

Change of Registrant (COR)

TPR Group 1(b): Part II

Meeting #113



Recap: COR Security Measures

What (if anything) needs be added to the COR to enhance security for registrants?

Security Measures

When an Improper COR is reported...	When a COR is followed by a Registrar Transfer request...
<p>Option 1: Registrars must provide contact information for questions (current policy) *</p>	<p>Option 1: No special requirements are necessary. *</p>
<p>Option 2: Registrars must investigate/respond to reports of improper CORs **</p>	<p>Option 2: There should be a waiting period before issuing the TAC, allowing time for objections.</p>
<p>Option 3: Registrars must provide a dispute/appeal process to correct improper CORs ***</p>	<p>Option 3: Before issuing the TAC, changes to RNH/Account Holder information must be verified.</p>
<p>Option 4: Registrars must provide an appeal process with specific criteria to correct improper CORs</p>	<p>Option 4: Following a COR, impose a 30-day transfer lock, but allow Registrars to lift it, if agreed. **</p>
<p>Option 5: Other: _____</p> <ul style="list-style-type: none"> - Ability of registrant to prevent CoR upon adequate notice + registrant-initiable dispute resolution process. - “PendingRegistrantChange” EPP Status - Look at ccTLDs 	<p>Option 5: Registrars must offer registrants an opt-in option for added protection.</p>
<p>Option 6: None of the above</p>	<p>Option 6: Other: _____</p> <ul style="list-style-type: none"> - Let the Registrar be responsible - Defer to registrars
	<p>Option 7: None of the above</p>

Security Measures: Improper CORs (without TAC request)

Currently: Registrars must notify the Prior Registrant and New Registrant before or within one day of the completion of the Change of Registrant. This notification must contain contact information for questions.

Preliminary Recommendation 1:

The Working Group recommends that, following a Change of Registrant,* the Registrar MUST send a notification of the Change of Registrant to the Prior Registrant, as listed in the Registration Data immediately prior to the Change of Registrant, and the New Registrant without undue delay [but no later than 24 hours after the Change of Registrant occurred.]**

* Definition in Progress

** The working group recognizes that this notification MAY be sent 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.

Security Measures: Improper CORs (without TAC request)

Preliminary Recommendation 1: The Working Group recommends that, following a Change of Registrant,* the Registrar **MUST send a notification** of the Change of Registrant to the Prior Registrant, as listed in the Registration Data immediately prior to the Change of Registrant, and the New Registrant without undue delay [but no later than 24 hours after the Change of Registrant occurred.]**

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

1.2 The Registrar **MUST** include the following elements in the Change of Registrant notification:

- ❖ Domain name(s)
- ❖ Text stating that the contact information was updated
- ❖ Date and time that the Change of Registrant was completed
- ❖ **Instructions detailing how the Prior/New Registrant can take action if the change was invalid (how to initiate a reversal)**

Security Measures: CORs with TAC request

Currently: Registrars must impose a 60-day inter-registrar transfer lock following a Change of Registrant. However, Registrars may allow the RNH to opt out of the 60-day lock prior to any COR request.

Preliminary Recommendation 2:

The Working Group recommends eliminating from the Transfer 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.

Rationale: The Working Group has noted the 60-day lock has been a source of confusion and frustration among registrants, and has not definitively demonstrated that it effectively prevents domain hijacking/hopping. The removal of this lock is therefore recommended, in lieu of the working group's other recommendations to provide greater security, namely:

1. enhanced security measures surrounding TAC issuance (Group 1a)
2. mandatory 30-day transfer restriction following an inter-Registrar transfer (Group 1a)
3. notifications to New and Prior Registrant when COR occurs, containing instructions for taking action if the change is invalid

Security Measures: CORs with TAC request

Group 1a Prelim. Rec. 12: *The working group confirms that the Transfer Policy MUST continue to require Registrars to set the TAC at the Registry and issue the TAC to the RNH or their designated representative within five calendar days of a request, although the working group recommends that the policy state the requirement as 120 hours rather than 5 calendar days to reduce any risk of confusion. The working group further recommends that the policy MUST make clear that 120 hours is the maximum and not the standard period in which the TAC is to be issued.*

Preliminary Recommendation 3 (12.1):

When a TAC request follows a recent Change of Registrant*, Registrars shall utilize the five calendar day (120 hour) period for TAC issuance to ensure due diligence that the TAC request is requested/authorized by the Registered Name Holder or their designated representative.

* In this instance, a “recent” Change of Registrant means the COR was completed within [thirty days (720 hours)] before receipt of the TAC request. For avoidance of doubt, Registrars should always ensure due diligence when completing a TAC request, but especially so when a Change of Registrant has recently occurred.

Security Measures: CORs with TAC request (Alternative 1)

Currently: Registrars must impose a 60-day inter-registrar transfer lock following a Change of Registrant. However, Registrars may allow the RNH to opt out of the 60-day lock prior to any COR request.

