Transcription ICANN Helsinki
Thick WHOIS Policy Implementation – Meeting with the IRT: Session 1 of 2
Wednesday, 29 June 2016
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Dennis Chang: Okay, it's 12:31 per my clock. And we're to start at 12:30, correct? Okay. Okay, thank you. Welcome, everyone. This is the Thick Whois Policy Implementation IRT Meeting on June 29, 2016 at ICANN 56 in Helsinki. Welcome. My name is Dennis Chang. I am GDD Services & Engagement Program Director, and I'll be moderating this session today.

So before we get started, I would like to go around the table and introduce ourselves. There's not too many of us. So if you're in the back, please feel free to come and join us at the table, because you will need to use the microphone if you're going to ask questions or comment, for the people who are remotely participating. So please come up and let's fill out this table.

So we'll start with introductions. So let's start from Kristine. Go ahead and introduce yourself and your role. And if you're an IRT member, please identify you as such.

Kristine Dorrain: Thank you. Kristine Dorrain, Amazon Registry Services. I am not an IRT member. I'm just observing.

Joe Waldron: Joe Waldron from Verisign, and I am an IRT member.

Erika Randall: Erika Randall, ICANN staff.

Steve Chan: Steve Chan, ICANN staff.

Tom Iacobucci: Tom Iacobucci, ICANN staff.

Man: (Unintelligible), ICANN staff.

Roger Carney: Roger Carney, GoDaddy, and I'm on the IRT.

James Gannon: James Gannon. I'm a service and security consultant. I'm not an IRT member.

Jordan Buchanan: Jordan Buchanan with Google, and I'm also not an IRT member.

(Dale Hoods):   (Dale Hoods), and I am an IRT member.

(Nick Saselio):   (Nick Saselio) with (DNS). Not an IRT member.

Jeff Eckhaus: Jeff Eckhaus from Rightside, which is Enom and Name.com registrars, and not an IRT member.

Dennis Chang: Let's see. Any other IRT members in the room who may be sitting in the back, please join us at the table and identify yourself. Otherwise, let's see. Is there any IRT members joining us in the remotely? Let's see. Okay, Jody is there, Kolker.

Woman: And we have Mark Anderson and (unintelligible) on the phone.

Dennis Chang: Okay. I understand Mark Anderson is there, too. Thank you for checking in. All right then, let's get started. So let me cover the agenda, and a couple of the preceding slides. And Fabien is going to go ahead and take over, as he usually does on the IRT meetings.

So for this session, we'll do some background and talk about the milestones and recent activities. And we will be looking at policy implementation timeline, and the consistent labeling and display that is the next step. And what we would like to do is focus today's session on the transition from thin to thick. So we want to remind you of the current objectives, and we'll go from there.

Now we have two sessions at this ICANN 56 in Helsinki. So we have this session, and then tomorrow we will have another session. So think of it as a continuation of the IRT work. And what I'd like to do is, today we'll do the background, and we'll answer questions in an overview fashion if you have any questions about the program. And we'll cover our general approach to the implementation.

And if we have - if at all possible, what we would like to do is really get to the working session of the timeline, and perhaps get a consensus of that timeline; and tomorrow maybe look over the whole timeline, and then the rest of the plan.

So let's see. Some background. I think most of the IRT members know this. The Thick Whois Policy Development was done in March 2012 to October 2013. And the Board adopted the recommendation in February 2014.

And there's two expected outcomes of the policy recommendation. One is the consistent labeling and display, and the other is the transition from thin to thick for .com, .net and .jobs. So we'll be talking about the two different expected outcomes or tracks, however you want to think about it. But it was the IRT's decision to go about this as two separate projects, and we'll

probably end up making the implementation, you know, two different timelines, too.

So this is basically some details on the steps that we have taken, and some of the milestones that we have achieved, starting in November '14, 2014. And I won't go over the details here. These slides will be posted on the session calendar, so you can look them up later.

So let's look at our policy implementation timeline. It's a busy slide, and it'll take some time to get used to. The IRT members have seen this several times before, but there are new participants, so I would like to take a little bit of more time and talk about this. Fabien, do you want to take over from here?

Fabien Betremieux: Sure. Thank you, Dennis. So what you see on this slide - so hello, everyone. Sorry. I apologize for not being with you, and I hope that we can learn these slides this way in an effective way.

So what you see on this slide is the implementation timeline, so that is the policy implementation work we're doing. So let's start at the bottom of the slide. So that piece is the transition from thin to thick. As you understand, we've coupled our work in those two areas, the transition for the (unintelligible) and the consistent labeling and display way for all gTLDs.

