

Group 1(b) Recommendations for TPR Initial Report

Instructions:

1. Review the following TPR Group 1(b) Recommendations for finalization
 - **Yellow highlight** represents updated text following the WG's 26 March discussion
2. Starting on [page 9](#): Categorize level of support for all recommendations by placing recommendation numbers and alternate text (where applicable) into one of the following four tables:
 - (a) you **CANNOT LIVE WITH** (provide text that you could support);
 - (b) you **CAN LIVE WITH but prefer a change** (provide alternative text); or
 - (c) you have a **grammatical edit**
 - (d) you **SUPPORT** recommendation text **AS IS**

Please indicate your support/opposition/proposed changes to the below Recs no later than: **9 April 2024**

TPR Group 1(b) Recommendations:

Rec 1: The working group recommends that the Transfer Policy and all related policies **MUST** use the term “Change of Registrant Data” in place of the currently-used term “Change of Registrant”. This recommendation is for an update to terminology only and does not imply any other changes to the substance of the policies.

Rec 1.1: “Change of Registrant Data” is defined as a Material Change to the Registered Name Holder’s name or organization, or any change to the Registered Name Holder’s email address.

Rec 1.2: The Working Group affirms that the current definition of “Material Change” remains applicable and fit for purpose.

Rec 1.3: A “Change of Registrant Data” does not apply to the addition or removal of Privacy/Proxy Service Provider data in RDDS when such P/P services are provided by the Registrar or its Affiliates.

Rec 2: The working group recommends eliminating Section II from the Transfer Policy; instead, the working group recommends that a standalone “Change of Registrant Data” policy MUST be established, existing outside of the revised Transfer Policy. As part of the implementation of the new standalone Change of Registrant Data Policy, the working group recommends the following changes from the existing policy language in Section II of the Transfer Policy.

Rec 2.1: The working group recommends that the role and definition of “Designated Agent” is no longer fit for purpose. Accordingly, the working group recommends all references to Designated Agent MUST be eliminated from the future standalone Change of Registrant Data Policy.

Rec 2.2: The working group recommends eliminating Section II.B “Availability of Change of Registrant” from the future standalone Change of Registrant Data Policy.

Rec 2.3: The working group recommends eliminating from the future Change of Registrant Data Policy the requirement that the Registrar request and obtain confirmation from both the Prior Registrant and the New Registrant prior to processing a Change of Registrant Data as detailed in Sections II.2.1.2 and II.2.1.4 of the Transfer Policy.

Rec 2.4: The working group recommends eliminating from the future Change of Registrant Data Policy the requirement that the Registrar impose a 60-day inter-registrar transfer lock following a Change of Registrant. This requirement is detailed in section II.C.2 of the Transfer Policy. Additionally, the working group recommends eliminating from the Transfer Policy the text regarding opting out of the 60-day lock, as this text has been overtaken by the removal of the lock requirement from the Transfer Policy.

Rec 3: The working group recommends that following a Change of Registrant Data, unless the RNH previously opted out of notifications, the Registrar **MUST** send a Change of Registrant Data notification to the Registered Name Holder without undue delay, but no later than 24 hours after the Change of Registrant Data occurred.

Rec 3.1: This notification **MUST** be written in the language of the registration agreement and **MAY** also be provided in English or other languages.

Rec 3.2: The Registrar **MUST** include the following elements in the Change of Registrant Data notification:

- Domain name(s)
- Text stating which registrant data field(s) were updated
- Date and time that the Change of Registrant Data was completed
- Instructions detailing how the registrant can take action if the change was invalid (how to initiate a reversal)

Rec 3.3: The Registrar MUST send the notification via email, SMS, or other secure messaging system. These examples are not intended to be limiting, and it is understood that additional methods of notification may be created that were not originally anticipated by the working group.

Rec 3.4: Subject to the opt out requirements described in Recommendation 4, when a change to the Registered Name Holder's email address occurs:

- a. the Registrar MUST send the CORD notification to the RNH's prior email address (the email address that was on file with the Registrar immediately prior to the change).
- b. the Registrar MAY send the CORD notification to the RNH's new email address.
- c. the Registrar MAY additionally send the CORD notification to the RNH via SMS or other secure messaging system.

Rec 3.5: The Registrar MAY send additional notifications resulting from changes to the Registered Name Holder's phone number, postal address, Account Holder information, or other contact information used by the Registrar to associate the RNH with their domain name or relevant account.

Rec 3.6: To the extent that the Change of Registrant Data is requested for multiple domains, and the Registered Name Holder is the same for all domains, the Registrar of Record MAY consolidate the Change of Registrant Data notifications into a single notification.

Rec 3.7: To the extent that the Change of Registrant Data may incur a verification request to be sent to the Registered Name Holder pursuant to the RDDS Accuracy Program Specification, the Registrar of Record MAY consolidate the optional Change of Registrant Data notification and the verification request into a single notification, where applicable.

