ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 05 April 2022 at 16:00 UTC

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JULIE BISLAND:	Good morning, good afternoon, good evening, everyone. Welcome to the Transfer Policy Review PDP working group call taking place on Tuesday, the 5th of April 2022. In the interest of time, there will be no roll call. Attendance will be taken by the Zoom Room. For today's call, we have apologies from Daniel Nanghaka (At-Large) and John Woodworth (ISPCP.) They have formally assigned Raymond Mamattah(At-Large) as their alternates for this call and for remaining days of absence.
	As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite emails. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only.

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As a reminder, please select everyone when using the chat feature in order for all participants to see your chat, and so it's captured in the recording. Alternates not replacing a member should not engage in the chat or use any of the other Zoom Room functionalities.

Statements of Interest must be kept up to date. Does anyone have any updates to share? If so, please raise your hand or speak up now. Seeing no hands, if assistance is needed updating your statements of interest, please email the GNSO Secretariat.

Please remember to state your name before speaking for the transcription. Recordings will be posted on the public Wiki space shortly after the end of the call.

And as a reminder, those who take part in the ICANN multi stakeholder process are to comply with the expected standards of behavior. Thank you and over to our chair, Roger Carney. Please begin.

ROGER CARNEY: Great. Thanks, Julie. Welcome, everyone. Before we jump into our working schedule here, let's cover a few things. I know that Zak has an update from BC. So if Zak wants to jump on now and give us an update from the BC, that'd be great.

ZAK MUSCOVITCH: Thank you so much, Roger. As Roger said, there's an update from the BC. The BC had a special call about transfer policy locks last Thursday, and had a discussion about them. And I have a short

summary of the positions and views of the BC on three different kinds of locks, which I'll share with you verbally, put in the record and also share by email afterwards.

And just a note, because the move to daylight saving time, I'm going to have to leave the call early today because it created a conflict believe it or not, but we'll get that sorted out for next week.

So the first lock that was discussed was the post creation lock. And I'll read out to you the summary. 10 days is too short, leave it at 60 days if possible. Maybe 30 days is a happy medium, but 60 days is still preferable. The longer the better from a trademark enforcement perspective, as it prevents having to redo a UDRP or demand letter and also assist with preventing registrar hopping when a registrar is asked to take enforcement proceedings against infringing or unlawfully used domain name.

There may be an issue in shortening the period from a registrar's perspective, in that a registrar customer may take advantage of promotional or loss leader type pricing for the initial year, and then the customer moves away to another registrar.

The second lock that was discussed was the change of registrant lock. I'll read to you the summary. The default rule should be a transfer lock following a change of registrant. However, a registrar should be required in a transparent manner to enable a registrant upon request to opt out of the transfer lock or to reduce the transfer lock period rather than leave it to each registrar to decide whether they will generally permit opt outs.

Nevertheless, each registrar should retain discretion as to whether to permit a transfer even if the registrant has ostensibly opted out for security reasons.

A transfer lock should not prevent registrants and businesses from affecting bonafide transfers when necessary or desirable. There should be a fact-based rationale for the determination of the length of the default transfer lock, whether it is 60 or 30 days for example.

Additionally, a BC member is looking to see whether the recent domain abuse activity reporting data can provide any insight into the appropriate length for transfer locks in terms of how long it takes to identify an abusive registration.

The last lock was a change of registrar lock, AKA and inter-registrar transfer lock, not a major concern, doesn't appear to be significant concern as it would usually coincide with the change of registrant lock in any event. However, registrant should not be prevented from transferring the domain name from one registrar to another, even after a recent registrar change unless there's another type of lock at play.

So just to give you an idea, there was about 11 members of the BC representing various large and small companies and fairly representative group of the membership of the BC. And so these were the views that were reached more or less by consensus. So I've been happy to share those with you. Thank you.

ROGER CARNEY:	Great, thanks, Zak. I really appreciate that. And sending that to the list so everybody can take a look at it is a great idea as well. Really appreciate that and good input from BC. That sounds great. Did anybody have any questions for Zak, anything specific to what he mentioned? Okay, great. Again, thanks, Zak. It's great information to have. Good things are happening in between calls. That's great.
	I just called to make everybody notice, I guess, that Farzi also posted something to the list earlier this week, maybe it was last week, even. Just some questions that she had about a few things, I think that they're fairly straightforward, but just wanted everybody to take a look at them. I don't see that she's on today. But just take a look and see—I don't know if Wisdom has anything he wants to share on those that she sent over. But just take a look at those and see if there's anything. We can probably answer them fairly direct on list for her. And if not, we can obviously bring those back to this call. So just wanted to call that out.
	Great. Okay, I and Kristian, if you do we can obviously talk about those as soon as we can. So, in chat, Kristian just said he may have some questions for Zak.
	Okay, any other updates from any of the groups? Okay, let's go ahead and take a look at what our schedule looks like for the next, I guess up until ICANN at least, to get us to our initial report. Staff has been keeping this going. Thanks, staff, for doing that. Thanks for pulling it up here. They keep this in line so that they're tracking progress and what we have left here.

And as you can see, it's laid out pretty well. We do have several more sessions, meetings to go before we kind of wrap up our initial discussions and get back into our I guess final discussions around the initial report. So if you take a look, this week, obviously, the bulk use and the fast undo or whatever it is. And then the small team, thank you small team, there was several participants that joined the small team. They're going to meet tomorrow for the first time just to try to work through any the NACKing left open questions, clean ups on some of the items. Then next week, we'll do the locking, kind of timely from Zak's input there. But we will take a look at those locks. Once again, obviously we spent some time on those but we're going to try to get those cleaned up so that we can get them put into initial report and then we can take a look at them from there.

And then the following meeting, we'll try to get to the NACKing and maybe the small team will have something by then that we have additional to look at. But we do need to get those cleaned up. And then we'll actually start back in on reevaluating our TAC recommendations and discussions and see if we need to add anything or make any modification modifications there. This will be really our first meeting here in a couple of weeks to really start getting into that initial report, getting that solidified. Keiron, yes, we did get several volunteers for the small group. So they'll get going tomorrow, actually.

And again, you can take a look at each of the meetings, we're just going to step through all of our items that we've already covered. The discussions we've had, make sure that we've got it documented and correct for the initial report. And again, we've got

a few meetings here on specific things, obviously, the topics we've covered, TAC, losing gaining FOA, digital security measures, and we left a few meetings to clean up anything else. And again, some of those obviously, we don't know if we'll spend a little more time here or there. So we've got a few meetings to clean that up.

