
ICANN Transcription

New gTLD Subsequent Procedures PDP Working Group

Monday, 12 August 2019 at 1500 UTC

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MICHELLE DESMYTER: I'd like to welcome everyone. Good morning, good afternoon, and good evening. Welcome to the New gTLD Subsequent Procedures Working Group call on the 12th of August, 2019, at 15:00 UTC.

In the interest of time, there will be no roll call, as we have quite a few participants online today, so attendance will be taken via the Zoom room. If you're dialed in on the phone bridge, would you please let yourself be known now?

All right. As a reminder to everyone, if you would please state your name before speaking for transcription purposes and please keep

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your phones and microphones on mute when not speaking to avoid any background noise.

With this, I will turn the meeting over to Jeff Neuman. Please begin.

JEFF NEUMAN:

Thank you, Michelle. Thanks, Julie, as well. Welcome, everyone. Now it is I guess officially the middle of August. I know there's a lot of people that have vacation time, and, with our normal staff assistance, usually we normally have two or three ICANN personnel on the call to help us out with running the meetings. Today we only have Julie, so, if things are a little bit slower than normal, Julie's doing her best. We're doing our best. Again, by saying "slower than normal," that's not a comment on Julie. Julie is great. It's just that normally we have several people. One person to do everything is a lot. So thanks, everyone.

Let's go to the proposed agenda, which should look fairly familiar in terms of just moving on with the summary documents. But before we do that, let me just ask if there are any updates to statements of interest.

Okay. Not seeing any or any hands raised. Let me see if there's any other items to cover for Any Other Business.

Okay. Let's move on then to the application change request, continuing a subject that we started on the last call. I know it says Page 7, but we actually skipped Page 6 because we went [inaudible]. On that note – if everyone could please mute their phones, that would be great – can you just scroll about a little bit,

Julie? There was a comment I inserted on Page 5. Right there. At the end of the call last time, we were talking about changing of the string in a very narrow circumstance. Julie, can you open – there’s a comment a little bit down from what’s on the screen, right under Kathy’s comment. Just a little bit down. Right there. What we were talking about was – I don’t know if could open that comment, if that’s possible. Yeah, there we go.

So what we’re talking about is a very narrow circumstance of when a party would be allowed to potentially change their string. What I captured from the notes was that this was a circumstance where, as a result – this is for brand TLDs only – a change would add a descriptive word to a string to resolve the contention set. The descriptive word is in the description of the goods and services of a trademark registration. The change does not create a new contention set or expand an existing one. The change would trigger a new public comment period opportunity to object, etc.

That was the very narrow circumstance. I sent a file to Julie. I don’t know if you can open that. It’s basically just a copy of a trademark registration in the United States. As an example, let’s say there were two applications for delta. Let’s say this random what that I picked happened to be one of the applicants. If you look at the description of goods and services, it says “threaded metal drill pipe connections used on metal drills,” etc. So they want it to go to Delta Drill or Delta Drills or Delta Pipes or something like that that’s in their trademark registration. That was the very narrow exception we were taking about.

I don't know if anyone had any continuing thoughts from the last time on whether such a proposal would work again to resolve a contention set. It's not to allow anyone to change their string or generic string or anything like that. It's a very narrow circumstance that came up a couple times in the 2012 round.

I see Kavouss. I see your hand raised.

KAVOUSS ARASTEH: Yes. Good morning, good afternoon, good evening to everybody. I'm sorry I was not able to attend your last meeting. However, I am reading your document and the [output]. I would like to submit the following. It is not only the change of the ICANN Board string or application that you have changed. There are many other areas that any application would be subject to changes. With what I have as experience from other cases, there should be a list, very specific, providing that the changes that do not require evaluation or reevaluation and does not have, in case of a string – an IDN does not require any additional cost. So it should be specific, very well spelled out and detailed. [inaudible] and should avoid using any adjectives, significant or narrow or wide or so on and so forth because I have read in your document several objectives which I have difficulty with in the implementation. So we should have a list. There is already something and we should look at that one to look at whether that list should be amended or that is sufficient. So we should have a specific list. The following changes does not require the evaluation nor any additional cost to what was already [inaudible].

Outside out, then you come to see whether the evaluation with cost or whether the evaluation is required without cost and so on and so forth, among that some of those that you mentioned or mentioned in the document could be done – contentious cases and so and so forth – and joint ventures or many other cases. This should be a specific and very clear cut. An application in the future guidebook should not leave any doubt for the people because this is one of the major and important elements of this situation that may require a careful consideration. I'll come back at the latest stage to other points as appropriate. So that is my first suggestion to you.

JEFF NEUMAN:

Thanks, Kavouss. This is a very narrow proposal. The other changes – if you go back and read the summary points of high-level agreement, you'll see that a lot of what you said is already subject to high-level agreement in terms of being very clear as to what the changes are, what are allowed. We'll talk about public comment in a minute. We'll get more specific details on other specific cases. Right now, we're just talking about this one area because it was left over from the last call.

Let me go to Trang and then to Martin.

TRANG NGUYEN:

Hi, Jeff. Can you hear me?

JEFF NEUMAN:

Yes. Thank you.

TRANG NGUYEN:

Wonderful. Thank you. We had raised, from an ICANN org perspective, some concerns about this proposal on last week's call. Thank you for the revisions that have been made here. I wanted to reiterate the same issues and concerns that we had from last week on this particular proposal. If I understand this proposal correctly, the proposal is that, if a particular applied-for string is found in contention with other strings, the applicant would be allowed to change the applied-for string, given certain parameters for that particular change.

The issue that I had raised last week was with regards to the timing of this change. In order to establish contention sets, all of the applications must be put through what's called string similarity evaluation. At the conclusion of string similarity evaluation, strings are determined to be either in contention or not in contention. If a particular string is found to be in contention and that particular string is allowed to change the applied-for string, then we would have to put all of the applications through to string evaluation again and then potentially also open up the objection process again. This is the issue I had raised last week, which is that it creates instability to the program and it requires potentially constant reevaluations of string similarity and objection processes, potentially creating a lot of disruptions to all of the other applications.

So these were the concerns that were raised last time with regards to allowing string changes. Thank you.

