

The NCSG appreciates the consideration given to issues of importance to the non-commercial community by the Transfer Policy Review Working Group. Even though not all our comments were fully accepted, we remain satisfied that the recommendations included in the final report streamline and facilitate the transfer processes. We look forward to learning how some of the challenging issues, such as registrant participation in transfer disputes and the standalone change of registrant data policy, will develop.

We know that the security and integrity of the transfer process remains a key issue for all stakeholders, including NCSG, and we welcome the working group's focus on this issue. We recognize that although security begins with registry account protection, this rightfully remains outside the scope of transfer policy. Nevertheless, as the world moves into a period of growing instability and increasing cybersecurity risks, the challenge to all registrants only grows, but especially for many of the civil society organizations that we represent. Therefore, we call on all stakeholders in the domain name management environment to strengthen cybersecurity protections, both internally by applying robust cybersecurity practices, and for their customers, by offering services like multi-factor authentication, and for public-facing actors like registrars to publicize how they are enhancing their security practices and offerings so registrants can make informed decisions when selecting a registrar that meets their needs.

Farzaneh Badii