

## **Frequently Asked Questions ICANN Ownership Change (OC) Process**

The ICANN Transfer Policy, valid as of December 1, 2016, regulates how Owner Changes can be processed for generic Top-Level Domains (gTLDs). An Owner Change (OC) is the process of changing the current Registrant of a gTLD domain to a new Registrant.

---

### **What is considered a gTLD Ownership Change in the context of the ICANN policy?**

The policy requires this process for any change to a Registrant's:

- First or Last name
- Organization name
- Email address

Therefore, EPAG considers every unique combination of those fields within EPAG's domain database as a Registrant. Once a Registrant has accepted EPAG to act as their Designated Agent, this consent is recorded for all domains where that combination of name or organization name, and Email is listed in the Registrant contact. The consent will also apply to cases where this combination is used in a Registrant contact that is about to become the new owner.

---

### **What fields will be locked in registrant handles of gTLD domains?**

For all contact handles that used as the registrant contact of a gTLD domain, the Name, Organization Name, and Email Address fields are locked against change and cannot be edited. If the same contact handle is used as a contact on another domain, those fields will be locked against change for that domain as well.

If you would like to update one of these three fields, you must first create a new handle with the correct data, or re-use an existing contact, and assign the new contact to the domain via a domain update or owner change.

For more information on how this affects gTLDs and country code Top-Level Domains (ccTLDs), please read the following sections further below.

- What effect will this policy have on gTLD registrar transfers?
  - What effect will this policy have on gTLD updates?
  - What effect will this policy have on ccTLDs?
- 

### **How will the new OC process work at EPAG?**

The process starts when a reseller submits a request to modify the Current Registrant of a gTLD domain name.

Owner Change Acceptance Request Emails: EPAG will check if the New Registrant has previously accepted EPAG to act as their Designated Agent (DA). If so, EPAG would auto-

approve the change for the New Registrant. If not, EPAG will send an email to the New Registrant, asking them:

- to approve or ignore the OC

EPAG will check if the Current Registrant has accepted EPAG to act as a DA. If that is the case, EPAG will auto-approve the change for the Current Registrant. If not, EPAG will send an email to the Current Registrant, asking them:

- to approve or ignore the OC, and
- opt out of the 60-day registrar transfer lock following the OC (optional).

Owner Change Notice Emails: After both approvals have been recorded, either by EPAG as the DA or by the Registrant directly, EPAG will complete the OC and send final confirmations to both Old and New Registrants which notify them about the completed OC process. Even if the email of the Old and New Registrant stays the same, the policy requires EPAG to send two separate emails. There is no further response required from Registrants at this point of the process.

---

### **What is a Designated Agent in the context of this policy?**

The policy allows Registrants to delegate giving their consent to an OC to a third-party on their behalf. The policy defines such third-party as a Designated Agent (DA):

*1.1.2 “Designated Agent” means an individual or entity that the Prior Registrant or New Registrant explicitly authorizes to approve a Change of Registrant on its behalf.*

In practical terms, this means that a Registrant can give authority to EPAG to confirm an OC. When EPAG is enabled to act as a Designated Agent, the Registrant will not need to receive or confirm an email in order for a change to proceed. Instead, EPAG will always auto-approve any OC.

In order to support this option, EPAG has made a change to its Terms and Conditions, which is the legal document that each and every Registrant has to accept in order to manage a domain name through EPAG. In this agreement, we have added the following language:

*21. TRANSFER OF OWNERSHIP. [...]Registrant explicitly authorizes EPAG to act as their Designated Agent, as stipulated by the ICANN Transfer Policy, to approve a Change of Registrant on their behalf.[...]*

**As a reseller, you are required to incorporate all provisions of the EPAG Terms and Conditions, which include this provision, in the agreement with your customer, so we advise that you update your agreement to the latest version. We may be required to provide evidence to ICANN that your customer has actually accepted those terms, including your customer’s timestamp and IP at the time acceptance. These must be provided promptly upon request.**

---

---

### **In what cases will EPAG be the Designated Agent?**

Registrants that have accepted EPAG's Terms and Conditions as of November 14, 2016 will have named EPAG to act as their Designated Agent on their behalf. Whenever this Registrant is listed as the domain owner contact of a gTLD, EPAG will be able to approve OCs on behalf of that Registrant. This will apply to domains that are newly registered or complete Registrant Verification as of November 14, 2016. This will also apply to any domains listing Registrants which have accepted EPAG's new Terms and Conditions as a part of one of the above processes for another domain.

---

### **What is the process if both the New and the Old Registrant have accepted EPAG as a Designated Agent?**

In this case, the entire process completes immediately without Registrant email approvals required. Both Old and New Registrants will receive a notification about the completed OC.

---

### **What happens if one of the Registrants does not approve?**

In case either the New or Old Registrant does not approve the OC within 10 days, the entire process is cancelled, and the Old Registrant details will stay in place.

