

Subject: Business Constituency (BC) comment on IRTP Part C recommendations

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From: Steve DelBianco

To: comments-irtp-c-30mar15@icann.org

The Business Constituency thanks the working group for their work in developing recommendations for the Inter-Registrar Transfer Policy (IRTP) Part C. Below are BC responses to working group questions.

What constitutes a “material change” that would trigger the change of registrant process? The policy recommendations defined a “Change of Registrant” to be a material change to Registrant name, organization, or email address.

The Business Constituency agrees with the definition of Change of Registrant to include any material change to the Registrant Name or Registrant Organization.

We do not agree that a change to the Registrant email address alone is always a "material change". There may be many reasons for a registrant to change their email address without changing the status of an individual or the business organization. We would recommend limiting the definition of Change of Registrant to Registrant name and Registrant Organization.

The prior and new registrant must authorize the change by using a unique, “change of registrant credential”.

Does the working group contemplate the “change of registrant credential” be used in addition to the auth code when the domain name is transferred between registrars and a change of registrant is implemented?

The registrar confirms that both registrants have authorized the change and that the name is eligible for change of registrant, i.e., there is no lock or restriction on the name.

We support the requirement of a confirmation from the gaining, or “new” registrant. This would prevent transfers of domain names to entities without their knowledge or without any interest in owning the domain name. Moreover, it would limit fraudulent use of a registrant’s information. But sharing the “change of registrant credential” as described may hinder the transfer process if implemented.

The Business Constituency agrees that process for transmitting the change of registrant credential should be open to alternative methods — as long as they are secure. This may include SMS to the phone number connected to the registrant’s account, requiring a two-factor authentication process or other methods. But security should be of prime importance

Conclusion:

The Business Constituency once again applauds the working group for taking an innovative approach to the transfer process.

We are concerned that the requirement to share a “change of registrant credential” in a transfer will not be implemented in a way that guarantees security and addresses all reasons for transfer. We suggest that the IRTP part C group rethink the implementation of the “change of registrant credential”

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These comments were initially drafted by Susan Kawaguchi and approved in accord with the BC Charter.