JEFF NEUMAN:

Thanks, Trang. I totally understand that. If we think to add to the proposal a required timeframe – in other words, X number of days from reveal or something like that ... If we really drill down on this proposal, which was made several times and got very favorable attention from the work track that was working on it, I think you'll see that adding a descriptive word to an already-existing brand is very unlikely to produce any kind of string confusion or anything like that. So I understand those concerns, but I think, if you drill down, if the original string passed a string confusion, then, by adding a descriptive word, I would think that the chance of any issues go down tremendously of any kind of issue. But we did talk about [inaudible] as part of the proposal that was made. It would be to trigger a new public comment period, etc.

So let's see if this proposal has legs. If it does, then I think we can address those comments from ICANN. I think we also need to take a step back and think about the purpose of the program. If there are entities out there that want TLDs and they're able to work it out in such a way that's not going to cause issue to the stability, resiliency, or security of the Internet or DNS, I think we should give those some thoughts.

Let's go to Martin and then back to Kavouss and Trang.

MARTIN SUTTON:

Hi, Jeff. Thank you. First of all, I'd say I'm supportive of the proposal – I don't think that's a surprise – the reason being that is very specific. So I think it is manageable, and I think the benefits of being able to introduce this are very positive.

In response to some of Trang's concerns, I think there is also need to consider what the benefits can be of introducing such a proposal in that it could help to reduce then the contention sets and any need for some to go to an auction process, which is the last resort. So I think that there is a lot better options that can be introduced by this proposal.

As an add-on to it, though, I think we just need to flag that, if this progresses further, we need to think about how that impacts Specification 13 and to introduce any of the terminology that is allowed in this particular space to then extend into Specification 13. Thanks.

JEFF NEUMAN:

Thanks, Martin. Let me go back to Kavouss and then to Trang and then to Christopher.

Sorry, Kavouss. You're—

KAVOUSS ARASTEH:

May I proceed? Yes. Jeff, perhaps I was not clear. You are taking the issue in a piecemeal approach, which I don't support. We should have an overall holistic approach. In every process, there should be a time period during which you can make any changes that you want and you don't need to give any reason. That period [inaudible] is about 30 days. You can reduce it to 15. You can increase it to 45 days. There would be a period during which you can make any changes that you want without being subject to reevaluation, without being subject to cost, without being subject

to public comment, without being subject to so and so forth. This is Point #1.

Point #2. Changes that do require a reason. We don't need to say "Because of contention [strings]." "I want to change." [As easy as that]. So the consequence of change beyond that 30 days should be subject to careful examination, whether reevaluation is required, whether additional cost is required, and whether public comment is required. That is the process. We don't jump from the very beginning to auctions. I don't understand Martin going to auctions and wanting to [inaudible] all these things. You are in a rush. You have to do it totally, and you have to do it logically. We have to establish the period of 15 days [for each stage] during which we don't require ... The changes are allowed without any consequence.

Beyond that, then you have to [vote] to see whether it requires the cost or requires reevaluation or whether it requires public comment and so on and so forth. That is the situation. In either of the two cases, you don't need any reason. This is the authority of the applicant to change, without any reason. If they give the reason, so far, so good. But you don't ask for the reason. "Because of contention, I changed." "Because contention may give rise to another contention." So I don't think that we should go that far. We should be very logical, as it is done in any other cases. You don't take ICANN only. It's a very narrow thinking of the last proposal made and before the last proposal. Thank you.

JEFF NEUMAN:

Thanks, Kavouss. I was hoping to avoid this because we spent a considerable amount of time on this on the last call. It's really important, before you raise a comment or question to, if you can, catch up. On the last call – Julie, can you please go back a little bit to the middle of Page 5? There we go. High-level ... right there. Oh, no. Yeah, there we go. Okay. So on the last call, putting aside the comments that Kathy has inserted, [inaudible]. So, for the moment, don't pay attention to the comments. We talked about on the last call that the commenters generally supported a high-level criteria-based change request process as was employed in 2012 with the following improvements.

Before we get to the improvements, later on you'll see a citation to the list of criteria that were used by ICANN. There's also, in the supplemental initial report ... We talked about this. So all of that that was in the section that was supported by the commenters [inaudible] part. The additions that commenters had agreed upon (or it seemed there was agreement) was that additional guidance should be provided on changes that would likely be approved and changes that would not likely be approved because that was not necessarily indicated in the ICANN documentation – that the guidebook set forth the types of changes which are required for public comments and which are not. We'll get into a little bit more detail on that later in this call. Then the guidebook should set forth that types of changes that would require reevaluation. Some of the application or changes that would not require any reevaluation ...

So we talked about all of this. Right now, we've jumped into the narrow situation because we talked about all this general stuff on the last call. So, Kavouss, I totally understand what you're saying.

If you could go back and listen to that call or look at the notes and then make any comments, that would be great. But right now on this call, we're going to talk about specific situations because that's where we are in the conversation.

Let me go back to Trang and then Christopher and then I want to move on to the next situation.

TRANG NGUYEN:

Thank you, Jeff. I want to come back to a couple points you had made earlier. One, I guess, has to deal with timing. If the intent of this proposal is really to provide applicants with an opportunity to change the applied-for string before the string similarity evaluation occurs, I think that certainly would not create any disruptions to the process.

For example, once all of the strings are posted for the first time (Review Day), a window of time could be provided where applicants themselves could take a look at all of the applied-for strings and determine whether or not they want to submit a change to the applied-for string. I think certainly that would minimize any sort of disruptions.

But if the intent is for this proposal to be applicable after string similarity evaluation is completed, then I think the same issue that I spoke about before would exist, meaning: just think about a situation where string similarity evaluation is completed. A number of strings are found in contention. The applicant decides to change the applied-for string. We would then have to perform string similarity evaluation again.

Another scenario to contemplate is that, even in the case where the string similarity evaluation process did not put a string in contention but the string confusion objection process puts that string in a contention set and then, if the applicant is then allowed the opportunity to change the applied-for string to resolve that contention set in that point in time, we have to perform string evaluation again and then, after that, the string objection again ...

So, again, it's really about the timing of when the ability for an applicant to change the applied-for string is provided. Thank you.

