EN

ICANN Transcription

Registration Data Accuracy Scoping Team

Thursday, 14 July 2022 at 14:00 UTC

Note: Although the transcription is largely accurate, in some cases it is incomplete or inaccurate due to inaudible passages or transcription errors. It is posted as an aid to understanding the proceedings at the meeting, but should not be treated as an authoritative record. Attendance and recordings of the call are posted on agenda wiki page: https://community.icann.org/x/TQUVD

The recordings and transcriptions of the calls are posted on the GNSO Master Calendar page
http://gnso.icann.org/en/group-activities/calendar

JULIE BISLAND: All right. Good morning, good afternoon, and good evening, everyone. Welcome to the Registration Data Accuracy Scoping Team call taking place on Thursday, the 14th of July 2022.

Today we have apologies from Owen Smigelski and a tentative apology from Lori Schulman.

Statements of Interest must be kept. Does anyone have any updates to share? Please raise your hand. Seeing none, all members will be promoted to panelists for today's call.

As a reminder, when using the chat feature, please change the drop-down from host and panelist to everyone. In order for everyone to see your chat, and so it's captured in the recording, observers will have view-only chat access. Alternates not replacing a member should not engage in the chat apart from

Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.

private chats or use any of the other Zoom Room functionalities such as raising hands or agreeing and disagreeing.

All documentation and information can be found on the wiki space. Recordings will be posted shortly after the end of the call. And please remember to state your name before speaking. As a reminder, those who take part in the ICANN multistakeholder process are to comply with the Expected Standards of Behavior.

Thank you. Over to our chair, Michael Palage. Please begin.

MICHAEL PALAGE: Hello, everyone. My apologies if I'm a little slow today. I'm trying to do this via my phone. But I think I've already discussed with our ICANN Org colleagues how I think we're basically going to propose going through the comments received … use of our time. And there we go. I think the document that Marika had shared with the list yesterday I think proposed grouping it into different topics. So with that, Marika, do you want to perhaps open up that document and we'll go from there?

MARIKA KONINGS: Sure. Thanks, Michael. Just give me one second.

MICHAEL PALAGE: Marika, I can't hear you? Is it me? Hello?

JULIE BISLAND: I can hear you.

MICHAEL PALAGE: Okay, hold on. Can you hear me, Marika?

MARIKA KONINGS: Yeah, I can hear you.

MICHAEL PALAGE: All right, hold on. I'm having issues. Okay. Dealing with technical issues, some additional ones. Can you just start going through the document that you had posted yesterday? I believe, if I recall from the document, we're basically going to start focusing in on those comments regarding potential revisions or enhancements to the registrar survey.

MARIKA KONINGS: Thanks, Michael. I hope you can all hear me. So what you see now on the screen is basically the same as was circulated in the e-mail yesterday but just basically copied pasted into a Word document. As we explained in the e-mail, what we tried to do is we noticed that there were some proposals that seemed to be aligned or focused on the same area. We tried to group those together so that it might be easier for the group to consider those in further detail. So what is in the document here is exactly the same as was in the e-mail.

First of all, I think we have four proposals that seem to propose additions or enhancements to the registrar survey proposal, which is already in the report and which has as well a specific Annex that

basically sets out the expectations for the survey at the moment. Then there's a second basket of proposals that seems to focus on what we've labeled here, a type of registrar audits or stress testing, as well as understanding of current accuracy requirements. And then there were a couple of more individual proposals, but we still thought it might be helpful to give them a bit of a heading. Again, of course, if we label these incorrectly, I'm hoping that those that put forward these proposals will speak up. So there are three other areas where proposals were received, one focusing on cross-field validation study and another one on study of ccTLD practices. And then last but not least, development of other validation and verification requirements.

So it's basically also what was shared in the e-mail. What we had suggested to Michael was, it might make sense to take these as well as such. So maybe to first look at the set of proposals that deals with additional suggestions for the registrar survey proposal. From our understanding, of course, we're hoping that those that put forward these specific suggestions are willing to speak to their proposals. We believe these are all additions to what is already being suggested in the report.

As you may recall, there was a kind of a small team setting that worked on some specific questions and criteria for the survey that had been included in the report as an Annex to basically serve as guidance for developing such a survey. So I think it would be helpful to understand from the group whether the input that has been provided is something that should be added to the report. And at least from the staff expectation, it would be that the details of the survey would be worked out and of course would be done in

the consultation with this group. So I think it's just important that we call out in the Annex the types of information or even if it's specific questions that are expected to be included. But hopefully, we're able to fine tune that as we actually work on the survey, provided that of course gets to support from the GNSO Council to move forward.

So with that, I will pause. Michael, I hope you've managed to solve your audio issues and be able to have your own tenacious conversation.

MICHAEL PALAGE: Thank you, Marika. I think all technical issues have been resolved, fingers crossed. So what happens here is I have no objection to how you have laid out the questions. Does anyone else have any questions/ concerns from the group? If so, raise your hand. How many people do we have? Real quick. Okay, 25. All right, just do a quick look. Okay. Well, perhaps just from a quick administrative update, Brian, I don't think I've seen anything, but has ICANN heard back from the Commission in connection with their inquiry?

BRIAN GUTTERMAN: Hey, Michael. Hi, everybody. Know there hasn't been a letter received back or correspondence back on that. And then in the sort of the work, the ongoing work from ICANN Org scenarios and the [inaudible] is that's ongoing and in progress. So that's the update there. We can come back with more details or answer questions that people have about that.

MICHAEL PALAGE:	All right. Thank you for that. Okay. I'm sorry, that was just something I missed from the organizational, if you will, background update that I missed while dealing with technical issues at the start of the call.
	So, Marika, do you want to start walking through the individual comments for the registrar survey. And perhaps it would be best, instead of either you or I reading, perhaps if those people that actually made a recommendation, if they are on the call, they could actually walk through and speak to that themselves, I think that would probably be optimal. Unless there's any objection to that, I would say, Sophie, I guess you're up first there.
ALAN WOODS:	Hey Michael, it's Alan here. Sophie is actually on leave today so I'm stepping in for her.
MICHAEL PALAGE:	Okay.
ALAN WOODS:	I will do a pale comparison of Sophie Hay at this particular point in time, but I think the statement that they gave in the first one, I mean, perhaps Marc or Beth might be better placed than me to put in that. Beth, thank you.
BETH BACON:	Sorry. I will say I didn't mean for Alan to take the hit as the alternate today. So I think this is fairly straightforward. We are

supportive of working on this registrar survey as an option. We think that it has merit if we can, as a team, figure out what questions to ask, what's the best way to ensure at least a decent response where those results would be accepted and trusted, then we're into that. So, as we move forward, we do think that the survey is a good option if we can get it to a place where the group feels comfortable, that the output is going to be worth our time, and we think that there could be some good work to be done as we wait for the EU folks to respond to ICANN's letter. I'm not sure what else folks want to hear, but happy to discuss further.

