ICANN
Transcription
EPDP Data Elements Workbook
Thursday, 24 January 2019 at 17:30 UTC

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Terri Agnew: Good morning, good afternoon and good evening and welcome to the EPDP Data Elements Workbook taking place on Thursday the 24th of January, 2019 at 1730 UTC for two hours.

In the interest of time, there will be no roll call. If you are only the audio bridge, could you please let yourselves be known now? Hearing no one, I would like to remind all to please state your name before speaking for recording purposes and to please keep your phones and microphones on mute when not speaking to avoid any background noise.

With this I'll turn it back over to Berry Cobb. Please begin.

Berry Cobb: Thank you, Terri. Berry Cobb for the record. And welcome, all, to those who joined. Unfortunately Alan couldn't make today's call but he did say that he'll be available for Tuesday's. Secondarily, we are still waiting on Stephanie to join so hopefully she'll join us in a few minutes.

Before we get started, I thought I would just quickly talk about what we - was discussed in today's plenary call. And I think it's pretty aware in that the discussions that are taking place there have direct implications to what this

small team is tasked with do - in terms of testing the logic and adjusting the workbooks appropriately. But I thought I'd just kind of reiterate again about how we got to Recommendations 4 and 5. And most specifically, what you see in Adobe Connect room again is an older version of the consolidated processing activities of the data elements tables.

And so what I meant by that, Page 1 is specifically around the collection of data elements by the registrar because up to the initial report we were working under the assumption that whatever data was collected from a registrar, some subset of that data, or all of it regardless, would be transferred to the registry, hence is really what Page 2 is about, the transfer of data elements from registrar to registry. And then thirdly, which, you know, can be further along in our discussions is, you know, the disclosure that may occur. And again, this is really from a rolled up perspective and not indicative of any individual purpose but a compilation of the seven purposes.

And so I'll point out again on the far right column, there is a logic column, whether it's based on collection or transfer of disclosure. And at a bare minimum if a data element is optional, and again we're still working through that definition, it would trigger the logic that it should be included in this aggregate view of what would be collected or transferred. And so if you could imagine visually if we were to filter out this Page 1 where anything that showed as red, that became the table that is listed under Recommendation 4 which is the collection of data elements by a registrar. And specifically Recommendation 5 is the transfer of that data - of those data elements from the registrar to the registry.

So why am I bringing this up? Because, as we are getting ready to review the skeleton document I sent around yesterday, which is really just a proposal for our steps forward, we don't have to go that route, but in understanding some of the logic discussion especially around Purpose 1(a) and 1(b), it sounds like to more appropriately and adequately document the processing activities as

this small group sees it, is that it could substantially change how Recommendations 4 and 5 look.

And it also does tie in with a fair amount of the input that was received by ICANN Org, especially from Francisco, but if my assumption is correct about our change in logic, for example, Recommendation 4 could actually have two parts; one of it being data that is collected from a registrar or B, data that is collected by a registry. And then of course we need to have a more complex discussion about what data is actually passed between those two parties which is the essence of Recommendation 5 which could again substantially change if I'm understanding our potential logic path that we've been talking about.

So I'm just going to briefly talk about the skeleton and what I was hoping to accomplish by this approach. As I mentioned in my email, it was too difficult to try to go through the actual workbooks themselves and so what I attempted to do here, and I'm un-syncing this for you to scroll, is to really just get down to the bare basics, or the skeleton, that defines the logic of our workbooks.

And as noted, you know, our task is not to debate the specifics of a purpose statement per se, but more to the point is to properly define our processing activities by which a purpose is governing that. And then of course down the road we'll, you know, or next up we would assign a possible responsible party and then thirdly kind of outside of the scope for us or certainly until we get some legal advice about 6.1(b) or 6.1(f), the lawful basis would start to be populated.

So my goal of doing this again, this is really just a throwaway document so that we could try to step through each of the purposes and their subsequent processing activities so that we can properly define each processing activity such that I can go make those changes into our Annex D document. And once that's done, I should say, not only the processing activities but possible the designations of the responsible party for that processing activity I can

make those changes in the document structurally first by adding or deleting rows in the processing activity section of the workbook and then subsequently adjusting the columns that represent each one of the processing activities when we get into the detail of whether a data element is required or optional or not collected etcetera.

The last thing I'll kind of say about this, Purpose 1a and 1b on Page 1 of this document is a - my best guess at what the registries are proposing in terms of the split. I did pick up on the fact that Alan was adamant that in terms of data is not necessarily transferred to the registry but it is collected. And that may need - it's probably more a nuance of trying to think of these processing activities in terms of GDPR versus what may or may not happen from a technical perspective. And I think ultimately, you know, that's one of our primary goals in trying to…

Terri Agnew: And Berry, this is Terri. It appears your audio has dropped. And we're checking on Berry's audio. It'll be one moment.

Berry Cobb: Hi, can you hear me now?

Terri Agnew: Yes, you're back.

Berry Cobb: Sorry, my computer just blacked out on me and I'm quite upset by that because it's a pretty darn new computer. So I lost my train of thought. But at any rate, again, to, you know, whatever logic process change we come up with I'm hopeful that at least by today's call we can have an understanding of this general structure so that we can move on down into more details. So I'll stop there and Marc, please, state what you need to. Thanks.

Marc Anderson: Thanks, Berry. It's Marc. I raised my hand because you brought up - you brought up the fact, you know, or I guess you pointed out that there's a slightly different discussion when you're talking about these activities as sort of a legal construct versus sort of the technical implementation of them. And if

I'm, you know, if I'm being, you know, if I'm trying to be somewhat transparent here, part of the reason why it's taking registries so long to get the workbooks back out to everyone is that some of us were discussing them as sort of a technical step and some of us were speaking of them in the legal sense, which are subtly different.

And so it took us a while to realize we weren't exactly using the same words in the same way. And once we realized that we had a little bit of an easier conversation. But, you know, you made that point just now and I think it's important, you know, for us when we're going through this because we need to make sure we're in agreement on which we're talking about.

And then also I want to pass along a request from Alan who again sends his apologies for not being able to make this call, but when we're talking about disclosure activities, you know, and maybe being a little more specific, you know, this disclosure to maybe a well versed privacy lawyer might think of disclosure in privacy terms; whereas disclosure as it's intended in the workbooks is really about the publication in an RDS-like solution.

And so I guess, you know, the request from Alan is to sort of clarify in the workbooks when you talk about disclosure what you're talking about is disclosure via publication in an RDS solution and so just to pass along a request there to make that a little clearer to somebody looking at the workbooks, and then also just maybe jumping on what you said to maybe give a cautionary tale to everybody to make sure you're clear on whether you're taking about the sort of the technical functions or the legal functions. Thank you.

