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## ICANN Transcription

### Transfer Policy Review PDP WG

**Tuesday, 12 April 2022 at 16:00 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/LhAiCw>

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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 12th of April 2022 at 16:00. 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 Crystal Ondo (RrSG) and Steinar Grøtterød (At-Large). They have formally assigned Jothan Frakes (RrSG) and Lutz Donnerhacke (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

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promoted to panelists. Observers will remain as an attendee and will have access to view chat only.

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:

Thanks, Julie. Welcome everyone. I just have a couple of things before we get started. The small team for cleaning up the NACKing items is still ongoing, they're going to meet yet again this week. We'll hear from them in the next week or so on this call on any of the changes that are needed there just to clean it up. And also, I know that Sarah posted a section, maybe a recommendation or maybe a possible solution. I'm not saying

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she's recommending—she's provided some language around bulk use of TAC where you can use one single TAC to possibly move multiple domains. And that is in the bulk working group or the bulk working document. So please take a look at that. And if you have comments or questions, please put them in there and we can get them addressed. And also, we're kind of looking for the feedback there.

Today in our current recommendations, bulk for using one TAC for multiple domains would not be allowed unless we do this carve out. So if we don't get this carve out, which is perfectly fine if we don't, just want to make sure everybody understands that you'll have to use one TAC per domain and there won't be the option to use one TAC to move multiple domains. So please take a look at that. Again, it's in the bulk working document. And Sarah put language in there and she's got a few open ended questions in there as well. So just [inaudible] discussion, so please take a look and place your comment in there.

And finally, as we're starting to wrap down our meaty discussions here, I just want to send out a reminder that the big tactical discussions are kind of behind us now we're going to kind of clean up everything moving into the initial draft of our report. So we'll definitely be backing off of any heavy meaty discussions after this next week or so. And we're just going to be going through and making sure we've documented what we've just talked about so far, what we're recommending, and anything that we have open still. I don't know that there's a lot that we have open. I think we've made a path down all of our expected charter questions.

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So I think that we're in good shape. But if we do end up with anything that needs to go out for public comment, we need to get that addressed and put in there. But for all purposes, we're going to be wrapping up our heavy discussions quickly here and moving into clean up and agreement on things. So just wanted to set that so everybody knows where we're moving in the next month or so, with the goal of probably having our initial report in good shape in June.

So I think that's about all I had. But I will open the floor up for any of the stakeholder groups that had discussions in the past week or so that they want to bring forward. See if we can get any questions or comments done here. So if any of the stakeholder groups have any comments they want to bring forward, I'll open the floor.

Okay. Again, we encourage stakeholder groups to work outside the group here. And if any conversations need to come forward, you can do it on the mailing list, or bring them here, and we could talk about them. And hopefully get them addressed. The more we do now, the better for our public comment phase. Hopefully, we can get them addressed before people bring them up then and then we have to address them later and all that. So it'd be good to address them from the start.

Okay. With that, I think we can go ahead and jump into our post creation, our locks, I guess, post creation and our post transfer locks. Yeah, we've had several sessions on this. It seemed like we were in a fairly good spot. We've had some good information coming in from other stakeholder groups, though that may do more than a 10-day window, which is what we left this as. And

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several groups have suggested maybe 10 is a little short. But I think that that's why we're here and we'll discuss that.

So I think let's not jump into the working document yet. I think we can go ahead and we've got a few poll questions to kind of spur this discussion and hopefully get to a result here. As we've kind of transitioned our polling, we will kind of talk about the question prior to actually getting responses. And I think that it'll help get a cleaner response. And we need responses from the active members only, we don't need alternate or anyone to answer it. We'll just use the active members voting.

All right, here we go. Thanks, Julie. All right. So some pointed questions to try to drive to a good quick resolution on the locks here that we've had discussions on. The first question is, should a transfer lock be required after a domain is registered? I don't know if there's anything really to talk about here, it seems fairly straightforward.

Seems like Theo can't vote.

JULIE BISLAND: One moment, please.

