# Report of Public Comments

| Title: | Inter-Registrar Transfer Policy Part B Policy Development Process - Recommendation 9, Part 2 Concerning a New Provision to Lock and Unlock Domain Name |
|---|---|
| **Publication Date:** | 14 February 2012 |
| **Prepared By:** | Marika Konings |

| **Comment Period:** | |
|---|---|
| Open Date: | 23 January 2012 |
| Close Date: | 13 February 2012 |
| Time (UTC): | 23:59 |

| **Important Information Links** |
|---|
| Announcement |
| Public Comment Box |
| View Comments Submitted |

| **Staff Contact:** | Marika Konings | **Email:** | Policy-staff@icann.org |
|---|---|---|---|

**Section I: General Overview and Next Steps**

The Inter-Registrar Transfer Policy Part B presented its recommendations to the GNSO Council last year. For one of those recommendation, #9 part 2 ("denial reason #7 should be replaced by adding a new provision in a different section of the IRTP on when and how domains may be locked or unlocked concerning a new provision to lock and unlock domain names"), the GNSO Council requested ICANN staff to provide a proposal. In consultation with the IRTP Part B Working Group, ICANN Staff prepared a proposal that, together with the IRTP Part B recommendation, has now been approved by the GNSO Council.

The ICANN Staff proposal, taking into account the deletion of denial reason #7 as previously approved by the ICANN Board, proposes to expand the existing section 5 (EPP - based Registry Requirements for Registrars) of the IRTP to address "Registrar Lock Status". The proposed modifications to the IRTP can be found in redline form in the ICANN Staff Proposal on IRTP Part B Recommendation #9 part 2 [PDF, 490 KB]. The main elements of the proposed modifications are:

- Registrar may only impose a lock that would prohibit transfer of the domain name if it includes in its registration agreement the terms and conditions for imposing such lock and obtains express consent from the Registered Name Holder: and
- Registrar must remove the "Registrar Lock" status within five (5) calendar days of the Registered Name Holder's initial request, if the Registrar does not provide facilities for the Registered Name Holder to remove the "Registrar Lock" status

Following the closing of the public comment forum, the Board will now consider the recommendation and the ICANN Staff Proposal, in conjunction with the comments submitted.

## Section II: Contributors

*At the time this report was prepared, a total of two (2) 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 |
|---|---|---|
| At-Large Advisory Committee | Holly Raiche | ALAC |
| Business Constituency | Steve DelBianco | BC |

## 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).*

ALAC and BC expressed their support for the proposed changes to the Inter-Registrar Transfer Policy.

## 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.*

As no substantive comments were received apart from those expressing support for the recommendation and ICANN Staff proposal, a reply period on the comments submitted was not deemed necessary.