JEFF NEUMAN:

Thanks, Trang. I totally understand, so we'll put something in there about timing. But again, I would ask you to think about the likelihood of having to actually go through string confusion analysis if you're adding a descriptive word to a brand. It would be very difficult to think of a situation where the initial string proposed had no similarity but now all of a sudden adding a descriptive word would create it. I guess it would be theoretically possible. Our general inclination is always to oppose changes, but just think about it. Again, this was strongly supported in the work track. If there's a way we can come up with some kind of compromise where this is allowed, let's see if we can work that.

Let me go to Christopher, Kavouss, Trang, and then we really need to move on to the next area.

CHRISTOPHER WILKINSON:

Good afternoon. [Trucking] it down here. If the water starts coming in through the front door, I'll leave the call.

I'm desperately trying to think of ways of vastly simplifying this issue, but listening to you all, I feel you're all beyond that and we're stuck with a highly-regulated system of preventing people from changing their string so that it's likely to be successful. Two comments. I think, following on Kavouss, you could say that, as soon as the current package – I'm speaking in terms of phases. I don't agree with a vast single opening of the procedure. Looking at the current package, as soon as they have been revealed, all applicants should have a period where they could field substitutes, just to avoid string contention.

Secondly, since, as far as I can tell, there's a highly structured and very well organized intellectual property community, including all the brands issues, I think you guys should actually be proactively advising people to apply for strings which have a serious possibility of being unique. To go back to your example of delta, it's absurd to claim that you want to monopolize the word "delta" on the DNS worldwide, whether you're producing drills or popcorn. That's absurd. Somebody should have advised Delta – I believe this is totally hypothetical, so I allow myself to pick up on the example that was presented. Somebody should have told Mr. and Mrs. Delta that they had no chances [for] delta as such. But if they applied for deltadrills, it would probably go through with no contention at all. I think we should try and make this simpler. Thank you.

JEFF NEUMAN: Thanks, Christopher. We'll go to Kavouss one last time and Trang. Kathy just raised her hand. Then I'm closing the queue for this little subject and then we'll go onto the next one. So Kavouss and then Kathy.

KAVOUSS ARASTEH: Jeff, again I think you misunderstood me. More or less I'm saying what Christopher and the previous speaker before him said. We need to have a period, whether it's a fixed period of 30 days or [inaudible] days or whether before the evaluation starts or whether the evaluation is terminated, that changes are allowed. This is something essential. It doesn't that the last meeting concluded that. A wrong conclusion is dangerous. It's harmful. We have to be quite careful. So you have to have specific period, either in terms of days or in terms of activities or functions before evaluation starts. [inaudible]. So please kindly deal with me. I'm a member of this group. I have not been able to attend but I read all the past calls, [prescriptions], and transcripts and everything. I'm coming back with that. I want to share the experience. It's not only you dealing with this issue. There are other areas where there are changes and we should be logical. We should have some argument, but not because of the taste of some people. [inaudible] have that. We should have a period, whatever that period would be, fixed or not fixed, during which we can change. That is an important issue. After that, you say that you can change with this. Sometimes you have to pay for the cost. Sometimes you have to go to public comment. Sometimes you have to go to reevaluation and so on and so forth. But I'm not talking about auctions at this stage at all. This is important and I am sorry. I request you on

appeal to accept the comments for people. This is my comment. I have the right to send my comment, irrespective of whether you have discussed it previously or not. Unless the whole process is [inaudible], then I [inaudible] ICANN public comment saying that I made the comment. My comment was [not agreed to]. And I do it in other areas. Publicly announce that I made the comment [inaudible]. You have [inaudible] logic. Thank you.

JEFF NEUMAN:

Thank, Kavouss. I think I'm understanding your proposal now in two parts. One is that a period of time in which you believe any changes should be allowed to be made before any review or anything like that. But the type of changes we're talking about now are changes that occur just in the natural cycle of applications, which could be anything from a change of personnel to a change of entity name to what we'll talk about in a few minutes: the creation of a joint venture. So I understand the proposal. Let's see what comments we have as we go through on other specific types of changes.

Kathy, please?

KATHY KLEIMAN:

Thanks, Jeff. Can you hear me?

JEFF NEUMAN:

Yes.

KATHY KLEIMAN:

Okay, great. Initial testing. Apologies for joining late. Glad to be continuing the string changes. Is it going to be captured clearly in the document, perhaps under high-level agreement, that the only string changes that we're talking about now are very, very narrowly tailored, probably involving brands and still subject to open questions, like, "What happens if it's Delta Airlines or Delta Faucets and the group that represents Delta or a community that calls itself Delta (lots of communities do)?" and whether they get to change, too? I can see the problems here. But the idea of capturing very, very clearly that now we're only talking about very, very narrow string changes, not anything that anyone is thinking of and not in all contention sets. That's the first question. Where is that captured so that we don't have to revisit it or remember it?

The other – this may answer Kavouss' question – is – tell me if you agree, Jeff – that, in terms of application changes, I think we only touched on that briefly, I guess in expectation that we'd be going farther. That question has been raised certainly by Non-Commercial and others: that unlimited changes really don't help the community. Unlimited changes are pretty scary in terms of what that would mean in terms of community oversight. Once you submit the application, you should be fairly well locked into it unless there's a really good reason to change, such as, say, overwhelming comments from the community.

I'd like to know if that's understanding as well, where that is captured. Thanks, Jeff.

JEFF NEUMAN:

Thanks. Kathy, you have a specific proposal right now just in a comment because we talked about it the last time and then there was a section that we talked about on Page 7 that talks about the string change. So, to the extent that there's agreement, then we'll be very specific if there's agreement on that one type of change.

If we start scrolling down a little bit, on Page 6 we'll talk about the rest of the comments we got for the change request. So it's actually a good segue to talk about some of the other deeper-dive items a level down from the high level that we talked about the last time.

If we look at these general comments and get outright into it, the registrars said that change request should be more flexible. For example, the registrars believe that mistypes should be allowed to be fixed. There was one situation where there was an entity that applied for DOT-something – we don't have to get into this situation – and they were eventually allowed to remove the letters D-O-T from their application. But that was a question as to whether a typo should be able to be fixed from an application.

If we look at Kavouss' proposal, this would actually solve – thanks, Rubens, for pointing out the specific example. If we did allow a period of time – let's say it was 15 days or whatever it is – to make any typo changes after the applications are submitted, is that something we should contemplate? Let me throw that out there. Kavouss, I think we know your feelings on it, but if you want to expand, please take a minute to expand.