ROGER CARNEY: Julie will fix that for us. Thanks, Julie. While she's doing that, I don't know that there's a whole lot to talk about here. I think we've talked this through pretty good. So if anybody has any questions or comments, or you know, what does this really mean? Let's

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discuss that before. It's pretty straightforward. And we've talked this through in multiple sessions.

One of the issues of today is this is kind of a soft, flexible option. So it's not required at specific times. So it's a little squishy. And I think a lot of registrants have an issue with this. I don't know if anyone else really does. But the inconsistency, I think, is the problem here. Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. Since we have a moment, I'll just maybe give a little bit of context to the questions we're going to ask. So people have a preview of that. So we're going to ask you whether there should be a post create lock. And by lock here, we're just using shorthand, not for a specific type of lock, but for the idea that a transfer cannot take place for a period of time. We'll ask about the period that that should be, how long? If you do support it. And then we'll ask also about whether it should be kind of enforced at the registry or the registrar. And then we'll do the same for the post transfer lock. And it looks like people are voting. So I'll stop talking.

ROGER CARNEY:

Thanks, Emily. Yeah, and one thing, Emily, just follow up with what Emily was talking about. We're calling this a lock and a lot of people, especially the technical people that are on the call, think of a specific thing here. But we're not really talking about anything specific. We're not talking about a transfer prohibited lock or anything like that. That's something that we don't need to decide

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here, we just need to decide, Is there a window of time that a transfer shouldn't occur? And that's what we do, and how that happens I think is something that can be decided later and not specifically here, unless we have a specific requirement there. But again, I think the goal here is just to set the policy language, not necessarily the specific technical language. So Lutz, please go ahead.

LUTZ DONNERHACKE: To understand this correctly, we are talking about mandatory transfer lock, after domain registration, first registration of a domain name. So it's for the purpose of—I do not understand. It might be possible that somebody thinks it's possible to use this lock in order to receive the payment. But if I understand correctly, missing payments are a reason to deny incoming transfer. So for this purpose, we do not need a lock. So we need a lock only for abuse reasons. I don't see any abuse reason. Did I miss anything?

ROGER CARNEY: Thanks, Lutz. And actually, there's a few reasons. So you're right, this is a window of time after a domain is created, that it can't be transferred. And a few things popped up when we talked about that. And one was specifically the AGP five-day window. If you're allowed to transfer during that time, then it gets a lot confusing to try to track who and what that will count against. But to your point, yes, the other item that was brought up was payment. So there's a window here to make sure that payment arrangements can be set up and things like that. And to your last point, yeah, I think it's

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trying to catch just in case someone wants to start it a complaint against it or a trademark issue against it. So I think that after the domain create, those were a few of the things that came up in our discussion. Thanks, Emily, for posting that. The document Emily posted in chat goes through the reasons we've documented so far for those.

Okay. Any other questions? Okay. All right. I'll give everybody just a couple more seconds to answer and then we'll check the responses. Okay, Julie, if you want to share the responses. All right, so we have a fairly strong direction here. I guess with the 88% voting for yes, there should be a lock, I'd like to hear from the 13%, I'm guessing one or two people there, two or three people maybe that thought it wasn't needed. And again, just so everybody knows today, this is an optional lock at 60 days. Some registrars do it and some registrars don't do it and some registries kind of enforce it as well. So I think that again, the goal here was trying to get consistent across the board. But I'd like to hear from those that thought that it shouldn't be required and why.

No one that voted no wants to talk to it? Theo, please go ahead.

THEO GEURTS: I did vote no, I'm not going to rehash my reasons. I've been through that. But if everybody wants a lock, let's have a lock. Thanks.

ROGER CARNEY: All right, great. Thanks. Okay, but again, I think this is what we expected. As Theo mentioned, there were a few "why is it needed"



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discussions, but it seemed like the overall support was yes, lock makes sense here. Okay, let's go ahead and close the first one and pop up the second one.

All right. So the next question is on the duration. So what should the period of post creation lack be? Again, we had some good discussions on this moving from 60 days and our discussions kind of focused on what are the absolute rationales here, and obviously AGP came up as, we don't want to make it shorter than that, or even near that, because of the confusion that it can cause. And I think that that's how we kind of got to that 10-day window, is still allow some make sure of payment and things like that, obviously, the chargebacks can still happen after the fact. But it did afford that.