MICHAEL PALAGE: Thank you for enlarging that. I'm on my smaller notebook and it was a little strenuous. So thank you for whoever enlarged the screen.

I think there's two questions that I would like to propose to the group. We can complete our report to the Council before the survey is done. I think the answer to that question is yes. And then the secondary question is, if we are able to submit this report to Council and then work on the survey after that report has been submitted to Council, what do you think the potential cadence of this group would need to be? I don't think it is weekly. Is it biweekly, once a month? Maybe it is weekly until we wrap it up? I guess that is the question I would propose to the larger group, given that a lot of the initial comments to the survey focused on this registrar survey. So what does the group feel is the best dynamics for moving forward with this registrar survey? Somebody has her hand up. Marika, you have your hand up.

MARIKA KONINGS:	Yes, I'm sorry. I raised my hand before you said the group. I thought you wanted to hear the staff perspective on this. I guess we would be the ones implementing this recommendation. At least the way I had been looking at this would be that, of course, the original proposal already sets out in great detail the questions and the approach that is expected to be taken. Of course, there's an additional set of questions that have been suggested and we really want to appreciate. Our thanks, Sophie, because I think she did a really a great job in detailing those questions. So if the group is supportive of including those, and I think that is something that we could use to kind of mark off as the survey and then work with the group on fine tuning that. Because I think one of the things the group may need to think about and I think it's especially where input from the Registrar team eventually will be helpful is and it's something that of course the smaller team also discussed, the longer the survey, the more limited or harder it may be to get responses from registrars. And there may be a need to prioritize or see how the survey could be organized in a way that it's still attractive for registrars to respond to and it doesn't create an enormous burden or maybe it's kind of divided in sets or different registrars are targeted. Again, I think there are things we can talk through. So at least from our perspective, I think we would need a bit of time to kind of get our head around it, do a mock-up, and then share that back with the group for discussion. I don't think that would be a weekly conversation that we need.
	I do want to flag, as you know, we're already in the process of preparing for the next ICANN meeting. So we have actually

reserved a slot for this group, which could potentially be used for having a conversation and really work through the survey. I think it's also a question of whether that is an effort that the whole group wants to be involved in, or whether we're likely to development of the proposal, there's a smaller group that's interested in, actively working on this with the final result being reviewed by the full group. So again, I think there are various ways in which this can be done. But at least from our perspective, we don't think that immediately we'll need a weekly cadence of meetings as assessed. We need a bit of time to kind of get our head around this, probably develop the first draft. And of course, there's also the intermediate step of sharing the write-up with the Council and making sure that they're also happy with that proposal for further work and basically giving their thumbs up to take that next step, moving on to our direction of Assignment 3. So I hope that's helpful.

MICHAEL PALAGE: I think what I heard is we should be able to submit our report on Assignments 1 and Assignment 2 before the survey is complete. That is what I heard and I would tend to agree with that. Am I right on that?

MARIKA KONINGS: Yes. I think that's also the expectation in the assignment that basically going from 2 to 3, and especially if there are specific proposals that require additional work and require resources to implement that those would be basically checked with the Council, so the Council could also give their thumbs up and say, "Yes,

we're happy with that work to continue," or "We have concerns," or "We need to go and find those resources." Of course, actually, I'm speaking here from what I'm able to do in helping with the survey. I probably also need to check with Brian and his colleagues, because of course, from the development perspective, I think the Policy Team can help with that. But of course, kind of roll out and pushing this out, that would need to be done by our GDS colleagues through the context that they have. I don't need to commit everyone here. So we also need to check internally exactly how that would work, when would be the best time and to set, of course, also working with Registrar Stakeholder Group to get a better understanding of how we can best promote this, encourage participation. And then of course, there's also the power of analyzing what comes back. That is, of course, something that will come into the group as well for review and analysis.

MICHAEL PALAGE: All right. Marc Anderson, you have the floor.

MARC ANDERSON: Thanks, Michael. I just put my hand up. My two cents in the conversation on the question of, can we submit the initial report before doing the survey? In my view, in sort of my readout of the instructions from Council, not only can we, I think we should. This sort of overlaps with what Marika said, but the instructions are to provide recommendations to Council at how accuracy levels can/should be measured, not to actually do the measurement ourselves. So I think to Marika's point, it's important that we have

that check in with Council. If Council has additional questions, they can they ask, but I think it's really their call to review our recommendations and determine how to proceed. So I just wanted to throw my two cents there on top of Marika's.

MICHAEL PALAGE: Just to be clear, I was not proposing that we would actually get a completed survey back before 1 and 2. My concern was I think we can actually submit the report without having the questions finalized. Because remember, Marika, I think what we'll see here is it's the agreeing upon the number or depth of questions that may be asked. So that's what I was kind of drilling down on. I think the report will say, "Hey, here's a range of questions." If there's consensus on some of those questions, we identify where the consensus within the group was. If there's divergence, we do that. We package that up, we send it off to Council. And then this group going forward after that submission could perhaps use the ICANN75 meeting for perhaps rolling up its sleeves and doing some face-to-face work on what that survey will look like. That is what I was envisioning. Again, I want to be very clear here. I am doing everything I can to get Assignment 1 and 2 to Council. We're way behind schedule as Berry's charts have accurately stated. So, does that make sense, Marc?

MARC ANDERSON: It does. Thanks. Sorry, my misunderstanding. That makes sense. Thanks.

MICHAEL PALAGE: Okay. So with regard to that, let's just, I guess, continue to go forward with … so now we're down to number three. This who put this one forward here, this is Alan, if I'm correct. Alan, would you be able to walk us through … From what I am seeing here is you are talking about proposed enhancements to the survey. Specifically, I believe trying to drill down on how registrars are operationally validating either the e-mail or the phone. I think that is what I am reading here, but I will allow you to present your question to the group as a whole. You have the floor, Alan.

ALAN GREENBERG: Thank you very much. I think it speaks for itself. Maybe I didn't reword clearly. One of the things we don't know right now is to what extent the current RAA requirements related to accuracy are being implemented because the RAA, first of all, it gives registrars a number of options of which contact to verify. Second of all, it's unclear to what extent the 2013 RAA has applied to their overall sponsored base. This is trying to get a feel for that. We spent an awful lot of time talking about the specifics of the RAA but we don't know to what extent it is applied to the installed base, and this is an attempt to try to get at that. So we're looking at understanding to what extent the e-mail contacts have been operational verified, the phone contacts have been operational verified, a statement to what extent any indication of bounces or failure is followed up on. We know from the discussions we've had earlier that some registrars diligently follow up on bounces, and if there's a bounce, they try to find out why and correct the e-mail address. Others probably do not take that kind of action, but we

don't have any idea to what extent this is really happening in the real world.

