

**Results of IRTP Part C Data Gathering Survey – 21 April 2012**

<b>1. Name (optional)</b>			
66 Responses			
<b>2. Affiliation (optional)</b>			
38 Responses			
<b>3. Email / Phone (optional - in order to be able to follow up should there be further questions / clarifications. This information will not be made public.)</b>			
65 Responses			
<b>4. Are you a</b>			
Registrar		92	92%
Registry		7	7%
Registrant		5	5%
Aftermarket		2	2%
Other, please specify		2	2%
<b>5. How many domain names are under management of the entity you represent?</b>			
1-99		0	0%
100 - 999		3	3%
1,000 - 99,999		48	48%
100,000 - 499,999		24	24%
500,000 - 1,999,999		17	17%
2,000,000 +		7	7%
Other, please specify		1	1%
Total		100	100%

#Other, please specify

1	
2	I am a dealer too.

**Charter Question B**

<b>6. In your opinion, should a Form of Authorization (FOA) be time-limited?</b>			
Yes		70	71%
No		17	17%
No strong view either way		12	12%
Total		99	100%
42 Responses			

# Response

1	I say "yes" ONLY if the time limit more than sufficient for the registrant to respond and unlock the domain. This should be at least 30 days.
2	some transfers are started but never completed, but if the transfer is still "open" it could increase unintentional transfer
3	Without a limit, somebody could sell a domain name, and then a FOA from before the sale could still transfer.
4	In most of our personal experience, the FOA is provided and acted upon by the registrant within a few days. Never had one that wasn't acted upon.
5	In order to guarantee the domain name will not be malicious transfer
6	Of course, it should be. If it is not time-limited, in case that transfer confirmation Email is not replied, a registrar and a customer cannot help waiting endlessly.
7	In our opinion, a time-limit is not needed. We do not think that it would reduce a fraudulent transfer transactions. In addition, we do not have any bad experience with such transfer transactions.
8	The transfer process is complex enough to explain to registrants as it is today. Introducing another period among all the other periods observe with a transfer doesn't help. Either an FOA answer is valid unlimited, or it's valid only for immediate action, which means the gaining registrar has to initiate the transfer at the registry as soon as the FOA answer is received. If in the latter case a transfer request is canceled

	by the registry due to a transfer lock, then the whole transfer transaction fails and needs to be restarted including FOA. This is the way our registrar has implemented the process since many years, and it works without any problem for us and our clients.
9	We already have this in place. Our FOA is valid for 6 days only.
10	Fraudsters will soon realise that an FOA is time limited and work to accommodate the time limit. They will just get smarter and regular users penalised as a result.
11	Good security practice
12	would make the transfer process more secure.
13	It would give the registrant a higher level of secure to prevenet a 3rd party would have the possibility to transfer the domain.
14	We ask for FOA each time a transfer is started. If authcodes is wrong the transfer has to be restarted with new FOA and new authcode.
15	FOA's became meaingless when all registries moved to EPP - the *authority* to transfer a domain is now done by virtue of being supplied the EPP code and following the emails form the gaining and losing registrars
16	Because it is not a intention for eternity.
17	Provisions to time-limit FOAs should be implemented to avoid fraudulent transfers out.
18	FOAs could remain valid for the lesser of 60 days or until such time as there is a change to the registrant or administrative contact at which time the FOA should become invalid.
19	Consumer protection.
20	From a Gaining Registrar perspective, if the FOA is time-limited it would mean that additional time and effort would have to spent on generating and monitoring the new FOA. In addition, it is unlikely that the registrant or other registration information would be changed during this period of time given that Registrant has already indicated intention to transfer the domain name to a new registrar. Given the volume of domain names handled and raising registry costs and marginal profit margin earned, it does not make business sense for Gaining Registrars
21	We have had some limited feedback from our domain registrants that they get annoyed by continual requests for inbound transfers to other registrars that they made up to a year ago, where the other parties system sends continual automated requests.
22	Because it can reduces fraudulent transfer transaction
23	Limiting possibilities for fraud is a worthwhile goal

24	When a transfer fails, after a period of time the registrant forgets about it, or even thinks the request for transfer is cancelled. If via the FOA the domain name can still be transferred after a long period of time, that would be undesirable.
25	A domain lock is to prevent the transfer. There is no points in hanging on to a FOA waiting for the domain to unlock. This only opens a loophole for possible fraud.
26	To effectively protect registrant
27	Agree with "If a time limit on the validity of the FOA is implemented, that would potentially reduce a fraudulent transfer transaction."
28	to make sure that the domain name is already qualified to be transferred.
29	We can't wait for a long time
30	It will be more safety for every registrant
31	If the time decided, the following transfer process could implement smoothly
32	Because I think that registrar need the time for the verification, and also this will make margin for errors slighter.
33	no need time-limited
34	to avoid fraudelent actions.
35	Time limit such as 5 or 7 days would help prevent fraud.
36	to reduce the fraudulent transfers for which it is meant.
37	Even if those cases are extremely rare, any change to the IRTP that brings additional security to the registrants is always a good thing, as long as it's not penalizing for the registrars. Here, adding a time limit would be good, provided that it's not too short, to avoid unneeded noise / complication to the transfer process, and ultimately confusion to the registrant. Indeed, some customers have difficulties to unlock their own domains, because they notice after ordering the transfer that they have lost their credentials to their old registrar's customer interface, or that the person in charge of this is in holidays for 3 weeks, etc. This unlock process can take several weeks for legitimate reasons : we should not invalidate FOAs just because of this.
38	The registrant or other registration information can be changed anytime. Therefore an FOA should in my opinion not be used for more than one transfer process. Once the transfer cannot take place, i.e. because of a transfer lock, and has to be started again, a new FOA has to be obtained. To avoid this to happen to often, one can check the status of the name before sending the FOA.
39	if there are fraudulent seller issues, there would need to be a finite time period to determine that the issues actually existed (as a buyer, I would want to know when a transfer was going to occur by)
40	Operate up more trouble