Staff and I talked last week about possibly sometime in June doing a webinar on the initial report, we have to see how that works out. But the goal here is to have the initial report out right at ICANN 74. And if we get done early, great. If we get it done during the meeting or right after, that's perfect. And then we'll take those [inaudible] period after that. But that's the goal. And that should get us through the middle end of June there.

If anybody has any questions. I think we've got a good handle on this. And we've got the time. So I think we're in good shape to hit that middle of June release of that initial report. Okay, just wanted to share that so everybody sees what we've got ahead of us. Again, I think we've got the time and I think we're looking good. So kudos to everybody here for continuing to work forward.

Okay, looks like Sarah may have some questions to follow up on Zak. Sarah, please go ahead.

SARAH WYLD: Hi, everybody. Hope you're doing well. Zak, thank you so much for sending that in writing, it's definitely much easier for me to process it that way. So, in in the post creation lock, I guess I'm curious as to why—I was going to ask you, why is 10 days too short, but now

I'm looking again, I do see your second sentence right there is about how much time it takes to do a UDRP or a demand letter.

I guess I just want to know, is it really a lot of work to update it if the registrar changes? Maybe just look at the registrar at the end of the process? I don't know. And then the change of registrar lock, it kind of surprised me to see that that is not something that the BC wanted. And I guess that's because I don't imagine that the change of registrants lock would kick in when a domain moves from one registrar to another because the gaining registrar doesn't know if the registrant is changing. So are you saying that there would have to be the change of registrant, like change of ownership lock when any registrar transfer occurs? So the connection between those two locks seems a bit weird to me. Thank you.

ZAK MUSCOVITCH: Thank you very much, Sarah. So just for your first question regarding whether it's really a lot of work to redo a demand letter or UDRP, it's something we've discussed previously on these calls. And I know from personal professional experience, it isn't a terrible amount of additional work, but it is something significant to consider.

But I would also point you to the latter part of the post creation lock comment, and that seemed to be of more importance to some members of the BC. That latter part was that when a brand protection company, for example, contacts one of you all as a registrar and say there's this abusive domain name, counterfeit site, whatever it is and the registrar might say, "Oh, that domain

name just hopped to another registrar so it's really nothing that we can do about it."

And so the period of a post creation lock would appear to some within the BC to help mitigate against that contingency. If it's a longer post creation lock, then there's at least a longer period in which to deal with it directly with a registrar.

And in terms of your second question regarding the interplay of a change of registrant lock versus change of registrar lock, that's an interesting point, I'm going to have to give that some more thought. I think that the way that some members of the BC were looking at this is that if there's a change of registrant, there should be a lock by default. But if it's merely a change of registrar, without any change of registrant, then from A to B is no problem. But then from B to C can be a problem for some registrars. There shouldn't necessarily be a prohibition on that B2C transfer. Thanks.

ROGER CARNEY: Rick, please go ahead.

RICK WILHELM: Thanks, Roger. Thanks, Zak, for the email. I just wanted to clarify something that as I'm reading the email closely, I think that all of these are referring to the lock in question is transfer prohibited lock where—presumably the client transfer prohibited lock? Is that the lock that's being referred to in all three paragraphs? When it refers to lock, so it says post creation lock, I really am reading that as the application of a transfer prohibited lock after creation, and then change of registrant lock, application of transfer prohibited

lock after a change of registrant, and similarly for the last one. I am I correct in that reading? Thank you.

ZAK MUSCOVITCH: Yes. So you may very well be correct. From what we do not have the technical and hands on expertise about the nature of the locks as you do. But we look at it just from the perspective of there is a lock. What it technically qualifies as, I leave that to you.

ROGER CARNEY: Thanks, Zak. Yeah, and I'll just follow up with that. And I think that from a policy perspective, I don't think we want to get too specific and maybe even lock is maybe the hard word to get past here. Because we do technically have locks, I mean, it's really just— there's no ability to move it, and then maybe that's just by policy or by whatever, but the policy is not going to get into specifically saying a lock, I don't see why we would just because that has never changed in the past. But it could change. Keiron, please go ahead.

KEIRON TOBIN: Thank you for looking at that, Zak. I just wanted to clarify just some information in regards to the post creation lock. So the initial 10 days that we had would be standardized for both the post creation lock and for the change of registrar lock. So it would be 10 days set as a minimum for both of them. So standardizing the process across the board would make it easier so that registrars are kind of more accessible to be contacted. And it also would probably reduce the work from your side. Because whether it's

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been transferred, it would still be locked from that registrar for another 10 days before it would be allowed to be transferred out again. So I just wanted to just make sure that that point was clarified as well and that we that we are looking at standardizing it. And some of that would help the BC I believe. And so I just wanted just to confirm that. Thank you.

ZAK MUSCOVITCH: Thank you, Keiron. Yes, it's an important point and one that I did share with the BC several occasions throughout the call, to make it clear that there is at least an initial inclination as far as I can see within this working group for consistency across all locks. And so the BC is aware of that, I guess some people in the BC would say that yes, we understand it, but let's just standardize it as longer [inaudible]. Thank you.

ROGER CARNEY: Great. Thanks, Zak. It's an interesting point that Sarah and you were talking about? I think from the BC standpoint, now that I see it and it makes some sense that the change of registrant is probably a bigger, impactful thing to the BC community where the change of registrar is bigger to the registrars, and that's interesting to bring up so that's great information. Kristian, please Go ahead.

KRISTIAN ØRMEN: I just wanted to note that if we do a change of registrar, we can't transfer the owner information. So basically, when we do a change of registrar, it could be a change of registrant as well in the same process. So that's also one of the reasons why it has to

be the same lock period, because it wouldn't make sense to have different lock periods. Because then you can issue a registrar transfer instead. Thank you.

ROGER CARNEY: Great, thanks, Kristian. Yeah, and that's just to note on that, as you know, that's obviously true today as well. It's not necessarily what we've done. It's the fact of an inter registrar transfer is in practicality a change of registrant as well. And again, it's hard because it may be a change of registrant but there's no knowledge there. So you have to assume it is.

Okay, any other questions, comments before we jump into talking about bulk again? Okay, great. Again, thanks for that great updates. Let's go ahead and jump into our bulk. I think where we left bulk last week was, I think we finally got to a spot and there may have been really late in the call that we got to the idea that it's probably a flexibility thing of using the same TAC across a bulk transfer.

And again, I think what we agreed to as what we're talking about here is registrant initiated bulk transfer, meaning more than one. And it's the bulk idea is a bulk idea at the registrar, not necessarily the registry. Because the registrant may ask to transfer these 10 domains but they may be at 10 different registries in the end. So, it still would be a bulk. And possibly, a registrant could use the same, or the registrar could assign the same TAC to each one of those. So that registrar only has one to have to deal with. Or I think what the discussion ended up last week was yes, but maybe

that's a registrar option, or even a registrant/registrar agreement that they make.