So that's Roman numeral one I think somewhere. I've lost track on where I'm reading it. Roman numeral two, I'm not quite sure what the one is, but Roman numeral two is registrar survey should include a request for other non-RAA checks that may be voluntarily done or to satisfy terms of specific requirements of specific registries, including ccTLDs. Again, we have talked about whether it is practical to do other things. There may well be other checks that are being carried out that are not specified in the RAA that we should be aware of.

Lastly, point number three, as Marika pointed out, the survey may be getting onerous. Now, perhaps we can address it saying, "We would appreciate you answering the first part. The second part, we understand will be more difficult so maybe not do it." The other alternative is can we provide some sort of incentive, presumably monetary, to encourage registrars to do this? This has been done before in ICANN history where we have waived certain fees or reduced fees based on certain targets. It certainly could be done again. Thank you.

MICHAEL PALAGE: Thank you, Alan. Marika, is that a new hand or an old hand?

MARIKA KONINGS: New hand.

MICHAEL PALAGE: You have the floor.

MARIKA KONINGS: Thanks, Michael. I just wanted to flag. I think there is some overlap in what Alan is suggesting with what Beth and Sophie have suggested. I think some of the items are already covered as well, for example, the incentives I think is already called out and [inaudible] is something that the small team discussed, and I think there were some creative ideas that could be considered in that area.

I also wanted to flag because I don't think I see Lori on the call at the moment, we'll put forward the next proposal, which I think also goes to the point of asking about what has gone above and beyond the required validation or verification requirements to get information on that. Between I think the four proposals we have here, I think there is some overlap, but I can suggest from the staff that is maybe that we work on some language and include in the Annex to flag that these are areas as part of implementation, that the group will further consider how to phrase those questions. I can definitely link to the document that Sophie already shared with the full group I think back in May. It has very detailed set of questions, I think, that tried to hone in on some of these items, as well as the questions that may go beyond what are you doing in addition, and of course make a note as well that the group will further need to consider how to best package that. I think Alan made a good suggestion of having certain parts. If you respond, please definitely respond to that. Here are some other parts. It will be really great if you can, but that is really the information we need to get from 2 to 3, the rest may help inform us for the other parts.

ALAN GREENBERG: If I may respond, I had a hard time getting this done. And if I ignored things that were already said and replicated them, my apologies. There wasn't any intent to do that, but it may well have happened. Sorry.

MICHAEL PALAGE: That's okay. You would not have necessarily known everything that everyone else was saying in their surveys. So I see two hands. Scott, hopefully your hand is going to be that you will speak to Lori on behalf of the IPC. But, Beth, you had your hand up first. You have the floor, Beth.

BETH BACON: Thanks. I think I agree with what Marika said. I think that sounds like a great plan and I appreciate in advance ICANN staff and all your work to pull our suggestions together, and looking at what Sophie had previously done, which I agree was very nice work, to get us to a survey. Alan, I like that it's restated. I think it's nice that we can see where we do overlap and have some agreement on ways forward.

My only item that I wanted to flag is that maybe when staff is thinking about how best to incorporate these suggestions into actual survey questions is—Roman numerals two on the other, maybe there could be an open question there saying, "Are there other things you do?" but not guide them particularly towards anything that a cc might do. My only reservation with regards to specifically noting a ccTLD operation is that this is the GNSO and

we're working on gTLD registries. Surely, we can understand what they do or if we do ask that question, we have to certainly look at the options that ccs may be implementing through a gTLD lens to understand if that's something that given the contractual requirements and legal requirements that differ between gTLDs and the operators of ccTLDs, if those are things that will be transferable. So that's my only thing. Certainly open to hearing ideas because we know the ccs do great work. I just wanted to note that for the back end.

MICHAEL PALAGE: Thanks, Beth. I hear you. Historically, there has been a clear demarcation between gTLD and ccTLD, if you will, business operations. The problem with NIS2 is it kind of blurs that because NIS2 makes no distinction between Gs or Cs, it says TLDs. On top of that, and I think that blurring not only is occurring, I would say, at a legislative level or at Brussels, but even in connection with CENTR actually wrote an e-mail correspondence before ICANN74 regarding some comments that Göran himself was making to ccTLDs and some of the potential, if you will, blurring of lines. So that that to me, while not binding, I think to Alan's point, I think it does provide us some evidence to actually go and see what's out there. I think what we've all said at the beginning of this exercise is we want to make fact-based determinations. So if there are business practices out there being undertaken by ccs, which probably most registrars on this call, a vast majority of them are probably providing ccTLD registrations as well, it would be interesting to look at that from our fact-based analysis. That would be my thinking.

Okay, moving forward. Scott, you have the floor. Alan, you're next.

SCOTT AUSTIN: First of all, Michael, can you hear me okay?

MICHAEL PALAGE: Yes. I can hear you well, Scott.

SCOTT AUSTIN: Terrific. Thank you. Okay. Yes, Michael hinted of Lori is in a location where she's having some questions about her access to the Internet, so asked me to specifically speak to the items that she posted on behalf of IPC. I think that, first of all, we are very much in agreement. I think basically go to items 4A and 4B in the poll document, at least the one that I saw. So I think specifically, what she had said and wanted me to convey—let me pull that up so I'm operating from the exact one—that we think that there are new projects that we can be working on in the Accuracy Scoping Team also, but she believes that they should conduct a randomized statistically significant survey with fictitious registrations to ascertain the scope of the accuracy problem and to adapt the registrars survey to the realities of the NIS2, which is what, Michael, you've been speaking to a few months ago, and perhaps use the results to create standards inside and outside of ICANN. Let the community work together to determine what are proportionate verification measures for accuracy.

I think to add on to that two things, one, I would wholly support the detailed items that have been suggested by Alan and ALAC. I

think that's very consistent with what the IPC is looking for. Secondly, on the notion of ccTLDs, the IPC is on record in supporting some of the steps that have been taken and have been shown most recently in the EU DNS abuse report regarding .dk. They're successful steps taken, and yes, it goes beyond a nationalized postmaster program because they also deal with foreign submissions as registrants, as opposed to just citizens of Denmark. So I think that the ccTLDs in some cases may have some very valuable information that can be offered.

I also note in the summary that Marika provided, Lori has discussed the subject of costs, and although that may be a proprietary or maybe a defendant, in certain instances, in terms of how much can be revealed and maybe some way of putting them into a percentage or a basis that could be used to determine if there really is a significant concern amongst registrars and registries that any of the proposed changes would have and a reasonable basis so that people can make a determination what is being suggested or proposed, what impact there is. Obviously, any change has some impact but is it really outweighed by the benefit that can be given through the change?