41	because it doesn't make sense to have any pending status forever ,it must be limited by time to inforce the registrar to correct any missing data in specific period of time.
42	An FOA should be only used for a specific requirement and to be used within a specific time frame.

7. If you answered 'yes' to the previous question, what would be an appropriate time limit from your perspective? Please explain why.			
1 week		34	45%
30 days		18	24%
60 days		5	7%
90 days		3	4%
1 year		1	1%
Other, please specify		15	20%
Total		76	100%

Other, please specify

# Response

1	14 days
2	2 weeks
3	transfers should be completed quickly.
4	
5	By WDRP, A registrant must manage its contact correctly including its Email. As you know the fact, we could commnunicate each other in almost real time by Email. 5days willl be enough for this time limit.
6	Immediately.
7	2 weeks
8	15 days
9	to avoid longer time so that the registrant may find out the reason why a transfer is rejected and to fix the mistake so that the transfer process can be proceed soon
10	3 days
11	15 days
12	see above
13	2 weeks

14	10-14 days
15	N/A

<b>8. If you are a registrar, do you already time-limit the FOA yourself?</b>			
Yes		45	46%
No		43	44%
N/A - as I am not a registrar		6	6%
Other, please specify		5	5%
Total		99	100%

Other, please specify

# Response

1	based on client/circumstance
2	We do not yet register FOA-using extensions ourselves but are in the process of implementing this.
3	We send an FOA mail for every transfer process
4	We are not officially begin to register a domain name.
5	When any issue happens (for example name is locked), the process must be restarted.

<b>9. If you answered 'yes' to the previous question, please provide further details (what is the time-limit, why do you apply a time-limit, etc.)</b>	
48 Responses	

#Response

1	5 days
2	30 days. We believe this to address the issues raised in question 6.
3	We use a 2 week time limit so that we can easily return the customer's money if a transfer doesn't get approved. We found 1 week was too short for many legitimate transfers, and longer than 2 weeks just annoyed customers since we held money for

	too long in their views.
4	1 week
5	In order to prevent fraud the FOA email link is valid for 5 days. After this the customer may start the transfer again.
6	Limits are already time-based on automated EPP transfers. When transfer is denied, which normally takes 5 days, customer or losing registrar notifies us of update of domain status and transfer must be re-requested. Whenever a transfer is requested in our system, automatically a new FOA is sent out each time. Each request is considered a new transfer request.
7	The time limit is 30 days. It is assumed that if the admin contact has not confirmed the transfer in 30 days time that they have decided they do not wish to transfer the domain. We will cancel and refund the transfer if not confirmed in that time period.
8	6 days, simply a technical timeout, which we need to process transfers properly. A transfer without timeout is senseless.
9	5 days to confirm the transfer via email
10	We manually review each transfer as a final step and flag ones that "took a long time" for further review, although we'd usually allow it if the old registrar's WHOIS contact is unchanged.
11	time-limit:1 week, I need some time to deal with relevant things
12	5 days. By WDRP, A registrant must manage its contact correctly including its Email. As you know the fact, we could communicate each other in almost real time by Email. 5days will be enough for this time limit.
13	3 weeks, we check again after this time. Why? because it is sensible. It causes no issues, and our only feed back has been positive as it shows we care.
14	We do not have a time-limit but we provide an information in FOA that there is a limited time to respond and if not - the transfer request will be cancelled.
15	The time-limit is "realtime". As in my response above, we initiate the transfer request in the moment we receive a positive FOA answer, and in case this transfer fails, we require another FOA to restart the process.
16	6 days for security reason. Customer can relaunch the transfert process in its interface
17	5 calendar day limit We do not charge until FOAs are recieved and the transfer is sucessfully submitted to registry. We therefore need to limit the number of outstanding transfer requests that are in queue
18	10-15 days
19	1st step is to send out a pdf version of the FOA with a 7 day reminder. No final