So if I didn't get any of that right, or somebody was thinking something different, please, jump online, and let's discuss. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah, so me and some of my colleagues actually took this offline, just in regards to the BTAPPA idea. And we spent many hours delving into it. And in its current form, and even if we were to try and change it, it is just not viable. We need to look at some form of alternative but the BTAPPA is just a no go area, unfortunately. I mean, if anyone has any other kind of ways or methods, I think that would be great. But from what we delved into, it was just everything we're coming up with was kind of a red cross, you can't go any further. So yeah, I think we need to potentially look at an alternative. Thank you.

ROGER CARNEY: Okay, great. Again, we'll talk about BTAPPA a lot in phase two. So we don't have to get into specifics here. But knowing that you've talked about that as an option, and I don't think that we're leaning that way, I guess the one big question is we've talked about in a transfer today, and you can call it bulk or not, but however it is, even if registrant transfers one or 10 or 100 today, the expiration is extended on those by a year on the transfer.

This group had talked through that. And I'm not sure that we ever came to a conclusion that there should be discussion around if the

expiration should be extended or not. Again, today, it is so If we have no consensus to change that, it'll stay that way. So when someone transfers one, they get another year added on. And if they transfer 10,000, they get another year added on to each one of those as well. So just something to throw out there that I think that we touched on, but never really got to the end of that. Sarah, please go ahead.

SARAH WYLD: Thank you. I think the year is interesting. I definitely think that as much as possible, any bulk action should mirror the same action for an individual domain. So if we transfer one domain and it renews a year, then when I transfer 100 domains, each one renews a year, if I have to obtain a TAC and provide it, then I have to obtain 100 TAC and provide them I think, but maybe we should question whether a transfer, should renew a domain. Is there a place for that in our conversation somewhere? But definitely, I think it should be the same for one or for many. Thank you.

ROGER CARNEY: Great, thanks, Sarah. Theo, please go ahead.

THEO GEURTS: Yeah, thanks, Roger. You know, when talking about adding a year, when transferring a domain name, it sort of makes me wonder if that is still a verifiable path. I mean, Germany is going to change their laws when it comes to subscriptions. And it might be very likely that the way we do things within ICANN won't be even compliant with that law.

Here in the Netherlands, what we do is, if you want to rent a domain name for a month, you can do that. You can cancel a domain name after month. When you transfer a domain name, there's not even a cost involved, because there is no renewal taking place. And that is how we stay compliant with the Dutch laws. I mean, it's kind of like a Netflix subscription. If you want to cancel after two months, you can do that. You don't have to take it for a year. And you see that more and more consumer laws that deal around these digital services that go more into that line and come up with regulations that go like you don't have to renew for a year. You don't have to register for a year. So that's going to be very interesting forward. I'm not sure if that is within the scope of this group. But I certainly wanted to flag it. Thanks.

ROGER CARNEY: Great. Thanks to you. And maybe we'll take that back and look at the scope. I mean, obviously, it is part of today's transfer policy. But yeah, we can look at and I think it's still important to have that discussion. I mean, there's a lot of good questions popping up in chat about exactly that reason. And I wasn't around when this was made, that the year was done, or added to it. But I can only assume that as Sarah kind of touched on, that it's not a fear or anything, but that guarantee to the gaining registrar that they're not just accepting the transfer just because—and typically I would think it's not just because. But yeah, I think that's the interesting thing is—and you bring up Germany, but I know that several places have or are talking about that same thing. And it's something to think about. So, Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah, I think billing data here is kind of the key point to transfers, because it shows us that the individual is, in some respects, legitimate or has actual connection in terms of to a bank, in order to ensure that they can verify that information. And the cost of transfers as well to us, also is something that is an addition.

But coming back to Theo's point as well. Remember, you can renew for up to 10 years. So when I was looking at the German policy, you may have read it a little differently. But I was under the impression that, yes, it can be reduced, but you can also extend it as well. And so if you want to do something on an annual basis, because as you know, the margins on domains are very low. So if they wanted to extend for additional years, maybe that's something.

I'm not fully sure at the moment which registrars currently maybe have an extension when you transfer, you can go up to 10 years, or you can kind of look at potentially adding on additional years through transfer. I'm not sure if that's something that we want to discuss further as well. Or even limiting that down to potential months but again that would change the entire process of how this whole kind of operation works. Thank you.

ROGER CARNEY: Great. Thanks, Keiron. Yeah, and I think you're right. And I think what Theo was talking about is obviously, those regulations, they're trying to protect the consumer or registrant here. But to your point, if the registrant actually selects five years and pays for five years, I don't think that that goes against any of the

regulations that are being discussed. It's the fact that they didn't have the ability to select that multiple years. So I think that's the issue, and then on a transfer, then that kind of gets a little squishy. Right. The transfer is an automatic year. And then I don't know what the regulations will come out as. I'm guessing that it probably still works, but it's a good thing to look at. And is it needed? I mean, a lot of the chat is talking about that cost recovery aspect of doing it from the gaining registrar's perspective, so it's interesting. Theo, please go ahead.

THEO GEURTS: And also, if you look from the perspective of the registrant, I mean, I registered a domain name with registrar a and then after a couple of months I go, "Okay, this is not my registrar," and then you need to transfer to registrar B, and then you have to pay for another year, while the current term has not been consumed yet, so to speak.

So we sometimes get these complaints and I don't want to go into the discussion if those are valid complaints. I'm just saying they're out there. So apparently there are consumers that go like, "This is some kind of unfair," especially, maybe we get those complaints because they just transferred their .NL with zero cost, zero effort. And now they want to transfer their whatever gTLD. And they suddenly have to pay and they go like, "Why is that? I mean, why is there a difference? A domain name is a domain name." That's the argument you'll hear all the time. Thanks.

ROGER CARNEY: Great. Thanks. Any other comments? Steinar had a question in chat about the ICANN transfer transaction fee as well. And I think that that is applicable as well, does that fall into the same line of being charged or not charged? So Steinar, please go ahead

STEINAR GRØTTERØD: I'm aware that this is maybe not within the scope of the charter questions, etc. But I do have some problems seeing it's end user friendly, removing the another year to the lifecycle when it's a successful transfer.

Mainly, because I think there has to be some sort of initiative with a gaining register to actually work on getting that transferred successfully. And we also have to think about that there are expensive top levels also in this world, not only the cheapest on. So the I feel that there's more initiative when there is another year added to that. And if we agree upon 10 days, as a lock period, there will be actually a short period for the gaining registrar to collect or to have to pay for to ICANN, etc. if that is still there, and to collect the money. And really, it doesn't make sense to me. Badly spoken, but there's some red flags in my mind. Thank you.