MICHAEL PALAGE: I get that. I think you jumped a little ahead there, Scott. But thanks for getting that on the record, and thank you for filling in for Lori. Alan, you have the floor. Or is that an old hand?

ALAN GREENBERG: Thank you very much. No, it's not an old hand. Thank you very much. I want to respond to Beth. You said part of it in your comment. But I want to be quite clear. The legal and other considerations that may differentiate ccTLDs from gTLDs are certainly a factor that must be considered when we decide what to recommend as future policy. But the intent of what I was suggesting for was not to imply that we could or should do these things. But if there are other accuracy-related checks that are being done and are clearly financially viable—and remember, financial viability and implementability has been a real factor for us—if there are other things that are being done, whether they can be applied universally or not, I think we need to understand it. That's why I specifically targeted other registries, specific registry requirements or ccTLD requirements, not to say we're going to implement them, but that so we're aware of what is currently being done in the real world and what may be viable and what we may want to consider for the gTLD world. So, with full understanding that not everything may work for various reasons, but that doesn't mean we shouldn't be aware of them. Thank you.

MICHAEL PALAGE: I guess that's what the Scoping Team is supposed to do, right? Let's get out there, get the facts, and bring it back to Council. So when Council does make any recommendations to move forward, they could do so armed with facts.

ALAN GREENBERG: We may reject it ourselves for those facts and not even get to Council.

MICHAEL PALAGE: There we go. That's what a Scoping Team is supposed to do. Stephanie Perrin, you have the floor.

STEPHANIE PERRIN: Thanks very much. I don't want to bore you or drag you back into the mists of time, but way back in the mists of time so we're talking Circa 2003. I think it was 2003. I did the first privacy policy, was hired by CIRA to do their first privacy policy with the expert help of Kim von Arx, who was then legal counsel. Now, I was actually quite shocked at what CIRA was attempting to do in terms of identification and verification of potential registered name holders for the ccTLD. I didn't think it complied with data protection law at all, and I have since talked to several data commissioners who have similar views about what their ccTLDs are doing. However, this nebulous land of how countries manage their ccTLDs makes it very complex and I think it's not an area that you are going to find too many data protection commissioners jumping in and opining. First of all, they have limited resources and taking on their own governments in terms of how they're managing this authority, the authority to administer their own country codes wouldn't be a first pick. It's abstruse, it's arcane, as we all know, having thought about it for the past, God knows how many years, not particularly ccTLDs but the whole business of how much accuracy and how much identity verification you need.

Then, of course, on top of this, each country does it differently. I mean, not each country, over 160 or whatever it is, but some have held it very closely within government. Some have done some

kind of quasi outsourcing as Canada has with CIRA. I mean, CIRA is an odd body in terms of outsourced responsibility, but there are quite a few in democratic Western countries of this kind of NGOs. How those countries relate in terms of the application of federal data protection law as opposed to private sector in jurisdictions where there is a difference, and there are many of those, it's kind of a no man's land.

So I think we need to be extremely cautious in applying practices that are going on with the ccTLDs to what is basically a market reality in the gTLDs. It makes me cringe when I hear different countries being held up as examples. Because I happen to know that some of those data protection authorities have looked into the matter and don't appreciate it. Many who say, "Oh, this is fine, do all the verification and identification," don't understand the intricacies of the domain name system. So I would welcome a meeting of the DPAs at ICANN with legal counsel to discuss the matter if you feel like really getting into this. But let's not just pull examples that we like and without looking at whether those examples actually pass scrutiny. Thank you.

MICHAEL PALAGE: Yeah, 2002. So let me ask you this question, if I could, Stephanie. I'm a big fan of Albert's who is the current general counsel at CIRA. My question to you is, did CIRA change their business practices after you completed that report and audit?

STEPHANIE PERRIN: Frankly, I'm not up to date on what they're doing. I think they probably did, but that doesn't mean it is correct. They also haven't been the subject of scrutiny from the DPA's office.

MICHAEL PALAGE: Okay. I guess my question and a comment—the comment would be, so this would be aligned with the comments that ICANN submitted to the communication to the European Commission, asking to facilitate direct engagement with the European Data Protection Board on this very issue. Because that's what I basically heard you ask for is bringing a bunch of DPAs together, and perhaps even beyond just the European Data Protection Board, others as well. So I think what I heard was you seem to be supportive of the action that ICANN has taken. I guess my next question would be going back to Alan's—

STEPHANIE PERRIN: May I comment? I actually don't think I said that. I don't think ICANN, as an organization, can seek basically a legal opinion from the central authorities, either the EDPs or the Belgian Authority that is potentially their oversight of their own actions. That is something you do with lawyers. I think that I would be tempted to get a sound legal opinion comparing these things from our excellent Bird & Bird counsel before I went marching off to Brussels to get them to engage. That doesn't mean that we can't do what we have done in the past, what NCSG has done in the past, invite them there to comment. I mean, people like [inaudible] and the late Buttarelli and Peter Hustinx, I mean, they understood these issues and I think that the current EDPS does. But there's a

difference between having a colloquium and seeking a legal opinion and inviting people informally to come and talk. Remember we brought quite a few dignitaries, including Buttarelli and including the Council of Europe. Buttarelli and the then privacy advocate in the UN privacy—I forget his exact title, the guy from Malta—Cannataci. He offered to come back and we never took him up on that. But Cannataci certainly would have been capable to opine on some of these things. We have countries that are experimenting with and rolling out facial recognition systems, retinal recognition systems in order to register a domain name. That doesn't wash in western democracies, you know. But if you are a central government controlling your country code, you can do whatever you like because you can just put it into law. That's different in democracies where there's a tension between the data protection rights in private sector activities and what the government does.

MICHAEL PALAGE: All right. Thank you, Stephanie. Beth, you are next in the queue.

BETH BACON: Hi, folks. Well, I feel like we're talking a lot about something where none of us disagree, which is funny. I think that Stephanie has made excellent points. Alan, I want to point out that I agree with everything you said. Maybe I didn't come across appropriately, but I was agreeing. I think yes, why not ask? And all I wanted to do was flag that there have in the past been differences. There are things to consider so that when these responses come in, I just wanted to say, yeah, we just thought we need to look at those and

analyze the responses. So I think, again, we're all on the same page that we will have to think about all of these things that we just discussed and all the things that Stephanie just very wonderfully and expertly laid out when we get the responses. I don't think we need to debate it now. We're talking a lot about things where we don't disagree. So I just wanted to clarify that comment that I made and say I look forward to seeing how staff incorporates all of these suggestions into the questions. Then we'll just put our thinking caps on and come back together when we get responses. Thanks.

