

ALAC Updates ----July- August 2022

Policy Development Activities

Statements approved by the ALAC

[ALAC Statement on the Initial Report on the Transfer Policy](#)

At-Large supports a transfer policy that makes an Inter-Registrar transfer of a registered domain name as secure and fast as possible. At-Large believes that the charter questions and the work done in the TPR WG, as written in the Initial Report for Phase 1a, mostly support this position.

At-Large has comments on some of the preliminary recommendations and sections related to this Public Comment proceeding, which are described below:

Section 2 - Preliminary Recommendations 1-4 on Losing and Gaining Forms of Authorization (FOAs)

For **Preliminary Recommendations 1 and 2**, the changes seem to be positive and indicate a more streamlined process.

Question for Community Input: Should the Gaining Registrar's IANA ID be provided by the Registry Operator to the Losing Registrar so that it may be included in the Notification of Transfer Completion sent by the Losing Registrar to the Registered Name Holder? Why or why not? Please explain.

At-Large believes adding the IANA ID for the new sponsoring Registrar enhances the security of the transfer process. The "Transfer Complete Notification" is sent by the Losing Registrar based on their contact data for the Registrant. If there is an unauthorized transfer, the information about the new sponsoring Registrar is of great value for the Registered Name Holder (RNH).

At-Large recommends that the IANA ID connected to the new sponsoring Registrar should be included in the "Transfer Complete Notification" (Recommendation #4), which the Losing Registrar is required to send it to the RNH. We are aware that information about the new sponsoring Registrar can also be queried using WHOIS/RDAP and thereby added to the "Transfer Complete Notification" by the Losing Registrar.

If technically feasible, information regarding the Gaining Registrar IANA ID should be provided by the Registry Operator in the Extensible Provisioning Protocol (EPP) notification

to the Losing Registrar. In our opinion, this will enhance the process completed by the Losing Registrar.

Section 3: Preliminary Recommendations 5-13 on Transfer Authorizations Codes (TAC)

For Preliminary Recommendation 13.1, the At-Large community appreciates the proposal to set a Time To Live (TTL) for the Transfer Authorization Code (TAC). However, there are some concerns that the recommendation of 14 calendar days set in preliminary recommendation 13.1 is too long.

We are aware that the 14 days TTL was recommended by the Contracted Parties House (CPH) Tech Ops Group. However, seen from an end-user perspective, a reduced TTL will still enhance the security and be sufficient time for the RNH to initiate the transfer.

At-Large recommends that the 14 days TTL for the TAC be returned for discussion by the TPR PDP WG.

Question for Community Input: Who is best positioned to manage the standard 14-day TTL – the Registry or the Registrar, and why? Are there specific implications if the TTL is managed by the Losing Registrar?

From an end-user/RNH point of view, the entity to manage the TAC TTL does not matter. Since it will be the sponsoring Registrar that creates the TAC (Recommendation 9) and thereby sets the TTL, it makes sense that the Registrar should manage the TTL for the TAC. The Registry has the obligation to verify the TAC, and hereby also confirm that the TAC has not expired.

Section 6: Other Comments and Submission

Additional comments from At-Large

At-Large would like to emphasize the responsibility ICANN Accredited Registrars have to implement the Inter-Registrar Transfer policy. Once adopted as a consensus policy, Registrar obligations should be passed onto resellers.

We believe this is of importance and would like additional wording inserted into the final policy underlying the Registrar's responsibility in regards to implementation of the Inter-Registrar Transfer Policy to resellers. We are aware that ICANN does not have a contractual relationship with the Resellers. However, we believe that the policy should include a direct order and request to the Registrars to make sure the updated transfer policy is policed towards the Registrars' reseller chain.