ROGER CARNEY: Thanks. Yeah. And I looking at it from the registrant perspective, I think you have to ask that question of, okay, is it a benefit or not? Because I mean, I really can see an added you're being a benefit as well. I mean, obviously, they're still interested in this domain, or else they wouldn't be transferring it, they would have done something else with it. So I can see the benefit as well as not

having to pay for it. Obviously, you can see it as well, but if they're in their last month, and then they transfer it and then it just disappears a month later, I don't know how helpful that is to the registrant. Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you, I just wanted to say that if we don't add another year, people are going to transfer in, and then the registrar don't send the renewal notice, because maybe they would send that a week before or something. So you transfer in, and then the domain expire the day after. And that's a really bad experience. So, because of that the renewal of domains in a transfer is a really good feature in gTLDs.

ROGER CARNEY: Great, thanks, Kristian. Again, I mean, I'll take a look at this with staff just to see about the scope issues here. But I think the acknowledgement that there's some potential upcoming issues around this or even current issues around this could be acknowledged even if we're not suggesting a change to it right now. And maybe even a pointed question to the community about it is something that we can look at as well.

Again, without a consensus, we're not going to change it from the way it works today, which is to add another year. So let me take back and see about the scope and then also thinking about not changing it currently, but prompting a question from our initial report out to the community so that we can wrap that up.

Okay, any other comments or questions on that? Okay, anything else about bulk? I went through the TAC recommendations, and I didn't see anything that stops anything or hurts—I didn't see anything that had to be changed for to allow a bulk. Again, I think that what I've heard is, we've come down along the lines of the one big question is, is it one TAC for the 10 domains you're transferring or 10 TACs for each domain for each individual one? And what I've heard is the group saying that that should be a registrar or registrant/registrar decision, and we need to make the policy be able to allow for that not necessarily to stop either one of those or pick either one of those. So thoughts on that? Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah. If it was set by the registrar, how would the registry be able to determine that from their end?

ROGER CARNEY: I don't know that the registry cares. TAC requirement is that the TAC is unique per domain. So it would still be unique in the sense that the domain always makes it unique. So a TAC and a domain is always unique when they when you combine them. And our recommendation doesn't say that has to be unique globally, or whatever. So I don't know if registry really cares. And maybe registries can pop up and say that, but that's my thought, anyway, Keiron.

KEIRON TOBIN:	I was just thinking from a backend perspective, in terms of let's say, you've got ABC and 123. They both operate from the same backend. But they're both sent the same TAC, and they're both operating off different extensions. I'm just thinking from that point, how would it work? Thank you.
ROGER CARNEY:	Great. Thanks, Keiron. Yeah, and again, I'm just not sure—you bring up another thing about the multiple TLDs being housed at the same—but I'm not sure that it would matter, as long as the policy is clear that the TAC and the domain is what the uniqueness is. And Rick is kind of thinking the same thing in chat there. But any anybody else that has any comments, that'd be great. Sarah, please go ahead.
SARAH WYLD:	Thank you. So when I read, the TAC must be unique per registrant and per domain name, I definitely take that to mean that it needs to be a different TAC on each and every domain. Not that you can have one TAC on multiple domains. To me that does not sound like unique. So if that's our intent, I feel like we need to go back to the TAC requirements and change that. And very hesitant to change that because I thought that we did that for really good reason. So that's a concern.
	But in terms of what the registry does, like, I feel like they don't care. Because whatever the TAC is that the registrar sets the registry is going to take. And on the other hand, if the registry is requiring that the TAC be unique per domain, then maybe they'll

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fail—like when you try to set it, if it detects that it's the same TAC in multiple places, it would fail. So maybe they do care. Definitely don't feel like unique means the same one on multiple domains thing.

ROGER CARNEY: Right, Thanks, Sarah. And that's a great clarity point that we need to make. And obviously, if we're reading it differently, we can make it a little clearer. But I guess that's the question is, are we recommending that the TAC is different for every domain in a transfer?

SARAH WYLD: What else would unique per domain mean?

ROGER CARNEY: To me unique per domain is that that each domain and TAC is a unique combination. And to me, all that means is that the domain name, or the domain basically, is the uniqueness. The TAC isn't necessarily the uniqueness. And again, if that's not clear—so it's not clear that way. So Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. If what you just said was what we meant, then we didn't need to write it at all. Because it wouldn't make any sense. Like if the domain is the uniqueness, then all of them are different by default. And then we don't have to write it in the policy. So we did write this in the earlier recommendation, because we want

them to be different. We want to make sure that no one puts the same TAC on all domains, either on purpose or by mistake. Thank you.

ROGER CARNEY: Great. Thanks, Kristian. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah. So essentially, what we would do here, we would allow multiple domains to be transferred. But each one would have their own unique TAC. And so essentially, you can combine them to create the transfer. Yeah, combined is the right word, I would say, put in more than a couple together. That's how I understand it now.

ROGER CARNEY: Yeah. So I think everyone besides me read it the same way. So that's good. So everybody believes that—or what we're saying is that there's a unique TAC itself for each domain. And I think Sarah's question is right, in chat here. Is it then the possibility in a bulk scenario that you can change that rule? And I think that that's the question. Rick, please go ahead.

RICK WILHELM: I don't have the draft text in front of me, but I believe that that sounds right, that the intent is that if the TAC is set, in other words, if the TAC is not null, then it would be unique within the registry generally, as it's currently written. However, it would it be

possible that the TAC is null and so null would be an allowable value, but of course, null is not approved as a valid TAC. So that would be okay. Right.

And Sarah says, yes, but unique for the registrar. So I don't know. I don't have the text at hand. So I think that one of the things though, that when we were talking about this case of—and I won't use the term bulk, I'm just going to use the term multi domain transfers, because I think bulk has a certain connotation to it that I'd like to avoid for right now. But if we think about multi domain transfers, one of the things that Galvin and I were contemplating is that if you—in order for usability's sake, and if the TTL on the TAC was sufficiently short, it might be an acceptable thing to allow the same TAC to be used for multiple domains, if the TTL was sufficiently short, if that makes sense, because that would allow you a situation where you had say, 10 domains, but you wouldn't have 10 different TACs. But you could have one TAC that would be valid for those 10 domains for a short window of time. Thank you.

ROGER CARNEY: Great. Thanks Rick. Jim. Please go ahead.