MICHAEL PALAGE:　　　Scott, old hand, new hand?

SCOTT AUSTIN:　　　　It's a new hand, Michael. A couple of points. I noticed that there was another aspect that I had left out in the summary. It's not in the e-mail that I received from Maureen, but it's in what was summarized on behalf of IPC. But I also wanted to make a comment that the suggestion about .dk is not to say that it is just thrown up as "This is what we should do" or "It should be a blindly applied, not in the slightest." The point is that if there is information where there has been some benefit in terms of the steps taken with regard to accuracy or verification or validation of registered data, for example, in that country there has been a reduction in infringement and there has been a benefit to a trademark rights holders and the reputation of businesses in those in that country, that should be considered. But it also should be considered in light of the downsides or any impacts upon privacy, of course. So that's

a given as far as the items that Lori had suggested to discuss. Let me take a quick look again. There was an item in what Marika had sent that I think was under IPC.

MICHAEL PALAGE: If you want, Scott, I'm going to give you 30 seconds. Alan, is that a—while you're looking for that, just to give you time.

SCOTT AUSTIN: I have it right here.

MICHAEL PALAGE: Go ahead.

SCOTT AUSTIN: It is go through the specific verification processes. The idea is that, again, because the survey is about questions and it's obviously the caliber of the questions and then perhaps the detail of the questions that will be very important in terms of getting a meaningful result. So what she considered was explain the verification procedures that registrars employ if the verification procedures go beyond the minimum that ICANN required within its contract and what percentage of domain names are operational and verified, etc. It may not even be additional cost as a result of this but just rethinking of those questions. Thank you.

MICHAEL PALAGE: All right. Alan, I think you may have the last word. I think we have pretty much hopefully exhausted the aspects of the registrar survey. You have the last word, Alan.

ALAN GREENBERG: Thank you very much. We seem to all be violently agreeing with each other right now and I won't belabor the point. There's no doubt that there may be registrar or registry ccTLDs or others that are doing things which would be deemed illegal, improper, unethical, whatever, in some areas. But there may well be something they're doing that is good, legal, appropriate, and useful that we haven't thought about. That was all this was trying to get at. Let's proceed. Thank you.

MICHAEL PALAGE: Excellent. Marika, where are we at? Are we on four now?

MARIKA KONINGS: Thanks, Michael. I think we just covered four as Scott introduced Lori's proposal, and as we noted, that is also aligned with some of the other suggestions as said in the chat. What the staff support team can do is we can go back basically to our write-up and add some language to the Annex that describes the registrar proposal that basically conveys the discussion of today of additional areas where questions should be included in the survey and note as well some of the points that we need to be further considered as part of the implementation. Then, of course, the group can have another look at that to see if that aligns with the discussion and

sufficiently covers the input that was provided, if that works for everyone.

MICHAEL PALAGE: Okay. Scott, I think that summarized four properly. Would you agree? Do you have any—

SCOTT AUSTIN: No. I think that's fine. I think that covers it. We've gotten through the point of cost and going through the specific processes. I think those are the key points.

MICHAEL PALAGE: Excellent. Okay. So we're now moving on to the next bucket of questions. I do not see Melina on the call. Kenneth, hopefully, you may be able to speak on—so let me ask you a question. Kenneth, would you like to speak on this? Okay. Let's just stay on five right now. Marika, you have your hand.

MARIKA KONINGS: Yes. I just wanted to note, and that's why I was briefly scrolling down, because there are actually three proposals in this category that seem to speak of the same type of proposal. Again, it may be helpful for the group to consider those jointly. From our perspective, they seem to be talking about potential registrar audit, stress testing kind of approach. I just wanted to flag that, as hopefully most of you will recall, we did have conversations with ICANN Compliance already about the option of doing a registrar

audit. It may be helpful to look back what is in the Google Doc where we off recorded their responses on this. Because there are certain limitations to what ICANN Compliance can ask and can do. It's very much limited to what current requirements are, and I think at least it's part of that conversation. That was also the understanding. Of course, anything that is asked beyond that, what could be done in an audit, is again on a voluntary basis. So I think at the time, at least, the group very much felt that then the registrar survey might be a better approach to take as that would allow for a wider set of questions even though it would be voluntary for contracted parties to respond to.

At the moment, the write-up does not recommend proceeding with a registrar audit type of activity. Again, there's some proposals here that seem to want to reconsider that. So I just wanted to make sure that people also remember that the history that we have on this. Again, if this is something that the group would like ICANN Org to carry out, I think we probably would need to check again with our colleagues. Depending, of course, the exact nature of what it would look like, whether that is something they could do on a mandated basis or whether that is something that would be of a voluntary nature depending on the questions or information that is being solved.

MICHAEL PALAGE: Okay. As far as an audit and maybe—well, put it this way. I won't speak, I will let those that have comment on this have the floor, let them speak first, and then I will try to synthesize. I there are, if you could scroll down, I think five, six, and seven are all in this bucket. Am I correct? Or is there more under this what you've labeled

Registrar? Okay. No. Again, if we want to call this an audit or perhaps—what was the accuracy report? Anyhow, Volker, before we start, you have a question.

VOLKER GREIMANN: Well, just to comment with the idea of calling this an audit, I think an audit limits what we can ask. Simply because of the fact that as part of an audit, ICANN can only require a registrar to respond on issues that the registrar is contractually obligated to do. They can only ask specific questions regarding to specific domain names. They cannot give us a statistic of this and that, and an overview of this and that. That is ultimately not a contractual requirement to keep that statistic or provide that overview. They can certainly show us the documentation for domain name X, Y, Z and provide us evidence that this is properly in compliance with your requirements as a registrar, how you did the verification and validation and support, they can do that. But they cannot, for example, show us this for all your domain names or give us the statistics of how many domain names you find that are in compliant with the registrant's requirements to provide data and so forth. Ultimately, an audit is a cul de sac that will not provide us any benefit, other than wasting our time. Thank you.

MICHAEL PALAGE: Everything up until wasting the time, I was agreeing with everything. I would agree with the vast majority of what you said. I think six and seven, I guess they're talking about something, if you will—I think, if I recall, this was something that Lorraine, a couple of weeks ago, I think had made the proposal of actually engaging

a third party to register domain names. The third party, if I recall, you wouldn't have a PII because I guess you would be using synthetic identities. My recollection was that is what's being proposed here. I guess my comment, Marika, is maybe just put in parens the specific grouping of this as an audit. I don't want to spend more time wordsmithing this, but I tend to agree with the general comments that Volker had made. But what I really want to do is get into the substance of these specific proposals.

Kenneth, do you want to go first? Then Alan, then I believe it would be Scott. Alan, you have your hand up, would you like to go first?