Berry Cobb: Thank you, Marc. And yes, I mean, I guess that is the challenge that we're presented with because when we do step down to the actual data elements level that's where the technical (unintelligible) with the policy or the legal definition that we're - I shouldn't say "legal definition" but the documentation of our thought process in terms of how these processing activities could be

considered legally compliant with GDPR. And I'm not sure how we avoid that or, you know, if you have a transcript of your registry conversations that would help clear up the conversation or the differences between the two that would be great, otherwise we, you know, we can have it here again.

So I guess in terms of like trying to, you know, to move forward here, just from again a high level perspective, and we'll come to disclosure in a little bit, you know, and for sure that term is - probably serves a few different masters in that in some ways just like a collection can be confused as a transfer, the same applies as to a transfer is a transfer, also a disclosure. And, you know, a common example for me at least that we have loaded in our workbooks today is an escrow deposit by a contracted party to the provider is viewed as a transfer of data and it's only disclosed in the event that that data is then either passed along to a gaining registrar or a gaining registry.

But I recall Alan also making that point probably I think back in Barcelona about how that's confused. And so if we can't figure that out about how we're best going to document it here, then this entire workbook document will fail us down the road. So I think I'm looking for suggestions or, you know, help us define a path on how we should be documenting these processing activities so that we can continue onto the next leg of work.

And so I'm going to skip past Purpose 1a and 1b and just move over down onto Page 2 which is Purpose 2. And again, if I'm misunderstanding or misrepresenting the contracted parties' view about how this would be done, what you'll notice is a possible change is that before we just had collection of registration data elements as the first processing activity and the responsible party was typically the registrar and then we bumped it down to the transfer of that data. But again, yesterday as Alan had mentioned, we're also talking about collection of registration data by the registry and it's not being titled as a transfer of that data but a processing activity of collection.

But then I also asked the question, well, in terms of what occurs in reality from a technical perspective today, doing a Whois query against the registrar versus the registry, are some of these fields like registry domain ID still being transferred back down to the registrar? Or conversely, in effect if there are some data elements that are generated at the registrar, are those still technically transferred from the registrar to the registry? And so I'll say it again, we need to nail down - I don't think any one particular way is going to be 100% right, we just need to find the one that satisfies our needs the best in terms of trying to adequately document this for future use and reference from our potential consensus policy recommendations.

And please go ahead, Marc.

Marc Anderson: Thanks, Berry. It's Marc. I mean, I think you're hitting the nail on the head, you know, as far as exactly what, you know, what the task of our group is. From registry perspective, you know, we, you know, we're looking to, you know, to define the minimum, you know, the minimum amount necessary to perform the service and make sure that there's, you know, for each of these activities there's a defined purpose and appropriate legal basis associated with it.

And then also that, you know, that there's nothing - and we also want to make sure it's clear, and I think it has been so far so it's not a concern but just restating this we want to make sure that there shouldn't be anything preventing, you know, registries and registrars from, you know, mandating or requiring additional data, you know, require, you know, provided that they provide the justification for that appropriate for their particular business models.

And, you know, I think the, you know, the easy example there is, you know, at the - I'll pick on registrars but at the registrar level they may require additional data beyond what we're specifying here in order to bill their customers. You know, and I think we've made it very clear so far that, you know, we

anticipate that there's additional data there but that's done, you know, at the direction of the registrars and, you know, with them justifying that and in order for them, you know, establish and create their business relationship with the customers.

So I think you know, Sarah's summing it up nicely in chat what, "What we do here should not prevent other data processing done separately or independently." I think what we're trying to accomplish here is lay out the, you know, the minimum baseline that is required by ICANN in this you know, in this consensus policy.

Berry Cobb: Right. Thank you, Marc. And just to respond to your point and Sarah's point, and I don't think anybody disputes you know, what we're doing here would prevent any other processing activities that a contracted party would define on their own. Our scope here is strictly about what would eventually become a consensus policy by which ICANN could enforce via its contracts down the road.

So Alex, please go ahead.

Alex Deacon: Yes thanks. Yes so I agree with Sarah's comment in the chat that if we need to nail down definitions we should do that. But my - the comment I wanted to make was, you know, you instructed us to look at Purpose 2 like this little table in Purpose 2. And I think we have to look at this in the bigger kind of, you know, we need to take a higher level view of this specific purpose if we're looking at this now. It seems to me like processing - for Purpose 2, processing activity collection by the registrar, that should just refer to Purpose 1, right? Because I think that's really what we're talking about; perhaps even collection by the registry. Transfer from registry to registrar, is that applicable? I guess, you know, to this purpose? I don't know.

The only processing activity that's directly applicable to Purpose 2 is whichever processing - processing activity enables responses to lawful data

disclosure requests which would be I guess disclosure to Internet users. So I guess I'm trying to wrap my head around, you know, can we simplify here in some cases? Or is it necessary to repeat processing activities for - to be complete? I guess it's more of a question than a statement. Again I'm still trying to wrap my head around kind of ultimately what we need to deliver back to the group in the next few days I guess.

Berry Cobb: Thank you, Alex. And I'll just add to this that the approach taken thus far, and again, not a die in the ditch kind of person about it, but the original intent of the workbook was to review the purposes in isolation. And so yes, Purpose 1 does have a processing activity defined for the collection of registration data but when we're actually reviewing Purpose 2, it needs to - my understanding is that it should be viewed in isolation of its purpose and its subsequent processing activities as though no other purpose existed. And so to get down to - you're correct - the purpose statement is strictly about disclosure but what if our other six purposes never defined that the registrant name should be collected?

And this is strictly a hypothetical and it's probably a bad example. But in terms of meeting the intent of this purpose statement, suppose, you know, supposedly it has been confirmed that registrant name should be collected or it needs to be disclosed so it should be first, collected, and somewhere deposited in a place that it can be disclosed. And again, that was the intent of the consolidated workbooks. Sarah, please go ahead.

Sarah Wyld: Yes, this is Sarah. So it seems to me like we could start with defining our terms, collection, transfer, disclosure, I think that wouldn't hurt. I'm kind of surprised we haven't done that already somewhere within the EPDP and I looked in the GDPR and it doesn't seem to be defined there either. I think might be a good idea to get us all on the same page. But to speak to Alex's point as to why do we - or do we actually have to look at each purpose, I do think that's important because we have to define all the purposes for which we process data and then stick only to those purposes. If there's some other

purpose for processing data we can't use that unless we have gone through defining it, figuring out which data is required and disclosing that to the data subject.

So I would suggest that we do need to look at each type of processing activity within each purpose statement. And maybe it's just time to, you know, (unintelligible). Thomas xls, is that different than Rickert? Must be. So sorry, chat distracted me. But why don't we just jump into Purpose 2 and talk about each of the rows and whether we agree with them or need to modify them? Is that not what we're doing here?

Berry Cobb: Thank you, Sarah. That's what I was hoping we could do and start to adjust from there. And sorry for my cryptic - so, you know, how we got to the workbooks was originally an xls or a spreadsheet - an Excel spreadsheet created by Thomas and Farzaneh that was quite a document to consume. And so we slimmed down and made thinner versions of that that eventually became the workbooks.