JIM GALVIN: Yeah, thanks. To build on what Rick was saying, rick proposed a particular solution in this context, I want to take a step back and try to say, again, what I've tried to say before, [inaudible] the messenger, right, when you can't get your message across here. I think what's important here, to me, the thing that I'm trying to say

in this is that if you go down this path, currently, the TAC is defined as a unique per domain name, or unique per domain name within the registrar. I believe that that's what's there.

But nonetheless, the important thing is, if you're going to allow multi domain transfers, you're changing the security status, you're changing the security dynamics, you're changing the security picture of the transfer process. And that's the critical feature that I'm trying to press on here, and trying to stress.

So if you want, as an industry, to—I mean, so far, we came into this process, suggesting that we're trying to make security better. And also, by the way, we have a lot of opportunity for making things more efficient. And I'm 100% behind that. And so the point that I'm making here is that you really want the TAC to be unique per domain name, per transfer.

But if you want to carve out this notion that there's multi domain transfers, and I completely see that you have a customer service issue in play here, right, you have a desire to facilitate a customer being able to do a set of things.

So a customer that wants to move a multiple set of domains all at the same time, you don't want them to have 100 TACs that they now have to manage in order to make that happen. So that's kind of the issue you're dealing with.

And I'm just focused on the fact that I think, even in this policy, you need to add some rationale that explains why this is the right thing to do. And then I would suggest that you should have some suggestions. Maybe not policy, I don't know, that's an open

question for you guys to figure out. But I would suggest that you go down the path of some suggested solutions, like what Rick was saying, you should always use short TTLs when you're dealing with multiple domains, because you're really opening the window of vulnerability here by having the same TAC for a lot of things.

You've achieved a nice place here with one TAC per domain name and making that uniform. And that has a certain security posture. You start changing that, and you really should talk about why. And then some suggestions for how to make that relevant and a good thing and as safe as you can make it.

I'll end with one last comment. One of the things that I had said before is if you're going to have one TAC for multiple domains, you might also think about the fact from a customer service point of view, that you might want to suggest extra protections that you're dealing with the right registrant. So you don't want to risk someone who might come in and just use your automated interfaces and just sort of make stuff happen and do things. It may be as a customer service option, that you're actually going to want to check to make sure that it's really the registrant logged into that account and go the extra mile to double check that before you open this larger gap of vulnerability. So, yes, final comment, you're changing the security positioning, I really think you need to see that and rationalize all of that. So thanks.

ROGER CARNEY: Great. Thanks, Jim. Yeah, and I completely agree, I think that the idea of the TAC on a single use, and using the same TAC on a multi domain, it does change that security profile. And that's what

you have to make the decision on is, okay, is that still acceptable? Or, as you suggested, if that's used, is there other security mechanisms that can be used to help there? So as Volker says, a two factor or something like that.

And I just want to comment on—I went back, and I was trying to find it real quick. And I think Emily may have beat me to it. Our current recommendations don't say anything about uniqueness. Our current TAC recommendations, one through 11, or whatever it is. But in the current transfer policy, there is a statement that Rick put in that talks about it being unique per domain. So thanks, Emily, for pulling that up. And Sarah wanted to talk about this. Sarah, please go ahead.

SARAH WYLD: Thank you. So I definitely agree that if we are doing something special for bulk or for multiple domains to transfer, we do need to address security in a heightened manner. Absolutely.

And honestly, like having been the person that has done a transfer of many domains using an Excel spreadsheet with the list of auth codes, it was a pain in the butt. It would be nice if there were an easier way. Emily, if you click on my face at the top of the page, it'll take you to where my cursor is. Yeah, thank you. Okay.

So recommendation 9, the TAC must be used no more than once per domain name. I guess I had initially read that it should be unique, but like, no more than once per domain, does that I can use a TAC now and then later, when it needs a new TAC, it has to be different than the one I use? It doesn't mean that it can't be the

same from multiple domains. So was I wrong in the first place when I said unique? Like nothing here says unique. Thank you.

ROGER CARNEY: No, no. And I think what Rick pointed to and what Emily had at the top of this document was, I think this recommendation may have actually tried to combine two things, and maybe not done that well. And I think the original intent here—and correct me if I'm wrong, Jim, was an idea actually, from Jim, that it's a one-time use. And I think that this was the one-time use thing. I don't think it was the fact that was unique. I think this was the one time use Idea. And that's why I followed up with TAC should be reset. But Jim, please go ahead.

JIM GALVIN: Yeah, no. Again, it really is about uniqueness. If you're going to have auth info codes or the TACs, they really need to be unique within a domain. That really is part of the responsibility. So what Emily had showed up before, is actually part of the discussion. But you're right, as I think about it, and Sarah is correct too, this notion of uniqueness, those words never really made it into the recommendations. And it's kind of an oversight that I didn't capture that early on and realize that. I guess this is where you read something too many times and you forget some details sometimes you don't realize that that gets in there.

There really are two things going on here. There is the bit about uniqueness. And we had even in this group, you had many discussions about the fact that registrars—there are some—there

have been, I should say, poorly behaved registrars that will use the same auth info code for all domains that they have under management in their environment. That's just clearly a bad security practice.

And we had some discussions here about the need for uniqueness of these things, and try to encourage better practices among the industry at large. So you do want the uniqueness per domain name. And then the one-time use is important too, that just gets to the issue that it needs to be one-time use because what you're worried about here, a registrar should have a single source of TACs that it's drawing from. So when it wants to create a TAC, should have a single source, and then it uses the next one whenever it needs to for each domain name that comes up.

Why is this important? Well, you don't want replay attacks, you don't want to have a system that allows for somebody to have a TAC, and use it, and maybe they lose it or throw it away, or they put it on a sticky on their laptop, and the next person comes along and sees it and grabs it. And they happen to know that, "Oh, I can use this for this person over here, grab this domain name" kind of thing.

So there is the bit about the uniqueness and the one-time use, which speaks to a characteristic quality of the TAC. And I acknowledge that we haven't properly captured that in these recommendations, although I think we kind of had that in the text. And I hope that wasn't too much detail all of a sudden, we probably need to come back and go through that a little more slowly at some point, but I'll be quiet now. Thanks.