ALAN GREENBERG: Sorry. I was just going to comment that the word audit and the title—and Volker is correct about what you can do at an audit. But I don't think the term was particularly accurate for what is in the rest of the description. So I'm agreeing with you. Let's not get hung up on the word audit and note that it probably is the wrong word. Thank you.

MICHAEL PALAGE: There we go. We have so much consensus today. Let's keep it rolling. Kenneth, I'm going to put you up. You have the floor. Would you be able to walk through what the GAC has submitted in connection with this specific proposal, if possible?

KENNETH MERRILL: Sure, Michael, I can try. First, I want to make sure you can hear me okay because I've been having some connectivity issues here. Can you hear me?

MICHAEL PALAGE: I could hear you. You were fading out but I could hear you now, so please continue. And if we lose you, I will let you know.

KENNETH MERRILL: Okay, great. I can, to the best of my ability, try to summarize what we've provided here. I think the key info that is new is on the proposal to measure existing registrant data accuracy controls for new registrations. We cover that, I think, mostly in the second paragraph. I think the idea here is to do something that would not require the processing of data. I think it pretty much speaks for itself. I think that was the new proposal that we were providing, the stress test of existing accuracy controls.

MICHAEL PALAGE: Thanks, Kenneth. One of the things that jumped out at me is—and this is a discussion that I've had with a number of people, not only within this group but within the broader industry, and it talks about, I guess, the reliability. I think when I talk to some people, reliability means that you know that communication was sent to the registrant, and to some there's an expectation that the registrant will acknowledge receipt either via e-mail or phone or respond. I have talked to others that have very vehemently have said that a registrant is in no duty to respond, so if I have accurate information and I get a request. That to me, I think, the reliability

question is something that I think would be helpful for the group as a whole. I don't know if you're in a position to specifically speak to that reliability point. And then perhaps maybe we could hear from some of the registrars on, while they do not require a registrant to respond to a third party request, do registrars themselves expect an affirmative response when they send something to their customer? I think that would really be helpful in fleshing out what that business practice is. At least in talking to different people in the community, I have seen people with different expectations regarding what that reliability factor means.

KENNETH MERRILL: Just to add onto that, I think one additional question for the group is given that this is a separate proposal from the registrar survey, what would be the sequencing of these two of the survey and then potentially this accuracy or the stress test or whatever we're going to call it? And if there would be a sequencing there, could there be questions designed for the survey that could inform this more experimental design? Just throwing that out here as maybe additional point that we didn't include here that we've sort of batted around.

MICHAEL PALAGE: All right. Thank you, Kenneth. Any comments or questions from the group regarding this specific proposal or recommendation by the GAC? Scott, you have the floor.

SCOTT AUSTIN: Thank you, Michael. I think the IPC in the sense of rights holders having to deal with this issue in the context of things like a UDRP proceeding I think would be very interested in changes in registrants, and if in fact that's part of it. But an issue of reliability is if there is a new registrant that comes on board that is essentially replacing the original registrant of record, what kind of assurances are made that that information is provided and that it's accurate if that's a different procedure, especially if it's still midstream, in other words, it's not at the time of expiration of the original term? I think that there's issues there for rights holder because again, they're trying to determine who it is that's the appropriate respondent, if they're in some kind of an action and something is abusive about the domain name as it's being used. I think reliability is a very important aspect of this.

MICHAEL PALAGE: All right. Thank you, Scott. Sarah, you have the floor.

SARAH WYLD: Thank you. Hi. I guess I'm a little bit confused about the line of questioning here and maybe it's because there is some audio difficulties. Sorry, I'm having a bit of a hard time relating what's on the screen to what's been said verbally. But we know what the triggers are for accuracy verification and validation. It's not expiration or renewal of the domain name, it is updates to the contact information. So if it would help, I would be happy to go through what the RAA requires and typical implementation of how those requirements are met. I don't quite understand what's being looked for in that question.

Then to the text on screen, I did have a question about this, which is where it says—I don't know where it is. But it was talking about reliable and whether the data is not only accurate but also reliable, what does that mean? What does reliable mean in this context? I would like to understand because I don't right now. Thank you.

MICHAEL PALAGE: I will let other people speak to this. I've had this discussion with a number of people within this group and others. But as I said, this is the GAC's comment. Kenneth, is that something you could elaborate more on, the reliability issue?

KENNETH MERRILL: I could certainly try, but I feel like I would be wasting folks' times. I think I would rather take that back and come back with a more fully fleshed out response to that that takes into consideration input from other members of the GAC.

MICHAEL PALAGE: Totally understand. I think, Scott, you had talked about the reliability. I know historically, Steve Crocker has I think spoken to the reliability. I see Steve on. Scott, I think you have spoken to this. Steve, historically, you have spoken on the reliability from the perspective of a third party. Is this something you want to speak to or not?

STEVE CROCKER: I've been listening but I missed the context of this particular thing. Give me just a clue here and I'll try to say something coherent about reliable.

MICHAEL PALAGE: Well, what happens is—I do not mean to put you on the spot. I think what is best is since this specific recommendation was put forward by the GAC, Kenneth, it would be helpful if you and your GAC colleagues could perhaps circle up over the next day or two and perhaps early next week put forward to the mailing list. I would like to try to get this done before next week's call. So if you can do that and send something to the mailing list in advance of next week's call, that would be greatly appreciated. Then, Steve, after the GAC has done that, you could follow up as well. I think that would probably be the most efficient use of everyone's time. Thank you again, Steve. With that, I want to now move down to number six in this bucket. Alan, you have the floor.

ALAN GREENBERG: Let me see. Okay. I think someone else suggested, I don't remember who it was but—

MICHAEL PALAGE: It was Lorraine from the GAC, I believe.

ALAN GREENBERG: Thank you very much. This is akin to a study that was done unrelated to our work, but a study that was done on whether the

comment form or whether you can get messages through to registrants via whatever the process is would work, that domains were registered and then they tried to contact the registrant, and in some cases, it worked well. In other cases, the message just didn't get through. That was true even for some very reputable registrars for reasons that were later corrected. This one essentially says register a bunch of names using patently incorrect information in various different ways and see to what extent the checks catch it or not. So it's a relatively simple process. That's a real life stress test to say is it working or not. Thank you.

MICHAEL PALAGE: I don't have your specific survey answer in front of me. But part of this was, I think a two-parter. So this is the proposal. I think you said here this would be a third party that ICANN would commission much like with the old accuracy ARS study, I believe. Correct?

ALAN GREENBERG: Yes. This is not part of the survey. This was answering "Are there other things we could do?"