KAVOUSS ARASTEH: Excuse me, Jeff. You don't know my comments. You guess. You cannot read my mind. I have not said anything yet on the subject I want to say. A period during which any change could be made, a period after which changes subject to first reevaluation. One you reevaluate that, then you decide whether it's subject to cost and whether it's subject to public comment. In that process, if the changes after that specific period is for the removal of contention, that will be doing during the reevaluation change. "Yes, now we understand that you have a problem. By this removal of a contention, you have change." That is a decision whether you maintain the same period of update or whether you say "That is a new change" and you have a new process and new money and it should go to public comment.

Still, we should go logically, not piecemeal. What I heard from everybody except Christopher is that we are a piecemeal approach. We're just narrowing down to a specific place without having a general approach. That is dangerous because you will have hundreds of cases in the future that you need them. You said that that is agreed/approved. Who approved that? You want to give that to ICANN to approve these changes? We should have predetermined criteria but not ICANN. I agree that changes that agreed and I don't know why we give that [possibility] to ICANN. We should have predetermined to let the applicant know that these changes require reevaluation and these changes require additional costs and these changes require public comments. I'm not saying to leave it to ICANN to decide whether it requires [inaudible]. We give too much authority to ICANN and it depends on the people. I don't want to delegate that authority.

So please kindly, I have not said everything. Still I have a lot of things to say to you because I have full experience, vast experience, of this sort of thing, exactly similar but not identical. Thank you.

JEFF NEUMAN:

Thanks, Kavouss. In the supplemental initial report – I'll say this again – we had a whole section on change requests. In that section, it specifically had listed the criteria that ICANN had used in 2012. I had asked people to comment on whether that was the appropriate criteria or whether any additional criteria should be used. What we got out of the comments that people submitted and groups submitted were a couple things, and they're all reflected in the high-level agreements.

Number one is that the commenters agreed that the criteria used by ICANN in 2012 was appropriate. They also agreed that we should add some elements to it, number two being that we should make sure this is all spelled in the Applicant Guidebook so it's in advance. Three, it's specified in the Applicant Guidebook – just as you said, Kavouss – which changes require public comment, which changes require additional reevaluation of some or all of the application, and which changes are likely to be approved and which are not likely to be approved.

So that's all in there in the supplemental report. Right now we are talking about the comments that we got that are above and beyond what commenters generally agreed with. So I think, Kavouss, you're actually supporting what was in the supplemental initial report and agreeing with the high-level comments which we

already believe have high-level agreement. So that's great. Right now we're talking about some comments that we got where there are tweaks or additional things that were brought up by constituency stakeholder groups and other commenters.

If we look at what the registrars have said – I know we're running out of time – the registrars have said that there should be a time period to allow for typo changes or mistypes. I have not heard too many comments. Kavouss, you have presented that there should be a period of time where you should be able to make these or any changes, so I'm just seeing if there are any comments on that.

I'm not seeing any comments, so let me go to the Non-Commercial Stakeholder – oh, Kathy's hand is up. I was just about to go to the Non-Commercial Stakeholder Group [comment].

KATHY KLEIMAN:

There was one other change in strings that I heard about in the first round, Jeff, so I just thought, for a data point, I would add it. It was an IDN for Verisign. It was a misspelling. They had created K[V]M with the letters kuf, vav, and mem (for anybody who speaks Hebrew). They hadn't realized that in general you don't use vowels in formal Hebrew. So they wanted to delete the middle letter. Ultimately, I believe they were allowed to do that. So we now have two examples: dot (D-O-T) taken out – obviously somebody miswrote; perhaps English – an IDN did that— and then the K[V]M. So we're looking at a very, very narrow range of misspellings. If there's a way to encapsulate that and provided they're not going into another contention set or something like

that, maybe those types of misspellings should be allowed. We did allow them in the first round. Thanks.

JEFF NEUMAN: Thanks, Kathy. Can we verify whether that change was allowed or not? That's helpful. I did forget about that one. So if we can just check to see if that was allowed, then that will also be a good data point. Thanks, Kathy. Susan, please?

SUSAN PAYNE: Hi. My understanding is you're seeking to understand whether people on the call generally are supportive of this notion. I would agree that I think it's reasonable to allow this kind of correction of error, where it's an obvious error. I think we probably need to require the applicant to demonstrate that it is generally an error and they're not effectively changing their string after the event.

I wonder what people think about having some kind of fee for making a payment. I hesitate to use the term "penalty," but I think one of the things about having a belief that you can't make a change after your application of the string does is it does encourage applicants to be diligent and careful and to check. I don't think we want to encourage applicants to be less scrupulous in checking their applications because it's like, "Oh, okay. Well, we can just fix it later."

So I think there might be some merit in imposing not a huge fee but just something that focuses the mind.

JEFF NEUMAN: Thanks, Susan. Let me ask a clarifying question of both you and Kavouss and others that support this error correction. Would this be only after the application is submitted? In other words, there's a time period between which the application is submitted and the time in which applications are revealed. Or are we talking about a time period after reveal because that's generally when those types of errors may be noticed? I just want to clarify with what everyone is thinking. Is after submission or after reveal?

KAVOUSS ARASTEH: Excuse me. After what? The second one.

JEFF NEUMAN: After all the string are revealed.

KAVOUSS ARASTEH: Revealed? What does that mean?

JEFF NEUMAN: When it became known to the public what the strings were. Just as an example, applications were due, after the glitch, I think, in the very beginning of June, but it wasn't until July that the world saw all the applications. So do we have the error correction in the time period between which the application is submitted and revealed, or after the world knows what is submitted?

I have Jamie and Kavouss in the queue. Jamie, please?

JAMIE BAXTER: Thanks, Jeff. If I'm not mistaken, from the point that the application period closed and before the reveal actually happened, there was an administrative check that went on behind the scenes. It seems to me that checking the string against other statements made in the application would be a very simple way of figuring out if there was an actual type made in the cell that you actually spell out the string that you want. Whether it's referenced in your mission statement or whether it's referenced at some other point in the application might be one way of quickly learning that the applicant may have put the wrong thing into the one single cell that identifies the string you're applying for.

So I don't know how extensive that administrative check is or what things were actually handled during that administrative check, but it seems like that could be something that's included. Thanks.

