31 Mar 2011

IRTP-B PDP Working Group Draft Final Report
Please accept the following comments in response to the call for Public Comment regarding the Draft Final Report of the IRTP-B PDP Working Group.[1] Go Daddy reserves the right to future comments on this issue and our positions include, but are not necessarily limited to, the text herein.

Overview
As participants in the IRTP-B PDP, we are generally satisfied with the recommendations. However, many elements of these are still undefined in the Draft Final Report, so we welcome this opportunity to provide our thoughts in an effort to inform the Working Group.

Recommendation #1: Emergency Action Channel
To combat domain name hijacking and other forms of abuse, we support the establishment of an Emergency Action Channel. In order to ensure that this communication method is not abused, we recommend that its use be reserved for inter-registrar and ICANN-registrar communications, and only in situations where a timely response is critical. We recommend that ICANN Compliance test this channel periodically to ensure a non-automated response, and issue reports or warnings if registrars fail this test. Finally, we would like to see a reasonably short (24 hour) turnaround on Emergency Action messages, as many abuse / hijack scenarios are exacerbated by delayed action.

Recommendation #3: Thick WHOIS
We agree that, within the limited context of IRTP, requiring all new and existing gTLDs to adopt a "thick" WHOIS model would address many issues associated with transfers. However, the Working Group and GNSO community should consider the unintended consequences of requiring this change, particularly with large incumbent registries.

Recommendation #4: Change of Control Issues Report
We agree that there is no defined "change of control" or "change of registrant" procedure, and that the IRTP is often used for this function. Because this can present concerns regarding domain name security, we support further study and policy clarification or development in this area.

Recommendation #5: Transfer Notification
We support this recommendation, with the qualification that the transfer is not delayed or dependent upon any action on the part of the "losing" registrar.

Recommendation #6: Clarification of "Reason for Denial #6"
We support the proposed language in this recommendation, as a means of clarifying this "reason for denial" in a manner that supports registrar security practices.

Conclusion
The IRTP-B working group has been a long, but ultimately productive effort. Many of its recommendations will, in our opinion, significantly improve domain name security and consumer trust, while having a minimal impact on existing commercial activities. We look forward to concluding this PDP and moving on to IRTP-C.

Sincerely,
GoDaddy.com, Inc.

Tim Ruiz
Vice President
Corporate Development and Policy
GoDaddy.com, Inc.

1. http://icann.org/en/announcements/announcement-21feb11-en.htm