And as I noted that the, you know, the four primary processing activities that we've been working from were essentially individual tabs in that original Excel spreadsheet. And so version 1 of the workbook was pretty simple but I quickly realized that we had multiple processing activities, we had processing activities that would apply to a registry and not to a registrar, and we ran out of room in terms of how we would account for the specific data elements that were being designated for a specific processing activity. And so now that's why the data elements table has shifted down so that we could have more room to properly tag those.

Marc, please go ahead.

Marc Anderson: Thanks, Berry. Marc Anderson. Sarah and Alex covered much of what I originally raised my hand for so I won't repeat that. You know, I agree with what Alex and Sarah said. I don't think either of their points are mutually

exclusive, I think they're rather supportive. And, you know, I think they both suggest, you know, and you suggested we sort of jump in and start reviewing this Purpose 2 line by line so I'd just suggest yes, let's just get to it.

Berry Cobb: All right, thank you, Marc. And Sarah, one more?

Sarah Wyld: Thank you. Total agreement. So in the spirit of just jumping right into it I would say Purpose 2 as it is presented here looks very sensible to me. As a registrar, I do collect data for this purpose and I agree that transfer from registrar to registry is not required. I wonder if that processing activity is written because it says from registry to registrar. You see that? I just noticed that.

Berry Cobb: Right. So I'm going to - it'll help to scroll back up to the Purpose 1a statement and this is specifically why I kind of have the question here because again, the way Woods had positioned what they were doing for Purpose 1a or 1b is that it didn't make sense to him the registrar transfer data to the registry but that the registry was actually collecting that data. And again, that's probably more a legal-ese use of the term "collection" from a GDPR perspective than technically what happens at the registrar or registry.

So the proposed logic, again, based on my limited understanding is that if we're not longer really documenting that data elements are transferred from a registrar to a registry, then there's some subset of data that a registry will generate but somehow those specific data elements that are generated at a registry do they actually wind up back down to the registrar? And again, the two examples are the domain - registry domain ID as well as the registry registrant ID. And my understanding is the disclosure of those two particular fields are helpful out in the DNS and maybe Trang can speak to that; it's not important now.

But how would those two particular data elements actually get back down to the registrar? Or do they even? And so that's why I reworded kind of task 3 or

Processing Activity Number 3 saying registry to registrar based on this change of term concept. Marc, please go ahead.

Marc Anderson: Thanks, Berry. It's Marc. You know, so one thing I think, you know, in this post-GDPR world we need to you know, be careful about transferring data between registries and registrars for the purpose of disclosure. You know, if - there are other reasons why the transfer makes sense, then that's - then we can justify that under other purposes and that's fine. But under Purpose 2, you know, you used the examples, you know, so the registry domain ID and the registrar, you know, whatever unique identifier exists at the registrar level, you know, but there are, you know, those are fine example but there are other cases as well where the transfer of that data isn't necessary for performing the service.

And so especially in, you know, with the advent of new technologies like RDAP, sort of the usefulness of having that in one place is, you know, has sort of, you know, come past. So I think, you know, I think under, you know, an RDAP world or at least, you know, the, you know, what RDAP is intended to deliver to us is the ability to get the data from, you know, from the authoritative source. And so, you know, there'll be some amount of data that exists at the registry level and there'll be some amount of data that exists at the registrar level, and you should be able to go to the appropriate source to get that data and not have to have it aggregated at the registry and registrar level.

And so I think, you know, I think that's sort in line with what you were getting at, but, you know, I just felt like it would be useful to put that context out there that we have tools like RDAP that enables someone to get the data from the authoritative source of it and there's no need to transfer the data unnecessarily.

Berry Cobb: Thank you, Marc. And this is perhaps one of the reasons why I wish me specifically or collectively as us as a whole group, better understood the

world of RDAP noting that, you know, whatever consensus recommendations we come up with here may or may not fall in line with the deployment of RDAP but - so kind of the things that is driving the scrutiny here though is that we do have an existing policy about consistent labeling and display.

And so for the moment I'm going to assume that RDAP can't be deployed and we're working in the existing Whois infrastructure or RDDS infrastructure, how is consistent labeling and display as a policy maintained when I go to do a query against a domain name at a registrar or versus a registry? And then my secondary question is, you know, in a RDAP world, where you're right, it's about finding the authoritative source of the data, when I do a query at Go Daddy's RDAP instance versus a registry's RDAP instance, you know, how is consistent labeling and display working in that environment? And if some sets of data from the RDAP query come from the registry and some come from the registrar to make one presentation for that query, you know, what's happening there? So Marc, please go ahead.

Marc Anderson: Berry, I think maybe you're - I think you're maybe a little bit more worried about the CL&D label and display - the CL&D policy then is necessary. I mean, the CL&D policy today applies equally to registry and registrar Whois outputs. And, you know, defines the, you know, so CL&D, you know, Whois is basically just a matched pair of fields. You know, you have a label and a value. And, you know, prior to CL&D there was some discrepancy in how you might label them.

Is it an expiration date? Is it a domain expiration date? Is it a registry domain expiration date? So CL&D just defined a common way of labeling and displaying the data. And honestly, you know, I have a hard time seeing how CL&D impacts the work that we have to do in this PDP. So I'm not sure I would spend time worrying about how that applies here and we should be focused more on the processing activities and what data is necessary to perform that processing activity and if there's any, you know, once we've done that work if there's impact to CL&D, which I don't think there would be,

to be honest, but if there is we can certainly go back and, you know, and decide what needs to be done once we're in that boat.

Berry Cobb: Okay. Thank you, Marc. I posted in the top right hand part of the agenda pod some initial definitions that Sarah had proposed for collection, transfer and disclosure. I guess we probably need one or retention but we'll get to that later. So all right just focusing on Purpose 2 then, is it sufficient to say that - or if I understood what I'm hearing from this group that in terms of Purpose 2 and identifying the processing activities and thus the lawful basis that we need to be very precise here and that basically state that there is no - for the purposes of this particular purpose, that there is no collection by a registrar or a registry.

And that we would essentially state that these processing activities are not required as they are - as those data elements are collected by another purpose, therefore there wouldn't be a need to document the transfer of any data from a registrar to a registry or vice versa, and that strictly it's only - the only processing activity that would be populated would be that if disclosure either by a registry or a registrar and eventually will get down to the lawful basis whether that's 6.1(b) or 6.1(f).

Is that logical to this group in terms of what I said or does it need to change up? Sarah, please go ahead.

Sarah Wyld: I would like to try to recap what you said to make sure that I understood because clearly there are a couple things you said to me that I didn't follow. So what you're saying is for Purpose 2, we are not tracking a collection processing activity purpose because if data needs to be processed in some way to contribute to the maintenance of security and stability etcetera, that data that is being processed would be - would have been collected under Purpose 1. And so we are not collecting data simply for this purpose? Is that what you're saying?

