

## **RrSG (TechOps) response to Policy Status Report: Inter-Registrar Transfer Policy (IRTP)**

IRTP Policy Status Report:

<https://gnso.icann.org/sites/default/files/file/field-file-attach/irtp-status-14nov18-en.pdf>

Closing date: 24 December 2018

### **Survey Questions:**

#### **1. On a scale of 1 to 10, how effective is the transfer policy generally as it exists today (10 being most effective)?**

6 or 7. It's not so bad it should be under 5, but definitely has room for improvement.

It should also be noted that:

- FOA is not necessary
- Other processes also are unnecessary and do not prevent hijacking

The Dispute policy is ineffective. It cannot be used at this time to reverse a transfer, so that section of the policy gets a 0.

#### **2. More specifically, on a scale of 1 to 10, how effective has the policy been at facilitating transfers?**

Specifically regarding facilitating a registrar transfer, we'd give the policy an 8. It is effective and not overly burdensome, although there are some areas that are unnecessary.

However, the change of Registrant process is scored at 3; it's a difficult process for the Registered Name Holder with lots of confusing choices that do not seem to have significant benefits, but overly complicate the process for valid changes and create unnecessary burdens.

#### **3. On a scale of 1 to 10, how effective has the policy been at preventing fraudulent or abusive domain transfers?**

0. The Policy does not effectively prevent fraudulent transfers.

#### **4. Per year, approximately how many transfers have you/your company been a party to (either as a "gaining" or "losing" registrar) as a percentage of your total domains under management?**

N/A. The response to this question would vary significantly across different registrars.

#### **5. The transfer policy has evolved over the last six years. In your opinion, have the policy modifications improved, worsened, or had no effect on the process for transferring domains between registrars and/or registrants ? Please provide details to support your answer.**

Between registrars the changes to policy have not had a significant effect on the process.

For Change of Registrant, it's gotten worse. It is overly complicated and a bad user experience.

**6. Many of the recent IRTP changes centered around protecting registrants from domain name hijacking. Do you believe the policy changes helped to mitigate this threat? Why or why not?**

No. We have not noted a decrease in domain hijacking following the implementation of IRTP-C requirements.

**7. What methods do you use to mitigate domain name hijacking outside of the IRTP framework?**

Registrars individually employ account security and authcode best practices.

**8. Compared to previous years, do you see more, less, or the same amount of hijacking cases?**

More

Less

**No change**

**9. In your view, did the Form of Authorization (FOA) requirement work to mitigate problems surrounding unauthorized domain transfers? How might this requirement be improved or changed to mitigate such problems?**

Responses vary.

Some registrars find that the FOA increases risk because it relies on a non-secure method (email), which can be accessed improperly to transfer a domain without the RNH's approval.

Other registrars find that the FOA helps mitigate problems by ensuring the current registrant understood the domain was transferring to a new registrar.

There is agreement that we should move away from the FOA and focus on authcode security.

**10. Do you think the FOA should continue to be a requirement given most systems are now based on the Extensible Provisioning Protocol (EPP)? Why or why not?**

No. Prior to Temp Spec changes, the FOA functioned as a second factor of authentication for the transfer, but was cumbersome for the Registered Name Holder to use effectively. Removing the FOA requires the enhancement of other security measures, specifically the authcode. There should be best-practice guidelines for authcode security; TechOps leans towards Registrars bearing the responsibility for the authcode.

**11. It is no longer required in all cases for the gaining registrar to obtain the FOA as a result of the "Temporary Specification for gTLD Registration Data." Is this a transfer solution you support? Do you have concerns with this? Please explain your answer.**

Yes, supported, with the suggestions regarding authcode security made in #10 above.

**12. What issues, if any, have you encountered with the 60-day "Change of Registrant" lock requirement? Do you see this as an effective policy requirement? Please explain your answer.**

The 60 day Change of Registrant lock requirement can at times be a burden when a client wants to transfer the domain to another registrar for an unforeseen reason prior to the end of the 60 days. Registrants who do not opt-out of the lock often don't understand why their domain is locked (despite explanations presented at the time of update). This can create an unnecessary waiting period.

The approval delay is effective at giving registrants an opportunity to catch and prevent fraud, but forcing users to accept the transfer is over-burdensome. There is also over-use of the Designated Agent, which has basically circumvented the policy.

COR also hinders corporate acquisitions, consolidations, and divestitures of large lists of domains to new legal entities, which places the domains in a lock that can then be problematic.

**13. Do you lock domains by default upon registration of a name?**

Yes

No

**14. When implementing the "Change of Registrant" lock requirement, did you chose to implement the opt-in option vs. the opt-out? Why or why not?**

Registrar implementations vary; registrants are often offered both choices from which to select.