	respond after 3 weeks results in an timeout.
20	To notify our resellers that a transfer did not proceed.
21	Depending on the TLD If it's not accepted the transfer out is cancelled after 15 days.
22	We wait for FOA approval for two weeks, if not approved we cancel the transfer. If approved, we initiate the transfer immediately.
23	we expire FOAs and EPPs after 7 days as people either use them immediately, or never use them at all, and they can always get another one instantly if needed
24	We basically deem the FOA to be effective for 30 days, and in particular case at the longest up to 60 days. We have set the time limit for a reason why transfer processes are done three times within the period. After the period, we have the customer to start way back in the transfer application.
25	It is up to Registry policy. Some TLDs will automatically transferred after such time passed. But some will not be transferred without approval during the such time.
26	It's done informally at present but the aim is to prevent fraudulent transfers out and protect the registrant.
27	N/A
28	7 days, consumer protection
29	We provide a one week window then notify with a rejection and instruction to contact us if they wish to re-open their request. Requests for re-open are handled on a case by case basis.
30	our time limit is 15 days, so that Registered Name Holder can proceed with next steps.
31	Our time limits are set to 3 months. If a transfer has not completed 3 months after the transfer was requested chances are that: 1. The registrar is not doing its job very well 2. The registrant might not want the transfer any more 3. The registrant might have forgotten that a transfer is pending
32	At the time of accepting the FOA online, the lock status is checked and if the domain is locked the FOA will NOT be accepted. The link to submit a FOA form will expire in 7 days.
33	15 buyiguochang , bimai zhucelang zhijian chansheng zhengyi
34	so no more extra time needed for transfer a domain
35	5 days. For have a correct live cycle of the transfer.
36	Our Time-limit is 5 working days.
37	15 days time-limit To avoid fraudulent actions to avoid having domain names in our db that we don't manage.



38	30 days.
39	5 days. Generally if the Registrant has not confirmed by then, they do not actually want to transfer.
40	five days
41	Unfinished transfer operations are currently cancelled after 6 months, the FOAs are invalidated at the same time. However, we are projecting to reduce this to 3 months.
42	1 week.
43	n/a
44	In my opinion (5 days) is enough because the registrant have already all the necessary information for transferring process , and the suggested time is enough to do so.
45	30 days
46	Transfer authorizations are good for 30 days. After this time frame, the transfer expires and the process needs to be restarted.
47	N/A
48	1 week

<b>10. Have you ever experienced a problem with a transfer because of the FOA not being time-limited?</b>			
Yes		12	13%
No		84	88%
Total		96	100%
15 Responses			

#Response

1	I do not think the lack of a time-limit is an issue but might be used by losing registrars to block transfers.
2	Some customer shared their email mailboxes within their companies. After the transfers was started they forgot to confirm it. After weeks another user of their company falsely cofirmed it and we had to stop the transfer manually.
3	In one case, the transferor had simply forgotten he initiated the transfer. In another one the details registered for the domain name to be transferred were changed and did not match the FOA ones.
4	the registrant details were changed between the timefram when the FOA has been sent and the time of transfer request.

5	But whois data of the domain in question might be changed in the meantime, so immediate transfer start after FOA is the only reasonable option.
6	No trouble, but we don't use an overdue FOA, and need a "fresh" FOA for initiating each transfer process of an domain name, and accept the FOA for re-request reason within certain period.
7	Registrant had forgotten about it
8	As a registry operator, we see FOAs only in conjunction with disputes filed under the TDRP.
9	Transfers that were done after a long time where clients had forgotten a transfer was still in progress. The clients were not prepared for the transfer any more, and were not prepared to transfer e-mail, database or site contents.
10	This does not apply to us. We do not accept the FOA if the domain is locked.
11	any transfers have always been done in a reasonable time period, but would want a limit if they weren't
12	because many times we have a problem in transferring some domain names , but we have no idea why this happens.
13	N/A: our FOAs are time limited
14	Not to my knowledge.
15	Problems of transfers from Godaddy

<b>11. Have you ever heard about problems being experienced by others because of the FOA not being time-limited?</b>			
Yes		4	4%
No		94	96%
Total		98	100%
6 Responses			

#Response

1	I do not think the lack of a time-limit is an issue but might be used by losing registrars to block transfers.
2	a sale of a domain, seller then transfers after payment is made.
3	As mentioned above, some of our customers have complained to us that they receive many requests for transfers they no longer want from other registrars.
4	Read some reports from Domain Name Wire

5	We don't discuss this with other registrars. We do have one example where a name was listed for sale with an auction service, but expired and was purchased on backorder. The new registrant was not aware of the auction listing, and the name sold and was transferred out of their account.
6	None known.

