AT-LARGE ADVISORY
COMMITTEE

ALAC Statement

on the Inter-Registrar Transfer Policy Part B Working Group Proposed Final Report

Introduction
By the Staff of ICANN

Alan Greenberg, At-Large Advisory Committee (ALAC) liaison to the Generic Names Supporting Organization (GNSO), originally composed this statement.

A Wiki Workspace on the Statement of the ALAC on the Inter-Registrar Transfer Policy Part B Working Group Proposed Final Report was posted on 28 March. On that same day, a call for comments was sent to the ALAC-Announce mailing list.

After incorporating comments received, a second version (the present document) was created on 31 March 2011.

On 31 March 2011, Olivier Crépin-Leblond, Chair of the ALAC, requested the At-Large Staff to begin a five day ALAC vote on this statement.

The vote resulted in the ALAC endorsing the Statement with 12-0 votes and no abstentions. You may review the result independently under:
http://www.bigpulse.com/pollresults?code=16757hbBTXI7G5SjKHh4fSEJ

On 31 March 2011, the enclosed statement was submitted to the public comment for this issue, the relevant staff person, and the Board Secretary, with a note saying that the document was currently undergoing ALAC ratification.

On 13 April 2011, the At-Large Staff informed the person responsible for the Public Consultation process and the Board Secretary of the result of the vote.

[End of Introduction]

Statement of the ALAC on the Inter-Registrar Transfer Policy Part B Working Group Proposed Final Report

The original version of this document is the English text available at www.atlarge.icann.org/correspondence. Where a difference of interpretation exists or is perceived to exist between a non-English edition of this document and the original text, the original shall prevail

The ALAC supports all of the recommendations in the Inter-Registrar Transfer Policy Part B Working Group Proposed Final Report.

Individuals who register domain names are arguably the registrants who are most vulnerable to problems being addressed in this PDP. They often have little technical or domain-industry knowledge and are ill-prepared to deal with hijacking or the subtleties of domain name transfer.

Moreover, the ALAC has specific comments on two of the recommendations:

Recommendation 1.
The ALAC strongly supports the Emergency Action Channel. With regard to the specific questions, we offer the following comments on several of the questions:

<u>- Within what timeframe should a response be received after an issue has been raised through the Emergency Action Channel (for example, 24 hours - 3 days has been the range discussed by the WG)?</u>
As a prime use of the Emergency Action Channel is to reverse domain hijacking, we support as short a period as practical. The target should be well under 24 hours.

<u>- What qualifies as 'a response'? Is an auto-response sufficient?</u>
An automated response is not considered acceptable as it eliminates the intent of establishing communications between the registrars.

<u>- Should there be any consequences when a response is not received within the required timeframe?</u>
The Emergency Action Channel would have no meaning if there were not consequences to no response. Consequences should include a provision for the registry unilaterally reversing the transfer and possibly fines.

<u>- Is there a limited time following a transfer during which the Emergency Action Channel can be used?</u>
We support a reasonably long period but have no specific suggestion. We defer to the registrars who regularly must respond to hijacking as to what time period they find acceptable.

<u>Who is entitled to make use of the Emergency Action Channel?</u>
The Emergency Action Channel may be useful for a number of registrar issues. Those are likely outside the scope of this PDP, but other uses should not be precluded.

Recommendation 2.
The ALAC supports the concept of increased and improved registrant education. The ALAC, through its RALOs and ALSs can interact with users worldwide in ways that are both geographically close and culturally sensitive. Although it is not clear that the ALAC should be designated as the prime channel for such activities, The ALAC and At-Large may be considered one of the possible channels, factoring in the limited ICANN budget at its disposal for such activities and the limited control over volunteer time that it exercises.