ROGER CARNEY: Thanks, Jim. I think that's perfect. And I think that that's the issue with recommendation nine is, I think, originally the intent here was the one-time use. And we kind of skipped over the unique requirement that we wanted. So I wouldn't suggest rewording recommendation 9, or maybe we do reword it and make it more clear that it's one-time use. And I say 9 is one time use only because of the second sentence of it, the registry operator must clear the TAC upon a successful—probably should say successful—transfer request, because I think that that's exactly what we were talking about the one-time use, is once the registry accepts it, it can no longer be used there. And again, obviously, it could be used again at some other later time, but it wouldn't be valid for that domain anymore. And I think that that's what recommendation 9, at least, I think that's what the intent was. I think we actually just missed the unique intent in our recommendations, and we probably need just to add another recommendation, but Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah, so one of the other things I was going to point out is, so this is kind of no different to the current stance that we have at the moment. However, if we were to look at this option, we should make it clear that registrars should not restrict the number of domains that can be transferred out. Meaning, I mean, I can tell you two or three companies that I can think of off the top of my head, that they only allow you to do one domain transfer at a time per unique TAC code. So if you couldn't do it in bulk, where registrars could essentially, well, the registrant can list as many as

needs be to transfer out, then we're not being as restrictive and allowing kind of multiple transfers to take place, again, for those domain investors, those large portfolio holders. So we're not changing everything, but we're kind of giving extra companionship to the people who we're trying to work with within the domain industry.

ROGER CARNEY: So Keiron, are you suggesting a change there? Because in today's policy, I don't think it's stops a registrar from requiring individual requests on each domain. Are you suggesting possibly making a policy requirement that they should be able to do multiple domains in a single request?

KEIRON TOBIN: Yes, that's what I'm requesting. Thank you.

ROGER CARNEY: I can't remember what Ricky used, multi-domain or something that he used instead of bulk, which is probably a good idea. So Sarah, please go ahead.

SARAH WYLD: Thank you. I like multi-domain transfer. I think of bulk as being anything more than one at a time. But sure, multi-domain. And Roger, I do think you were correct about the intent of recommendation 9. Yeah. So one other thing that I'm thinking about is how would that one-time use be policed by the registry if

the registry clears the TAC once the transfer is completed? Because then they won't know what—so maybe it's for the registrar to ensure that.

ROGER CARNEY: Well, but the one-time use is, again, that TAC is no longer there. So it can never be used at that registry again, until the registrar goes and sets it again.

SARAH WYLD: Right. So the registry won't know—

ROGER CARNEY: So the registrar could go set it to the same TAC, theoretically. At least that's my perception of it.

SARAH WYLD: Yeah. So to me, that doesn't sound like no more than once if they're using the same TAC again later. But I think what we intended by use no more than once is when the registrant initiates the transfer—anyways, okay, so then specifically about bulk transfers. In my ideal world, what I would like is to see a default of a unique TAC per domain, but with the possibility of a TAC that applies to multiple domain names, along with some kind of enhanced security requirement to get the permission for that thing. I think that's where we should try to end up. Thank you.

ROGER CARNEY:	Great. And Sarah, I'll let you think about this. But to my mind, I am assuming you're thinking, which is also the notifications would be balkanized that same way, so you wouldn't send 100 notifications, you'd send one and be done. Yep. Okay. Jim, please go ahead.
JIM GALVIN:	Thanks, Roger. So the critical phrase that we're missing here, and I immediately became sensitive to this, Roger, when you were summarizing what I was saying before, and then Sarah perfectly captured the question that made me offer this response here.
	The critical phrase that we don't currently have is randomly generated value. That's what a TAC, is a randomly generated value. And that's the phrase that captures what you want. We haven't talked specifically—I guess I sort of remember that we've had discussions about TAC characteristics. But I'm now realizing carrying forward with some of our other comments here that we have not actually captured a recommendation about TAC characteristics. And this is what's important, what you get from randomly generated is both registries and registrars, we get the value of not having to keep track of all used TACs, because the next TACs value is going to be a randomly generated value.
	So this is what I meant before when I was using the phrase—even as a registrar, you would have a single source of TAC values. And the next time a domain needs one, you go to that source and you grab the next one, and you go to that source and grab the next one for each domain name as it comes along. And that ensures you end up with pseudo random values from a software

implementation point of view. But that's a detail. You get random numbers, and they all come forward.

That way, you don't have to keep track of the old ones that are used, they're only ever used once. So that gets you the uniqueness quality, you're not subject to replay attacks, which is the other key feature that we're looking for here.

And then what you're doing here in this discussion, to bring it back to this discussion, you're talking about multi domain transfers, you're explicitly creating a carve out for using a TAC across multiple domains at one-time. And that's the appropriate discussion to have, realizing that you have a particular customer service responsibility, and you want to make this thing effective in your ordinary environments. That's what you're trying to do. But your security profile mandates a single randomly generated value for each domain name. And, of course, that's unique in the space of a registrar. And then nobody has to keep logs about what's been used or not used. You grab it when you need it. Registries simply null it out when it's done being used. And even a registrar doesn't have to store it, somebody wants a new value for whatever reason, you just grab the next one, you don't have to worry about it. You don't even have to store them. Thanks.

ROGER CARNEY: And, Jim, I think that early on—and maybe we glossed over that discussion, I think we had that discussion about the fact that the real goal here is not to store this basically anywhere. Even the sponsoring or the losing register, whatever you want to call them, they don't really have to store that because as you point out, just

create a new one if something happened or got lost or whatever. The goal here is not—and that's, again, a great security feature if no one's storing it. And maybe—I know Emily was the one typing there, recommendation regarding registrar randomly generated value because it should be the registrar doing it. Yep. Thank you. Rick, please go ahead.

RICK WILHELM: Very good. Thank you, Roger. I'm just going to plus one slash pile on to what Jim Galvin said there, I threw a link into the chat to a pointer to Section 4.1 of RFC 9154, which Emily had in January added in as a possible reference, but I'll strengthen that. 4.1 points to the actual algorithm regarding secure random authorization information. And so what that can do is sort of give some firm grounding to the words that Jim said. And I'll stop there. The details of all that math there is something that only the programmers worry about. But that's really the backbone of what Jim is saying. Thank you.

ROGER CARNEY: Great. Thanks, Rick. Okay, I think we made good progress. And again, I think maybe we need to add on to 3, which we always thought we would come back to a little bit anyway. But also on recommendation 8 or 9, I can't remember which one, I think that we need to specifically call out, as the current policy does, I think we need to specifically call out the fact that the TAC needs to be unique. And again, randomly generated should provide that. But I think we can be specific so that it just calls that out. So everybody's doing the same thing.

But jumping back to how we got to this discussion, I think we can get back to Sarah's pointed chat message that said, okay, so she is good with—She wants to have the discussion around if there is a need—and this goes down to Jim's and Volker's comments about security. But is there a need to have the ability for one single TAC on multiple domain transfers? Sarah, please go ahead.

SARAH WYLD: Thank you. Another thing to think about—So I do believe that there is a lot of value in the option to set one TAC on multiple domains. I do not think it should be the default. But I think it should be available. I wonder if perhaps we don't need to really define what the security enhancements would be. Maybe we just need to say the registrar should make this option available and should do whatever security things are necessary to ensure that these requests are valid. Maybe a thought. Thank you.