Berry Cobb: That's what I said and me trying to understand the logic. There was no authoritativeness behind my (unintelligible).

Sarah Wyld: Thank you.

Berry Cobb: And Marc. Oh…

((Crosstalk))

Berry Cobb: Go ahead.

Sarah Wyld: Okay I was going to say as a registrar I do agree with that; I collect the data that I need to in order to enter into a contract with the domain owner and I would use that data in order to contribute to the maintenance of SSR but I wouldn't collect other data points or I wouldn't collect these data only in order to contribute; I'm collecting it primarily for Purpose 1. Yes.

Berry Cobb: Marc, please go ahead.

Marc Anderson: Thanks. This is Marc. I also agree, you know, Purpose 2 is, you know, is our access placeholder, right? And so we'll of course revisit and get into the weeds with Purpose 2 in Phase 2, right? But what we do know is, you know, Purpose 2 is there to, you know, for the purpose of access to registration data that is collected by, you know, the, you know, I should say that, you know, exists at the registry or registrar level for, you know, for other purposes, namely the purposes of activating and allocating a domain name.

So we're not collecting specifically for this purpose and we're not performing any transfers of the data specifically for this purpose. I'd also add, you know, with retention - see that's the last one - I'd say we're not, you know, we're not retaining data for this purpose either. You know, so retention, you know, there's requirements on retention for, you know, in other places, right but

we're not retaining data specifically for the purpose of publishing it to Internet users or providing access to it.

So, you know, so there's no collection or transfer or retention that occurs specifically for this purpose; this purpose is, you know, pretty specifically it's for providing access to the data that's already processed for other purposes sort of under the terms laid out in the purpose statement. So that's I guess my take on it.

Berry Cobb: All right. Thank you, Marc. So if I interpret that correctly, then in terms of documenting the processing activities both collection by - and noting that Sarah's suggestion on Tuesday that if a processing activity is not required we still leave a road there and just document why it's not required. So for both collection by registrar and by registry, we would state that we would make - create a pointer that data collection is occurring under Purpose 1, so we'd be very precise that it's pointing to Purpose 1 for these processing activities. Transfer, whether it says registry or registrar, would be not applicable and the comment or response to that is basically the text that I put there in lawful basis.

Disclosure would remain as-is because it would either be a registry or a registrar that would eventually disclose that information, again noting that we'll worry about populating the lawful basis down the road. And then lastly, retention would basically be not applicable and the rationale is that for the purpose of - of enabling responses to lawful data disclosure requests, that retention is taken care of in Purpose 1. So I'll start back again with Marc and then Alex.

Marc Anderson: Thanks, Berry. Marc Anderson. So I mostly agree with what you said. I think where I differ is, you know, for the collection and retention you're referring back to Purpose 1. And that makes me a little uncomfortable. You know, it doesn't have to be Purpose 1, it's really the disclosure can occur for, you know, I think you know, we still have a lot of work to do in Phase 2, but I think

the disclosure can occur for any of the data processed for any of the other purposes. So it doesn't you know, I don't think, you know, I don't think it buys anything and it's potentially limiting to tie it to Purpose 1.

You know, so I think, you know, Alex made a good point, you know, earlier in the call that, you know, we can't necessarily look at Purpose 2 in a vacuum, you know, we have to be considering, you know, all the, you know, the entirety of the ecosystem. But, you know, looking at, you know, for this purpose, right, there is no processing activity for the collection of data, right? You know, so we're looking at, you know, what is the purpose and what are the processing activities associated with that purpose?

So on collection and retention I would just say, you know, there is, you know, it doesn't apply to this purpose. You know, and rather than trying to tie it to Purpose 1, I think that's, you know, I think that's sort of the one place where I got a little uneasy but mostly I thought your summary was good.

Berry Cobb: Thank you, Marc. And before I turn it over to Alex then I just pulled up Annex D and so to try to get to a somewhat of a visual when we get down to the data elements table is that the only column that would be filled out here would be what would be PA3, disclosure and of course redacted. And we'll get to that a different time. But that basically only the disclosure column would be populated with ones for those specific data elements that this group agrees that would need to be disclosed upon a lawful request.

Alex, please go ahead.

Alex Deacon: Thanks, Berry. Yes, Marc made the point I wanted to make which is that collection can happy in any other purpose. I think the reality is that it's only Purpose 1 and Purpose 7 but I think, you know, the point that I wanted to make was made by Marc which is, you know, the disclosure of this data as defined in Purpose 2 is going to be the data that has been collected via other

purposes which is 1 and 7 at the moment but I suppose it could be others. Thanks.

Berry Cobb: Thank you, Alex. And before I go to Sarah, and again I think that this is where we're going to need to be careful because there could potentially be certain disclosure data elements that marked as 1 here, that may not have been marked as a 1 under collection under any of our other purposes or vice versa. There could be a data element that is collected in another purpose that may not necessarily be disclosed here.

So we'll need to reconcile that once we better understand how we're collecting this data. And I think, Alex, you're right, it's pretty much Purpose 1 and the one field in Purpose 7 that ultimately defines the pool on what is being collected. But to stay true to us only processing data elements necessary for that specific purpose we need to make sure we're on top of that. Sarah, please go ahead.

Sarah Wyld: Thank you. This is Sarah. I want to jump on the agreement train. I really like how we are really all on the same page. Yes, we need a specific defined purpose in order to do the thing. That purpose doesn't need to be collected - the processing activity doesn't need to be collection but we need to track that disclosure processing activity or else we won't be able to disclose it. You know, yes, I should have just stopped at saying "I agree." Thank you.

Berry Cobb: Thank you, Sarah. And I just now saw this as a - somewhat of a loose example but about in the Adobe Connect room about 2/3 of the way down there's the tech ID field. And according to our old documentation, we showed that this field was optionally collected if - and I think the understanding was if a registrant had provided a tech name and a tech email address. Obviously the tech ID field would be generated but we didn't show it as actually being transferred nor did we show it being disclosed.

And I had highlighted this around the time when we were publishing the initial report is if we're not transmitting it or disclosing it, then, you know, why is it even being collected? Or do we just need to adjust our documentation? So that's kind of the, you know, at the end this is probably one of our last tasks is to confirm what data elements are being disclosed? And regardless of whether they're being disclosed or not if they're not disclosed at any point or transferred, then we need to retest the original purpose and its collection processing activity to begin with. Marc, please go ahead.

Marc Anderson: Thanks, Berry. This is Marc. So I want to, you know, so you moved workbooks and this is sort of right as, maybe the next point is, you know, looking at, you know, there's sort of the public disclosure and then there's disclosure for lawful requests to the data. And so I think, you know, maybe we need to bear in mind that those are two different things. And, you know, if you have a lawful basis for, you know, you're requesting the data like any like the entire universe of data that exists at the registry and registrar level is in scope, right? You know, if you have a lawful basis, you know, then, you know, under GDPR, if you can establish that basis then that data can be provided to you.