JEFF NEUMAN: Thanks, Jamie. There was an administrative check. I'll have to wait to hear from Trang, but my assumption or what I remember was it was just to make sure that all the questions were filled out, that there was no missing information. I don't think anyone actually read the applications prior to the reveal to do that kind of check that you're talking about, Jamie. But I'll wait to see if – oh. Trang says, "The specific check he spoke about was not part of the evaluation performed during the admin check, Jeff. That's correct." Okay. As Kathy says, "I don't know if that'll pick up things like IDN ..." It wouldn't pick up things like IDN transliterations and stuff.

Kavouss, please.

KAVOUSS ARASTEH: I think also [inaudible] for many, many years. There would be good cases. One case is self-identified errors. I am applicant. I send something and I identify that there has been an error. So I will [inaudible]. If this identification and submission is during that X period, agreed [inaudible]. If it is after that, it should be reevaluated to see what is the consequence of that. If it is a type of typographical error, it should be accepted. So we have to say what type of changes do not require all of those things, among which would be typographical. Or sometimes you may say any other changes, like the name of the company but everything else is the same.

However, there is another type of identification: by ICANN. Then they have to give a period to the applicant and say, "During this period, if you clarify the matter and make a confirmation that this error that was identified by ICANN was valid, then okay. If not, your application will go out of the date and you will have to restart again."

So these are the things that we have done already somewhere else. So there are these types of that. So you need to provide a period in which all errors identified by ICANN or by the applicant could be done if it is in nature typographical or anything that we have to clearly mention. [inaudible] that error. Who decides that it is a typographical check? ICANN or no? There should also be criteria. Which type of change is considered to be the error type or a typographical type and so on and so forth? If you say "hotel" and "hotels," could you say that's typographical? I don't think so. They are two different things, singular and plural. So we have to identify

which are the changes which are considered typographic and accepted, either self-identified or identified by ICANN, and give them some period of time during which, if that correction is made, then the data is complete and you can start the evaluation process. So we have the period. We call them validation and data correction and data [inaudible] period. That would be a period – X days – during which all these things should be done until we determine now that the data is subject to a [starter] process. Without that, it is in the examination/validation [stage]. So you miss this point of validation. Someone should validate the data to avoid some of these errors which give rise to contentious [inaudible] or to some examples that I gave – hotel and hotels – or any other things, like bank or banks. So many, many things could happen. Thank you.

JEFF NEUMAN:

Thanks, Kavouss. I think we'll get to some of the other types of changes. I think there's been some comments in the chat. I want to go back and just make sure those are covered. One I saw was particularly a good clarification. I think Justine had said a comment, "What's the harm if obvious error correction is allowed at any time during application or after reveal." I think, Justine, the type of error correction we're really talking about here is of the string itself. You are correct that other errors like misstating – I don't know – an employee's name or – I don't know what else; there's probably many other kinds of errors – I think would be subject to the normal change process that we're talking about here. I think this is a limited typo change for really the string itself,

not really for, as Maxim says, grammar mistakes because that can be subject to the regular changes.

Let me go to the NCSG comment, which the [timers covered] – thank you. All right. So the NCSG stated, “Many changes might be fair and reasonable, especially changes in response to comments by people served by the TLD as long as they are fair and openly and transparently shared with the community and the community is given a full, fair opportunity to comment. Opening this opportunity for using application changes may diversify the pool of new gTLDs.” Then they go on to say that we should establish criteria for what changes are allowed, what changes are not allowed, what changes require evaluation fees, and how they’re going to be considered, essentially, and reviewed.

I think what we’re talking about here is a different type of change, which I think is useful to talk through. This is dealing with changes in response to public comments, potentially early warnings. These could be very material. Let’s assume we’re not talking about the string in this case but other types of changes. Let’s say, as an example, there were comments and concerns about the string, and the applicant was to assure the public that that protections would be in place or some other addressing whatever the comments were. Should those types of changes be allowed. Yes or no? If so, I would think, because we agreed at a high level that certain types of changes should be subject to comment and potentially opening up the objections again and other aspects ... Let me get thoughts on allowing changes to applications to respond to comments. Thoughts on that?

Just to go back to 2012 while people are thinking, those types of changes were not allowed in the last round. Let's say, when the governments filed early warnings, applicants were not allowed to change their application to address those early warnings. Should this be allowed? If so, we can then talk about the process it must go through.

Trang is in the queue, so Trang, please?

TRANG NGUYEN:

Thanks, Jeff. Just a quick point of clarification. There was no specific rule that an applicant could not change their application to address GAC early warning from the last round. I think that we had some very specific guidelines for changes as it relates to community applications. But as far as I remember, we didn't have any specific rules against applicants changing their applications in order to address GAC early warning.

Now, one thing I will mention is that most of the time applicants are not required to tell us the specific reason as to why they're submitting the change. So even if they did submit the change to address something in the GAC early warning, that was not something that was always this close to us [in] the last round. Therefore, that's not a data point that we tracked either. Thank you.

JEFF NEUMAN:

Thanks. I think the way changes were made after the early warnings was through the addition of PICs. Trang, just to clarify, you're saying that any type of change was allowed to made,

except for a change to the string, after early warnings? Because it was my understanding that, other than filing PICs, other changes were not necessarily allowed. But I could easily be wrong. So, Trang, if I could ask you to just respond to that and then I'll go to Kathy.

TRANG NGUYEN:

Yes, Jeff. Sure. PICs were a mechanism for applicants to address GAC early warning. My point was that, if an applicant decided to submit an application change request to change something in their application, we would have accepted it. We don't have a specific rule that says you cannot address GAC early warning by submitting a change request to your application.

Now, even if the application submitted a change request to address a GAC early warning, for example, that's not something that we would necessarily be privy to. They're not required to tell us, nor do we track that information. So when we're processing a change request, we don't know if it's in response to GAC early warning, in conversations that the applicant may have had with some government entities, or if it's just simply a change request because of changes to other circumstances. But there was no specific hard rule that the applicant cannot submit a change request once GAC early warning was issued.

PICs are definitely a mechanism that applicants could use to address GAC early warning, but there was no specific rules that says you cannot submit a change request after the GAC early warning was issued.

JEFF NEUMAN: Thanks, Trang, for the clarification. I'm assuming though that changes to the string were not allowed.