If you look at the bottom part, as you can see we're still working through the design of the implementation plan, which we aim to publish for public comment in the fall, from September to October roughly, with the idea that by the end of the year, we would have a revised plan for input we'd received in the public comments, and announce the policy effective date, on that basis, early next year. So that's for the transition from thin to thick on .com, .net and .jobs.

For the second outcome, in the middle of the slide, that's thick Whois consistent labeling and display, as you may be aware, we have published a proposed policy language for public comment in December.

That public comment period ended in March. And we are now working through revising this policy language based on the input we received, and we intend to announce the policy effective date later this month - I mean in July, end of July. And so we'll talk about the status and next steps of that piece in a minute.

And we have on this slide the bottom part, which is the (unintelligible) timeline, because as you may be aware, we are synchronizing the implementation of consistent labeling and display of the Whois output for all gTLDs. And we have the rollout of the (unintelligible) profile.

So this is why you can see that goes through - are synchronized. This was one of the objectives of our implementation, to minimize impact on affected parties. Dennis, let me stop here and see if there's any questions or comments at this point.

Dennis Chang: Anyone have questions? I don't see any hands raised in the room or in the Adobe Connect, so let's proceed.

Fabien Betremieux: Thank you. So let me move on to the next slide. So let's talk about consistent labeling and display, and provide some status there, and an indication of next steps.

So as you can see the first bullet, that's a reminder of what was the text of the actual PDP working group Recommendation Number 1, from which stemmed those two outcomes we've talked about, consistent labeling and display of Whois output for all gTLDs, and the transition from thin to thick for .com, .net and .jobs.

So we're talking here about this specific outcome of the consistent labeling and display of Whois output for all gTLDs. We've heard - we've received substantial comments on our initial proposal. And so we've made a series of revisions which we've discussed.

We've actually considered the comments we've received. We've discussed those comments with the IRT, and now we will release later today our revised proposed policy language which incorporates those three elements here in the middle of this slide.

We've heard that there were substantial concerns with the potential confusion of displaying the registry expiration date and the registrar expiration date in the same Whois output. So we have decided that the display of the registrar expiration date, as well as the reselling permission, will be optional. And there will be no suggestions of mitigation mechanisms for those that would like to display those two expiration dates. So that's the first element.

The second one, we've received succinct feedback around the notion that making a reference to Section 3 of the 2013 RAA in our policy would cause a problem for registries, because of consensus policies becoming requirements of the registries, there would be a linkage between the RA and the RAA that was problematic for registries.

So what we are doing is that we will remove such a reference, and replace it by a specification, detailed specification, of the changes that would be applicable to registries (unintelligible).

And finally, there were also some concerned - concerns, sorry, with the reference to the Whois clarification advisory in our draft policy, because it was perceived as making this advisory a contractual requirement, which was not the intent. So we have made specific reference to this being a complement, not an element constituting the policy.

And so as I mentioned, as far as next steps, we will share the language later today for review by the IRT. And hopefully this will fit what the IRT was expecting, and is in line with the comments we received, and we will move on to publish that policy language at the end of the month of July for implementation by affected parties by February 1, 2017. Let me stop here, Dennis, and see if there's any questions or comments.

Dennis Chang: Go ahead, Joe.

Joe Waldron: Yeah, Joe Waldron from Verisign. So thanks for the update, Fabien. I think that's helpful. I know there was a lot of discussion about the reseller and registrar expiration date, so I think that it might be helpful just to have a brief discussion about what that really means.

So my understanding of that is that that's optional. Since these are - these apply to all gTLDs, right? So this is optional at the registry operator level. So is that a correct understanding?

Fabien Betremieux: That's correct, Joe. Thank you. Because the policy does apply to (unintelligible).

Joe Waldron: Thank you.

Dennis Chang: Go ahead, Jordan.

Jordan Buchanan: Thanks. Just a brief comment. I'd like to thank the staff for their responsiveness to the feedback you received. I think this roughly - this reflects certainly the feedback that Google provided in our most recent comment on this. And I think it's a much better solution than the previously one proposed. So I just wanted to thank the staff for its reactivity, and this implementation looks right to me based on my understanding of the policy.

Dennis Chang: We appreciate that. Thank you for that comment. No other comment. So as Fabien said, this is important for the IRT members. Please check your email today, tonight, because you will receive a document. And hopefully you can have a chance to look at it. And in our tomorrow's session, we can talk about this again, if you like. Move on, Fabien.