If the data, you know, and this maybe stating the obvious, but, you know, it may be fun to state anyway, if the data doesn't exist it can be disclosed, right? And I think that's maybe where you were going with that last point. You know, if it's, you know, if it doesn't exist, if it's not, you know, collected, created, transferred or otherwise used for any of the other purposes then you can't disclose it because, you know, because it doesn't exist. So I think that's, you know, like I said may be stating the obvious but a little fun to do so anyway.

But then, you know, on the redacted field, you know, I think that's really getting to the fact that, you know, we have maybe two types of disclosure and that's, you know, what goes into maybe, you know, a public RDS system and then what data we're talking about providing, you know, access to following

sort of a lawful, you know, or a vetted lawful request for access to the data. And so I think those - there's a difference, you know, they're both a similar activity but they're both different - I guess my point there is it's important to differentiate between the two to make sure they're both accounted for in the worksheets.

Berry Cobb: Okay. And if I understand that correctly, I'll go back to Purpose 2 then, so perhaps there's two disclosure processing activities. One is, you know, what's publicly available is disclosure to lawful requests because, I mean, at the end I think we can all agree that if we were to light up what we've created so far we're still basically getting a - a publicly available displayed amount of registration data, some of which is redacted. And really it's only probably those redacted fields that would then be disclosed under a lawful request.

Alex, please go ahead.

Alex Deacon: Yes, thanks. It's Alex. Yes, I think that's right. I don't think you have to disclose public information. Within the EPDP we've - I don't think you've ever had the focused discussion on the concept of the minimum public data set which we had in the RDS Working Group. But, you know, I think public data is just that, it's public and it's available. But data that is redacted or behind the gate, if you will, that has to be disclosed.

And I think there's a - I think it's important to not kind of munch, you know, those two concepts together, combine those two concepts together because I think they're both important and I think keeping them separate is useful, you know, in terms of kind of how we think about data and, you know, what rules we put around its disclosure. Thanks.

Berry Cobb: All right. Thank you, Alex. All right I think I have - I think I have enough for Purpose 2. Let's move onto Purpose 3 to test our logic and agreement. So Purpose 3, this one is fairly easy or pretty much mimics Purpose 2 to a certain degree. "Enabling communications with the RNH on matters relating

to the registered name." So again, like what we discussed in Purpose 2, collection by registrar or collection by registry or transfer of any of that data are not required processing activities to achieve this purpose nor is retention but it's strictly a disclosure processing activity which, you know, again I think kind of it would practically mimic what we just defined in Purpose 2. And, Marc, please go ahead.

Marc Anderson: Hey Berry. I'm - I think I'm going to disagree with you on this one because I think you know, Alex mentioned the RDS, you know, the RDS Working Group and, you know, I've blocked out that segment of my memory a little bit but he brought that back a little bit. And thinking about, you know, one of the things that, you know, we talked about there - when you're talking about the public display of data, you know, and the purpose of a registration data directory service that, you know, what Whois does for us today, one of the, you know, one of the main purposes of that is contactability (sic) so to provide a mechanism to contact somebody authoritative for a domain name registration.

And so there I think, you know, there I think you're not just talking about processing data that's collected for other purposes. You know, here I think you, you know, I think you actually collect the data for this purpose, you know, you're actually collecting it so that you can provide a mechanism of contactability (sic) with somebody authoritative for the registered name holder. So yes, let me maybe see what Alex has to say about that one but I think, you know, I think you do actually collect data for the purposes of enabling communication with the registered name holder.

Berry Cobb: Great. Thank you, Marc. Alex, please.

Alex Deacon: Yes I think the point I wanted to make was similar to one I made earlier which is with regard to enabling communication of the registered name holder, one way that communication happens is via either the Web - the link to a Web form or the, you know, the anonymous email address that is provided in the

email field of the registrant. But again I'm not too sure it's correct, I maybe being pedantic here, but not too sure it's correct to say that that data is disclosed in that users, again that's public data.

There may be some contact information such as address and state and others where disclosure is required, so, you know, whether we need to get into that level of detail or not I don't know. But I guess the point I'm making again is that in terms of the email field that data isn't disclosed, it's going to be public, it'll be a URL or anonymized email, but it does not require a kind of reasonable access or any access to get access to that data whereas some other contact information fields will. I got a little confused there at the end, but I think that's the point I'm trying to make here. Whether it's super relevant or not I don't know but thanks.

Berry Cobb: Thank you Alex. And I put up again our Annex D workbook and specifically on Purpose 3, I'll sync and unsync. So, you know, obviously with the initial report with this so we never actually completed what disclosure of this registration data meant as it related to being able to communicate with the registered name holder.

And more specifically in our disclosure column, while we denoted that, you know, practically all of the fields that were collected under Purpose 1 were collected here and transferred to the registry, none were disclosed at least in our original documentation. And now - I don't know - and what Marc had said that, you know, for this particular purpose it does require the collection of data - I don't know. I'll go to you, Marc.

Marc Anderson: Thanks, Berry. Marc again. You know, I think this is probably a great example where - I think this is probably a great purpose where maybe we, you know, we as a full working group hadn't spent enough time kicking the tires on this. And I think, you know, I'm hearing Berry, Alex and myself we're trying to noodle through this one on the fly a little bit here.

You know, I know it was - Sarah put in chat, right disclosure, you know, I don't think disclosure is necessary in order to fulfill this purpose, right. And, you know, that's sort of a, you know, sort of part of the line we're trying to walk because, you know, I think there's general agreement, you know, I think within this working group and, you know, across the broader community that in order to have an opened and interoperable, you know, DNS there needs to be a way to contact the - somebody authoritative for a domain name, right?

And that doesn't, you know, as Sarah has pointed out, that doesn't necessarily mean disclosure of that data and, you know, what the temporary spec did is introduce the idea that you could have an anonymized form or other mechanisms for providing that. But then, you know, also we know that there are some entities that for various reasons will want that data, you know, published and openly available. And so, you know, we have to account for both of those things.

But either way I think at the top of that in order to enable communication, you know, there is a collection processing activity, right, and I think that's, you know, there, you know, I think we know that there may be multiple reasons why data is processed but I think at the, you know, I think at the top of this activity we're going to collect, you know, there's going to be data collected in order to do - to meet this purpose.

And then there's going to be, you know, there's going to be some mechanism, it could be anonymized form but it could be disclosure of data in, you know, in a Whois or other RDS-like solution to meet this. But I think this is, you know, this is an area where, you know, the working group hasn't necessarily kicked the tires enough on it and it's - I'm glad we're getting into it now to start sort of noodling through these flows and defining what is necessary for each of these steps.

Berry Cobb: Right. Thank you, Marc. And teeing off what you said as well as what Sarah placed into the chat, then is it fair to state that for this particular purpose

statement, "Enabling communication with the RNH on matters relating to the registered name," while it doesn't say specifically that all communications for this particular purpose do in fact just flow to the registrar.