---

### **What happens if the New Registrant email is invalid or not accessible?**

If the New Registrant cannot locate the confirmation email, you will have the opportunity to resend the confirmation request to the same email address. This option is available in your customer portal under ICANN Owner Change => View Owner Changes.

If the new Registrant informs you that their email address is not valid, you can cancel the OC in your customer portal under ICANN Owner Change => View Owner Changes. Then you can then resubmit the OC using a valid email address for the new Registrant.

---

### **What happens if the Current Registrant email is invalid or not accessible?**

If the Current Registrant cannot locate the confirmation email, you will have the opportunity to resend the confirmation request to the same email address. This option is available in your customer portal under ICANN Owner Change => View Owner Changes.

If the email address of the Current Registrant is invalid or no longer accessible, EPAG will request manual confirmation of the OC from the Current Registrant. In order to do so, the Current Registrant must first prove their identity using documentation. Then they must confirm the OC via another email address. The below documentation will be accepted in order to verify the identity of the Current Registrant:

- For a private person, a copy of their personal identification document which matches the Registrant Name, or

- For an organization, a signed letter on company letterhead, confirming the OC.

After the Current Registrant has proven their identity and confirmed the OC, EPAG will manually approve the OC on their behalf. After approval of the OC from the New Registrant is also received, the OC will be processed as described above.

Please note that whenever EPAG confirms the OC on behalf of the Current Registrant, the domain will automatically be locked for 60 days against registrar transfer.

---

### **What effect will this policy have on gTLD registrar transfers?**

The new policy explicitly prohibits a registrar transfer from being combined with an OC. This means that the Registrant's name, organization name, or email address can only be changed via the OC process after a domain has been transferred to EPAG.

As soon as the transfer has been completed at the registry and the domain is under the administration of EPAG, the system starts an update of the WHOIS record to the data provided in the transfer order. First, the Admin-c, Tech-c, Billing-c, DNS, and DNSSEC data will be updated to the details provided in the transfer order.

Next, EPAG will check whether the Name, Organization Name, or Email Address of the Current Registrant is different than the Registrant in the transfer request. If there is no difference, the Registrant will be updated to the details in the transfer request and the transfer order will be completed with a "transfer successful" message.

If there is a difference between the Name, Organization Name, or Email Address of the Current and New Registrants, an owner change process will be started and a pending message "owner change started" will be returned.

In order to complete the ownership change process, ICANN requires confirmation from both the Current and New Registrants. If one or both of the Registrants do not confirm the OC within 10 days, the Registrant will not be updated to the details listed in the transfer order and the success with reservations message "owner change failed after update" will be returned for the transfer order. The Old Registrant will remain listed on the domain.

If both Registrants confirm the owner change, the Registrant will be updated to the New Registrant listed in the transfer order and the transfer order will be completed successfully.

---

### **What effect will this policy have on gTLD updates?**

According to the ICANN Transfer Policy, any changes to First Name, Last Name, or Organization or Email Address fields for the Registrant of any gTLD must start an OC process. This means that the Registrant's Name, Organization Name, or Email Address can only be changed via the OC process, which will be automatically started as a part of the update order.

When EPAG receives an update order for a gTLD domain, we will first update the Admin-c, Tech-c, Billing-c, DNS, and DNSSEC data to the details provided in the update order. Next, EPAG will check whether the Name, Organization Name, or Email Address of the Current Registrant is different than the Registrant in the update request. If there is no difference, the

Registrant will be updated to the details in the update request and the update order will be completed with an “update successful” message.

If there is a difference between the Name, Organization Name, or Email Address of the Current and New Registrants, an OC process will be started and a pending message “owner change started” will be returned.

In order to complete the ownership change process, ICANN requires confirmation from both the Current and New Registrants. If one or both of the Registrants do not confirm the OC within 10 days, the Registrant will not be updated to the details listed in the update order and the success with reservations message “owner change failed after update” will be returned. The Old Registrant will remain listed on the domain.

If both Registrants confirm the owner change, the Registrant will be updated to the New Registrant listed in the update order and the update order will be completed with an “update successful” message.

---

### **Can we still submit an Update order to start an ownership change for a gTLD?**

Yes. You can still submit an Update command to trigger an OC for a gTLD. A Change Owner command will be accepted but is not required.

---

### **What effect will this policy have on country code Top-Level Domains (ccTLDs)?**

For all handles used as the Registrant contact of a gTLD domain, the Name, Organization Name, and Email Address fields are locked against change and cannot be edited. If this handle is used as a contact on another domain, those fields will be locked against change for that domain as well. This also applies if the Registrant handle of a gTLD domain handle is also used as the Registrant, Admin-c, Tech-c, Billing-c or Zone-c of a ccTLD domain.

Example 1: A ccTLD domain uses a handle for the registrant contact, which is already being used as the registrant contact of a gTLD domain. If you would like to update the email address of the registrant contact of the ccTLD domain, you can either choose an existing handle which lists the correct Name, Organization Name, and Email Address or you can create a new handle with the correct details. Then, you can assign the new handle to the Registrant contact of the ccTLD domain via either a domain update or owner change order. For ccTLDs that do not allow an owner change using an update order, an owner change order will be required.

