

TPR WG Primer - Registrar Transfer Security

The Transfer Policy Review Working Group (TPR WG) currently proposes to eliminate the 60-day inter-registrar transfer lock that is triggered by a Change of Registrant (COR). The WG notes that this 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. Additionally, the WG notes that the preliminary recommendations it has developed thus far will provide enhanced security for Registrar transfers, eliminating the need for this 60-day lock.* These security-related preliminary recommendations (from TPR Group 1a and 2) are provided below for reference.

OVERVIEW (Group 1A):

- [Prelim Rec 2](#): Notification of Transfer Confirmation (formerly Losing FOA)
 - [Prelim Rec 3](#): Required TAC notification, instructions for taking action/invalidating TAC
 - [Prelim Rec xx](#): Required retention of TAC issuance records
 - [Prelim Rec 7](#): Minimum TAC composition requirements
 - [Prelim Rec 8, 10](#): Registry to verify TAC syntax and validity
 - [Prelim Rec 9](#): TAC generated only on RNH request, must be stored securely
 - [Prelim Rec 11](#): TAC must be “one time use”
 - [Prelim Rec 13](#): TAC Time To Live
 - [Prelim Rec 17](#): Required 30-day transfer restriction following Registrar transfer
 - [Prelim Rec 19](#): Registrar may deny transfer if evidence of fraud, DNS Security Threat, or reasonable concern that the transfer was not requested by the RNH.
- **Group 2 [Prelim Rec 1](#)**: Recommendation for GNSO Issue Report to explore (i) expanding TDRP to registrant filers and (ii) creating new standalone dispute resolution mechanism for registrants to challenge improper transfers, including compromised and stolen domain names.

Prelim Rec 2: The working group did not reach agreement to eliminate or substantially change the Obligations of the Registrar of Record described in Section I.A.3.1 - I.A.3.6 of the Transfer Policy. Therefore, the working group anticipates that these requirements will largely remain in place. The working group recommends the following minor modifications:

- **The term “*Transfer Confirmation*” MUST be used in place of “*Standardized Form of Authorization (FOA)*.”**
- The Transfer Confirmation language MUST include the **Gaining Registrar’s IANA ID and a link to ICANN-maintained webpage listing accredited Registrars and corresponding IANA IDs**. If available, the name of the Gaining Registrar MAY also be included.
- The Transfer Confirmation **MUST be provided in English** and the language of the registration agreement and may also be provided in other languages.

* The WG further notes that the introduction of data privacy laws, such as the GDPR, has also resulted in increased security for registrants and their data, namely in that registrant contact information is now often masked or redacted for privacy when searching in public Whois/RDAP lookups. The WG continues to develop recommendations for updating and improving the Change of Registrant policy.

- The timeframe of **five (5) calendar days specified in section I.A.3.5 of the policy MUST be expressed in both calendar days and hours**: “Failure by the Registrar of Record to respond within five (5) calendar days / 120 hours to a notification from the Registry regarding a transfer request will result in a default "approval" of the transfer.”

IN SHORT: UPDATED REGISTRAR REQUIREMENT

Prelim. Rec. 3: The working group recommends that the Registrar of Record **MUST send a “Notification of T[ransfer] A[uthorization] C[ode] Issuance”** to the RNH without undue delay but no later than 10 minutes after the Registrar of Record issues the TAC. For the purposes of sending the notification, the Registrar of Record **MUST** use contact information as it was in the registration data at the time of the TAC request.

- **MUST** be provided in English and language of registration agreement
- Notice **MUST** include:
 - Domain Name
 - **Explanation that the TAC will enable the transfer of the domain name to another registrar**
 - Date and Time TAC was issued and when it will expire
 - **Instructions on how to take action/invalidate the TAC**
 - If the TAC has not been issued via another method of communication, the communication will include the TAC

In short: NEW LOSING REGISTRAR NOTIFICATION REQUIREMENT

Prelim Rec. xx: The Registrar ***MUST retain all records pertaining to the provision of the TAC to a Registered Name Holder***, as well as all notifications sent per the requirements under the Transfer Policy. At a minimum, the records retained in accordance with this section ***MUST document the date/time, means, and contact(s) to whom the TAC and notifications are sent***. The Registrar **MUST** maintain these records for the shorter of 15 months or the longest period permitted by applicable law, and during such period, **MUST** provide such records to ICANN upon reasonable notice.

