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Internet Corporation for Assigned Names and Numbers
12025 Waterfront Drive, Suite 300
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comments-irtp-c-30mar15@icann.org

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

Dear ICANN Staff and Members of the IRTP Part C Implementation Recommendation Team:

Web.com Group, Inc. (“Web.com”) appreciates the time and effort taken to prepare the IRTP-C Draft Implementation Plan. In regards to the proposed draft, we are in support of the Registrar Stakeholder Group (RrSG) comments and do not support the proposed implementation requirements as currently written.

It should be noted that representatives of Web.com participated in the IRTP-Part C Working Group (the “Working Group”) to develop policy that would facilitate the ease of domain name transfers between registrants while at the same time helping to prevent domain name hijacking and unauthorized transfers.

Unfortunately, the policy changes that are now being proposed in the current policy draft are inconsistent with the recommendations of the Working Group. See Final Report of the Working Group (the “Report”) as found online at <http://gns0.icann.org/en/issues/irtp-c-final-report-09oct12-en.pdf>. Among other items, the Working Group made it clear that pre-approval and/or approval by proxy on the part of the prior registrant was acceptable, provided such pre-approvals are secured using a generally accepted method of authentication. However, this stipulation is noticeably absent from the proposed policy update and conflicts with the recommendations and intent of the Working Group. In addition, per the Report a change of registrant can be requested by the registrant or an authorized representative of the registrant, however, this language is noticeably absent from the current policy draft.

It is our belief that the proposed changes to the current policy would overly restrict the efficient sale and transfer of domain names between registrants, which in turn would hamper the established and thriving marketplace that exists for domain names. In addition, we oppose the notion that a Prior Registrant must transmit a Change of Registrant Credential to a New Registrant when that Prior Registrant has allowed the registration to expire and has no further

rights regarding the domain name. It is clear from the Report that the Working Group did not contemplate or recommend the implementation of a transfer approval process for the transfer of expired domain names.

In summary, we believe that some of the Working Group's recommendations have been lost in translation and are unworkable in a practical setting. Based on these inconsistencies we respectfully request that ICANN review the implementation of the Working Group's recommendations and look to revise the policy accordingly.

Sincerely,



Robert C. Wiegand
Senior Vice President, Domains
Web.com Group, Inc.