**12. If you answered 'yes' to either question 8 or 9, how often have such problems occurred in the past 12 months?**

20 Responses

#Response

1	zero.
2	Very rarely
3	Not often, not more than 3 times
4	questions 8 and 9 do not refer to any problems
5	Less than a dozen.
6	no exact figures. 1 - 2 a year.
7	The only recurring problems we see with transfers are 1. some registrars regularly giving out invalid EPP transfer codes 2. some registrars not giving our codes at all ( on average takes 7 attempts to get a valid code from Joker to transfer a domain away)
8	Not often. Just few times with dispute.
9	once or twice
10	N/A
11	Approx 1 complaint per 2 months.
12	once or twice
13	maybe 5-10 times on a portfolio of 500.000 domain names
14	n/a
15	n/a
16	NO
17	I cant determine when the domain has been really transferred unless I checked it manually.
18	We do not track these statistics, but we have cancelled transfers due to stale data in

	the FOA. Usually we restart the transfer process.
19	N/A
20	occasionally

<b>13. How many transfers do you typically handle in a 12-month period?</b>			
0 - 999		42	45%
1,000 - 9,999		26	27%
10,000 - 99,000		19	20%
100,000 +		8	9%
Total		95	100%

<b>14. Are there any downsides to time-limiting FOAs that you can think of?</b>			
Yes		30	31%
No		69	70%
Total		99	100%
39 Responses			

#Response

1	An excessively short time limit (i.e. anything less than 1 week) could be an unnecessary constraint for legitimate transfer requests.
2	Names are often locked or the whois contact is often not the registrant. sufficient time should be allowed for the registrant to make updates without requiring a new FOA.
3	Frustration for slow customers.
4	Confusion for domain owners and the fact too many registrars have cumbersome and confusing rules regarding locks they put on domains for things that the registrant isn't expecting (such as changing their WHOIS info)
5	May not be able to use an Auth/EPP transfer code right away. Issue always comes up that take priority over certain name transfers.
6	issues should be handled in a couple days
7	If the period is to short the customer may not confirm in time.
8	No, as far as I konw, FOA-Mails are already time limited, not? [...]you must respond to

	this message via one of the following methods (note if you do not respond by <date>
9	complications
10	Some effort to enforce the restriction in code to prevent staff mistakes.
11	In our opinion, it would make the transfer process more complicated.
12	You need an active timer in the system. This makes everything a little bit more complicated. The question is: why should we need a time limit?
13	Uncertainty whether a change to relevant whois information occurred in the meantime. This may lead to a situation where the person authorizing a transfer might not be the same person as registrant at the time the transfer is effective.
14	Adding further complications to the already complex transfer process for genuine end users, thus making transfers prohibitive to carry out and reducing competition in the market - contrary to the original aim of ICANN!
15	could impact fast transfer negatively
16	The time limit that is chosen will force all Registrars to time-limit their proprietary transfer processes, (billing etc.) and result in increased operating costs.
17	Doesn't leave room for unexpected complications.
18	The registrant would not understand the secure background of this measurement. For him/her it is just another bottleneck in the transfer proceeding.
19	We hope *universal* policy and implementation in gTLDs for users.
20	It can occur little issues with dispute.
21	Other registrars might not be aware of the time limit and not act in a timely manner.
22	If the time limit is too short and if the domain name happens to be on a clienttransferprohibited status (registrar applied transfer restriction) or servertransferprohibited status (registry applied transfer restriction) and the transferprohibited status is unable to be removed timely, the FOA could 'expire' prior to the transferprohibited status being successfully removed.
23	As long as the time limit is sufficient to correct errors such as registrar lock and billing issues.
24	* inefficiencies; * frustrated Registrants
25	If a registrant is slow to act they may be annoyed at having to re-submit.
26	Depending on the timelimit it could create situations where a FOA needs to be confirmed twice.
27	the reseller chain has to cope with it
28	It will be more work for the registrar when the FOA expires. They will have to issue it

	again, but that can be automated.
29	If a registrant is having difficulty with current registrar in terms of getting data updated or locked status updated.
30	We've already worked that way
31	Registrant might get upset that they have to resubmit if they did not approve in time
32	Confusion to the registrants, as detailed in Q6. Mitigation of this problem would be to have a not-too-narrow time limit.
33	If someone is making a transaction, they should be able to do so in a timely manner.
34	Operate up more troublesome, and feel not a function
35	because in some rare cases maybe there is a problem can't be time limited since it depends on other factors and unknown circumstances
36	Might create some minor inconveniences, but always safe to verify.
37	None known.
38	Gaining registrant may be legitimately unavailable to approve FOA within specified time frame, potentially creating further complications to the process, like restarting the transfer cycle.
39	If it avoid fraudulent transfers, I think it's good.

<b>15. Should there be a requirement for time-limiting FOAs, do you think that the effort involved in implementing such a requirement would be:</b>			
Minimal		33	33%
Some effort		40	40%
Sizable effort		19	19%
Other, please specify		8	8%
Total		100	100%

Other, please specify

1	see answer to number 9, it's not an issue for us.
2	We would not implement it. We would stick to requiring a fresh FOA for every transfer request that we initiate.
3	Depends on its purpose.
4	No idea what the level of effort would be.

5	Depends on ICANN implementation on this. May require extensive change to current standard of process.
6	I think it would vary from registrar to registrar but not sure what the effort itself would be. Would there be any changes imposed on registries related to this?
7	For regular registrar transfers, within the registry there is already a 5day time limit before a transfer request is automatically approved. However, this is independent of knowing if the transfer is an owner change. For FOAs, it could be done the same as long as the auth code was provided to the purchaser and the name was unlocked.
8	This would be a registrar effort.