**15. Should the duration of the "Change of Registrant" lock stay the same, be shorter, longer, or no longer be a requirement?**

Same

Shorter

Longer

It should no longer be a requirement

**16. Should there be more standard reporting requirements across registrars as they relate to transfers? If so, what should these reporting requirements include?**

Definitely not. Reporting by registrars should be voluntary and on an as-needed basis.

**17. Would you be willing to share transfer data publicly in order to enable assessment of the transfer policy's effectiveness, even if not a contractual obligation?**

Yes

No

Not sure

**18. Do you think the Transfer Emergency Action Contact (“TEAC”) is an effective way to handle urgent inter-registrar transfer issues between registrars, or does the TEAC process require changes?**

The TEAC **does** require changes. The TEAC is an effective way to make contact regarding an urgent transfer issue, but it does not go far enough, because it does not require that both registrars work together to investigate and reverse the disputed transfer if needed. The process should be revised to require the two registrars to come to a mutually acceptable resolution, potentially with the assistance of a neutral mediator.

There is significant concern with the 4-hour response time requirement, as this can be a burden especially across different time zones and languages. One option could be to require the current 4-hour response time for registrars with overlapping time zones, while registrars with significant disparities in timezone could have a longer response time.

**19. In general, what issues are your customers having, if any, as they relate to transfers?**

- Registered Name Holders often think transfers should be instantaneous
- They’re annoyed by the FOA and think providing the authode should suffice
- If a domain is hijacked, there is no effective dispute or resolution mechanism
- Bulk transfer of domains should be improved and streamlined
  - Difficult for Registered Name Holders to retrieve authcodes for a long list of domains as there are no requirements to permit bulk authcode requests
  - Registry often does not allow for bulk transfer requests

**20. What do you consider to be measures of success as they relate to transfers?**

- Happy registrants
- Reduced failure rates
- Minimization of fraudulent transfer and effective reversal process
- Low ratio of NACK’s to ACK’s

**21. What do you think the ideal transfer process should look like from a policy and a technical perspective?**

Rather than duplicating the efforts already undertaken by the CPH TechOps group to suggest a modified transfer process, we recommend the following components be included in any new policy:

- No FOA
- Authcodes with good standardization and valid only for a set period
- Registries enforce secure authcode policies
- Transfer is conducted instantaneously
- Both registrars notify registrants of the requested transfer

- Effective ability to reverse a transfer - should be immediate and done via EPP command or other contact to the registry
- Effective and accessible dispute mechanism that puts the burden of proof to demonstrate that it was a valid transfer on the gaining registrar and the requesting registrant (not the person who was the Registered Name Holder holder prior to transfer) - the losing registrar must be involved and will be able to provide historical information to verify domain ownership prior to transfer
- The waiting period during which time the transfer can be disputed should be moved to when the Registered Name Holder requests the authcode, instead of after the transfer is initiated with the registry (at which point the transfer should be completed immediately). This waiting period to receive the authcode should be 5 days long, and should be a MAY not a MUST; individual registrars can choose how they implement this for maximum security and customer satisfaction.

**22. If the GNSO was considering further review of the transfer policy in addition to the IRTP Policy Status Report, what priority would you assign it given existing policy efforts: high, medium, low, or no priority?**

High priority

**23. In your view, what could be improved in regard to making domain name transfers?**

- See notes above
- Ease and speed of transfer (from the registrant's perspective)
- Ease of undo (for registrar) in cases of unauthorized transfer
- Setting minimum requirements for auth info codes throughout the domain industry. These requirements would include:
  - Minimum and maximum number of characters required for auth info code.
  - Generic terms such as "password, authinfo" not allowed.
  - Maximum TTL required for auth info codes.

**24. If you have any additional input on the IRTP and/or transfer process in general, please do so here.**

When a transfer request is submitted, both the registrar and the registry should watch for a "brute force" style attack, where many potential authcodes are tested against the domain until one succeeds, and prevent such abuse of the transfer process.

ICANN Compliance needs to be more responsive to non-compliant registrars and more consistent in their enforcement of policy.

Authorization should be allowed via whatever form the registrar uses to contact their clients; email should not be specifically required. Registered Name Holders may communicate with their registrars by any number of communication methods, including for example telephone and social media, and it should be up to the registrar to ensure that any requests are appropriately verified.

Allow for business decisions such as being able to use an EPP command to initiate an immediate transfer reversal.

For a Change of Registrant, both the gaining and losing registrants should be notified of any requests, and should have the option to accept or reject, over EPP notifications.