Example 2: A ccTLD domain uses a handle for the Admin-c contact, which is already being used as the Registrant contact of a gTLD domain. If you would like to update the Name of the Admin-c contact of the ccTLD domain, you can either choose an existing handle which lists the correct Name, Organization Name, and Email Address or you can create a new handle with the correct details. Then, you can assign the new handle to the Admin-c contact of the ccTLD via a domain update order.

---

---

### **What if the Old Registrant wants to opt-out of the 60 day transfer lock?**

ICANN allows the Old Registrant (and only the Old Registrant) the option to opt-out of the 60 day transfer lock following an Ownership Change. This opt-out must be received before the Old Registrant approves the OC. In cases where EPAG approves an OC as the Designated Agent of the Old Registrant, the 60 day transfer lock will automatically be applied. If you would like to provide the Old Registrant with the option to opt-out of the 60 day transfer lock, then the Registrant must complete the OC approval process via email.

In order to notify EPAG to process the OC approval process via email, EPAG will be introducing an API flag, as well as a checkbox in the order form in the Customer Portal. The API Flag or checkbox can be used to trigger the email approval process. You can find more information on the API changes in the section titled “Are there changes to the API as a result of the ICANN OC policy?”

---

### **How do I bypass the Designated Agent and have the Registrant confirm the OC via the email approval process?**

This process is the same as for opting out of the 60 day transfer lock. In order to notify EPAG to process the OC approval process via email, EPAG will be introducing an API flag, as well as a checkbox in the order form in the Customer Portal. The API Flag or checkbox can be used to trigger the email approval process. You can find more information on the API changes in the section titled “Are there changes to the API as a result of the ICANN OC policy?”

---

### **Can we edit the emails that are sent to registrants?**

You have the option to customize the owner change approval and confirmation emails sent to Registrants as a part of the owner change process. If no changes are made to these settings, emails will be sent using the standard contact information for EPAG Domainservices GmbH.

Log into your client portal and under the menu “ICANN Owner Change” select “View / Edit Email templates”. Here you can edit the settings for the two email templates that are sent as a part of the owner change process.

#### Owner Change Acceptance Request:

These emails include a link with which the owner change can be approved. If EPAG is the Designated Agent for either the Old or the New Registrant, then that confirmation email will not be sent and the owner change will be automatically approved on behalf of that Registrant. If EPAG is the Designated Agent for both the Old and the New Registrants, neither email will be sent and the owner change will be processed immediately.

#### Owner Change Notice:

These emails are sent to the Old and New Registrants following every successful owner change process. The emails confirm that the owner change was successful and are sent to both Registrants regardless of whether EPAG approved as Designated Agent or not.

In each of the above templates, please proof the following fields:

- Language
  - Sender name
  - Sender address
  - Free text field in email body (English and German)
  - Free text field for Signature Line (English and German).
- 

### **Can I see which OCs are currently pending approval?**

Yes. Under the menu ICANN Owner Change -> Pending Owner Changes you can view the pending owner change processes for the domains you manage. For each domain name where a process is pending, you can see the Old and New Organization Name, Name, and Email Address. Additionally you can see the approval status for each Registrant, the last email that was sent, and the date the next email will be sent. Should you wish to resend an approval email, you can select the check box for the appropriate domain and then click “Resend last email for the selected entries”. Pending owner changes can be cancelled by selecting the appropriate domain and clicking “Reject selected owner changes.”

---

### **Can I cancel a pending OC?**

Yes. Pending owner changes can be cancelled by selecting the appropriate domain and clicking “Reject selected owner changes.”

---

### **Are there changes to the API as a result of the ICANN OC policy?**

Yes. A new flag and status callbacks have been introduced to our API.

#### 1h. Use standard IRTP-procedure:

This flag indicates whether an gTLD ownership change should bypass the Designated Agent (DA) process. When a positive value is included with an Update or Transfer order, the ownership change approval will be forced to go through email approval. This gives the Current Registrant the opportunity to opt-out of the 60 day transfer lock following the owner change. Information on using this flag can be found in our API Document under [Domain orders](#).

#### “Pending” callback codes:

The status callback codes 102071 and 108071 have been introduced in order to notify you that a transfer or update order for a gTLD domain contains an owner change. These codes indicate that an owner change process has been started. More information on these codes can be found under EPNIC API (Email and SRS) -> [Summary of status callback codes](#).

#### “Success with reservations” callback codes:

The success with reservations codes 302091 and 308091 have been introduced to notify you that an ownership change process has failed. These will be returned if the owner change

process times out after 10 days or if you actively cancel the owner change in your customer portal. More information can be found in our API Document under [Summary of status callback codes](#).

A description of the modified gTLD transfer and update process in our API, including callback codes, can be found in the API Document under [gTLD Transfers and Updates](#).

---