<b>16. Are there any other considerations / thoughts that you think should be taken into account by the Working Group in relation to this issue?</b>	
38 Responses	

#Response

1	Please define any proposed time limits as calendar days and/or hours based on the UTC time of the request.
2	None
3	no
4	If a customer wants to transfer more than one domain name it may cause a hassle for them to confirm hundreds of FOA emails.
5	None that I can think of currently.
6	It should not be a fixed limit. It would be better to give the registrar a timeframe (5 to 60 days)
7	no
8	the name EPP code, Auth-Code secret code is confusing. The term should be changed to Domain Password or some term standard and easily understood by everybody
9	n/a
10	I think current policy which limit transfer confirmation within 5 days is good. Now no problem.
11	The current Transfer mechanism is completely wrong, existing registrars should push the domain to the new registrar upon request. Such is the way with several cctlds. But no you have to do transfers the most cockeyed, insecure, unreliable method you can dream up. If you want to stop fraudulent transfers, CHANGE THE MECHANISM to one which works, don't fiddle!. No doubt you will not take any notice of my

	comments as this is what I expect from a money driven organisation such as yourselves. Prove me wrong. All the best Bob Fox
12	no
13	If I were to recommend, you should impose a requirement that FOAs have no validity period, but need to be obtained for every transfer request being sent to a registry.
14	The FOA process being based on the parsing of the whois details information, unifying all whois database would tremendously simplify transfers between registrars.
15	It is always a challenge to find a way that is very useful for the registrant on one hand and with a higher level of security on the other hand.
16	No.
17	At some registries, even the authcode expires after 2-4 weeks, so there's no reason to keep the FOA decision for longer.
18	Do FOAs even have a purpose anymore when everything is/can be done electronically - what *problem* are we trying to solve ?
19	Implementation should be completed in concert with gTLD registries on their SRS in some form, or led registrars to be uniform and not-confused for users. If you decide its implementation, please control to avoid ill-assorted practical shape of "time-limiting" between registrars for users. My answer to question 15 is "Depends on the purpose". I hope its purpose will be more clearly. What fraud do you think?, and how do registrars avoid its(those) fraud(s) using "time-limited FOA" discussed this time? How effective would that be, compared with current situation?
20	Issue of registrar transfer with dispute.
21	No.
22	Registrant's the register their domain(s) for more than 1 year. We have client's that register their domain for 10 years at a time and probably wouldn't notice a domain theft unless the thief took down the website (if active). I believe this is problematic when considering time limits on the FOA.
23	The need for FOA should be eliminated for the following reasons: * harvesting the Transfer Contact email address is a sizable effort given that registry like Verisign is a "thin" registry and do not require Registrars to provide Registrant and Admin contacts information. The Gaining Registrar would then have to "harvest" the Transfer Contact's email from the respective registrar's whois which may not be working at times, adding to the inconvenience. With the increasing registry costs and having to cater to such requirements are additional costs on the Registrars; * If an FOA is required, the respective Registry or Registry Operator would be in a better position to generate the FOA and Registrant only need to respond to one FOA instead of two. Generating the FOA would be a simpler task for the Registry given that they



	have the access to the Transfer Contact email address.
24	NA
25	No comment
26	The registrant should pay certain fee for domain name tranfer.
27	No
28	no
29	No
30	no
31	Nope !
32	NO
33	no
34	no
35	Aside from time, are there other actions (e.g. Change of Control or Expiration/Rewnal) that should trigger a new FOA?
36	None that I can think of.
37	Problems caused by Godaddy's unique rules on correcting admin contact data.
38	No.

**Charter Question C**

<b>17. Have you experienced and/or are you aware of problems resulting from the use of proprietary IDs vs IANA IDs in the transfer process?</b>			
Yes		18	18%
No		82	82%
Total		100	100%
20 Responses			

#Response

1	Have heard complaints that looking up proprietary IDs can be burdensome.
2	Poll messages often contains the ID, but if you want to make sure who sended the

	request you cannot find out, because these registry IDs are not public. IANA IDs are therefore much better to check. Furthermore with the new gTLDs there are many new registries and it would be easier to implement the EPP handler if we do not have 1,000 different IDs.
3	Proprietary IDs are a big pain in the ass! We want to be able to identify the old registrar name in messages to customers, etc. (because half of them say "I don't know who my current registrar is"), and this would be vastly easier if the IDs were standardized in one place, not per-registry.
4	Half the time we can't easily check to see who the registrar is.
5	Because of individual IDs used by registry operators (e.g. PIR, Afiliias) it is complicated to identify the registrar. We experienced many situations where it took a lot of time to identify the proper registrar.
6	Very minor problems, in that we cannot consult a consistent database to identify and reference other registrars in registrant communication related to transfers.
7	It's not a big deal but it takes longer to find who is the gaining/losing registrar when we need to contact them.
8	Just unnecessary confusion. No big deal to work around, but why do we have two systems. Registries should be forced to use IANA system.
9	Difficult to know where domains are transferring away to in the case of fraudulent transfers
10	Researching and assignability is more difficult.
11	A mapping of IDs to registrar names is required, as we want to show the registrants the gaining and losing registrar name so he can verify if the request comes from the right registrar. A mapping of IANA IDs to registrar names exists, but I'm not sure if it exists for proprietary IDs.
12	No, although it does make the software to deal with each registry more complex than necessary
13	It requires additional work in use of proprietary IDs, to identify an coresponding registrar and maintain each list of all gTLD registries.
14	When we receive a transfer notification email from a certain registry, the name of the requesting registrar is not mentioned as the name of the the registrar itself but a kind of registry's code.
15	Adds burden to development.
16	this is particularly when dealing with resellers
17	Transfers with .BIZ show some crazy ID for our registrar. If I saw something like that myself, I would not trust the email for it.