Fabien Betremieux: Let me mention on this subject one thing. The format of the language will be different than what we have drafted and submitted for public comment. This is why we really need the IRT's attention. We believe the substance is no different. It's actually what we've explained here in line with the feedback we've received.

But because we've changed the format of the way we've written the policy, this needs the attention of the IRT, and we can certainly take time tomorrow to walk everyone through it and discuss it.

And one of the main changes in terms of format is that we have gone into more of the details, because as I mentioned, we specified the changes that would apply to registries' RDDS output, as opposed to making a reference (unintelligible). And we hope that by doing this, we've made a very clear policy language that will be helpful for everyone to implement.

Okay. So, Dennis, unless there's any question or comments, I'm moving on to the next slide.

Dennis Chang: Please do.

Fabien Betremieux: So now on to the transition from thin to thick. Here is a reminder of what we're trying to do, and what we've been doing for the past six months at least, in particular.

We've identified that there should be two parallel tracks in the implementation of the transition -- a track for the handling of the new registrations, and a track

for the handling of existing registrations. I'm not going to speak to the implementation plan. We've discussed this already. Our target is to publish this in January 2017.

In order to get there, we've agreed with the IRT that we will - we have been working - discussing an implementation path that we're trying to close this week. And on that basis, we would then, as staff, draft an implementation proposal by the end of the month of July, which would then be reviewed and validated by the IRT before going for public comment.

So we are at this stage today where we're trying to close the discussion of the implementation path, and switch to a mode where we can draft a plan that would then become what we submit to the community, and eventually publish for implementation.

So where are we today on the discussion of the implementation path? As of last week, the high level agreement that there is right now in the IRT is the following. And please, IRT members, stop me if you don't recognize the consensus here.

First, we would approach the transition, as I mentioned, in two tracks that would have potentially independent timelines. And I think the assumption was discussed as to ensure that any delay or complication in one track would not affect the other one. That's the first principle.

The second one is that with respect to existing registration data, the registry system would enforce a limited set of validation rules, and this would be to ensure that all the existing registration data is transitioned, and there's no data left out because of data formatting or data missing issues; the objective being that after the transition, the registries' RDDS output should contain as much information as was available in both the registry and the registrar's RDDS output before the transition.

And so in concrete terms, there will be three specific fields that would be required for contact, and that's the contact ID, postal info type, and (unintelligible). That's a bit of the details of the discussion right now.

I believe it's important to note this principle, that we are aiming for the same amount of information before and after the transition, but making sure that all the transition - all the data can indeed transition. So that was the second principle.

The third one is that there would be two options available to registrars for completing the transition of existing registration data. There would be an EPP channel and a file-based channel. There are still some elements in defining both of those channels, but I think the IRT agrees on these two channels.

And finally, the fourth principle, and that speaks to the validation rules enforced by the registry systems. And the idea is that once existing registration data is transitioned, the transition is complete, or that the date for that transition has passed, then it's regular validation rules that would apply.

So the same rules would apply for new registration and existing registration after that cut-off date of the transition of existing registration from thin to thick. Let me stop here, Dennis, and see if there is any question or comments.

Theo Geurts: Good morning, good afternoon, everybody. This is Theo from (unintelligible) register. Just about to highlight something regarding Point 2 there, regarding the EPP. The IRT hasn't been able to actually come to a sort of consensus there on what EPP we are going to use in the terms of like - let me explain it a little bit.

Currently Verisign has two EPP channels -- its so-called back channel, the back pool channel, and there is the shared registration system that they offer. And most registrars - well I don't likely know if most registrars use the SRS

pool or the batch pool. So we still need to figure out where we are going to connect to, or if both will become available. Thanks.

Fabien Betremieux: Yes, thank you to you. And we - you know, depending on the time we have today and certainly tomorrow, we can spend more time and go back into those open items we have, and try to close as much as we can - as many of them as we can.

((Crosstalk))

Dennis Chang: We have a comment from Joe.

Joe Waldron: Yeah, thanks. This is Joe Waldron from Verisign. So just on that point, so the two bullets - just for clarification. The two bullets here is EPP which will be a transactional mechanism for registrars to be able to upload all of that data, as they do for any other transactions.

The bulk file is one that I believe has been discussed quite a bit, but I'm not sure that we have any kind of consensus from the registrars on preference of having a bulk upload capability versus EPP. So I think that's still an open issue, but those are the two that have been discussed within the group.

And then to the point about which of the EPP channels - I guess I don't look at them as different channels. But you're right. We have a standard pool of connections, and then we also have a batch pool that are typically used by registrars that are picking up deleting names.