MICHAEL PALAGE: Okay. Thank you. I guess on that regard there, Brian, a question to Xavier is my recollection from my previous discussions with him is ICANN was allocating I think between $400,000 to $500,000 a year annually on the old ARS. Could you perhaps just get confirmation from him on those numbers? Obviously, that particular historic line item has not been used since, obviously, the

suspension of the ARS. But it would be helpful, I think, to have some perspective of what ICANN previously spent in this area to give that information to the Council as they consider potential next steps.

BRIAN GUTTERMAN: Yeah, sorry. Thanks, Michael. So maybe if you could just put that.

MICHAEL PALAGE: I'll put that in writing.

BRIAN GUTTERMAN: I just wanted to verify or just ask about what was spent previously on ARS to finance that.

MICHAEL PALAGE: Yeah. I'll put it this way. I actually engaged with him specifically. So I will send that to you, and then you can just confirm that nothing's changed and those were accurate numbers that he had previously quickly referenced. So I just think it would be good—

BRIAN GUTTERMAN: Yeah. Thanks. We can relay the question. Thank you.

MICHAEL PALAGE: Perfect. Sarah, you have your hand up. You have the floor.

SARAH WYLD: Thank you. I have a few different concerns with this proposal. One side is their business implications—and I don't really have a good idea as to how to handle this, but I don't really like that this team or ICANN or somebody is going to choose a specific registration provider or several, and then that provider gets a whole bunch of business from these tests. So we're giving them money, which seems kind of weird or problematic. And then, on the other side of it, whatever provider does get chosen, they're now being more scrutinized than the other providers who are not being tested. So it's kind of unfair to them in that regard also. Then finally, as Volker said in the in the chat, buying a domain name with incorrect information on purpose does violate the registration agreement. I understand where this idea came from but I'm not sure that it's something we should proceed with. Thank you.

MICHAEL PALAGE: Okay. I have heard your concerns. So with that, let's move on to number seven. This is an IPC comment that I think actually is aligned with the comments of ALAC but I will let you speak to this, Scott. You have the floor.

SCOTT AUSTIN: Thank you, Michael. Let me just pull that up.

MICHAEL PALAGE: This is paragraph seven.

EN

SCOTT AUSTIN: Yeah, I think that it follows on the same question as above with Alan that there would be a domain name just using the term fictitious entity. And then this contractor wouldn't necessarily be a registrar or registry, but it would be a third party contractor. They monitor the number of domains that were flagged that required further verification. I guess the question again that I can already hear the registrars and registries being concerned in terms of what type of fictitious entity or individual that would be used? I would think in terms of as far as the question about violating certain things, if it was an ICANN sanctioned study, there would be an exception because it is in the interest of improving the system. But I'll leave that to the folks at ICANN to determine if there is a way that some kind of testing like this can and should be done without being concerned of a violation. If it's not a contracting party and is a third party contractor, then there's perhaps a specific way that they would permit that. But I think that the point is that there's some kind of a process that will be used to determine if a fictitious entity or if a proposed sample registrant is put through and tracked and monitored to determine if it was flagged where the data was clearly incorrect and needed to be flagged for further verification using the existing standards that we have currently for verification and validation. That's my understanding from speaking for what we're focusing on there.

MICHAEL PALAGE: Okay. Marc Anderson, you have the floor.

MARC ANDERSON: Thanks, Michael. I guess the devil in the details kind of question I have is there's this assumption that the fictitious nature of the registrant sort of eliminates PII concerns, but I'm not sure how that would sort of practically be implemented. The registrar wouldn't know that this is a fictitious registrant or entity so they wouldn't know that this could be treated differently. And then, of course, if they were notified and told that this is a fictitious entity, it could be treated differently than that. That sort of defeats the purpose. That's sort of one question that has been gnawing at me. I think this was a similar thing. I think the GAC had a similar proposal where there's an assumption that this fictitious data could be treated differently. Maybe that's true to some degree. I'm not sure in practice how that could be executed. Just sort of a question I have about how that could practically be implemented.

MICHAEL PALAGE: Scott, you have the floor.

SCOTT AUSTIN: I think the question of testing and the fact that it's in the nature of testing is what's being questioned. I think that that needs to be run up the flagpole with the folks at ICANN to see if something like this could be done without fear of those kinds of violations. Marc is absolutely correct. You wouldn't want to alert people ahead of time. That's the whole point is that it will be used as a test case. Then there will be, it seems to me, a spectrum of how blatantly obvious is the fact that it's fictitious. The Mickey Mouse has been thrown around at people, some people have said, "Well, maybe there is a Mickey Mouse." Others have said, "Yeah, that's blatant."

Especially if it has the address of Disneyland or of things that clear on its face would be blatantly or patently false. Then I'm sure there are things move along that spectrum that will be less blatant. The question is, where would we come out in terms of deciding? And who would make that decision? I guess the third party contractor with input from ICANN and perhaps with certain members of this team. At any rate, it's a proposal and the system needs to be tested is the sense. At least that's what's raised here. So if the parties feel it doesn't need testing, then that's, I guess, where we'll go. And if it should be tested, then I think all of the parties on this call have the ability to suggest what would be a fair and meaningful way to test it. Thank you.

MICHAEL PALAGE: So, Scott, I have a suggestion for you and Alan. As I said, in connection with point five, I've asked Kenneth to engage with his GAC colleagues and provide some additional clarity on reliability. Perhaps in advance of next week's call, if IPC and ALAC could get together and perhaps provide a little more meat on the bones on what you're proposing, that would be incredibly helpful towards moving this forward. Quick time check, we have 10 minutes. Marika, you have the floor.

MARIKA KONINGS: Thanks, Michael. Maybe on that note, I can maybe refer Scott and the others to the original document we have for the submission of proposals, because I think those ask very specific questions as well around what's the intent of the proposal, what is trying to search, what kind of resources are needed, who would be

involved. So really try to kind of gather as much information as possible to help the group appreciate and understand how that proposal would contribute as well to the group's assignment. So it may be helpful if those you're putting forward, the suggestion, could use that same format so that the group can evaluate that proposal as well in the same way as they evaluated some of the other proposals that were put forward.

MICHAEL PALAGE: Excellent. To pass this prologue, I think that's an excellent suggestion there, Marika. So, Scott and Alan, if you could go back to some of that original homework and some of the specific questions, and if you could perhaps share that via the mailing list before next week's call, that would be greatly appreciated. Roger, you have the floor.

ROGER CARNEY: Thanks, Michael. Maybe just for Scott, because I'm a little confused on number seven and/or whoever is going to handle number seven, I guess, what that number actually means and what would it be compared to? If we get to a number on number seven, what does that mean unless it's extremely high? I mean, wouldn't you want to have something to compare that to? Again, maybe just some more clarification on number seven helps. And maybe, Marika, what's the goal here? I'm not sure getting to a number here supplies anything besides then asking the next question, okay, what does that number mean? And how do you get a comparison? Thanks.

