

IRTP-C: Handling of Email Address Changes

IRTP-C Implementation Review Team
Discussion

8 January 2015

Agenda

- Quick recap of open issue
 - IRTP WG C recommendations call for exchange of a credential in order to effect a change of registrant and a “change of registrant” was defined to include an update to the registrant or admin-c’s email address
 - Exchange of Change of Registrant Credential is not possible via email when Prior Registrant can no longer access its email address
- Review of approaches proposed to date
- Discussion

Use Case

1. Registrant tries to update its email address (ordinarily, via the registrar's control panel) after its email is no longer valid. Other contact elements might also have become inaccurate (e.g., Rt relocated, has new ISP & new telephone number).
2. The email update is considered a Change of Registrant per the WG's recommendations (p6 of Final Report <http://tinyurl.com/kqcwr98>), so the registrar must exchange a Change of Registrant credential with both the Prior and New Registrants. The recommendations do not specify the means or channels by which the exchange should occur.
3. Registrar emails the credential but Prior Registrant cannot receive it.
4. Registrar might attempt to transmit the credential via the postal address or fax or phone numbers on file, but this could be time consuming and could also fail to reach the Prior Registrant.
5. As a result, registration/Whois data remains unchanged.

IRT Guidance

IRT members have indicated that IRTP WG C intended as follows:

1. The registrant should be able to update its email address, even if contact details have become inaccurate.
2. Credentials should be exchanged with the Prior and New Rts; use of the control panel to exchange credentials would not meet this requirement if the account holder is not the same as the Prior Rt.
3. Although email address modifications are considered to be a “Change of Registrant,” registrants should be able to update their email addresses without having to affirmatively approve the change via email (such as in the FOA process).

Rt Name/Org Change Process

For any material change of registrant name or organization, there must be an exchange of credentials between the registrar, the Prior Registrant and New Registrant. The registrar should not provide the Change of Registrant Credential to the Account Holder (e.g., via the control panel) unless the Account Holder and Prior Registrant are the same.

- The Rr must send an informational notice to both Rts.
- 60 day opt-outable inter-registrar transfer lock applies.

Proposed Approach (A)

For any change of email, there must be an exchange of credentials between the registrar, the Prior Registrant and New Registrant. The registrar should not provide the Change of Registrant Credential to the Account Holder (e.g., via the control panel) unless the Account Holder and Prior Registrant are the same.

- Rr would not be limited to use of contact information on file in providing credential to Prior Rt. Rr may authenticate the identity and contact details of the Prior Rt using reasonable and appropriate methods (e.g., requiring submission of a copy of ID, using contact data that was validated via reliable means, or use of pre-set secret PIN/code word that cannot be changed without reliable verification of identity)
- The Rr must send an informational notice to both Rts.
- 60 day opt-outable inter-registrar transfer lock applies.
 - restrictions could be imposed on means of opting out, such as: must be done x days before Change of Rt, or must be authorized via affirmative response to email (as is required in FOAs), or secondary proof of identity (such as copy of ID) required to remove lock
- Note: This conflicts with guidance from the IRT (#3: that email updates should not require affirmative ACK).

Proposed Approach (B)

For any change of email, the Change of Rt credential may be exchanged through Rr's control panel. In the case where the domain name remains in the same customer account, the effect would be the same as if no credential were exchanged (the account holder acts as agent for both Prior & New Rts).

- The Rr must send an informational notice to both Rts.
- 60 day opt-outable inter-registrar transfer lock applies.
 - restrictions could be imposed on means of opting out, such as: must be done x days before Change of Rt, or must be authorized via affirmative response to email (as is required in FOAs), or secondary proof of identity (such as copy of ID) required to remove lock
- Note: This appears to conflict with guidance from the IRT (#2: that the control panel should not be used to exchange credentials).

Proposed Approach (C)

For any change of email, the Change of Rt credential may be exchanged through Rr's control panel. In the case where the domain name remains in the same customer account, the effect would be the same as if no credential were exchanged (the account holder acts as agent for both Prior & New Rts).

- The Rr must send an informational notice to both Rts.
- 60 day opt-outable inter-registrar transfer lock applies.
- Lock cannot be disabled for a specified period of time, giving the Prior Rt an opportunity to object.
- Note: This conflicts with guidance from the IRT (#2: that the control panel should not be used to exchange credentials).

Proposed Approach (D)

For any change of email, the Change of Rt credential may be exchanged through Rr's control panel. In the case where the domain name remains in the same customer account, the effect would be the same as if no credential were exchanged (the account holder acts as agent for both Prior & New Rts).

- The Rr must send an informational notice to both Rts.
- Rt may not opt out of 60 day lock and previous requests to opt-out will be disregarded.
- Note: This appears to conflict with guidance from the IRT (#2: that the control panel should not be used to exchange credentials).
- Note: This might conflict with the recommendation that registrars be able to offer registrants an ability to opt-out of the 60 day lock. (p. 5-6 of Final Report: <http://tinyurl.com/kqcwr98>)

Discussion