IN SHORT: NEW REQUIREMENT FOR REGISTRARS

Prelim Rec. 7: The working group recommends that the **minimum requirements for the composition of a TAC MUST be as specified in RFC 9154**, including all successor standards, modifications or additions thereto relating to Secure Authorization Information for Transfer. The requirement in section 4.1 of RFC 9154 regarding the minimum bits of entropy (i.e., 128 bits) should be a MUST in the policy until a future RFC approved as “Internet Standards” (as opposed to Informational or Experimental standards) through the applicable IETF processes updates the security recommendation.

IN SHORT: NEW REQUIREMENTS FOR TAC (Auth-Code)

Prelim Rec. 8: The working group recommends that, at the time that the TAC is stored in the Registry system, the **Registry MUST verify at the time the TAC meets the syntax requirements** specified in Preliminary Recommendation 7.

IN SHORT: NEW REQUIREMENT FOR REGISTRIES

Prelim Rec. 9: The working group recommends that:

9.1: The **TAC MUST only be generated by the Registrar of Record upon request by the RNH** or their designated representative.

IN SHORT: NEW REQUIREMENT FOR REGISTRARS

9.2: When the Registrar of Record sets the TAC at the Registry, **the Registry MUST store the TAC securely, at least according to the minimum standard set forth in RFC 9154** (or its successors).

IN SHORT: NEW REQUIREMENT FOR REGISTRIES

9.3: When the Registrar of Record issues the TAC to the RNH or their designated representative, **the Registrar of Record MUST also provide information about when the TAC will expire.**

IN SHORT: NEW REQUIREMENT FOR REGISTRARS

Prelim. Rec. 10: The working group recommends that the Transfer Policy include the following requirement: **“4. Registry Operator MUST verify that the "AuthInfo" code provided by the Gaining Registrar is valid in order to accept an inter-Registrar transfer request,”**

IN SHORT: CONFIRMATION OF CURRENT TEMP SPEC REQUIREMENT

Prelim. Rec. 11: The working group recommends that the TAC as created by the Registrar of Record according to Preliminary Recommendation 7, **MUST be “one-time use.”** In other words, it **MUST** be used no more than once per domain name. **The Registry Operator MUST reset the TAC to null when it accepts a valid TAC from the Gaining Registrar.**

IN SHORT: NEW REQUIREMENT FOR REGISTRIES

Prelim. Rec. 13: The working group recommends that:

13.1: A standard **Time to Live (TTL)** for the **TAC MUST be valid for 14 calendar days / 336 hours** from the time it is set at the Registry, enforced by the Registry.

13.2: The Registrar of Record **MAY reset the TAC to null prior to the end of the 14th calendar day / 336 hours by agreement by the Registrar of Record and the RNH.**

IN SHORT: NEW REGISTRY REQUIREMENT

Prelim. 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.

IN SHORT: TIMING CHANGE (60 days to 30 days)

Prelim. Rec. 19: The working group recommends revising the following reasons that the Registrar of Record **MAY deny a transfer request as follows:**

1. Evidence of **(a) fraud or (b) the domain presents an active DNS Security Threat as defined here: <https://www.icann.org/dns-security-threat>.**
2. **Reasonable concern that the transfer was not requested** by the Registered Name Holder.
3. Nonpayment for previous registration period (including **payment disputes** or credit card charge-backs) if the domain name is past its expiration date **at the current Registrar of Record** or for previous or current registration periods if the domain name has not yet expired.

IN SHORT: LANGUAGE CLARIFICATION

Group 2 (TDRP review)

Prelim. Rec. 1: The Working Group recommends the **GNSO request an Issues Report** or other suitable mechanism to further research and explore the pros and cons of (i) expanding the TDRP to registrant filers and (ii) **creating a new standalone dispute resolution mechanism for registrants who wish to challenge improper transfers, including compromised and stolen domain names.** In making this recommendation, the Working Group recognizes that if such an effort were ultimately adopted by the GNSO Council, this request could be resource-intensive and will require the Council to consider the appropriate timing and priority against other policy efforts.

IN SHORT: REQUEST TO GNSO