ROGER CARNEY: Thanks, Sarah. I was thinking that—and I wouldn't say that we force—And again, maybe that's not true. Maybe we do force every registrar to allow multi-domain transfers with one TAC. But I think that last week, we had talked about maybe making that flexible, and some registrars wouldn't want to, and some would. And to your point about specific security measures, I think that's true, Sarah, I think that we don't have to be explicit, but we could probably provide examples of good practice even if we're not being specific about it.

So Sarah is okay with leaving it as an optional registrar decision maybe. I agree, Sarah, that I don't think the way our TAC recommendations are written now allow for the fact that a registrant can request multiple transfers, multiple domains to be transferred with a single TAC. And Steinar thinks that if that is, then the policy should set a minimum standard, Rick, please go ahead.

RICK WILHELM: So this is a question just to kind of help the discussion. I've not tried to transfer multiple domains in an account manager interface and so I haven't seen what user interfaces look like for that. And so is it the thought that registrars are contemplating that they would expose this kind of thing on the account manager interface? Or is that the kind of thing that the registrar would only expose to their customer service?

Because I think that that might impact kind of how you want this to work, because I think that this is really a case where the registries are the intermediary here, and so I just offer that as a way to kind of facilitate the discussion because you might end up that you get something that you don't want if it's not thought through with sufficient care, because you want to do this to help your customer service folks. So something to contemplate. Thank you.

ROGER CARNEY: Great. Thanks, Rick, and it's a good call on the possible two different scenarios. And maybe there's even more. I'm sure Theo would bring up the fact that this could be done via API or

something as well. But it's still kind of a registrar management kind of thing. But I think that's a good question. And I always pictured it as a registrant enabled functionality, versus an internal. But great question. Keiron, please go ahead.

KEIRON TOBIN: Yeah, just following up on Rick's question, I've seen a couple where essentially, you can put multiple domains in, they have to be on a separate line, and they have to have a comma after them. And on the other scale of that, I've also seen it where you can physically only enter one domain and there's only space for one individual domain and a TAC, and once that's completed, you'd have to go back and start back from the very beginning if you wanted to do multiple transfers. So I hope that helps clarify a bit for you, Rick. Thank you.

ROGER CARNEY: Great, thanks, Keiron. Sarah, please go ahead.

SARAH WYLD: Thank you. Yeah. So thinking about potential security requirements, here's a question. Would we want to require that all of the domains are going to the same place and at the same time, does this mean that we need to require gaining registrars to accept a bulk transfer in? Or is it about obtaining the TAC, like setting one TAC on multiple domains, so you've obtained the TAC for multiple domains, and then the gaining registrars still has the option to handle it like a normal transfer? This is the thing to think about.

And it came up because I tried to write it down. So here's a suggestion for how we might want to go about phrasing this that I just put in the chat. I'm going to read it even though I've been talking a long time. The working group recommends that the registrar may allow the use of the same TAC for multiple domains provided the following requirements are met. I think that's a good way to do it. And then we can talk about what the requirements would be. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. And to the one comment, I didn't think—as we talked about it—if it was flexible for the losing registrar, my guess is it would have to be flexible for the gaining registrar and that maybe they do allow a bulk. And maybe they don't, maybe they force one by one. But it's still a better user experience than it would be with a different TAC for each one. So just my thoughts on that. Steinar, please go ahead.

STEINAR GRØTTERØD: When we spoke about this on the previous calls, we kind of defined bulk as more in a wider, bigger number than maybe two. But now we're talking about multiple domain names. I still sense some logic in—it has to be on the same top level. So the registrar, when they're requesting multiple domain name, it has to be on the same top level and not the other way, the same registrar, multiple top levels. Thank you.

ROGER CARNEY: Thanks, Steinar. Okay. I think we've got a lot of good ideas, and I think we're going in a good direction. I think maybe it'll be more beneficial if we can take this offline into the list, just so that we can start working those ideas through. And as Jim mentioned, it's kind of a carve out or exception to the rule that one unique TAC per domain. But I think that we're getting down to a pretty good spot of some suggestive—and again, I don't know if everybody supports it, but obviously, some are working down that line. But I think we can take this offline, but let Sarah talk here. Go ahead.

SARAH WYLD: Thanks. Just to Steinar's question. I'm very hesitant about setting a requirement that it would be all the same TLD. In my experience, when someone has a portfolio of domains that they want to move, it is typically across multiple TLDs which is one of the many reasons why the BTAPPA process isn't always useful. So I think that might not do it. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Okay, so let's stop here for today on this but I want to take this to list and maybe Sarah can even start it with her text that she had started in chat there, and maybe she can throw an email together really quick for us just with that and get us to thinking about how we can add to that back and forth until we get something that looks good that people are starting to coalesce around. So, Jim, please go ahead.

JIM GALVIN: Yeah, thanks, Roger. An interesting detail here that comes to mind in this business of uniqueness versus one-time usage and source, and maybe this is just something for staff to capture at the moment, I think that one of the things about uniqueness is to be careful who's supposed to check what, where the requirements are.

So on behalf of registries, if registrars are responsible for uniqueness, and if they're getting that from a random source, then that accommodates all that. I want to be careful that on behalf of registries, that although registries would certainly be obligated to check the syntax of the TAC upon submission, but most of that falls out just from the XML specification, so there's no extra work there, per se. I wouldn't want registries, honestly, to be responsible for confirming uniqueness. That gets us to this place of keeping logs of TACs that have been used or not used, when and all of that. And I don't think either one of us want to do that. So just want to be extra precise here about that uniqueness principle. And along the way, we'll just watch that as actual text is developed. Thanks.

ROGER CARNEY: Thanks, Jim. Yeah, I completely agree, I don't want people to have to start tracking that. It would get to be such a mess that it wouldn't even become useful. Rick, please go ahead.

RICK WILHELM: Very good. Thank you, Roger. A slightly different topic than what Jim Galvin was talking about, but more related to the multi domain

transfer that we talked about, we've been thinking about, the notion of getting the TACs in quantity. One thing that the group should consider and remember is that when we're talking about getting the codes in quantity, the individual transfer requests themselves will, at present remain unique and atomic, and either succeed or fail on their own. The command the command to actually initiate the transfer at the registry—so the registrar goes to the registry and says I want to transfer this domain, and they provide the TAC. And when that happens, that thing either succeeds or fails on its own and can be accepted or rejected individually.

And so while we are talking about kind of doing this thing in quantity, there is the notion of that if you're sending a bunch of them that they will have individual success and failure and be subject to acceptance or denial, and all those different rules individually. Thanks.