TRANG NGUYEN: Correct, other than to correct simple typographical mistakes, like in the case of .africa, as you mentioned earlier, and the Verisign example.

JEFF NEUMAN: Thanks. While you're on, in the Verisign example, that change was allowed?

TRANG NGUYEN: I believe so. I can't remember the exact application, but I recall that specific change request. I believe it was approved.

JEFF NEUMAN: Thanks. Kathy, please?

KATHY KLEIMAN: For the purpose of this discussion, I think we're leaving string changes behind or we're talking about regular changes to the application. Jeff, it might be helpful if we can pause this discussion and actually get data on this because significant changes to applications were allowed. One of them at least came from Dish and .mobile. It was a massive change to the main application in

response to a community objection to settle a community objection. So that's at least one example and we should find out the others.

I think we need to put everything – any kind of changes to the application; major changes, like not address but major changes to particularly the public portions of the application – as Kavouss said, out for public comment and notice of at least 30 days, maybe more, and perhaps with some way of notifying people who have submitted comments that a change has been made. Let's collect the reason, for goodness sake. That's really important. We are submitting this in response to a GAC objection. That way we know if there's heavy lobbying coming in from, say, one stakeholder but not others. I'm not saying GAC is a stakeholder but let's say one group really wants everybody to have green motifs and that's what they're lobbying for and suddenly everybody changes to green motifs. We should know who pushed that.

The other is – something that really scared me in Kobe, as you know – the idea that unilateral or arbitrary changes completely driven by the applicant themselves might be allowed to be submitted to particularly the public portions of the applications, which means that you could submit a public portion of the application that says, "We are representing X. This is the goal of this TLD," and completely undercut it two months later after the whole public comment has passed and when people aren't really watching because the main community viewing will be when the round is revealed – the big reveal day. So I'd like to see us not allow arbitrary unilateral changes.

Summarizing, let's get the real data. Let's find out how many people like Dish did have significant application changes. Let's agree that we're putting this out for public comment, that we're going to collect the reason for the change – that's an easy one and cheap – and that we're not going to allow unilateral changes. The applicant had plenty of time to prepare their application. They should stick with what they put out so that the community can properly respond. Thanks. Sorry for the long comment.

JEFF NEUMAN: Thanks, Kathy. When you say “unilateral changes,” you're talking about the material items that you were mentioning, not unilateral changes to address people and entity information? That kind of thing?

KATHY KLEIMAN: Right. To the public portion, substantive portion, of the gTLD application. Thanks.

JEFF NEUMAN: Okay. As Trang notes, all change requests were posted for a 30-day comment period. I will note that, if it was changes to a confidential portion, all there was was a notice that there was a change requested. But obviously it was still confidential because the original part of it was confidential. As Trang says, they didn't track reasons for changes.

Let me go to Kavouss and Susan.

KAVOUSS ARASTEH: Jeff, I think there are some sort of misunderstanding of the early warnings. Early warning is not objections. It's early warnings. It does not necessarily require changes. But applicant after receiving an early warning, may decide on its own, optionally, to make changes. So we have to distinguish between the requirement of changes or optional changes. So early warning does not require an obligation to change something, but the applicant may change it. I have several cases that I was involved with. If the change was made during the early warning, they would have not had this problem for two or three or four years. So optional changes as consequence of early warning is already authorized, but it does not mean that, if your change is made, it's outside the fee, outside the public comment, outside the so on and so forth. [inaudible] go to the categories and so on and so forth. So let's not mix up this situation. Somebody said – Kathy – early warning does require an obligation to change. No, it does not. It's just an early warning. It's just a flagging of something. It is subject to the applicant whether they change it or not change. If they change it, problems may result. If they don't change, probably it continues for further discussion and so and so forth. These are separate from the validation by ICANN, from the other things and so on and so forth. I think we need to rethink the situation. Thank you.

JEFF NEUMAN: Thanks, Kavouss. I put the early warnings in the same category as other comments that were received to an application. So I did not to imply that early warnings require changes. You are right

that applicants have the ability to request changes if there are either comments or an early warning or another reason they would like to.

Let me go to Susan.

SUSAN PAYNE:

Hi. I'm a bit concerned about the notion that we or indeed ICANN is expected to form a determination and a distinction between where there's a reason and where there isn't a reason, although I'm noting that Trang has reminded us that there were criteria that ICANN nominated against and also that we are also reminded, of course, that all of these went out for public comment, and so the public comment could comment on these.

But it just seems to me that one person's lack of reason is not necessarily another person's lack of reason. For some of the reasons that Kavouss was just touching on ... You might have a third party reach out to you. You might get an early morning. You might become aware of the existence of an issue or a concern from a part of the ICANN community that you weren't aware of when you applied, so you would effectively be making what looks on the face of it a unilateral change. It's not a change that's in response to something like an objection but nonetheless it's a change that was seeking to address concerns and to move things forward so that you're perhaps heading off an objection. But depending on what your take on this is, that's arguably one which is without a reason.

I don't know that we should putting ICANN staff in that situation where they're making those kind of judgement calls. Honestly, I'm not even convinced that this makes it harder for the community to track. I honestly think the difficulty that people encountered last time around was having 1,930 applications all in one go that they had to look at and that they had a very limited time in which to do so. Arguably a change that happens later is much more under the spotlight because it's a public comment period. It gets flagged by people. It's almost easier to spot one within one objection or one issue for you within 1,930 application that are all vying for your attention at the same time.

JEFF NEUMAN:

Thanks, Susan. Just looking at the chat, Kathy says that there shouldn't be substantive changes absent public reason. A question I just posed to everyone to think about ... There needs to be some sort of flexibility, just understanding that the process for evaluation could take a year or two years or longer. So they're going to have to be changes just by necessity of timing. What may have seemed like a good idea – just think in the 2012 process – in 2012 when we fought on the application may not have been a good idea in 2016 when you were finally able to launch. So I think that the notion of no substantive changes may be a difficult one, and we just need to take a step back and really think about how we can not set that hard, fast rule so that we can take in concerns by the community but not be so inflexible as to ... Well, anyway, Kathy, I'm not sure if your hand is still up or if that's a new hand.

KATHY KLEIMAN: A new hand.

JEFF NEUMAN: Please.