18	I'm checking in the domain transferring process on the verification code, by sending email to the owner of the domain name. But I have a lack of information about both proprietary ID & IANA IDs
19	I am not aware of any problems as a result of using proprietary IDs.
20	Difficulty in knowing who they were, especially resellers.

<b>18. What are in your view the benefits of requiring registries to only use IANA IDs, or IANA IDs which may be combined with proprietary IDs?</b>	
71 Responses	

#Response

1	Registries have legitimate reasons to use proprietary IDs (for back-end purposes like billing), and should not be prohibited from continuing to do so.
2	Use both ID's the more information on has, the better.
3	Both, Registrars and Registrants would have a possibility to quickly lookup Registrar's contact-informations at internic.net. Creation of reports/trends/statistics on transfers to/from other Registrars will become easier (across several TLDs).
4	The benefit of using IANA ID's is the ability for the losing registrar to know who the gaining registrar is. Otherwise, the gaining registrar is "cloaked" by the registry. This could be a problem when a name is hijacked and the gaining registrar is not easily identified.
5	With proprietary IDs, it can take extra time to identify the registrar, but we don't feel the extra time is prohibitive. IANA IDs would streamline things a little bit.
6	Creates at a minimum a standard protocol seemingly making them easy to control.
7	should use only IANA IDs, makes for transparency.
8	Standardization, ease of development & integration, accuracy, simplification (less chance of mistakes / bugs), and less overhead.
9	unnecessary
10	see 17
11	Seems logical to keep the same ID for all registries and ICANN.
12	Using IANA IDs will make it simpler for registrars to identify where a domain transfer is going.
13	A lot of more work. And it seems senseless, because no enduser cares about IANA IDs.

14	Transparency.
15	Consistency and easy to indicate the Registrar
16	would be easier to contact the registries and identify our selves. When we send payments we have to describe our company id with that registrar, it would help to be able to use the IANA id
17	See above.
18	IANA ID is good because it is simple and unique.
19	not sure
20	Use them both, so we can see who they are.
21	It will be much easier and faster for us to identify the registrar.
22	no benefit
23	IANA IDs would allow us to build a consistent database to identify and store information on registrars to be used in communication to registrants.
24	It's a good idea.
25	Simplicity and making it easier for new registrar entrants to understand, thus increasing competition.
26	standardization
27	Not sizable if the whois standardization is not undertaken simultaneously.
28	Easier to quickly / accurately identify Registrars
29	Easier to recognize affiliate companies for registrars and avoid confusion.
30	It would provide us with more information.
31	Simplified management.
32	* Standardisation * being able to know who a domain is going to * simpler accounting - we multiple tld accreditations currently with affilias, and have to quote different refernces/registrar id's when contacting them - confusing both them and us
33	It is better to only use IANA IDs. It is easy to identify an registrar. Conversely, what is the benefits for use of proprietary IDs? I don't know. Sponsoring registrar is public information.
34	There are no benefits that I can foresee
35	A key benefit would be improved ease of operation as more and more TLDs are launched that may be operated by an increased number of registries. I would recommend that registries be given the option of providing only the IANA IDs or continuing to use their proprietary IDs so long as they also provide the IANA IDs.

36	The IANA IDs are more standardized. Less risk of error on company name - Inc. LLC, etc.
37	I don't see a benefit; only restraint.
38	Registrars only need to remember one IANA ID across the registries.
39	no opinion.
40	easy to identify who is the Registrar via only use IANA IDs.
41	The use of IANA ID's for ICANN as well as the registries would ensure a universal ID about which no confusion can exist.
42	For Registrars it would be much easier to match the IANA ID with the IANA list instead of doing the same with the proprietary IDs for every single Registry
43	The benefits are limited, since most registries we deal with are ccTLD registries, and they connect all sorts of registrars, not only ICANN accredited registrars.
44	In combination would be better because then it would be easier for registries that already have a good system in place not to have to change what they do except to carry the extra data.
45	The more transparency in the process, the better. The name of the gaining registrar should be also included.
46	No comment
47	No comment
48	easy to manipulate
49	by using IANA IDs, it will be benefit and easier to define the registrar if all registries use the same ID (IANA IDs)
50	will be more easier to do the transfer
51	No
52	Consistency especially in face of growing number of registries with new gTLD's.
53	The IANA IDs is the unique, so each party can clear who the Losing Registrar and the Gaining Registrar are.
54	We do not see an instant benefit.
55	N/A
56	We think that its more benefits using only IANA IDs, because they are publics and the others one not.
57	the resgitrants will be aware of the resgistrar.
58	clarify

