**SUMMARY OF CALL ON 13 NOVEMBER ON IMPLEMENTATION ISSUES WITH TRANSFERS AND DE-ACCREDITATION**

**Preliminary Note:**

* Final Report to clarify distinction between: (1) registrar and P/P provider; (2) Affiliated and independent (i.e. unaffiliated) P/P provider; and (3) transfer of domain name and transfer of P/P registration

**Problem with Transfers of Domain Names – what else can be done to minimize (or at least ensure customer is aware of) dropping of privacy protection upon transfer?**

Current WG recommendations:

* [Mandatory] All accredited P/P service providers must publish their terms of service, and disclose to their customers the conditions under which the service may be terminated in the event of a transfer of the domain name and how requests for transfers of a domain name are handled
* [Best Practices] P/P service providers should facilitate and not obstruct the transfer, renewal or restoration of a domain name by their customers, including without limitation … transfers to another registrar.
* [Best Practice] P/P service providers should use commercially reasonable efforts to avoid the need to disclose underlying customer data in the process of renewing, transferring[[1]](#footnote-1) or restoring a domain name.

Additional ideas for discussion (to further strengthen existing recommendations):

* Give registrar the option to require that customer with an inbound transfer either switch within X days from its old P/P service to new Affiliated service (if registrar has one) or give up privacy protection; also, specify that customer must supply accurate details or risk getting its domain suspended?
* Require P/P provider to relay transfer request (including FOA) to customer, and customer response to requester?

**Additional Problems Discussed -**

1. Ensuring accuracy of customer data – if data escrow is too difficult or expensive, are there other alternatives? Is this really a problem that the WG can/should fix or is this in reality a bigger problem that goes beyond accreditation issues?

2. De-accreditation principles – need to work with Mike and Amy to figure out how much more specific the WG principles need to be in order to provide reasonable guidance for implementation

Note: Current Principles read –

Principle 2: Each step in the de-accreditation process should be designed so as to minimize the risk that a customer’s personally identifiable information is made public.

Principle 3: The WG notes that the risk of inadvertent publication of a customer’s details in the course of de-accreditation may be higher when the provider in question is not Affiliated with an ICANN-accredited registrar. As such, implementation design of the de-accreditation process should take into account the different scenarios that can arise when the provider being de-accredited is, or is not, Affiliated with an ICANN-accredited registrar.

3. Should WG recommend that a compatibility check with the IRTP be done by the implementation team when it comes to developing transfer and de-accreditation mechanisms?

Note: Current WG recommendation that next IRTP review should explicitly consider impact on P/P recommendations

4. Should the WG further recommend that if an accredited registrar with an Affiliated accredited P/P provider is de-accredited then the Affiliated accredited provider should be too? And vice versa?

1. [↑](#footnote-ref-1)