So those are available to the registrars, and I think that's an implementation detail that we can get to, but I don't think it's necessarily, you know, relevant to how we're going to do it, I think. The main question at this point is, do registrars want to individually upload the data, or do that through bulk files?

Jordan Buchanan: It's Jordan Buchanan with Google. This is a quick question based on reading this. If the notion of sort of doing new registrations and transitioning the prior registrations are happening in parallel, I'm trying to wrap my head a little bit around the validation rules.

Are we saying that during the transition period, new registrations will be subject to the normal validation rules, while contact objects that are associated with older domains will have lighter validation rules? Or is the validation rules across the entire system going to be lighter-weight during the transition period?

Joe Waldron: It's Joe. So I think we've circulated a document that has what validation is done. And I would say it's a fairly lightweight validation. This is not intended to satisfy the Whois accuracy requirements. Registrars do that. So the validation rules should be the same for both sets of data.

Jordan Buchanan: Like, I guess, what's the point of this last bullet on this slide there? What's the difference between post-transition and during transition, in terms of validation rules?

Joe Waldron: I guess the way I was reading that was that if you - once you backfill the data, then any modifications to that data just follow the normal validation rules that are in place. Maybe I'm not reading it the way it was intended. So, Fabien…

Fabien Betremieux: No, that's right. That's right.

Dennis Chang: Go ahead, Fabien.

Fabien Betremieux: Yeah, no, I was going to say, Joe, this is correct. I think once the registration data - the existing registrations are transitioned, then those are subject to the same validation as the new registrations. But during the transition, Joe, I think, to clarify and make sure, the current discussion has

been that the validation rules that are enforced on both of these types of data, new and existing registrations, are different in parallel.

So each are operating in their own track. New registrations are subject to the full registry system validation rules, or to a given set of rules. And the existing registrations are subject to another set of rules where mandatory fields are different. Is that consistent with your understanding, Joe?

Joe Waldron: This is Joe. So I'll have to go back and look at that. I don't - I guess I wasn't following that.

Fabien Betremieux: Yeah, I'm trying to…

Joe Waldron: There may be different - I was just going to say there may be different validation if you're doing bulk files. I can see that you'd have different validation of the files. But I think that if you're doing EPP transactions, they'd be the same. But I'll go back and double-check that.

Fabien Betremieux: Yeah, I'm trying to get (unintelligible) the IRT to show - so let me see. I have the documents here. I'm going to - just give me one minute. I'm going to load it in the (unintelligible).

Dennis Chang: So while you do that, Fabien, Mark Anderson, go ahead.

Mark Anderson: Hi, this is Mark Anderson. Can you hear me okay?

Dennis Chang: We hear you fine.

Mark Anderson: Great. Just on that point, during the transition period, the reduced validation rules would apply to both new registrations and for the backfill of existing legacy registrations.

From a system perspective, we just wouldn't have a way of differentiating between the two. There's no practical way that we could differentiate the intent of registrars if it's a new registration or an existing registration. So, you know, those reduced validation rules that Fabien's pulling up right now would apply to both during this transition period. Thank you.

Fabien Betremieux: Thank you, Mark. I think that's a useful clarification, because I don't believe we had (unintelligible) discussed this point, or maybe it was missed in our notes, in the scorecard.

But so I guess then we need to make sure that that's well-understood from everybody on the IRT, that the minimum validation rules we talked about, which are reflected in the reference here, would then apply, as you just mentioned, to the new registrations and the existing registrations during the period of transitioning existing registrations.

So let me stop here and see if any other IRT members have comments on this subject.

Dennis Chang: Go ahead.

Christian Muller: Christian Muller from STRATO, Berlin, Germany. We have a quite large number of .com domains would probably transfer (unintelligible) transfer. What do we do if systematically our data is - you know, has some shortcomings due to the new needs here? I mean when do we fix that? And how do we call 800,000 customers? Or how is that supposed to work?

Dennis Chang: You want to address that, Theo?

Theo Geurts: Yeah. Let me try to address it for Christian. So we are going for these relaxed validation rules because the IRT thinks, assumes, there is missing data. I mean we're talking about really old data here. So that's why we have some relaxed rules here.

So the idea is just to transfer the data that you have. If you are missing certain fields here, there is nothing going to happen. We think that over time, the missing fields or missing data will correct itself organically, so to speak. At least that's our thinking.

Regardless, or nevertheless, your requirements with ICANN compliance regarding the RAA 2013 Whois specification will remain in place. So every time you get a complaint, you will have to fix it. And this is sort of like the organic process that we are thinking that data will correct itself.