Rec 4: The working group recommends that Registrars MAY provide Registered Name Holders with the option to opt out of receiving Change of Registrant Data notifications. IF the Registrar chooses to provide the CORD notification opt-out option to the Registered Name Holder, THEN the following recommendations apply:

Rec 4.1: The Registrar MUST enable Change of Registrant Data notifications by default (i) when a domain name is initially registered AND (ii) when a domain name is transferred in from another Registrar.

Rec. 4.2 If the Registered Name Holder elects to opt out of Change of Registrant Data notifications, the Registrar MAY disable Change of Registrant Data notifications, provided the opt out occurs AFTER initial domain name registration or following the completion of an inter-registrar transfer.

Rec 4.3: The Registrar MUST provide clear instructions for how the Registered Name Holder can opt out of (and opt back in to) Change of Registrant Data notifications. Additionally, the Registrar MUST provide warning of the consequences associated with opting out of these notifications, enabling the RNH to make an informed decision whether to opt out.

Rec 4.4: The Registrar MUST maintain a record demonstrating that the Registrar validated that the opt-out was requested by the Registered Name Holder.

Rec 4.5: The Change of Registrant Data notification opt-out option does not apply to any verification notices sent pursuant to the RDDS Accuracy Program Specification.

Rec 4.6: Registrars have the flexibility to offer an opt-out at the data field level. For example, a registrar may choose to offer an opt out for material changes to the Registrant Name or Registrant Organization but not allow an opt out for a change to the Registered Name Holder's email address.

PREVIOUS Group 1(a) Rec. 17: The Registrar MUST restrict the RNH from transferring a domain name to a new Registrar within 30 calendar days / 720 hours of the completion of an inter-Registrar transfer. To the extent that a Registry and/or Registrar has an existing policy and/or practice of restricting the RNH from transferring a domain name to a new Registrar for a different period of time following an inter-Registrar transfer, all policies and practices MUST be updated to be consistent with this new requirement.

Rationale for Preliminary Recommendation 17: The working group believes that a single requirement across the industry will result in a better experience for registrants and will also consistently prevent the transfer of a domain multiple times in rapid succession, a practice associated with domain theft. The working group recommends that 30 days is the appropriate period for this requirement because:

- It provides a window of opportunity to identify issues associated with credit card payments, including unauthorized use of a credit card. This may assist with addressing criminal activity and deterring fraud.
- For registrants who legitimately want to transfer a domain again shortly after an inter-registrar transfer has taken place, 30 days is a reasonable period of time to wait.

UPDATED Group 1(a) Rec 17: Registrars MUST apply a 30-day post-change of registrar restriction by default for all domain names transferred into a Registrar; however, on a case-by-case basis and where an Established Relationship exists, the Registrar MAY remove the post-change of registrar restriction on the domain name in less than thirty (30) days for the purpose of an inter-registrar transfer

An Established Relationship means a RNH who has:

- a) received registrar services for a period of at least thirty (30) days; and
- b) a history of regular interactions with the Registrar and who has demonstrated a willingness to continue receiving registrar services from the Registrar in the future.

Continue to the next page to indicate support/opposition/changes to the above Recs



CANNOT LIVE WITH
(provide text that you could support)

Group/ Constituency	Rec #	Proposed Update / Change	Rationale

CAN LIVE WITH but prefer this change
(provide alternative text)

Group/ Constituency	Rec #	Proposed Update / Change	Rationale
At-Large	Rec #3	Rec 3: The working group recommends that following a Change of Registrant Data, unless the RNH previously opted out of notifications , the Registrar MUST send a Change of Registrant Data notification to the Registered Name Holder without undue delay, but no later than 24 hours after the Change of Registrant Data occurred.	The Opt out feature should be removed due <ol style="list-style-type: none"> 1. The security concerns 2. Operation issues for the registrars <ol style="list-style-type: none"> a. Programming b. Audit trail Note: At-Large is aware that for some business models (corporate registrars) sending notifications does not make any sense. However, At-Large believe Rec #3.6 can be used for these categories of Registrars. Our understanding is that most likely the majority of registrars will NOT enable the opt out of notifications.
At-Large	Rec #4	The wording should be tuned for not enabling an opt out for CORD notifications	See Rec #3
	Rec #3.4	Rec 3.4: <u>Subject to the opt out requirements described in Recommendation 4</u> , when a change to the Registered Name Holder's email address occurs: <ol style="list-style-type: none"> a. the Registrar MUST send the CORD notification to the RNH's prior email address (the email address that was on file with the Registrar immediately prior to the change). b. the Registrar MAY send the CORD notification to the RNH's new email address. c. the Registrar MAY additionally send the CORD notification to the RNH via 	Wording to be in line with removing the opt out for notifications of CORD

