

Registry Product improvements: .UK Standardisation

Inter-Registrar Transfer Process

The current .UK inter-registrar transfer process is not directly compatible with standard EPP, nor is it as secure as it could be.

.UK policy provides for a push process where either:

1. The existing registrar must ‘push’ the domain to a new registrar’s accreditation; or
2. The registrant must ‘push’ the domain to a new registrar’s accreditation via Nominet’s online services.

The gaining registrar has the ability to configure whether or not they need to authorise accepting the domain.

If a registrar accepts a domain onto their TAG/accreditation, then it is both possible and not uncommon that they cannot match up the incoming domain with an expected user in their system. This means the domain sits in-limbo at the registrar until the registrant identifies themselves by submitting the request to the new registrar. While not common, a third party can then contact the new registrar and may be able to intercept the domain in this scenario.

The alternative approach used in the basic EPP standard is a pull process, where the gaining registrar must submit a transfer request alongside an ‘auth code’. This is much like the process used in UK telecoms number transfers where your existing provider gives the customer a ‘porting authorisation code’ (PAC) and the new provider submits the PAC to request the telephone number. The security of this approach is greater as in order to submit the request they must have obtained the data from a user of their system and thus on completion of the transfer can link it to that correct account.

The current .UK inter-registrar transfer process does not amend the expiry date of a domain and is done at no cost, whereas the EPP standard can support a transfer with or without renewal. The usual implementation for gTLDs is to mandate a minimum of single year renewal on completion of transfer. The industry standard RFC5731 EPP Domain Name Mapping standard can support both approaches with a pull transfer mechanism.

Revised proposal for Inter-registrar Transfer approach:

Our proposal to change from a “push” transfer mechanism to a “pull” transfer mechanism was widely welcomed but some registrars raised legitimate concerns around our proposal. We have therefore updated our proposals to take account of this feedback and now propose as follows:

1. A registrant must ask the losing registrar to:
 - a. Set and provide them with a Transfer Authorisation Code. Any request to set a new Transfer Authorisation Code will also be considered to be a request to expire any existing transfer authorisation codes.

- b. Remove any registrar set transfer locks on their domain before requesting the gaining registrar to transfer the domain.
2. The losing registrar must:
 - a. Ensure authenticity of the request from their registrant.
 - b. Remove any transfer locks that the registrar has set on the domain when asked to do so unless the registrar can show the lock is in place to deal with an attempt to genuinely prevent domain name abuse and/or data quality issues.
 - c. Set a Transfer Authorisation Code at the registry via EPP or Web Domain Manager for the domain.
 - d. Provide the Transfer Authorisation Code to the registrant within [5-days].
 - e. Retain records, which must be made available to .UK compliance team in a dispute or audit, pertaining to the provision of the Transfer Authorisation Code for 15 months including:
 - i. Timestamp of Transfer Authorisation Code being set.
 - ii. Communication method of the Transfer Authorisation Code.
 - iii. Who Transfer Authorisation Code was provided to.
3. The registry will set a time to live on any Transfer Authorisation Code that is created. Only one transfer authorisation code may exist at a time on any one domain.
4. The registrant:
 - a. Must:
 - i. agree to the gaining registrars' terms and conditions of service including binding current Nominet terms of service.
 - ii. request the transfer of the domain by providing a valid Transfer Authorisation Code to the registrar.
 - b. may, if supported by the gaining registrar, request:
 - i. the optional renewal of the domain with transfer subject to the normal renewal rules.
 - ii. configuration changes for the domain to be put in place post-transfer.
5. The gaining registrar must:
 - a. bind the registrant to their and Nominet's terms and conditions and be able to demonstrate this to .UK compliance team.
 - b. submit a transfer request via EPP or Web Domain Manager to the registry including the Transfer Authorisation Code. Where the registrant has:
 - i. not requested renewal of the domain no renewal period should be submitted to the registry.
 - ii. requested renewal of the domain the period 1 to 10 years should be requested as per normal renewal rules.
6. The registry will upon receipt of a transfer request:
 - a. Verify that:
 - i. no locks exist on the domain to prevent transfer;
 - ii. the Transfer Authorisation Code for the domain is valid.
 - b. Provided verification is OK, move the domain immediately to the new registrar:
 - i. If the registrar did not request renewal the domain will transfer with no charge from the registry to the registrar.

- ii. If the registrar requested a renewal a renewal will be processed as part of the transfer.
- iii. Expire the Transfer Authorisation Code from the domain.

7. The registry will:

- a. if it has not received a transfer request in [15-days] from the time the Transfer Authorisation Code was set, expire the Transfer Authorisation Code.
- b. provide a backstop escalation service where the:
 - i. Registrant may raise a compliance case against the losing registrar for failure to remove a transfer lock and/or provide a Transfer Authorisation Code on request.
 - 1. The outcome of a compliance process could result in the registry taking action against the registrar, removing a lock and providing a Transfer Authorisation Code to the registrant.
 - ii. Registrar may Dispute an inter-registrar transfer which has completed on behalf of the registrant.
 - 1. A compliance process will be put in place to deal with cases where transfers may have been carried out without proper authorisation.
 - a. The outcome of a compliance process could result in the registry taking action to return the domain to a previous registrar.
 - b. It should be noted that in the process laid out we do not propose allowing registrars to prevent the transfer of domain names in their first 60 days after create, update or transfer in any form. Other than in terms of dealing with other breaches of registry policy a registrant should be free to move their domain between registrars at any time.