59	not sure
60	Using IANA ID could remove any possible confusion of identification
61	One benefit I see would be to implement per-registrar workarounds/special behaviors in the transfer robots, if needed...
62	IANA ID's can at least be verified.
63	It is easy for using and identify.
64	I am no idea for this question
65	simplicity
66	This will simplify development & communication as gTLDs expand.
67	I do not see a benefit in using only IANA IDs. Using a combination of both IANA and proprietary IDs may work, but it will require some level of effort on the part of our registry.
68	The cohesion the IANA ID provides would lesson confusion for users, especially with registries expanding due to the new gTLD program.
69	IANA IDs which may be combined with proprietary IDs
70	Since only the ICANN Accredited Registrar is accountable for arbitrary acts.
71	The same ID everywhere. Easy to identify.

<b>19. Should there be a requirement to only use IANA IDs?</b>			
Yes		38	38%
No		31	31%
No strong view either way		31	31%
Total		100	100%
19 Responses			

<b>20. If you responded 'yes' to the previous question, do you think that the effort involved in implementing such a requirement is</b>			
Minimal		20	35%
Some effort		24	42%
Sizable effort		11	19%
Other, please specify		2	4%
Total		57	100%

Other, please specify

1	If registries that are currently using proprietary IDs are forced to use only IANA IDs, I anticipate that the level of effort to transition to using only the IANA ID will be significantly more sizable than allowing registries to add the IANA ID in addition to the proprietary ID.
2	

<b>21. Should there be a requirement to use IANA IDs, but with the possibility to combine this with existing proprietary IDs?</b>			
Yes		38	40%
No		57	60%
Total		95	100%
38 Responses			

#Response

1	This is the most sensible approach to (a) facilitate transfer requests while (b) not unreasonably burdening legacy systems.
2	Registries often require the registrar to remember their proprietary ID. this is a pain in the neck.
3	We do not feel that proprietary IDs have much impact on transfers.
4	Registrars should have the option to use their proprietary ID at least in a legacy capacity.
5	See 18
6	Only IANA IDs should be used
7	unnecessary
8	There are to many registries and to many upcoming registries.
9	If you're going to do it, it has to be done by everyone.
10	we never had a problem identifying a registrar
11	Don't see the benefit in having a secondary ID.
12	I don't understand why proprietary IDs exist at all. It's completely pointless.
13	see above
14	We prefer IANA IDs because the list is available in RADAR system or IANA website, but if IANA ID could be used in combination with proprietary ID that also will be ok.

15	Why would you want to have a combination. Just exasperates the problem you are trying to solve, by essentially creating a 3rd ID!
16	Unsure what the benefit of using both in combination would be vs. IANA only
17	What's the need of proprietary IDs anyway?
18	Prefer not the combine with anything proprietary
19	We don't need its proprietary IDs of each gTLDs.
20	The combination of proprietary IDs with IANA ID represents a larger development effort to implement than adding the IANA ID field in addition to the proprietary ID field.
21	No strong opinion.
22	I don't see the benefit of change if you allow both IANA IDs and proprtietary ID's.
23	no opinion.
24	If combine with existing proprietary IDs, effort involve would be beyond sizable and defeat the purpose of standardizing IANA IDs.
25	Combining both ID's would negate the positive force and perceived simplicity of a universally used IANA ID.
26	The registries could add it as an extra field, but they could also add more detailed registrar information (telephone numbers, email addresses) as extra fields, that would be much more useful in case of non-ICANN accredited registrars.
27	I think it is good to have the IANA ID in common but it should not mean that existing rqrmts should have to change.
28	to make it easier when tracing the ID
29	That they apply the same regulation as the ICANN.
30	not sure
31	Either keeping the current behavior (proprietary IDs) or changing it to only IANA IDs would both arguably make sense. But merging both IDs seems to be a strange and not very convincing compromise.
32	Pick one.
33	I am no idea for this question
34	This sounds confusing. Perhaps existing gTLD IDs can be "grandfathered" but new registries should use IANA IDs.
35	There should not be a requirement to use both IDs, however a plan to implement a gradual evolution toward using both IDs would be beneficial. Recognize that any change in the use of types of IDs for transfers will also drive change at registrars as



	well.
36	I see nothing wrong with using registry IDs in conjunction with IANA IDs.
37	as long as it is explicit
38	If an IANA ID is given, this should be the unique to work with.

<b>22. If you responded 'yes' to the previous question, do you think that the effort involved in implementing such a requirement is</b>			
Minimal		17	30%
Some effort		28	50%
Sizable effort		9	16%
Other, please specify		2	4%
Total		56	100%

Other, please specify

1	sizable due to adding lines of code to all our accreditations
2	N/A: Responded NO to Q21.