MICHAEL PALAGE: I think the numbers are important. So I think you raise a very valid point there, Roger. One way of looking at it is if X number of domain names are improperly registered, and all X are flagged, that would be a good thing to say that appropriate safeguards are in place. If that number is less than X or the percentage is less than X, then that becomes its own fact finding. That's information for the Council to consider, I guess. Does that make sense?

ROGER CARNEY: Yeah. Thanks, Michael. I agree, but I don't think that's what this says. I don't think that's what this is suggesting to do. So I think what you said, Michael, made sense to me. But I'm not sure that that's what this is asking you to do. Thanks.

MICHAEL PALAGE: All right. So what happens is Alan and Scott—Scott, if you can perhaps just connect with Lori and make sure, again, to Marika's point, it would really be helpful if you can follow the original template that we had used earlier in the call.

Marika, we have eight minutes left. How many we have—eight, nine? How many? Let's move on to eight if we could, Alan. Yes. Thank you, Marika, for including the link in the post call notes. Alan, you have the floor regarding—and as someone who has been around in this process long enough, you remember when this was included in the 2012 agreement and some of the work that has been done over the years. So would you like to speak to what you're proposing here in paragraph eight?

ALAN GREENBERG: Sure. When the 2013 RAA was negotiated in 2012, the cross-validation item was included. It was never fully implemented, and certainly has never been enforced. Largely based on, if I understand correctly, because they were private discussions, there were discussions that said basically this is not feasible, it's not practical, it's whatever. So although the words have remained in the RAA, they have never effectively been implemented to any extent. 2012 was 10 years ago, though, and maybe things have changed. Given that the words are still there, you haven't taken them out, I think it warrants a bit of investigation saying, "Looking at it in the context of today's technology, what is available today, what we know today, is it more practical than it was before?" My understanding, there are indications that that would imply that the answer is yes. But I don't know for sure and I'm certainly not an expert in that area. But I think it's worth investigating to see to what extent this could be implemented and enforced, given that a significant amount of time has passed and we're a lot better in doing some things that we weren't in 2012. That's it. Thank you.

MICHAEL PALAGE: I was actually going to ask Volker but, Roger, I know ICANN had done—they had done an RFI and I know they've gotten some price quotes. I think this is back in 2018. I think that was the last thing we had looked at earlier. So could you perhaps, Roger, speak to where things are at from a registrar perspective?

ROGER CARNEY: Thanks, Michael. I can't speak to details. What you just said is something that I do recall. Maybe ICANN staff can take a look at when the last. I thought this was done multiple times since the 2012 contract. So maybe ICANN can provide this group with an update on the last few times that they've done this. Thanks.

MICHAEL PALAGE: Brian? Marika, is that a Brian or how would you propose to get an update from ICANN Org's side of the house? Is that something policy staff would do, or is that more of a Brian?

MARIKA KONINGS: I don't know if you see me nodding, but that's definitely a Brian question. Policy Team has not been involved in the [inaudible].

MICHAEL PALAGE: Okay. So, Brian, I owe you an e-mail. What I will do, Brian, is I will send you an e-mail via the mailing list with the specific Xavier question as well as this specific recommendation. Kill multiple birds with one stone. Steve Crocker, you have the floor.

STEVE CROCKER: Thank you. I just wanted to toss in the following comment. It shouldn't be possible for different registrars, for each registrar to have its own policy as to what level of validation or verification it does. In fact, might be different for some registrants as opposed to other registrants. From a contractual point of view, I think what we would want is for ICANN to set the minimum requirement to permit

registrars to do more than to require registrars to be explicit about how much they do. And in the event that they don't do the same thing for everybody to be clear when they provide data in response to requests under various circumstances, what level of validation or verification they've done on that data.

MICHAEL PALAGE: I would agree with you, Steve. I think we've touched upon that as well in some of our discussions when we've looked at .bank, .pharmacy, .realtor, and others. So yes, I think that I would agree with your statement.

So just looking at the time, we have two minutes left. I would say that the study of ccTLD practices, I think we actually had exhausted that in our earlier discussion. So unless there is anything that I am missing on nine, Alan, would you mind if we tried to go to 10 unless I'm missing any objections to move—

ALAN GREENBERG: Certainly.

MICHAEL PALAGE: Perfect. And 10—let me just look at this. Oh, Alan, this is also you. I think this also gets to the point that you were talking about earlier in ccTLDs as well. Well, not just ccTLDs but the broader industry as a whole. So we are at the end of the call, I don't mind if you could perhaps wrap this up in a minute or two. If you could explain what you mean from point number 10. Does this potentially look at Assignment 4, or do you think this is something that is potentially

more Assignment 3? If you could speak to that briefly, I just want to be able to say we got through the entire document. So we'll go a little in the overtime here. So you have the floor.

ALAN GREENBERG: Okay, I'll be very brief. I have no idea if it's 3 or 4 because I don't remember enough about what those are. So I won't attempt to answer that. I'll let Marika tell me whether it's 3 or 4 in her wisdom. All this is saying is periodically we have spent a lot of time talking about what the RAA requires. We know that was derived that based on an original target and then significant negotiations. There are clearly other levels of things we could do such as verify all addresses or such as do some other level of verification and validation. This is simply saying we should take some time to put them on the table so we know what else we have to consider. This was done in the context of, is there something we could do now other than just pausing? And this was something that we have talked about innumerable times. We could do this work now rather than later, simply to put on the table what other options we might want to consider going forward. Thank you.

MICHAEL PALAGE: So, we're one minute in overtime. Does anyone want to speak to Alan? And then, Alan, perhaps we can try to also address this offline via the mailing list. So, are there any final comments/responses to Alan's comments? And if not, I appreciate people staying on for two minutes extra. Seeing nothing, thank you, everyone. This was, I think, a very productive call. Marika, you have the floor.

EN

MARIKA KONINGS: Thanks, Michael. I just wanted to flag that we don't have a call yet scheduled for next week. As you know, we're still trying to wrap up the work on the write-up. We had hoped that maybe we'll be able to do that today. But obviously, I haven't completed that yet. So we will send out a calendar invite for next week's meeting. I'm just encouraging everyone to follow up on the homework assignments. We'll send out the notes and action items after this call. As a reminder as well, the group did promise Council to deliver a write-up shortly after ICANN74. Of course, if more time is needed, that may require a further update to Council and indication of when the group expects to complete its work on that.

MICHAEL PALAGE: Thank you, Marika. No further comments, questions? We could end the recording. Thank you, everyone, for a productive session today.

[END OF TRANSCRIPTION]