What we don't want to do is, in advance, to have like a massive data correction program started. I mean it will delay the Whois migration till forever, I think. So that's why we came up with this idea. Thank you.

Jordan Buchanan: Hi. This is Jordan Buchanan again. So just to make sure I understand so in the post transition state then you'll be having sort of standard enforcement like other gTLD registries do. Does that mean that you can't associate a contact object with limited data with the new registration or does that just mean you can't update - create a contact object or update an object in a way that's invalid? Roger's saying it's the latter, not the former.

Roger Carney: Yes that's right. And just to clarify for the transition there's only three required fields and it's, you know, basic cost code. I did the IDs and everything. So the data, everybody knows there's a lot of data that's not correct. But post-transition I think there's like 13 or 17 required fields that have to be formatted correctly -- things like that. So the data that gets put into the SRS until updated is going to be what it was. So on update on create after the transition the new rules would apply.

Jordan Buchanan: Right but on create you could still create a domain name and associate it with a sort of old school contact object?

Roger Carney: Correct on a contact create or contract.

Jordan Buchanan: Okay great.

(Jenis):   Go ahead. That's okay. I mean I was looking for that. I was hoping from that not that we think that we have really weird (unintelligible) missing data. But this time he thinks like the international format of the phone number is not correct or stuff, you know.

Man: Very good. And go ahead.

Jeff Eckhaus: Jeff Eckhaus here. So I think first I want to say I know when I - when we first saw this information in this deck I'd say most of the team was very happy to actually have something in place. So I want to say thanks to the team for that. I'm just reading some of the notes from some of the teams because some of the members are - who are not here are - were either observers or members. I think one of the questions they had is for somebody like us we have millions and millions of contacts that'll need to be created.

                 What is - I haven't seen on something here and maybe it's - I don't want to steal your thunder. It's one of the next slides, but what's the timeline for this? You know, I know you said you'd be announcing the date but what's sort of the span you expect this to happen because it's not going to be an overnight process?

(Jenis):   You are correct. So the timeline slide is coming up and that is what we're wanting to focus this session on so you're right on stop. Any other questions before we get there?

Roger Carney: It's Roger again. Just on the last bullet here I think we need to be a little more clear because I mean I think Jordan actually brought up this question here as what happens with those sayings? And I - the team never really came to a conclusion on what happens to transfers either because transfers we still

have to create new contact ROIDs because they're registrar based. But we're going to have old data from a different registrar. So we never did as a team agree on what was going to happen with those contacts and what validation would apply to those going forward as well so…

(Jenis): Fabien go ahead.

Fabien Betremieux: Yes thank you Roger. That's right, I think this is one of the remaining of good items that we need to discuss. So, you know, I think we should also add a discussion of the case that Jordan just highlighted as well. Okay so we can probably now move on to discussing the timeline. So let me share - is this readable or not because I've prepared a slide with bigger fonts? Do you prefer that I switch or is it good enough?

(Jenis): I think it's good enough. We have a really big screen here.

Fabien Betremieux: Okay good, good. So with - so the IRT has discussed timelines on several occasions. And so we've tried to represent here what we understand would be the - it's - I don't know how that was. Okay.

So we tried to represent here what is our understanding of the discussions and the shortest path possible for implementing this transition from thin to thick. So as you can see on this slide we divided the slide in two parts with transition new registration and the transitional (unintelligible) registration. So let me speak to the first part.

So we're starting from our current you assumed announcement of policy sector base. And that - so that's end of January 2017. We understand that regarding new registration registries will need to update their systems and announce those changes for registrars so that we've - we understand that this would be - there were a three months' timeline discussed in the IRT. But so if we're adding registries needed to - you know, timing for registries to update their system so we're at six months here at a point at which optional

thick would be available in a registry production system. So any registrars wanting to start transition their new registration would be able to do so then.

And the registrars that the line in orange here we have had six months to prepare for doing that and would have six months after that date to complete their transition of a new registration to pick. And at the end of that 12 months for registrars we would prepare and complete the process. Thick Whois would be required in the production systems of the registries at which time would be the actual policy effective date for new registration. So this is for the transition of new registration.

Regarding the existing registrations we've assumed the same amount of time for registries to prepare and announce changes. And the IRT has discussed in this area a need for at least 18 months to complete the transition of existing registration from thin to thick. And so that's why the minimum time here would be 18 months as for the IRT discussion so far at which time it would be the policy effective date for existing registration.

So I understand that the conversation we just had on the relationship between validation rules for existing registrations and new registrations during a transition might effect this timeline. But let me stop here and see what IRT members think of this representation. I think we're trying to understand whether this is a fair representation of the discussion so far.