And so then if I were to look at the processing activities, if that assumption is correct, that we would show collection of data elements only by the registrar, nothing would be transferred or collected by the registry, nothing is disclosed but then I do wonder, you know, do we need to go as far as documenting retention on this because technically to communicate with the registered name holder you really only need to communicate with the active registration. It doesn't make sense to request a retention policy to communicate with the RNH if they're no longer the RNH. Right, okay thank you, Marc.

Alex, please go ahead.

Alex Deacon: Thanks. It's Alex. Yes, I'm lost now. Are we saying this Purpose 3 only enables registrar communication with the registered name holders on matters related to the registered name?

Berry Cobb: I would just respond back that if none of this information is being disclosed for the - for achieving this purpose, and then asking a general question, anybody that need to contact the registered name holder, would they ever contact the registry in this case? Right, as Sarah put in the chat.

Alex Deacon: This is Alex again. So if I'm an ISP, for example, and I noticed that there's an issue with the name server, and it's causing issues with my network or I'm getting complaints from customers that they can't access a certain domain name because of the name server miscommunication and - are we saying that you know, an ISP wouldn't have the ability under this purpose to contact the registered name holder on matters relating to the resolution of a registered name?

Sarah Wyld: So I have a thought on that.

Berry Cobb: Please go ahead, Sarah.

Sarah Wyld: Yes thank you. So I'm not - wouldn't the ISP, in that example, want to contact the registrant, they would do so through (unintelligible) and that could be by doing a Whois lookup or some kind of registration data lookup on the domain and seeing that the domain has either a Web form is required or an email address or the domain owner might have consented to putting their real email address in the registrant email field in the public Whois.

But either way all of that goes through the registrar; I don't think it's necessary for the registry to be involved or not. On the other hand I'm not a registry, so interested to know what Marc's (unintelligible). But the ISP - the upshot is the ISP would still be able to communicate with the name holder related to the name, it would just go through the information that the registrar (unintelligible).

Marc Anderson: And this is Marc. If I could tack onto that? Because I think the answer is it depends. Like getting you know, for some registries it would be like, you know, as Sarah just read, they would go through the registry. But for other registries, you know, I think Alex, you used the, you know, used an example where, you know, I think a name server was behaving badly but, you know, for any form of, you know, problems with the domain registration some registries would prefer to do that contact directly themselves rather than go through the registrar.

So I think there it depends a little bit on the individual registry and their particular use case. But, you know, and this is where I think we were - I think we're missing Alan because I think he would - what I would like to have asked Alan is does he feel like that needs to be specifically spelled out in this purpose or if he feels like that's covered in the new Purpose 1b specifically?

And there I'm not sure what the answer to that would be and so maybe that would be a follow up question for Alan and something I would defer to him on but, you know, I think, you know, back to Alex and Sarah's point, I think, you know, the answer is that it depends a little bit on the registry, different registries handle that differently.

Berry Cobb: Okay. So then if I understand this correctly in terms of trying to properly identify the processing activities for this, based on what I've heard thus far, is that there would be a processing activity for the collection of data by the registrar. There would be a processing activity for the collection of data elements by the registry. Disclosure would remain empty. Retention would just be life of registration. And then we still have the question out to Alan about whether the registry part would be covered under 1b. Alex, please go ahead.

Alex Deacon: Yes I guess where I'm getting tripped up here is the fact that disclosure to Internet users would remain empty. How would a third party, or anyone, be able to obtain the URL to the Web form or the anonymous email address if a disclosure of some kind doesn't happen? Or are we saying that those - that element doesn't require disclosure because it is public information and will always be returned and available to anyone who may need it? Again hopefully I'm not overcomplicating this but it's not clear to me how we could have - how we could fulfill this purpose without some type of disclosure to Internet users.

Berry Cobb: I tend to agree as well. Marc, please go ahead.

Marc Anderson: Yes I also agree. It's, you know, and this doesn't, you know, this is a topic that doesn't, you know, this doesn't necessarily fit nicely into our model. But, you know, I think it's a good point and, you know, I was just going to add to that and say, you know, we also have to take into account cases where the registrant has opted in for public disclosure, so, yes, so I think there's, yes, so I think, you know, I think the bottom line is I'm agreeing that this disclosure

row needs to be flushed out a little bit more, it's a little bit - there's a little more to it than that and maybe Sarah can shed some light on it.

Berry Cobb: Sarah, please go ahead.

Sarah Wyld: Yes thank you. I'm sorry, I'm never sure if I should wait for you to say my name first. I mean, if the purpose is to enable communication with the registered name holder, I see your point that disclosure could be a part of that but I don't think it's necessary if the way that we're enabling that communication is by providing this Web form or anonymized email that will forward to the remain email address. So I would say that we need to collect a real contact point so that we can do that enabling of communication but I don't really think that disclosing that data is required in order to enable that communication.

So maybe it would be something that's optional based on if the registered name holder agrees to disclose full data instead of - like real data instead of using the form.

Berry Cobb: All right. Thank you, Sarah. You know, again I think this is where we're running into limitations of our model because when we start talking about - and I guess it goes back to not having original definitions or there could be multiple definitions for one processing activity type. But, you know, in reality, again, we're going to know that if I query a domain name one way or another whether it's RDAP or Whois, I'm going to get a set of data fields, all of which is disclosed because any one of those data elements, the mere fact that I'm querying it is disclosing that information to Internet users in general.

It's only a question that comes back as to what is redacted or not or in this case which would be a Web form or email - Web email or form which goes back to Purpose 2 where we're disclosing that and noting - or will be noting a difference between what is publicly available versus what is disclosed. And so now I guess my concern, while this Purpose 3 is a distinct purpose from -

or that is distinct from Purpose 2, my fear is that we're basically creating a whole new workbook that accomplishes - or basically repeats the same thing that would occur under Purpose 2.

Marc, please go ahead.

Marc Anderson: Thanks, Berry. I'm, you know, noodling this through in my head still as we go and, you know, I think, you know, I take your point about, you know, we don't want to duplicate what we did in Purpose 2. And I don't think we are because I think the main, you know, the main reason for being on Purpose 2 is, you know, is to provide a purpose for facilitating access to nonpublic data. And this is a very specific purpose for providing a reason - or, you know, this is a very specific for providing - purpose for providing a mechanism for contactability (sic) with the registered name holder, or somebody authoritative for the registered name holder.

So, you know, I think they're, you know, I think they're separate. And, you know, considering your point and that, you know, Purpose 2 covers, you know, covers providing a purpose for nonpublic data, access to nonpublic data what we're talking about here is just the data - is a processing activity for data that would be public.

So there we're talking about anonymized, you know, anonymized email or Web form but I think also, you know, on disclosure we have to talk, you know, I think, you know, I think maybe a blurb about how, you know, this would be accomplished via either anonymized email Web form or, you know, I think there needs to be something in there about cases where the registrant has opted in to publish their contact information.