		SMS or other secure messaging system.	
At-Large	Rec #17	UPDATED Group 1(a) Rec 17: Registrars MUST apply a 30-day post-change of registrar restriction by default for all domain names transferred into a Registrar; however, on a case-by-case basis and where an Established Relationship exists, the Registrar MAY remove the post-change of registrar restriction on the domain name in less than thirty (30) days for the purpose of an inter-registrar transfer	<p>The “Established Relationship” is confusing/hard to understand. Weakly worded.</p> <p>Security argument: A 30-day post-transfer lock is fundamental seen from an overall security point.</p> <p>The object for the <u>post transfer lock</u> is to avoid “registrar hopping”. Also of importance is to mitigate DNS abuse (preventing a domain name to harm the security and stability of the internet by changing registrar(s).</p> <p>Note: There are some edge cases the removal of the post transfer lock MAY be reasonable.</p> <p>At-Large may consider this recommendation to be “moved” to category A “Recommendations we CANNOT live with”.</p>

GRAMMATICAL EDITS

Group/ Constituency	Rec #	Proposed Update / Change	Rationale
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SUPPORT RECOMMENDATION AS IS	
Group/ Constituency	Rec #

<p>At-Large</p>	<p>Rec 1: The working group recommends that the Transfer Policy and all related policies MUST use the term “Change of Registrant Data” in place of the currently-used term “Change of Registrant”. This recommendation is for an update to terminology only and does not imply any other changes to the substance of the policies.</p> <ul style="list-style-type: none"> ● Rec 1.1: “Change of Registrant Data” is defined as a Material Change to the Registered Name Holder’s name or organization, or any change to the Registered Name Holder’s email address. ● Rec 1.2: The Working Group affirms that the current definition of “Material Change” remains applicable and fit for purpose. ● Rec 1.3: A “Change of Registrant Data” does not apply to the addition or removal of Privacy/Proxy Service Provider data in RDDS when such P/P services are provided by the Registrar or its Affiliates.
<p>At-Large</p>	<p>Rec 2: The working group recommends eliminating Section II from the Transfer Policy; instead, the working group recommends that a standalone “Change of Registrant Data” policy MUST be established, existing outside of the revised Transfer Policy. As part of the implementation of the new standalone Change of Registrant Data Policy, the working group recommends the following changes from the existing policy language in Section II of the Transfer Policy.</p> <ul style="list-style-type: none"> ● Rec 2.1: The working group recommends that the role and definition of “Designated Agent” is no longer fit for purpose. Accordingly, the working group recommends all references to Designated Agent MUST be eliminated from the future standalone Change of Registrant Data Policy. ● Rec 2.2: The working group recommends eliminating Section II.B “Availability of Change of Registrant” from the future standalone Change of Registrant Data Policy. ● Rec 2.3: The working group recommends eliminating from the future Change of Registrant Data Policy the requirement that the Registrar request and obtain confirmation from both the Prior Registrant and the New Registrant prior to processing a Change of Registrant Data as detailed in Sections II.2.1.2 and II.2.1.4 of the Transfer Policy. ● Rec 2.4: The working group recommends eliminating from the future Change of Registrant Data Policy the requirement that the Registrar impose a 60-day inter-registrar transfer lock following a Change of Registrant. This requirement is detailed in section II.C.2 of the Transfer Policy. Additionally, the working group recommends eliminating from the Transfer Policy the text regarding opting out of the 60-day lock, as this text has been overtaken by the removal of the lock requirement from the Transfer Policy.
<p>At-Large</p>	<p>Rec 3.1: This notification MUST be written in the language of the registration agreement and MAY also be provided in English or other languages.</p> <p>Rec 3.2: The Registrar MUST include the following elements in the Change of Registrant Data notification:</p> <ul style="list-style-type: none"> ● Domain name(s) ● Text stating which registrant data field(s) were updated ● Date and time that the Change of Registrant Data was completed

	<ul style="list-style-type: none">• Instructions detailing how the registrant can take action if the change was invalid (how to initiate a reversal) <p>Rec 3.3: The Registrar MUST send the notification via email, SMS, or other secure messaging system. These examples are not intended to be limiting, and it is understood that additional methods of notification may be created that were not originally anticipated by the working group.</p> <p>Rec 3.5: The Registrar MAY send additional notifications resulting from changes to the Registered Name Holder's phone number, postal address, Account Holder information, or other contact information used by the Registrar to associate the RNH with their domain name or relevant account.</p> <p>Rec 3.6: To the extent that the Change of Registrant Data is requested for multiple domains, and the Registered Name Holder is the same for all domains, the Registrar of Record MAY consolidate the Change of Registrant Data notifications into a single notification.</p> <p>Rec 3.7: To the extent that the Change of Registrant Data may incur a verification request to be sent to the Registered Name Holder pursuant to the RDDS Accuracy Program Specification, the Registrar of Record MAY consolidate the optional Change of Registrant Data notification and the verification request into a single notification, where applicable.</p>