(Joe Alber): Yes, this is (Joe Alber) from Verisign. So I know in the past we talked quite a bit about the legal analysis that was required as part of the task to the IRT. And ICANN delivered that and I know that many of us have reviewed that. But I think that, you know, even the RDS Working Group session that (Chuck) chaired yesterday brought up a number of issues that I think impact some of the considerations that we have to look at for both. We - and we were talking about this primarily from a backfill perspective of some of these old registrations that have been around for many, many years and the impact to registrants that had signed registration agreements under one set of

conditions. So that's a distinction that we had drawn previously between new registrations and previously registered names.

But as we were going through both the legal analysis some of the discussions that were going on yesterday in the RDS Working Group session there was a lot of discussion about jurisdictional issues. And I know that I think many of us are familiar with the EU privacy law changes. There was a comment made yesterday about some countries not allowing private PII to leave their country. So this I think does create a situation that we need to look at and understand, you know, what that impact is. And that impact really both registries and registrars and not just Verisign in the operation of COMNET or employ media for .jobs. But I think it's a broader question about privacy data. And that was a specific call out in the task to the IRT was if there were privacy issues that weren't addressed in the working group that came to light as a part of this work that we should, you know, provide that notification back to the GNSO.

So I think that that's another area that we ought to consider because I don't know if waivers are going to be sufficient. I know Fabien at one point had talked about, you know, potentially having a system where we had, you know, where waivers became the rule and not the standard right? And we know some registries have received waives. But as some of these countries I think Russia has a privacy law going into effect on September 1 that requires PII to remain in Russia. At least that's not my non-legal read of what I've - I understand. So I think that some of these issues are just raising that question of is this the time now to go back to the GNSO and propose that as an issue that is outside of the mandate or the scope for the people that we have assemble for the IRT?

Krista Papac: Thanks (Joe), Krista Papac, ICANN staff. Wait so just a reminder first of all of all what the recommendation on this particular requirement was. I think it was Recommendation 2. I was trying to find them but I've over-organized myself. It was three, okay.

But the - it's - the recommendation was for the legal review to look at whether there were other privacy concerns that the EWG did not identify and that there were that the IRT would go back to the GNSO. So that's the first thing. And then to your point it is correct that the IRT could go back to the GNSO if they did identify concerns that - excuse me, privacy issues, if the legal review did find that there were privacy issues that were not already identified by the Expert Working Group.

The review did say that it didn't find any additional, you know, so the same set of privacy issues that we've been aware of from since the BWG work. But it is - it's your IRT so, you know, you guys can certainly discuss that. And I know that we even mentioned the - asked the IRT about this specifically based on some comments you made (Joe) at what meeting was it? I think it was maybe two meetings ago?

(Joe Alber):   It was in Dublin.

Krista Papac: Dublin at the end of that meeting. So we have an IRT call following the Dublin meeting where we said, "This is kind of still an open item. You know, is this something that should go back to the GNSO or not, IRT?" And you guys came back and said, "No, we think we should proceed." So if there's going to be a different decision made or a different discussion that's one thing that just may be a little bit of a reminder or what we've been, you know, discussed so far and what the recommendations say and what the legal review said.

(Joe Alber):   Thanks and good memory, something memorable I guess.

Krista Papac: That's right.

(Joe Alber):   So I've got the language here so I'll read it because I think that I'm not trying to make more of this than it needs to be but I think it's important. So it does refer to the applicable really to the transition of from a thin to thick model that

has not already been considered by the EWG memo undertaken with due consideration and I'm going to skip to the what has to happen.

So should any privacy issues emerge from the transition discussion that were not anticipated by the working group so in this case the working group I assumed, not the EWG but the PDP working group. So maybe that's my interpretation which would review - which would require additional policy consideration the Implementation Review Team's expected to notify the GNSO council of these so that appropriate actions could be taken. So that's all I'm saying is I think that we have learned things and we have had changes that potentially impact registries and registrars across the board in terms of, you know, laws that are changing, you know, with the EU privacy laws, other countries that have these - have implemented or now going to be enforcing these data restrictions.

And I think that we have an obligation to raise these and refer these - at least notify the GNSO of these issues because I think that if we're going to build a system where registrars and registries have more exceptions than the rule then we've - then we're perhaps building the wrong system right? We're implementing this in a way that isn't sustainable or maintainable. And that's - all - that's what I really want to make sure that, you know, that we comply with that task which is if we've identified privacy issues that haven't been considered in that working group that we notify the GNSO.

(Jenis): Any comments on this from other members of the IRT? Go ahead.

