Change of Registrant Policy Issues Briefing Document

1. **Account Holder rights with respect to Change of Registrant (“COR”)**:

Currently, Account Holders can log into a customer account and update contact information without the registered name holder’s approval. In order to allow this business practice to continue, ICANN staff added section 3.4 of the COR policy. The implementation review team would like feedback on if this part of the policy should be deleted.

Some points to consider in relation to Account Holder rights:

* Allowing the account holder to change information without prior registrant confirmation beforehand could result in domain name hijacking
* This should be balanced with the desire to keep a seamless user experience.
1. **Definition of Prior Registrant with respect to privacy services**:

Currently, the definition of Prior Registrant in section 1(e) is: “the Registered Name Holder, as indicated in the Registrar’s or applicable registry’s publicly accessible Whois service, at the time a Change of Registrant is initiated.”

A member of the implementation review team mentioned that this could be difficult if the Prior Registrant is using a privacy service that is not sponsored or affiliated with the registrar of record. We would like comments on if this definition needs editing.

 3) **Minimum Standards for “Confirmation” of Change of Registrant (“COR"):**

Issue: Should registrars be required to use an FOA to confirm a COR? (See sections 3.1(b) and 3.1(c) of the attached COR policy.) Alternatively, ICANN could provide minimum requirements for what a COR confirmation should contain, and the registrar could be free to adopt its own form. An example of minimum standards is below:

COR authorization form for New Registrant:

* It must always be sent to and approved by the New Registrant exclusively before the COR is performed.
* One form can be used to address the COR involving one or more domain names.
* Can be presented in different languages but, at a minimum, in the language of the registration agreement.
* Minimum content:
	+ Explain the request that was received and list the domain(s) in question.
	+ Inform the new registrant that it must enter into a registration agreement with the Registrar (a link to the registration agreement itself can be provided)
	+ Inform the new registrant that, once the COR is completed, the domain name will not be able to be transferred to a different registrar for 60 days unless the Prior Registrant opted out of the 60-day lock.
	+ Inform the new registrant about its obligation to provide complete and accurate contact information and that an email will be sent to verify its email address. If this is not verified or the contact details are deemed to be inaccurate or incomplete, the domain name may be suspended until the information is verified.
	+ Instructions on how to approve or cancel the COR (example: URL)
	+ Inform that if the request is not confirmed by (x) days the COR will not proceed.
	+ Include an email address to contact registrar for questions.

COR authorization form for Prior Registrant:

* It must always be sent to and approved by the prior registrant exclusively before the COR is performed.
* One form can be used to address the COR involving one or more domain names.
* Can be presented in different languages but, at a minimum, in the language of the registration agreement.
* Minimum content:
	+ Explain the request that was received and list the domain(s) in question.
	+ Inform the Prior Registrant that, once the COR is completed, the domain name will not be able to be transferred for 60 days unless the Prior Registrant opted out of the 60-day inter-registrar lock.
	+ Instructions on how to approve or cancel the change of registrar (example: URL)
	+ Inform that if the request is not confirmed by (x) days the COR will not proceed.
	+ Include an email address to contact registrar for questions.