So I think those are sort of the three use cases there. I don't know if we have a use case where, you know, contactability (sic) via a fax or email or carrier pigeon needs to be contemplated. I'm just sort of throwing that out there as I think out loud to noodle through it but I think where we sit today our main use

cases are Web form, anonymized email address or where the registrant has opted into publish their data.

Berry Cobb: Thank you, Marc.

Sarah Wyld: Alex (unintelligible) from the chat.

Berry Cobb: Go ahead, Sarah, if you want.

Sarah Wyld: Thank you. So Alex, I agree, I think we do need to know what is that minimum public data set but I'm not sure if it's okay for us to try to do that in this small group just we already have in the temp spec which fields can be redacted and which fields can be disclosed. And we've been talking about that through the - as we come to the report. So, you know, if the report says it's written, fields should be public I actually disagree with what it includes but I'm just not sure if we can do that here. Like maybe we are required to go by what it says in the report, maybe Berry knows.

Berry Cobb: Thank you, Sarah. I don't recall this being specifically documented in the initial report, but my understanding, and again, as a result of consolidating the workbooks, my personal understanding was that, you know, what you see here on Page 3 of the consolidated tables Purpose Activity 4, which was labeled as redacted, what you see here which corresponds to the ones that are marked under Purpose 2, Processing Activity 3, become the minimum data set that is publicly available.

And then it gets further defined as to of those publicly available data elements some subset of those are redacted. And that is that minimum public data set. Please go ahead, Marc.

Marc Anderson: Thanks, Berry. Marc again. Yes I think Alex and Sarah are making a great point here. It would be, you know, I think it would be useful if the - if our final report included sort of very clearly stating this is what we - this is what we see

as the minimum public data set, you know, stealing the term from Next Gen RDS. And, you know, and of those which, you know, may be redacted if GDPR applies. You know, and I think, you know, what Berry's telling us is that we haven't, you know, we didn't, you know, explicitly state that anywhere but that information can be sort of extrapolated based on the work done by the rest of the working group.

So, you know, again, caveat this by saying I'm thinking out loud and running my mouth an awful lot, which is dangerous, but, you know, would it make sense for our subgroup to send a recommendation to the full working group and say, hey, in our discussions we note that it would be useful to have this in the final report and, you know, based on the work Berry's done here, this is what we think the minimum data set is and these are the fields that are redacted in that minimum data set.

You know, apologies, I'm thinking out loud here but I think it may be useful for us to do that but to Sarah's point I'm not sure that's a decision we make in the small group; I think that's probably best taken up by the full group. So throwing that out there; what do you all think?

Berry Cobb: Thank you, Marc. I believe all of us can probably subscribe to that and for sure, you're right, it is not a decision that this small team can make so we do need to present it back to the full working group. And while important, that doesn't solve what we're trying to here which is testing logic per se of our workbooks.

And I'll just note, you know, what I find interesting and again, this third page of our consolidated tables kind of goes back to one of our original flaws here from the data workbooks that we had up to the initial report is, you know, what I find interesting is the organization field, Purpose 6, which is the RPMs, does in fact ultimately show that the organization field could be disclosed as a result of an RPM. Well I guess this actually does make sense. But in terms of it being listed in a publicly available directory, you know, we don't show it as

being redacted although there are certain conversations about it. Anyway, sorry, about that.

So going back to our skeleton, again I think we only got about 30 minutes left before we stop. And certainly one of the agenda items that I was hoping for was to be able to assign me as much homework as possible that I can do over the next couple of days to prepare us for our Tuesday session. So I am open to opinions about that. I think for sure one action item I can have is to put together a little bit more meat on our skeleton around Purpose 2 based on what we discussed earlier.

I can try taking a stab at Purpose 3 based on what we discussed although I'm not sure I'll be right on that because again we're still talking about this minimum data set. And what I'm going to just leverage or I guess use as an assumption for now is essentially that data set that gets defined out of Purpose 2 that would be available on a publicly available directory and try putting a better strawman together on Purpose 2 and Purpose 3 to help us reinforce our logic map here.

And that's something that we can work on next. And if we all can agree that what is proposed on Purpose 2 and Purpose 3 then perhaps that will leverage us to get to the remaining purposes and for sure hopefully it still aligns with what we're waiting on with Purpose 1. Okay, well so we have about 30 minutes left, should we review through Purpose 4 or should we draw a line in the sand and stop with our, you know, logic discussion around Purpose 2 and 3 and let me map that up and - or document it up and send it back and maybe we can have at least a few exchanges over the list?

Alex Deacon: Yes, that makes sense to me Berry. I think what we discuss could be applied to all of these and it's a good - I think we're on the right track. Another thing we may want to do is just try to nail down the definitions in the ones Sarah suggested and the ones you pasted in this box I think is a good - is a good start.

Berry Cobb: Right, yes. Thank you, Alex. So yes, for sure I'll make it one email thread about the definitions of a primary processing activities and we can chew on that in one aspect. The second, again, I'll put together a next iteration of Purpose 2 and Purpose 3, that'll be one particular email chain. And then a fourth will be defining minimum public data set and I'll make that a third email chain for us to chew on. And I think that's the three primary ones.

All right so let's go ahead and talk about escrow and to continue to test our logic here. All right so as we definitely learned early on that based on the different types of data elements processed either by a registrar or registry that we needed to split into two separate purpose statements, also complicated by the fact that in terms of when EBERO is kicked on versus a failing registrar and domains being transferred to a gaining registrar that provided complications in terms of keeping this together, consolidate it into one purpose, thus we split it into two.

Yes thank you, Sarah. Yes, save that for the email list but I do think in general, you know, there is a specific recommendation about what data elements are going to be redacted. And certainly keep in the back of everyone's mind here that if we didn't do a good enough job in documenting it in the initial report we should but I was under the impression that it was implied that if data was going to be redacted that it would still be made available in this public available directory.

Marc, please go ahead.

Marc Anderson: Thanks, Berry. It's Marc. So maybe a little off topic but trying to answer Sarah's question. I think sort of I looked at it so we're redacting for GDPR, right? And so redaction wouldn't necessarily apply in all cases, right? And so I'm looking at it maybe there's a - we're defining a minimum data set, some of, you know, and some of that data may need to be redacted for GDPR

compliance. So I think that's how I'm looking at it. If that - I don't know if that helps or confuses things at all but sort of throw that out there.

Berry Cobb: Right, thanks Marc. Okay, so I think we'll just - we have a registry and a registrar on the call but we'll just pick 4a first because I think the processing activities will still pretty much be the same. The idea here though is that so for 4a, registrar escrow, there are some data elements that will be collected by the registrar but I think under our new understanding of how the processing activities will work, it's actually more Purpose 4b that we should follow in that - and Marc had brought this up early on is that in terms of the purpose for escrow there is no reason to document a processing activity on collection because the point of escrow is what data is already collected that would wind up as the deposit to the escrow provider.