ROGER CARNEY: Great. Thanks, Rick. Okay. And Sarah said she'll take care of that. I just wanted to jump on with our last 10 minutes and get the clawback quick reversal discussion going because I hope everybody did their homework, because there's some good reading for IRTP that actually provides a lot of insight into the direction that—that was looked at many years ago. But it still seems to be very in line with what a lot of people were discussing as a quick reversal. And probably maybe a little more important here, since it's more of an automatic or quick transfer process that we're proposing.

So I just wanted to jump into that discussion here in the last 10 minutes and get people's ideas and thoughts. Specifically, does that information help? Obviously, we're going to get into this a lot deeper in phase two when we're talking about dispute mechanisms. But did that reading help? Does it provide direction for us? And does it help us answer the question? The big reason we were going to pull this forward a little bit to talk about was on the locking or that window of time where a transfer can't occur on both the domain create and the transfer, post transfer, and maybe the change in registrant, which we haven't covered yet. But at least on those two, we were looking to make sure that a quick reversal was something that was reasonable, and that we could probably get to when we are talking about setting those timelines for that prohibited transfer.

And maybe everybody didn't get a chance to read it or not. But for those that did read it, please share your thoughts and see if that's some information that's useful in deciding what those windows could be or should have to be. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah. So when I was reading it, I was obviously taking into consideration prior to 2018, there was a lot of kind of the FOA and stuff like that that I was kind of thinking about and how emphasis is put on that. But obviously, as that's gone now, and times have changed, I was kind of thinking that there's definitely ways where we can kind of insert our own feed into this and utilize that and kind of look at a wider approach, obviously, with the change in data protection laws.

ROGER CARNEY: Great, thanks, Keiron. Anyone else? And again, I think that the big reason to talk about the clawback was so that we could solidify that time window around the post create and post transfer, and make sure that that time still made sense with the idea that possibly there is no quick clawback that we can get to. Does that time make sense or not? Reading it, it seems like that, obviously, there's a direction we can get to, but if we don't come to that today, there is no quick reversal. So if we don't come up with something that everybody agrees on, we would have to say, "Okay, it's a 10-day window, and you don't get it back unless you file a transfer dispute" or something like that. So Theo, please go ahead.

THEO GEURTS: Yeah, in regards to the clawback function, I've given that a lot of thought. And boy is it complex to come up with something that actually works and that is not a long process. I mean, I've been looking at some blockchain solutions, passphrase solutions, and it's just very complex. I'm really wondering how that one goes. Thanks.

ROGER CARNEY: Thanks, Theo. And I really think that that's kind of what the IRTP came down to was, there was just a few outlying things that they couldn't get solved. I mean, they had a really good write up in their initial report about how to do it. But there was just a few items that

kind of kept coming back. And the public comments provided that to them, some of those issues, so they had to go around that.

And again, one of the quick reversals—and I've heard this group talking about it is—Thanks, Jonathan, for posting that. One of the things was they were going to reverse—the losing registrar got the name back and all that. But one of the things I've heard multiple times is that that process can work itself out, but the immediacy was more than DNS issues around it. If a transfer happens to somebody that—a website that's active, the important part is that the DNS reverts to what it was, and then a process can happen to determine who the owner should be and however that works out. But that's just one big difference that I noticed from reading the IRTP to what I've heard people discuss of late. Keiron, please go ahead.

KEIRON TOBIN: Thank you, Roger. Yeah, you just kind of touched on something that I was just kind of going to say, as well. If the clawback was to happen, again, using the example that you just used in terms of reverting back to domain name servers, I think we should put a timescale or a stamp on that just to kind of give it a bit more precise action. And then that way, because, I mean, at the moment, I've seen [inaudible] that are going on that have maybe been 9-10 months old, and the people are just complaining in regards to it now. So yeah, I think a timescale and a stamp kind of put on there would also help that situation. Thank you.

ROGER CARNEY:	Thanks, Keiron. Theo, please go ahead.

THEO GEURTS:	When I was reading all the required homework, I did notice that Verisign had an undo function, a sort of additional process which they have at Verisign. And I was actually wondering how many times has the undo function ever been put into action? If that is very low, it's an indication on how much actually that process is being initiated, though I do understand from some larger registrars that the undo function has some legal difficulties around the entire process. Thanks.

ROGER CARNEY:	Yeah, definitely. I think that's one of the key issues getting around that. But yeah, that's a good question, is, would there be any information that we could get from that? And I don't know if anyone from Verisign could get that for us, or to your point, extract it as much as possible so it's just basically a number would be good for use in that process. And I don't know, maybe we can reach out. I know Rick doesn't necessarily want to share that, because he's no longer there. But we can reach out to Verisign and see if they could provide that information or not.
	Okay. And again, I think the big reason we brought it forward was to talk about those transfer windows of post creating post transfer. So I think it's good information from the IRTP. And it's useful. I mean, obviously, they did some work to get there. And obviously, they found a few items that just didn't quite work out.

And interesting, obviously have to think about that. But I think that the key to the clawback is if we can get to something, I think that works out fine. But I think the thing to think about is, what happens if we can't agree on a quick clawback, then there is no such thing. And do those time windows still work on post create and post transfer? And if we get that far on the post, change of registrant as well.

Again, just something to think about. I think, again, the information provided from the IRTP before is great. And I think it leads us down a path. But I can't see the future. So I don't know if we can come to an agreement on a quick clawback.

So I think you've got to think about that in the context of those two time windows. And are you comfortable with those two time windows if there is no clawback? Because that's the way it stands today, unless we come up with something that we all agree to. So think about those things.

Again, I think that's the important thing, is think about the potential of that clawback. If we get to that, great. Maybe that sets the time a little shorter. If not, then there is no clawback. So those time windows, I think that's what we need to think about. And we're going to look at those time windows coming up in the next couple meetings anyway, so it'll be good to discuss that through there.

Okay, we are at time. Good meeting today. Great discussions. And I think that we're in a good spot for moving forward here. And small team starting to work tomorrow. Great. Thank you for everyone that's participating in that. And hopefully in a couple of

weeks, we'll have some information back from them. So we are over time. So Kristian, one last thing.

KRISTIAN ØRMEN: I just wanted to say thank you. This is my last meeting. It has been great. I'm looking forward to see the final report.

ROGER CARNEY: Thanks, Kristian. And we really appreciate your work here. All your comments have been so great. And if I'm not mistaken, Volker is going to be in your spot next week so he can fill in for those big shoes. So thanks, Kristian. Thanks, everybody.

[END OF TRANSCRIPTION]