KATHY KLEIMAN: Jeff, and everyone, how to we prevent gaming on this? It sounds like there was a pretty hard and fixed line in the first round that substantive changes had to come from someplace because it sounds like only a few were let in. How do we prevent gaming, backroom deal, or other things that then result in substantive changes? We're going to have a lot of applications. If you want efficiency, then the easiest way to do it is to pretty much lock these things down as much possible. Maybe we can pick a few sets of public ... How do we define what rises to the level of cross-community concerns or GAC concerns and not allow lots of other types of substantive changes that could wind up driving us all crazy? Where's the line? If there's not, then maybe we shouldn't have them. Thanks.

JEFF NEUMAN: Thanks, Kathy. I think, in order to do that, rather than just using – when you say “prevent gaming” I think we need to take a step back and think about what it is that constitutes gaming here. What ICANN has said in its criteria that it looks at things like materiality and other aspects as to whether it requires a reevaluation. Certainly everything went out for public comment. So shouldn't it be through comments that ICANN finds out whether parts of the community are concerned [and] understood that it's difficult to

follow this for years and to know – I don't think there was any affirmative way to subscribe to an application to find out when changes are made. But I think we need to think about those questions as well to think about what it is we're actually concerned about. I think

Justine says, "What concerns do you have with the seven criteria?" Again, that criteria was spelled out in the supplemental report, and the commenters seemed to agree that that was the right criteria. So I think, looking at that specifically, most of the commenters said that that was what we needed to see.

I do want to go on a little bit. I know, Kavouss, you have your hand raised. So quickly and then we can move on to—

KAVOUSS ARASTEH: Very quickly, yeah.

JEFF NEUMAN: Sure.

KAVOUSS ARASTEH: Very quickly I want to mention that we have to make every possible effort to avoid direct or indirect actions, misuse, misappropriation, abuse that gives rise to gaming and cheating the others. This should be very, very carefully written and provide no room for any type of gaming. Thank you.

JEFF NEUMAN:

Thanks, Kavouss. I think, when you say “not type of gaming,” something we need to determine is what exactly are we concerned about and then figure out how to address those concerns.

Susan says, “Perhaps we need a practical recommendation: that it’s possible to subscribe to any application to keep track of any proposed changes and be notified of a public comment period and so on.” I think that is a good practical suggestion. I think that makes sense, regardless of how we come out on what changes are allowed or not. I think that’s a good suggestion/implementation/guidance. I think that’s a good suggestion.

If we look at specific comments on criteria that were used to evaluate change requests, those are the seven ones that we were just referring to. That was in the link that Trang, I think, posted on this chat. If we scroll down, I think, in the comments on the specific criteria itself, the ALAC said that it was good guidance but then, on Criteria 1, said the explanation may be supplemented by a letter of support from an interested stakeholder outside of the applicant. They, for #7 – timing – said, “Interference with the evaluation process should carry the least weight.” I’m not 100% sure what that means, although we may have discussed it when we were discussing the comments and it may just be that I’m forgetting.

The Non-Commercial stated that any new guides provided by the working group should compliment the existing seven criteria and can’t substitute. IPC suggests an additional criteria. “Is the change being proposed to resolve contention? For Criteria 6 materiality

would also need to be downgraded in such circumstances since clearly that change would be considered material.” The BC says that the criteria for changes should be looked at by this working group, which we are, and amended if needed.

Let me get some thoughts. Jim says that’s – Jim, which are idea are you talking about? Susan’s proposal, I think? Yeah. Okay. What about the suggestion of the IPC that says there should be an eight criteria in that checking the changes should be – is this change being proposed in order to resolve a contention set? I’m sorry. Is it contention set or resolve an objection? I can’t ... maybe someone from the IPC could comment.

KAVOUSS ARASTEH: Could you repeat that?

JEFF NEUMAN: The IPC comment was they suggest that another criteria should be added. Is the change being proposed to resolve contention? I’d initially interpreted that to mean a contention set, but now that I think about the context, it could mean to resolve an objection.

Let me see. Is anybody in the comments now? Kavouss, your hand is up. Does anyone from the IPC know specifically what that was supposed to reference?

Justine is saying it could be captured in Criteria 1. Sure, we could do that. All right. So the IPC needs to check back, but perhaps that could be handled with just making it part of Criteria 1.

Now, the role of public comment on that. The GAC said, “Care is required so as to not allow changes that could undermine the role of application comments. In particular, the public comment process for some issues, such as competition, can be carried out only if information about a perspective new gTLD and the identify of a new gTLD like the operator is published.”

The ALAC talks about the importance of the opportunity for public comment to raise concerns or to address how concerns may have been mitigated by changes. NCSG talks about the importance of notice. Then, in looking at specific circumstances, the BC says, “If a substantial change is made, public comment may be necessary. Or, if drastic changes are made to the applications, this may constitute gaming.”

So I think right now in general ICANN has put everything out for a 30-day public comment period. Justine says, “In the last one, Criteria 1 may already address the previous, tracking why there were changes being requested.” Going back to when public comments is needed, IPC talks about only where it’s necessary for the evaluation of the applications, which would include the reevaluation of part of an application where a change request has been accepted. If public comments were part of the change request approval process, the role of public comment would function as an approval mechanism. Registries state that applicants that apply for change requests should be evaluated in the same process of public comments, and public comments should play the same role for changed string as they do for new strings. The BRG: “Public comments should be considered as if it were a new application, providing an important opportunity to raise

concerns or show support.” The NCSG says, “The same rules should be applied as to the original application to help avoid any confusion and gaming.”

Right now, if we use the existing process in 2012, there was an automatic 30-day public comment period. If we can supplement that with the way to track changes of an application, if we’re subscribed to changes, that is a useful suggestion that may solve a lot of the concerns here.

If we move then down, we’re going to skip the string change because we’ve already covered that item. If we can then go to—

KATHY KLEIMAN:

Jeff? I just wanted to note for everyone that I’ve looked up the seven criteria. I think that kind of thing would be very, very useful, if people are going to reference it, if posted. I wanted to say that number one on the seven criteria is, is a reasonable explanation provided? So the explanation issue is taken care of. It is the first of our seven criteria. I just wanted to share that. Thank you.