Theo Geurts: Okay this is Theo for the record. Those are pretty serious concerns you have, the IGO and I shared them with you. Currently what we did as an IRT because there are so many countries who have some kind of data privacy law in their country and maybe not as strict as the EU but nevertheless there are like 110 countries out there that have something in place there. We as the IRT sort of figured like this is not our problem. It's not within scope for us at the moment because we can't actually handle that at the IRT. We don't have

enough people, we don't have the expertise. So we could bring up here right now I think that's worth discussion.

(Jenis):   Any further discussion on this? Go ahead (Joe)?

(Joe Alber):   Yes so I would just say that I would recommend that we comply with that statement and provide that notification to the GNSO to raise our, you know, the points about the changes or the privacy issues that - even the ICANN memo deferred many of these decisions to registries and registrars to conduct their own analysis. So we've been conducting our analysis and I think that, you know, there's a question of when a registrar passes personal data to us as the registry in the United States are they able to do that in a lawful way? Are we lawfully receiving and storing and displaying that data in Whois? And I think that's an open question for us and I think that that's again being discussed in a number of other venues right now but I think that we have an obligation to provide that notification back to the GNSO so that would be my recommendation.

Krista Papac: Thanks (Joe), Krista Papac again. So how - what's the best way to proceed with doing that? Do you guys want us - like would you want to draft something or how would you propose moving like making that happen?

(Joe Alber):   To be honest I don't mind drafting something. I don't know that it's - I don't know that anything has ever been referred back to the GNSO. We may be breaking new ground here. So maybe that's what we need to think of overnight and we'll, you know, we'll talk to our folks and we can - maybe that's something we can discuss in tomorrow's session.

Krista Papac: That's a great suggestion by the way. And I'm so glad we have two sessions this week. And just and thank you for reading the recommendation. I did - I mean I assigned it to you and what the direction is is expected to notify the GNSO of these so that appropriate actions can be taken. So anyway but just to kind of refresh everybody of what the - what you just read a few minutes

ago and while we think on it overnight and maybe take this up again
tomorrow figure out. I'm not sure if this isn't done either so we'll get creative.
Thank you.

Alex Deacon: Hi. Alex Deacon with the MPAA. I'm just curious if we do refer this back to the
GNSO what's the impact? Do things continue in parallel or do we have to wait
for a response from GNSO to continue?

Krista Papac: That's for the question. This is Krista again. It's sort of why I wanted to reread
this. It says to notify the GNSO rather than refer back. I think that's an
important distinction. So my thinking is because it says notify that we would
continue our work here but still send that notification. And then it goes on to
say so that appropriate action can be taken by the GNSO. So that - I see
everybody else nodding their head so I think we have agreement there.
Thank you.

(Jenis): So that being said I'd like to bring your attention back to the schedule that
we're looking at here. And notification being done in parallel to our activity.
What does the IRT think about this schedule making the distinction between
the new registration and existing registration first, right? Is this the right
approach to take? Is this still rule from the registrar side as well as the
registry side?

We've been listening to the comments along the way in the previous
meetings and we believe that this facilitates everyone's need or can we do
better than this? Would you like to accelerate some parts of this to make this
faster? Let me hear from you. Go ahead Jody.

Jody Kolker: Hi this is Jody from GoDaddy. Can you hear me?

(Jenis): Loud and clear.

Jody Kolker: Hi. My concerns are on the time table as long as you're asking. Is 18 months a timeline for the existing registration? I - we have a significant amount of domains at GoDaddy so 18 months what I was hoping for was to have 18 months from the time that the registry has prepared, has offered the ECP to be updated so that we can start sending (unintelligible) registrations. So if the registry wasn't ready until six months into that timeline that would only give us 12 months to complete the existing registration. I was hoping to get 18 months from the time that the registry was ready.

Jeff Eckhaus: It's Jeff Eckhaus here from Rightside and we're probably second behind Jody and GoDaddy in having to do this. And I'd like to echo his comments saying that I also thought it was also from once it was available to begin uploading then it would start the 18 month period. So want to make sure that that 18 months remains sacred. Thanks.

(Jenis):   So the - from the prior conversation we were hearing 12 to 18 month range. So we start we'll start here. But let me hear from the registry side. So six month a good timeframe or can it be done quicker?

(Joe Alber):   This is (Joe). I wouldn't think that we would be able to do it quicker unless we really get in and, you know, do a more detailed analysis but there's a lot of - there are a lot of moving pieces to doing that and, you know, documentation and as well as development and testing and deployment so I think that that's a reasonable time right now to plan.

