

[IRT Discussion Draft v1] Privacy and Proxy Service Provider Accreditation Policy Section V

V. Best Practices

A. Privacy and Proxy Service providers SHOULD facilitate and not hinder the transfer, renewal or restoration of a domain name by their Customers, including without limitation a renewal during a Redemption Grace Period under the [Expired Registration Recovery Policy](#) and transfers to another registrar.<sup>i</sup>

B. Privacy and Proxy Service providers SHOULD use commercially reasonable efforts to avoid the need to disclose underlying Customer data in the process of renewing, transferring or restoring a domain name.<sup>ii</sup>

C. Privacy and Proxy Service providers SHOULD include in their terms of service a link or other direction to the ICANN website (or other ICANN-approved online location such as the provider's own website) where a person may look up the authoritative definitions and meanings of specific terms such as Disclosure or Publication, as defined in Section I of this Policy.<sup>iii</sup>

**Commented [AB1]: Note to IRT:** This section was originally proposed based on the references to "best practices" in the Final Report. However, these provisions might ultimately be better suited for the specific topic sections (transfers, terms of service).

**Commented [AB2]: Question to IRT:** The Final Report states this twice, but uses two different words. On p. 9, the word used is "obstruct." On page 55, the word is "hinder." Which word did the WG intend to be used here? Proposing "hinder" because this seems to be the broader term.

In addition, the word "hinder" is ambiguous. What if a P/P provider is closed for the Chinese New Year (which can be 1-2 weeks long) and cannot assist in facilitating a transfer during that period? Is that hindering a transfer?

Could we be more specific about what this means?

**Commented [AB3]: Question:** Could the IRT provide recommendations of what efforts are "commercially reasonable" (should we provide more detail here or in PPAA)?

<sup>i</sup> See Final Report, page 11, item 9 and page 55.

<sup>ii</sup> See Final Report, page 11, item 9 and page 55.

<sup>iii</sup> See Final Report, page 11, item 9 and page 55.