ALTERNATE Preliminary Recommendation 2:

The Working Group recommends that the required 60-day inter-registrar transfer lock following a Change of Registrant be reduced to 30 calendar days (720 hours), consistent with the 30-day restrictions following initial registration and inter-registrar transfers (Group 1a Recs 16 and 17).

2.1. Registrars may continue to provide the registrant with an option to opt-out of the 30-day inter-registrar transfer restriction prior to the Change of Registrant. Additionally, if the Prior Registrant did not opt-out prior to the Change of Registrant, and the 30-day inter-registrar transfer restriction is imposed, the Registrar may subsequently remove this restriction only upon explicit and documented agreement of both the Registrar and the New Registrant.

Security Measures: CORs with TAC request (Alternative 2)

ALTERNATE Preliminary Recommendation 2: The Working Group recommends that the required 60-day inter-registrar transfer lock following a Change of Registrant be reduced to 30 calendar days (720 hours), consistent with the 30-day restrictions following initial registration and inter-registrar transfers (Group 1a Recs 16 and 17).

ALTERNATE 2.1. The Working Group recommends eliminating from the Transfer Policy the option to opt out of the 30-day restriction prior to a Change of Registrant. Instead, Registrars must impose a 30-day inter-registrar transfer restriction following any Change of Registrant. However, Registrars must also be enabled to remove this 30-day post-COR restriction in specific circumstances.*

* Circumstances would be determined by the Working Group

The Working Group has expressed concerns about the security provided by the 60-day lock (e.g. in light of effective ‘workarounds’ to the restriction), and acknowledged that the inability to remove this lock after it is imposed is a source of frustration for both registrants and Registrars alike. There are often times where a valid registrant may need to update their contact information prior to transferring to another Registrar, such as in cases of a domain name sale or outdated contact information to receive an Auth Code (TAC). There are also valid reasons why a registrant may need to quickly transfer their domain to another Registrar, such as an approaching expiration date. By eliminating the pre-COR opt-out option but allowing Registrars to (limitedly) remove the resulting 30-day transfer restriction, a layer of security against domain hijacking is maintained while still providing a path for registrants to transfer their domains after a COR.

Definitions: Change of Registrant vs Control

Change of Registrant

“Change of Registrant” as defined in the Transfer Policy:

I.A.1.1 "Change of Registrant" means a Material Change to any of the following:

1.1.1 Prior Registrant name

1.1.2 Prior Registrant organization

1.1.3 Prior Registrant email address

~~1.1.4 Administrative Contact email address, if there is no Prior Registrant email address. (1a: Prelim Rec 15)~~

I.A.1.2 "Designated Agent" means an individual or entity that the Prior Registrant or New Registrant explicitly authorizes to approve a Change of Registrant on its behalf.

I.A.1.4 "Prior Registrant" means the Registered Name Holder at the time a Change of Registrant is initiated.

I.A.1.5 "New Registrant" means the entity or person to whom the Prior Registrant proposes to transfer its domain name registration.

Material Change

“Material Change” as defined in the Transfer Policy:

I.A.1.3 "Material Change" means a change which is not a typographical correction. The following will be considered material changes:

- 1.3.1 A change to the Registered Name Holder's **name or organization** that does not appear to be merely a typographical correction;
- 1.3.2 Any change to the Registered Name Holder's **name or organization** that is **accompanied by a change of address or phone number**;
- 1.3.3 Any change to the Registered Name Holder's **email address**.

Registrars have some flexibility to determine what a typographical correction is. Examples of typographical corrections could include:

1. Changing the Registrant Name field from oJhn Smith to John Smith.
2. Changing the Registrant Name field from Jane Kgan to Jane Kang.
3. Changing the Registrant Organization from Example, lcn. to Example, Inc.
4. Changing the Registrant Organization from ExampleCorp. to Example Corp.

For avoidance of doubt, nothing prevents the Registrar from treating any change to the Registrant Name or Registrant Organization field as a Material Change.

Change of Control

The WG previously discussed that the current definition of “Change or Registrant” is not fit for purpose, and should be replaced with “Change of Control”.

Should “Change of Control” be defined as a (material) change to the registrant’s A.) “contactability”, B.) “primary contact method”, or C.) “anchor contact method” ?

- Should the primary method of contactability (currently the email address) be considered the “anchor” with all other changes being incidental (e.g. name and organization)?
- Should registrars determine for themselves which information constitutes a Change of Control?
- Is a Change of Control signaled by a new registration agreement being signed?
- Is “material change” still relevant and worth incorporating into Change of Control?

Additional food for thought:

- ★ How does this affect the use of the Designated Agent?
- ★ How does this affect the use of Privacy/Proxy providers?

