RrSG Response to the Preliminary Issue Report on a Policy Development Process to Review the Transfer Policy

The Registrar Stakeholder Group (RrSG) is pleased to comment on the [Preliminary Issue Report on a Policy Development Process to Review the Transfer Policy](#) (Issue Report). The [Transfer Policy](#) is a crucial Consensus Policy for domain name registrants, and the RrSG appreciates the efforts of the ICANN community and ICANN org in preparing this Issue Report to improve the Transfer Policy. The RrSG supports the items identified in the Issue Report.

In addition to its support of the Issue Report, the RrSG would like one additional item that was not identified by the Transfer Policy Review Scoping Team to be included in the Issue Report: bulk transfers between registrars. The Transfer Policy defines two types of transfers: (1) Holder-Authorized Transfers and (2) ICANN-Approved Transfers. Holder-Authorized Transfers provide the opportunity for registrants to transfer domain names between domain name registrars. ICANN-Approved Transfers are authorized by ICANN, and involve transfers of entire or partial domain name portfolios due to registrar deaccreditation or portfolio acquisition. Although some registry operators utilize [Bulk Transfer After Partial Portfolio Acquisition (BTAPPA),](#) in order to provide this service, registry operators must first add it as an additional registry service through the [Registry Services Evaluation Policy (RSEP)](#). Because of these complicating factors, there may be differences between registry operators for bulk transfers, and not all registry operators may offer bulk transfers. The standardization of the bulk transfer process between registrars would allow registrars who are also acting as resellers to more efficiently consolidate their domains under management onto a single IANA credential, should they so desire. It may also harmonize divergent processes between registries, adding transparency and efficiency to the DNS ecosystem.

As additional types of transfers are not precluded by the Transfer Policy, it is within the scope of the Issue Report to consider bulk transfers to ensure that there is a standardized bulk transfer process across all gTLDs and domain name registrars. This will result in reduced costs to registrars (and thus registrants), provide clarity regarding bulk transfers, and standardize a practice that may vary throughout the DNS.

Sincerely,

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