So I think that that's where this group came from, probably more than a month ago, when we quit talking about it, or paused talking about it. But since then, we've had a couple groups come forward and say, okay, maybe 10 days is a little short. And they've brought through a few comments and questions. So I think that's what's prompting this question here is, again, the group kind of settled on 10. And obviously, that was for a few reasons. You know, we wanted to talk about a quick reversal/clawback idea. And other groups brought up the fact that 10 days may be short. Some discussion around that was like, okay, on a creation, maybe it's not as bad as on a transfer. But those discussions did come up. So I think a good question here, I don't know if anybody has comments. Again, pretty straightforward. If anybody has comments on what this means or how to interpret it.

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Yeah, and I think in chat, we're seeing a couple of things that Jothan and Lutz are talking about. And Lutz is right. I mean, without payment, they don't have to transfer but they can get paid even—I don't even want to say a date, two months later, they can reverse the charge, but whatever. Registrars can deny that transfer for current payment, but then also the chargeback effect to that as well.

Okay, any other comments, questions on this? Oh, thanks, Keiron. I'll make sure I'm a little closer to the mic. So I think this is kind of where we're leaning as I think we came out of our discussions as 10 days was pretty good. But as groups thought about it, they started saying maybe it wasn't quite long enough. And I think that that's where we're kind of fallen here. And maybe we don't make a specific recommendation, or we provide me with two alternates, a 10-day or a 30 day.

I think that almost everybody, one or two people thought that 60 days seems like a long period of time, especially when it's a mandatory lock after domain create and that no domain will get transferred within 60 days if this is the rule. Keiron, please go ahead.

KEIRON TOBIN:

Thank you. Yeah, just for some continuity, I would like to propose 10 days. This should be left to the registrar to make that decision as well. But I think across all registrars a minimum 10 days should be put into action. That way, we can kind of have some continuity before post creation and transfer, which I think is why 10 days was initially put on there. But again, registrars can choose 60 days,

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can choose 30 days. But I think having a minimum term of 10 days creates a lot of helpful kinds of information for a lot of people. And hopefully, it will go across continuity as well. Thank you.

ROGER CARNEY: So Keiron, you're suggesting maybe a different approach, though, is [inaudible] window based on the registrar needs. And I would just bring up that that seems to go against the idea of being consistent across the board, because then you're still back to some registrars doing 60 days, some registrars doing 10 days. So just my thought.

KEIRON TOBIN: Yeah, sorry, I missed a bit of what you mentioned there. The idea is that kind of 10 days is a minimum. So at the moment, we want for transfer, essentially, for post creation and transfers a minimum 10 days. So continuity, but a registrar can also make the decision to the point of whether they want to hold it for 60 days or 30 days, but 10 days is the baseline minimum. So you can't transfer out within that time. Thank you.

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

SARAH WYLD: Hi. So just thinking about the time period, as mentioned in chat, definitely agree that standardizing is very useful. 10 days in a post create lock seems very reasonable to me. But we're also going to

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be thinking about the post transfer lock period. And I think that there could be a lot of value in aligning those two periods to be the same amount of time. It's just easier for everyone to remember. Right. And I think that the post transfer lock period should line up with the period for disputing or like for doing a fast undo. Right. So which is going to be different—yeah, the fast undo period. So maybe we need to not decide exactly yet. How long this period is until we figure out how long the fast undo period is. Thank you.

ROGER CARNEY:

Thanks, Sarah. Yeah, and I think that that was obviously one of the reasons we kind of pulled that topic forward. We didn't get a whole lot of time on it. We had other discussions, but that was one of the reasons we pulled that discussion about fast undo forward from phase two work. So I think that that was one of the obviously reasons we did that. But I don't know that we can wait to do that. Because phase two work is actually post this report.

I think that we have to think about, okay, is it possible that we get to a fast undo solution? And I think that a lot of people think that, but I'll just caution that IRTP thought that as well and wasn't able to get to that spot. Again, I think things have changed and our process has changed enough that I think we can get to that spot. But obviously that—you're right, Sarah—should align with that undo timeline as well. And I do think aligning these dates across post create and post transfer make sense as well. So Sarah, please go ahead.