And so I'm going to step through - I'm going to come back to this document but I'm going to show you what we have currently documented in Annex D for this one for the registries in particular. Give me a minute to get there. All right so this is the data elements table for the registry escrow deposit. And what was mentioned here is that the - as I'm trying to channel Marc's original comments, again, that they aren't collecting data for the purpose of escrow, there is an escrow deposit made on the collection of data itself.

And I think superficially up in the processing activity here it was discussed a little bit more in detail so, yes, the processing activity of collection is not required to be documented within the purpose for registry escrow because this PA for transmission of registration data to the agent has already been collected or generated from other ICANN purposes. However, the transparency of collection to the registrant data subject for the purpose of escrow is required hence our data processing agreement recommendation.

And so as a result, column 1 down below was blank but then the question became is if we're not defining what data elements are required for collection, how do we determine what data elements are going to be transferred from

the registry to the escrow provider? And so I'm going to change the Adobe Connect screen again but what - just kind of take a mental image on this Column 3 where all the ones are selected under Transmission, how those were determined followed back to our consolidated table of data transferred from a registrar to a registry.

And so any - again, following the transmission logic over on the right, any field that came up as a green or a yellow made up the - any one of those that showed up as green or yellow would dictate the data elements that would eventually need to be part of that data - of that registry escrow deposit. And so that's how that came into force. But going back to what we have, then of course the same fields would be applied from a disclosure perspective and there are essentially two types of disclosure occurring. The first - sorry I need to - give me one second; I'm checking my logic here.

Okay yes, so there's two types of disclosures that were occurring here for registries. The first is Processing Activity 2 - or I'm sorry, 3 I believe and that the registry makes a deposit to the data escrow agent on a recurring basis but ultimately when you play that out at some point should the registry fail, we would need to assign a gaining registry in which the EBERO provider would kick in and they would request the deposit from the data escrow agent and then that is passed through the EBERO provider to the gaining registry therefore being the second disclosure. And then the gaining registry would be brought online.

So now the question is, does that same kind of logic about collection occur with the registrars because where we had it documented for the registrars up top is that - that has changed as well. But that the collection is still the same for registrars, the only difference is that there's really only one disclosure step and that's when the gaining registrars (invoke) versus two during the registries. So I probably confused the heck out of you. I'm going to go back to the skeleton document here.

And I'll turn it over to Marc, please.

Marc Anderson: Thanks, Berry. It's Marc. I think you - I think you got it. I was nodding my head through all of that. I think yes, I mean, I think basically what it comes down to is the data set involved is going to be a subset or, you know, I think sorry, not a subset, it's going to be basically made up of, you know, the data involved for Purpose 1 and I guess it could potentially include Purpose 7 depending on what data is involved in that, if any. So I think, you know, basing it on that makes sense.

You know, it's, you know, if it's necessary to perform the registration, if it's needed for activation and allocation, Purpose 1, then it's, you know, I think that flows logically there should also be escrow in the event of a failure. I think your processing activities made sense. I was nodding my head through that. You know, I think there's a, you know, I think there's still two activities on the registrar side because there's the transfer from the registrar to the escrow provider and then there's the transfer from the escrow provider to the gaining registrar so I think there's still both of those activities to take into account.

You know, I think on the registry side you're pointing out there, there's EBERO provider in place for - but there I think it's important to note that, you know, not all registries have, you know, that's a new gTLD construct so that doesn't necessarily exist for all you know, all TLDs so it's probably worth taking into account there but otherwise I think, you know, I think you got it. I was nodding my head through that, Berry.

Berry Cobb: Well damn, we should have started with that one first. No. So now this was - this again kind of comes back to our 4 horsemen processing activities. As you mentioned, Marc, registrars that you said that there should be a second transfer of - from the escrow provider to the gaining registrar and that's what we currently have labeled as disclosure because essentially yes there I saw transfer of that data but in effect you're really disclosing that data to the gaining registrar and so trying to just kind of kill two birds with one stone, as

to why there was only one transfer there from the registrar to the escrow provider. All right cool, all right.

Right, good. All right. So like I said, just trying to recap that. And I'm not seeing any other concerns - go ahead, Marc.

Marc Anderson: Sorry, just before I let you move on there's the question of retention. And I think, you know, and I'm - looks - let me just get to where that is. I don't think - it looks like in the skeleton you don't have anything on retention. We talked about retention a fair bit - oh you're saying let's circle back on retention like now or later?

Berry Cobb: Let's save it for Tuesday. In my next version of these I'm going to leave a placeholder but no specifics.

Marc Anderson: Okay.

Berry Cobb: And I think we need to have a macro level discussion and work our way micro across the purposes.

Marc Anderson: Okay.

Berry Cobb: All right, so thank you for that Marc. But I agree, it definitely needs to be discussed because it is different than what a macro level recommendation in the initial report is stating and so if there is going to be something different we need to be precise about why it's going to be different or however it's going to be addressed.

All right so three primary actions coming out of this, again, definitions, that'll be one email thread; the second is my homework assignment and I'm going to create the next iteration of Purposes 2, 3, 4a, 4b and the third one was to define the minimum public data set so that we can chew on those on the list up until next Tuesday. I probably won't have the - my homework done until

Saturday afternoon so maybe look in your inboxes Sunday morning your time to get some feedback and if you can really try to do some on the list before we meet again on Tuesday.

Once we meet again on Tuesday the first part of that call I see is just confirming what we've tentatively agreed to on approach for today. If - and hopefully Alan will also be able to join us to confirm our thought process. I'm feeling confident that he will for the most part. Then once we have that then we can work through the remaining purposes to make sure that we have the skeleton or the structure correct.

And likely I guess we'll probably need to meet again next Thursday because then we do need to step down and take a look - and by that time I hope to have everybody back into Annex D so that we can take a consistent view across the workbooks and - but more specifically drilling down onto the data elements that are being tagged.

And one of those changes are going to be how we're flagging specific data elements. Right now we kind of have three options, there's a 1, there's a 1 in brackets for optional and then there's a dash. I'm thinking we're going to need to probably have two if not three more designations based on some of the variabilities that we have if it's not collected at all or not required. And Francisco had brought that forward. Correct. Yes, Sarah, something along those lines for sure. I started out with the ones, the reason why I did that is because it was easier to create my consolidated tables but, yes, we can - definitely need to work on that.

So yes, Marc, well first the action item is for us to chew on the minimum public data set. I would like us to try to find agreement on that by Monday noon-ish time so that we can send them to the full working group for them to chew on Tuesday perhaps which would be before we meet but yes, I think it's important that we get that to their attention.

All right, any parting thoughts, complaints? All right well I appreciate your time and we'll meet back again on the list and see you Tuesday afternoon again as well. Thank you.

Alex Deacon: Thank you, Berry.

Marc Anderson: Thanks, Berry. Great meeting.

END