(Jenis):   Jody go ahead.

(Joe Alber):   Sorry that was an old hand.

(Jenis):   Any other comment? So what I'm hearing is 18 months from the point of where registry is ready to accept data.

Jeff Eckhaus: It's Jeff again, just one clarification that for people who are like, you know, may be freaking out because of that timeline just remember it doesn't mean that we're going to do everything in that last month. I mean we need that timeframe but, you know, because this hasn't been done and we would need to test everything out. But the goal is not to wait till the last possible minute but to have that flexibility and to try and maybe get it done at a sooner pace if possible.

Pat Kane: Pat Kane, Verisign. This is a question for Jeff and for Jody. In that 18 month window what would be about the percentage of domain names that you would have a natural expiration date if you could update expire because it seems to me if you had to go update domain names that aren't going to renew that that'd a lot of work for no value.

Jeff Eckhaus: Yes it's Jeff here. I mean I'd have to say if you looked at across all of our TLDs, you know, that we have managed on the registrars it would probably be an average life of about a 1.4, 1.5 would be my guess which I think is probably consistent with, you know, the Verisign registration data. There's going to be definitely some outliers because we do have some, you know, some very long-standing clients, some domain investors that have domains for, you know, that are - you know, that do register them and then maybe put on, you know, some registry lock and have it - they always keep them out for ten years. So there's going to be a large group of people that have that. But I'd say as an average it would probably be about a 1.4, 1.5.

Jeff Eckhaus: Go ahead Jody.

Jody Kolker: I don't have specific numbers on how many would be expired at that time or would be about to expire. But I would say that we would start on registrations that are definitely that are registered out ten years or two years or past the expiration or the timeline date start on those and then move back. And as we move back I would expect this to take, you know, a very long time for us to get all these existing registrations done. So we would work as Jeff said we

would start on this to be able to transition this right away. So we'd be doing this very slowly to make sure we didn't override any systems at the registry or in our own systems ourselves. And so we would definitely start on the domains that would - that are set to expire after the end of the implementation date and work our way backwards.

(Jenis): Yes that would be a helpful note that the implementation notes that we can remember to. Well good point. Any other comment? So this was our initial attempt at setting a timeline. And based on your feedback we'll work on this and come back to you.

Krista Papac: Thanks (Jenis). It's Krista again. I have a naïve question. I'm not the technical person in this conversation. So from a registrar's perspective when you guys get notified, you know, the official notification that this thing is kicking off and here's your 18 months in that initial - in the first few months you wouldn't actually be ready to start transitioning data. You would be building it out project, designing your project plan and putting that together.

Would you be able to do - work that in parallel with - that's part of your 18 months that you need. And would you be able to work that in parallel with the development work that the registries are doing so meaning like maybe that you're not losing all of that six months because you still need some time to like ramp up to prepare to send to the registry system?

Roger Carney: This is Roger with GoDaddy. We've talked about that in the group actually. And before the registrars can really start we need the specifications from the registry. So when we get the specifications from the registry we would begin. And I - where that happens I don't know but it won't be at the beginning of the six months. It'll be toward the end of the six months before they can give us a spec that actually says this is how you're going to have to do it so…

(Joe Alber):   Yes I expect we'll be working very - this is (Joe). I expect we'll be working very closely with all of the registrars on, you know, getting all the documentation out, testing environments and everything so…

(Jenis):   Any other comments?

Krista Papac: (unintelligible)?

(Jenis):   Jody is this a new hand?

Jody Kolker: Yes it is. Thanks (Jenis). I just wanted to comment on the 18 months period from when the registry is completed and in production. We're talking about 47 million domains that need to be pushed over there over to regular contacts or I'm sorry to thick contacts. Now we did this for .org I believe 12 years ago. (Joe) can correct me if I'm wrong here but at that time GoDaddy had 600,000 domains. And this took quite a long time to complete. And in fact years after this was done we were still getting notices from the registry that we had bad contacts due to transfer in from other registrars.

                  Well I just want to caution everyone that this is pretty massive. .Org at that time I think was only 1-1/2 million domains. And I think (Joe) has more confident numbers than what I have. And we're talking about something that's 100 times as large and, you know, (unintelligible) 18 months is a big project.

(Jenis):   Thank you Jody. I've just been informed that we have another meeting starting in this room right now. So we will have to continue our discussion tomorrow. So come back tomorrow everyone and we'll continue. Fabien do you have any last remarks?

Fabien Betremieux: It will be for tomorrow. Thank you all.

(Jenis):   Thank you all, see you tomorrow.

END