



VeriSign Comments on the Initial Report on the Inter-Registrar Transfers Policy - Part A Policy Development Process

29 January 2009

Issue 1. Potential need for exchange of registrant email information between registrars

In a poll conducted of the gTLD Registry Operators, it should be noted that the majority of Registry Operators that maintain thick Whois information are contractually required to make the registrant e-mail address available publicly. Further discussion should occur to determine why this is a requirement for some thick Registry Operators but not all and it is not a requirement for any Registrars. Several options for making this information available (ie. modifications to EPP or via IRIS) have been outlined in the report but all would require significant time and expense to implement.

It is our opinion that the suggestion that future IRTP working groups should consider the appropriateness of a policy change that would prevent a registrant from reversing a transfer after it has been completed and authorized by the admin contact should not be put on the table for discussion as this could make it easier for a domain name to be hi-jacked. Of the transfer dispute cases that have been filed with VeriSign, the second most common ground on which a case is filed is the registrant did not authorize the transfer. (The most common ground is failure by the gaining registrar to provide the Form Of Authorization, or FOA, when requested). If the registrant no longer has the right to dispute a transfer initiated and authorized by the admin contact, it will make it much more difficult for the rightful holder of a domain name to recover a domain resulting in what could be lengthy and expensive court proceedings.

Issue 2. Potential need for including new forms of electronic authentication to verify transfer requests and avoid 'spoofing'

VeriSign contends that the AuthInfo code used to further authenticate the transfer of a domain name from one registrar to another appears to have helped in reducing the reported instances of fraudulent inter-registrar transfers. We do not dispute that additional means of electronic authentication may be helpful in further reducing both inter-registrar transfers, as well as internal transfers (or change of registrant). However, VeriSign supports the position that offering such additional security measures should be left up to the registrar to choose whether or not to provide as a part of its offering.

Issue 3. Consider whether the IRTP should include provisions for 'partial bulk transfers' between registrars

At least one Registry Operator and several registrars have implemented solutions / products to address requests for partial bulk transfers between registrars. VeriSign agrees that market solutions should be the preferred method for addressing this issue. Requiring all Registry Operators and registrars to go to the expense to implement a means to effect partial bulk transfers when their customer base may not fit the profile that would benefit from such a solution is not justified when this issue can be adequately addressed via market solutions.