<b>23. What are the possible implications of requiring IANA IDs on ccTLD and/or gTLD environments, if any?</b>	
48 Responses	

#Response

1	ccTLDs will ignore any ICANN "mandate." Requiring publication in Whois of IANA IDs for the sponsoring registrar will require some coding, and potentially IETF support in the form of a RFC update.
2	None
3	greater efficiency and transparency would result.
4	Might force the ccTLD authorities to standardize more. Could be a benefit.
5	See 18
6	Only good things
7	none
8	The EPP handler config files has to be changed and also currently running transfers has to be finished. I cannot see a chance that ccTLD registries would use this because

	there are many of them which do not require an ICANN accreditation.
9	The same as for gTLDs, the time to change procedures & code.
10	Since not all "registrars" all ICANN accredited (there are EURID registrars, DENIC members ...) It's senseless to think about this.
11	Changing anything takes some effort. *shrug*
12	We need some code changes.
13	not sure
14	None
15	We do not see any implications.
16	Not a major issue at all.
17	not aware
18	An ease of the transfer process especially vis-a-vis domain portfolio consolidation.
19	You always have to build up an internal system that translates the IDs with the real name.
20	Not all ccTLD registrars are accredited at ICANN, so there are far more ccTLD registrars than ICANN registrars which are assigned IANA IDs. So you'd require all ccTLD operators to list their registrars at IANA.
21	As long as the value is unique there is no real implication
22	This issue should be delegated to the each registry of the ccTLD. All the company which directly purchase ccTLD from the ccTLD registry are not ICANN accredited registrars. Even if IANA IDs will be extended for its purpose in the future, it will become only complicated and confused.
23	Some ccTLDs will resist this and some won't and then there will be confusion
24	Some, if not all, ccTLDs do not require registrars to be ICANN accredited so there may be some registrars that are offering ccTLDs that do not have an IANA ID. Given this, most registries will have both proprietary ID and IANA ID fields in their systems.
25	gTLDs would be ok, but ccTLDs would be too problematic.
26	They may all have different requirements.
27	not at the moment
28	no opinion.
29	ccTLDs Registries have to operate Registry-Registrar model.
30	The current ID's and systems would need to be changed which can require a sizable effort.

31	none
32	Most ccTLD registries connect all sorts of registrars that do not have IANA ID's. So they would not be able to enforce the use of IANA id's on their registrars. Thus the use would be limited, and the ccTLDs will not happily follow the requirement.
33	Extra changes for those not already using that data but with a common basis for identifying registrars.
34	Only Function for Registrar Certification
35	No comment
36	if any issue emerges, registrants will know where to find help.
37	no
38	That if you an accredited registrar from which TLDs cc or gTLD are required to have an IANA ID.
39	Any registries are using their proprietary IDs, like Afiliias, PIR, and if that change, we must make change aswell in our systems.
40	not sure
41	not sure
42	Requiring IANA IDs on ccTLDs might be against some registries policies, that voluntarily use a pseudo-obfuscated ID, to avoid an easy identification between the losing and the gaining registrar.
43	No
44	good luck getting the cc's to agree
45	ccTLD systems do not have to follow ICANN rules. Therefore, there are some registrars not accredited by ICANN and as a result do not have an IANAID. That could cause large (and other) registrars to have two different identifiers if they are a registrar for both ccTLDs and nTLDs, which could cause confusion. A plan would need to be devised to eliminate this confusion. This plan would need to be coordinated and thus take time to implement.
46	None that are negative. Would make it easier for entities external to the registry to follow the bouncing ball.
47	My answers are based upon gTLDs only. ccTLDs are something quite different, probably not subject to this task force's charter.
48	Modify the authentication parts.

**24. Are there any other considerations / thoughts that you think should be taken into account by the Working Group in relation to this issue?**

30 Responses

#Response

1	The WG should consult with the IETF re: whether an RFC is really necessary. If so, that time consuming process should be undertaken ASAP.
2	None
3	no
4	Please keep in mind that more gTLDs are coming up and it should be easy for registrars to implement them. If not we could just skip these "problematic" ones.
5	Why should we change a running system? We never had any transfer which was done in error - never. The AuthInfo is the best way to protect domainnames from unauthorized transfers. DENIC uses AuthInfo without ANY foa mail or something like that. With 14 Mio domainnames and it seems to work perfect :-) Transfers under some ccTLDs like DENIC work in realtime. THIS would be a real improvement.
6	n/a
7	Of course, you should consider resellers. Many problems can be happen between registrar's reseller's transfer.
8	This won't work, see previous answers
9	no
10	not at this point in time
11	No
12	I wonder if a registrar could only use IANA IDs or use combined proprietary IDs based on registrar's choice on each gTLD registry service.
13	Seems a non-issue to me. Who does it cause confusion to?
14	No additional comments at this time.
15	not at the moment
16	no opinion.
17	Ensure Registry comply to ICANN new policy.
18	No comment
19	No comment

20	No
21	no
22	No
23	No
24	no
25	Time for migrate (if deemed necessary) & expense
26	No
27	no
28	We use internal registrars that we use to hold reserved domains and/or domains in violation of certain rules. These “registrars” do not have an IANAID. A plan would need to be devised as to how to handle this scenario.
29	I have included our most vexing issues, Godaddy's unique stand on the issue of correcting admin contact data. I causes a year delay in transfers. Godaddy charges higher fees for renewals than for original registrations, thus causing unjustified extra costs for the registrant.
30	No.