



15 May 2015

To: comments-irtp-c-30mar15@icann.org

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

The Endurance International Group, Inc. (“Endurance”), appreciates the opportunity to submit a public comment to the [Proposed Implementation of GNSO PDP Recommendations on Inter-Registrar Transfer Policy \(IRTP\) Part C](#). The Final Report on the Inter-Registrar Transfer Policy - Part C Policy Development Process (“[Final Report](#)”) and proposed [Transfer Policy](#) address complicated issues, and Endurance recognizes the enormous amount of effort put in by the working group.

Endurance has significant concerns about the functionality and sustainability of the proposed implementation contained in Section II of the Transfer Policy. The proposed implementation fails to consider all actions that trigger a change of registrant (e.g., UDRP decisions, court orders, post-expiry activities). In addition to creating operational problems, this failure may lead to situations in which adherence to the Transfer Policy would violate existing ICANN consensus policies and contractual requirements. The inability to enforce a UDRP decision or update Whois data to reflect a purchase on the domain name aftermarket is untenable.

In addition, the proposed implementation is convoluted and unfriendly to registrants. Instead of mandating additional verifications and rigid credential procedures that may serve to confuse registrants, it is far more appropriate to allow registrars to develop their own methods of obtaining and recording evidence of consent from both Prior and New Registrants as described in the Final Report. This will enable each registrar to develop a change of registrant process that is compatible with its current technology and personnel structure and (most importantly) supports the needs of its registrant customers.

Endurance recommends that Section II of the [Transfer Policy](#) be unilaterally rejected and that instead accredited registrars be directed to implement best practices consistent with the Final Report within an

appropriate timeline. In the alternative, a new Policy Development Process (“PDP”) should be initiated to investigate and develop adequate and sustainable inter-registrant transfer processes.

Thank you in advance for your consideration.

Sincerely,

The Endurance International Group, Inc.

[PDR Ltd.](#) | [Domain.com, LLC](#) | [Fastdomain Inc.](#) | [BigRock Solutions Ltd.](#) | [LaunchPad Inc.](#)