

The ICANN GNSO “Business Constituency”



ICANN Business Constituency (BC) Comment on

[PSR on Expired Domain Deletion and Expired Registration Recovery Policies](#)

30-Jun-2025

Background

This document provides input from the ICANN Business Constituency (BC), from the perspective of business users and registrants. We advocate for ICANN policy that:

1. promotes end-user confidence because it is a safe place to conduct business
2. is competitive in the supply of registry and registrar and related services
3. is technically stable, secure and reliable.

General Comment

The Business Constituency (BC) welcomes the opportunity to offer its input on the important subject: [PSR on Expired Domain Deletion and Expired Registration Recovery Policies](#)

The report comprehensively evaluates EDDP and ERRP policies and also evaluates how well these policies achieve their three core objectives including uniformity, clarity, and sufficient notice—by analyzing policy language, registrar practices, and compliance data from 2020 to early 2025. This PSR highlights inconsistencies between EDDP and ERRP definitions (especially around “deletion,” “auto-renew grace period,” and “expiration reminder notices”), points out that registrars often implement policies and fee disclosures non-uniformly (including varied treatment of auctions, DNS interruptions, and reseller responsibilities), and notes persistent failures in registrant notifications—over 50% of compliance cases involve missed reminders due to reseller or privacy/proxy oversight.

However, Business Constituency (BC) has one observation related to old domain warehousing practices prevalent in the domain industry.

Domain Warehousing occurs when registrars retain expired domains by renewing them themselves (instead of registrants), aiming to resell rather than release them. Better explanation can be found on [Wikipedia](#).

This issue impacts the strict compliance of EDDP and ERRP policies, since many domains never reach expiration/deletion status, thus limiting the open market access and raising concerns

about transparency and fair competition. Therefore, BC believes that the updated PSR may further review this warehousing issue, so that the GNSO Council can take these practices now or in future.

Conclusion:

The Business Constituency (BC) appreciates the work that has gone into this Policy Status Report and the opportunity to contribute to its review. We believe the PSR provides a strong foundation for evaluating the effectiveness of EDDP and ERRP policies. By addressing the noted inconsistencies and giving further consideration to domain warehousing practices, the ICANN community can enhance transparency, uniformity, and fairness within the domain name lifecycle. We encourage continued dialogue on these issues and remain committed to supporting policy outcomes that protect registrant rights and foster a competitive, well-regulated domain name ecosystem.

This comment was drafted by Hafiz Farooq and Marie Pattullo. It was approved in accordance with our [Charter](#).