JEFF NEUMAN:

Thanks, Kathy. Justine made a similar comment as well. So that’s helpful. If we go now to -- this is another one that seemed to ... If we went back to, which we’re not going to, the high-level agreement, most of the commenters seemed to support that, if there was a joint venture that was created to resolve string contention, that should be something that we look upon favorably and allow those types of changes.

For example, one that was mentioned in discussions was if there was a combination of – well, that’s not go into examples. There were plenty of examples that could have resulted in a joint venture where applicants could have come together and said, “You know what? Rather than going to an auction, we could solve this by forming a joint entity or a joint venture in some way that would allow us all to participate in the management of this TLD.” So rather than the 2012 rule, which basically prohibited those types of material changes, we should allow that going forward but subject to reevaluation, payment of costs and things, where evaluation would be needed. And of course, public comment and other aspects.

Any additional thoughts on the joint venture concept? Again, it seemed like there was high-level agreement on allowing that type of change.

Okay, good. Moving on then to other types of changes, the GAC had said that a change to the likely operator of the new gTLD would constitute a material change. That invokes a notification requirement in 1.2.7 and that ICANN may require reevaluation of the application, including a public comment period.

On this one, if it’s done after the TLD is delegated, then certainly there is a process to deal with that already. If we’re talking about changes in between when the application is filed to where it is approved for contracting, I think that would already be in the change process we discussed. So I’m not sure if this comment really changes anything that we have already discussed. So I think that’s already supported.

The GAC also supports changes to the business model because – wait. Is this the GAC that supports it? We may have a typo there. They’re supporting change to the business model because it promotes innovation. Is that from the GAC or someone else? Let me just ask for clarification. We’ll have to check on that. I don’t think that was from the GAC. I think that was from a different group, but we’ll check that.

Finally, as we check that, additional guidance regarding management of potential risks associated with recommended changes. Again, I think we talk about a strict, transparent process that has the opportunity to raise concerns and file objections. IPC notes that there’s a delay risk but that ... Let’s see. NCSG also states – I think we covered this – that the same rules should be applied as to the original applications. I think we’re done with this section.

Any last thoughts on this particular section?

Kathy, please?

KATHY KLEIMAN:

More like a question. How does our discussion of the last hour and 20 minutes change or modify the high-level agreements? Then, how are some of the comments and nuances going to be reflected in ongoing materials? Thanks.

JEFF NEUMAN:

To do a recap – let’s go back to the high-level ... okay. I don’t think, actually, that there are many changes to the high-level

agreements. I think that there is some clarifications that we had certainly gotten through the comments and then some implementation guidance suggestions that have been made. I think those, at least for the first bullet and the sub-bullets, are still high-level agreements. I don't think anyone disagreed with those. I think the second one also is one that's still a high-level agreement. The third one will have to modify to the specific narrow situations where we discussed where the string should be allowed – I think that's what gets changed – and then some other areas of guidance that we talked about throughout.

KATHY KLEIMAN: Jeff, how do we encapsulate the seven criteria so that they're clearly marked for criteria-based change? It's not any criteria. It's the seven.

JEFF NEUMAN: Those seven were called out in the supplemental initial report, which this topic was initially discussed in. So they will be called out just the same way. So this is just a high-level agreement summary, but when we get to the final text, there'll be more specifics. That'll be in there when we get to the seven specific criteria.

KATHY KLEIMAN: Should the high-level agreement reflect that we've agreed, if there is a change in string, it would be very narrow?

JEFF NEUMAN: No. It will not be in the seven criteria. That would be in the high-level agreement.

KATHY KLEIMAN: That would be another bullet point [inaudible].

JEFF NEUMAN: If you look at the last bullet point, it says “If a string is allowed, then this, this, and this.” What it will now say is, “A high-level agreement that a string change may be allowed in the following circumstances, blah, blah, blah, provided that it doesn’t create ...” with all the terms and conditions we talked about during these calls. [inaudible] will be changed.

KATHY KLEIMAN: Thank you. [inaudible]. Thank you.

JEFF NEUMAN: I think we are now done with the application changes. I note that we have just five minutes left, so it’s not enough time to start the reserved name section, which is the next subject on the list. So be prepared for the next time, on Thursday to go over the reserved names, which will also include the item that’s added by Christopher on currency.

KAVOUSS ARASTEH: Excuse me, Jeff. You are going too fast. At the end of the thing, after all those comments, you want to say that high-level

agreement is maintained? No. I have difficulty behind the high-level agreement because there is [inaudible]. If you don't create [inaudible] evaluation, if you don't create an order of treatment, how do you treat the applications? Either you have a random numbering and this numbering could be distributed and then there will be a process according to that distribution number. That's not how it should be processed because you don't have a [inaudible]. You don't got to first come/first serve. But what do you do? The applicants. In one day, there are ten applications for one person, one applicant, and there are other ones. So if you don't take first come/first serve, if you don't [inaudible], how do you [inaudible] the applications? It is not clear? I'm sorry. It is not clear. I don't agree with this. [inaudible] on Page 2, but not all of them. ICANN should not attempt to create a [inaudible] system like digital archery to determine the processing order. If you don't have the processing order, you go without any order. So [inaudible] without order? So how would you process?

JEFF NEUMAN:

Thanks, Kavouss. We have not updated that section yet, but that will be updated to reflect the discussions that have happened, I think, last Monday and the Thursday before that. So that's been covered. If you can go back and review that and you still have questions, let us know. But that—

KAVOUSS ARASTEH:

Yes, I have to go back because someone said that we agreed to maintain high-level agreement. No, we don't maintain high-level agreement. Some of them yes, some of them know. We should

have a clear way forward. So I don't understand that is maintaining high-level agreement. Some of the high-level agreement I agree with. The second bullet I agree with. The fourth one I agree with. The first [inaudible].

JEFF NEUMAN:

Let's take that and put that online because it relates to something we've covered. Maybe the conversations have cleared some of that up, especially when start making the changes. But for now, everyone be prepared for the next call to talk about the reserve names. That shouldn't take us too long. I'm hoping we can get through reserve names and at least at a start to the registrant protections the next time because none of this stuff should be new. So please do some preparation for that. we will talk to everyone on Thursday. Thanks, everyone.

KAVOUSS ARASTEH:

We need to com back to Page 2. Sorry. We need to come back to Page 2. Thank you.

[END OF TRANSCRIPTION]