Appendix: Poll Results

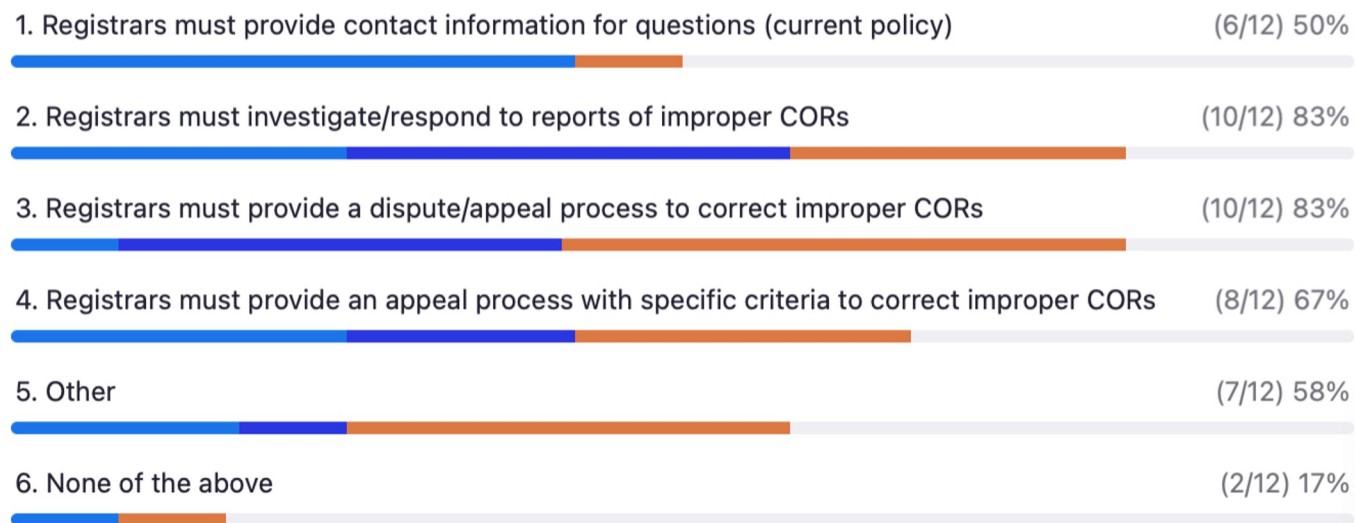
Poll Results

12 Dec-2a. Saved

Poll ended | 2 questions | 12 of 25 (48%) participated

1. Of the Options discussed thus far, which can you support as a minimum requirement for Registrars when an improper COR occurs? Select your first, second, and third choices (if applicable) (Rank Order)

12/12 (100%) answered



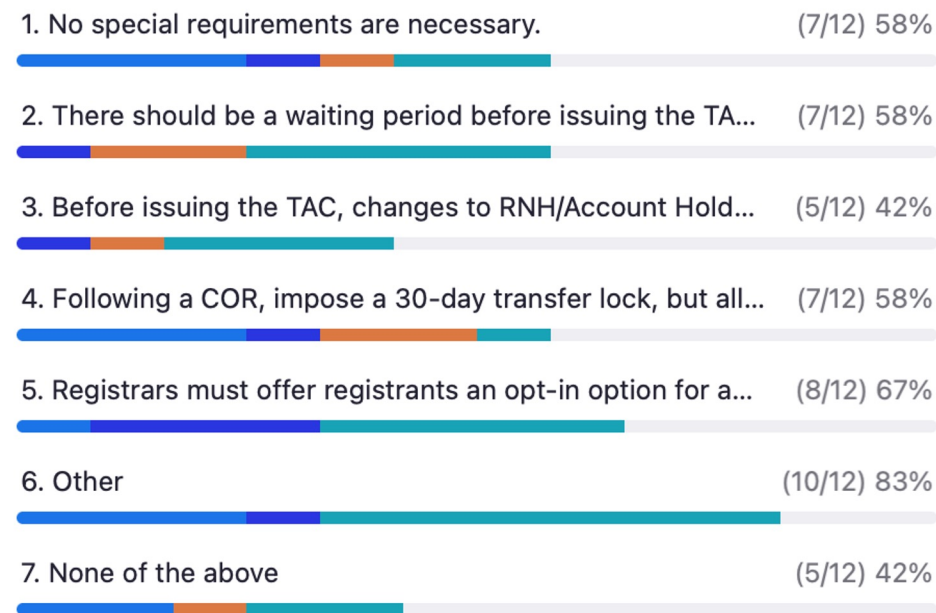
● First Choice ● Second Choice ● Third Choice

12 Dec-2b. Saved

Poll ended | 2 questions | 12 of 25 (48%) participated

1. Of the Options discussed thus far, which can you support as a minimum requirement for Registrars when a TAC request follows a completed COR? Select your first, second, and third choices (if applicable) (Rank Order)

12/12 (100%) answered



● First Choice ● Second Choice ● Third Choice ● n/a