

May 15, 2015

Re: Proposed Implementation of GNSO PDP Recommendations on Inter-Registrar Transfer Policy (IRTP) Part C

Dear ICANN Staff and Members of the IRTP Part C Implementation Recommendation Team,

Thank you for your time and efforts in regards to the preparation of the IRTP-C Draft Implementation Plan. In regards to the proposed draft, the Registrar Stakeholder Group (RrSG) would like to bring attention to the following key notables:

First, the proposed implementation requirements are unworkable in a practical setting. The rigid implementation requirements will create a poor experience for registrants, and registrars must be given flexibility to implement the Plan as part of their best practices. For example, a more flexible implementation would allow a registrar to combine the registrant verification process with the change of registrant process to improve the registrant experience. The following language would allow Registrars flexibility in the implementation of this policy: "Registrars must obtain and record evidence of consent from both the previous and new Registrants." We ask that this proposed language be incorporated into the Plan in place of all strict implementation guidelines.

Second, as the Plan pertains the commercial use, the RrSG would like to set forth the following comments based on the Working Group Recommendations.

- 1.0 There is no defined response timeline in which the losing and gaining registrant is required to take action. In order for Registrar to provide commercially reasonable responses to the associated registrants, there should be a required timeline in which the applicable parties must respond.
- 2.0 The policy does not sufficient address change of registrants resulting from Court Order Actions, decisions by UDRP or other administrative proceedings, law enforcement actions, settlements, fraud or abuse. We recommend that this Plan be modified to explicitly state that consent is not required for change of registrant resulting from these scenarios.
- 3.0 The domain industry includes a vibrant and mature processes domain name aftermarket, and its commercial transactions would be negatively affected by this plan. We recommend that this Plan be modified to explicitly state that the policy only applies during the normal domain registration life cycle, and does not apply post-expiry, including the Auto Renew, Redemption, or Pending Delete grace periods, or any future post-expiry grace periods.

In closing, as Registrars, our organizations will be primarily responsible for implementing these changes, and we seek additional consultations with ICANN Staff to develop a plan that meets the Policy Recommendations in a manner that does not disrupt our industry, or result in a frustrating experience for our Registrant customers.

Sincerely,

Registrar Stakeholder Group