ICANN

4 May 2018

RE: Updated Proposal referring to the CPH TechOps Letter on GDPR Impact on Domain Name Transfers and Registrant Contact Changes sent on 8 March 2018

Tobias Sattler
Co-Chair, CPH TechOps
Vice Chair, RrSG

Dear Mr. Sattler,

Thank you for your letter on 1 May 2018. ICANN org agrees that preserving the ability to transfer domain names between registrars is critical to maintaining a positive experience for registrants, as well as upholding competition in the marketplace. ICANN org also considers it important to keep existing policies intact as much as possible while implementing the model, particularly when those policies provide protections for registrants.

Your letter proposes no longer requiring the gaining registrar to send a Form of Authorization (FOA) to the registrant. ICANN org believes the FOA provides a second factor of authentication of the Transfer Contact (referred to as the Registered Name Holder or the Administrative Contact in the IRTP) and we would like to explore keeping the FOA requirements. We would like to propose the following approach that would allow for this important second factor of authentication to remain in place.

In order to provide the gaining registrar with access to the Transfer Contact's email addresses, we propose that the authorization code be expanded to become the existing string plus the concatenation of the emails of the Registered Name Holder and the Administrative Contact with some separator to be defined (e.g., comma). For example, if the current authorization code for a given name is "`NBGj67kGiPRRnGrP`", the registrant email is "`registrant@example.com`", and the admin contact email is "`admin@example.com`", the new authorization code would be: "`NBGj67kGiPRRnGrP,registrant@example.com,admin@example.com`". To be clear, every time there is a change in the registrant or admin contact, the authorization code would need to be updated appropriately. The first part of the new authorization code should continue to be renewed or updated as per current registrar procedures.

This new form of authorization code would continue to allow the gaining registrar to obtain authorization from the Transfer Contact using the Initial Authorization for Registrar Transfer FOA by email . This way, the requester provides the email of the registrant and admin contact to the gaining registrar as part of the authorization code in a secure manner (via the registrar system). The authorization code, along with the two (2) required email addresses, cannot be successfully altered by an attacker who gained access to the code since the registry will verify the code. And the second form or verification (i.e., the FOA) will remain intact.

ICANN org recognizes that this proposal would require some implementation work on the registrar side and is subject to potential authorization code length limitations on the registry side.

We would appreciate your feasibility assessment of this ICANN org proposal, including whether it is implementable by 25 May 2018.

On a related note, we would like to request your input on an issue that ICANN org will face until such time that the development phase of the ICANN GDPR Interim Compliance Model is completed. As you may know ICANN org's Contractual Compliance team needs access to full registration data of specific domain names for compliance purposes, e.g., when handling transfer complaints. Currently, Contractual Compliance verifies registration data for proactive monitoring and to verify complaints to avoid sending invalid complaints to registrars and registries. Your input on how ICANN org's Contractual Compliance team can continue to obtain access to full registration data on specific cases during the development phase of the interim GDPR compliance model would be appreciated.

We look forward to reaching a mutually agreeable solution with the CPH TechOps group as soon as possible.

Best regards,

Akram Atallah
President, Global Domains Division