dispute filed for the domain name. In order to preserve the integrity of the FOA, there cannot be any opt-in or opt-out provisions for these reasons for expiration of the FOA. As recommended and approved as a result of the IRTP Part B PDP, Losing Registrars under IRTP-B are now required to send an FOA to a Prior Registrant. It is advised that Losing Registrars have the option to send a modified version of this FOA to a Prior Registrant in the event that the transfer is automated where the FOA would be advisory in nature.

- **Recommendation #3**: All gTLD Registry Operators be required to publish the Registrar of Record's IANA ID in the TLD's WHOIS. Existing gTLD Registry operators that currently use proprietary IDs can continue to do so, but they must also publish the Registrar of Record's IANA ID. This recommendation should not prevent the use of proprietary IDs by gTLD Registry Operators for other purposes, as long as the Registrar of Record's IANA ID is also published in

the TLD's Whois.

As required by the ICANN Bylaws, public notice was provided of the policies that are considered for adoption as well as an opportunity to comment on the adoption of the proposed policies, prior to consideration by the ICANN Board of these recommendations. The recommendations will now be submitted to the ICANN Board for its consideration.

Section II: Contributors

At the time this report was prepared, a total of one (1) community submissions had been posted to the Forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
Registries Stakeholder Group	Keith Drazek	RySG

Section III: Summary of Comments

General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. Staff recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

In its submission, the RySG supports the recommendations for consideration by the ICANN Board.

Section IV: Analysis of Comments

General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.

N/A