



22 Dec 2011

### **IRTP-C Policy Development Process (PDP)**

Please accept the following comments in response to the call for Public Comment regarding the Inter-Registrar Transfer Policy (IRTP) Part C Policy Development Process.<sup>1</sup> 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-C PDP, we welcome the opportunity to contribute to this Policy Development effort, and address the specific issues outlined in its Charter.

#### **Question A: Change of Control**

We recognize that there is an absence of policy in this area, and that transferring domain name registrations between Registrants is inconsistently handled by registrars and other service providers. This can create confusion for Registrants and vulnerability for their domain name registrations. The IRTP-C PDP Working Group should seek to strike a balance between domain security and domain portability.

#### **Question B: FOA Expiration**

ICANN policy is also unclear in this area, which can create confusion and unsecure domain names. We believe that practical limits on the effective term of a Form of Authorization should be considered. Sixty (60) days would be a reasonable time frame. Also, to inform its work we urge the IRTP-C Working Group to gather and consider scenarios in which a registrar receives an FOA from the Registrant but does not submit the transfer request to the Registry.

#### **Question C: IANA IDs**

While the use of proprietary ID numbers by gTLD Registries has not yet created any problems for our operations, we anticipate that this will become a greater burden for all registrars when hundreds of new gTLDs are active in the DNS. Therefore, we favor a move to uniformly employ IANA ID numbers in gTLD Registry systems to the extent practical.

#### **Conclusion**

We look forward to working collaboratively with other stakeholders within IRTP-C, and offering our thoughts on future comments.

Thank you,

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1. <http://www.icann.org/en/announcements/announcement-21nov11-en.htm>