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SARAH WYLD: Thanks, Roger. Just want to clarify. So where does that leave us? Did you say that the fast undo is not in this phase? But we need to choose the period in this phase? Like can we make it a placeholder and come back to it when we do do the fast undo?

ROGER CARNEY: Yeah, so phase two is a separate—we'll issue a final report on phase one after we do change of registrant. So the phase two work which is mostly the dispute mechanisms and things along that line. That's our phase two and it'll have its own final report. So they are disconnected and that's why we pulled forward the high-level discussion on undo into this but the undo discussion, detailed discussion is going to happen in phase two. Berry, please go ahead.

BERRY COBB: Thanks, Roger. And just to build on what you were saying, the idea of when we put the charter together and thinking about how all this fit together was that once the phase one work was completed, that theoretically and assuming that the Council and the Board adopts the consensus recommendations, that getting this out to market as fast as possible, an IRT would be formed sometime thereafter the Board's adoption of the recommendations and can start the implementation work.

It's conceivable, not preferred, but it is conceivable that in discussions during phase two, that based on some of the rollback discussions, that if it required a change to a phase one recommendation that it could be made, and likely, even signal in

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enough time to the implementation that that may be subject to change. Because these recommendations aren't going to be implemented overnight. But again, the idea was that these things would be worked on in parallel, thus decreasing the time to getting the transfer policy updated. And the primary rationale for that was mostly around the fact that the gaining FOA is one of the primary issues that we're trying to resolve, because it is currently not functional in today's environment.

ROGER CARNEY:

Great, thanks, Berry. Yeah, and again, I think that's one of the reasons that we took a step back a while ago and tried to think about pulling that forward, so people could start thinking about what that undo looks like, and putting their mind around that. And you know, thinking about, again, that timeline, and not just the timeline, the whole thing how again, is it feasible that we can get to a solution? There is no such thing as a quick undo today. So it has to be an agreed upon solution that we get to. So first of all, can we get to an agreed upon solution, and what does that timeline look like for that as well? Berry, please go ahead.

BERRY COBB:

Thank you, Roger. And I just wanted to kind of draw attention to where we're at as the taking the temperature of the room results that we see here. So by and large, there seems to be a high degree of agreement about a period by which a transfer can't occur after the registration or creation of the domain name. There's a high degree of agreement of 10 minimum, 30 maximum, which by rough calculations here is roughly 80 to 90%. And I'll

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note that in chat that Mike Rodenbaugh, “What about a happy middle ground of 21 days?” And I'm not trying to suggest 10, 21 or 30.

But from a staff perspective, and where this is likely heading, if the group can agree preliminarily here about one of these two options, then we're forced with presenting both options as part of community input through the public comment proceeding. Which, to me is not ideal, the more concrete that the group can be in going to public comment, the better off we'll be, but from a staff perspective and documenting this in a way that if we go with an initial report of both options on the table, I think we need to provide adequate rationale for why it shouldn't be 30. And I'm not sure that I've heard enough reasons why 30 is too long versus 10. And I think also from a staff perspective consistency is probably the primary driving factor here and having a minimum kind of creates or continues to create some of the variabilities that we have detected as an issue that exist already today. Thank you.

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

KEIRON TOBIN: Yeah, thank you, just in regards to, I agree with Berry, 30 days, or 21 days, I think 10 days minimum. And hopefully we can bring some continuity against both of these as well. Maybe some ccTLDs would like to start looking at their rules. And if they were to start changing, obviously, we can't speak on their behalf. But if it was across all gTLDs, and it became a standard thing, then

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hopefully, some ccTLDs may follow suit, which would make registrants a lot easier to understand in terms of their 10-day minimum, [inaudible] transfer or creation has been put on there. I think it would help the community massively understand kind of the mechanisms that we have put in place. Thank you.

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

THEO GEURTS: So Keiron, on the last part about ccTLDs, I don't think that is going to happen. I mean, a lot of them don't have any locks in the first place. They don't see any issues in their respective countries. So them changing stuff, I doubt that will even happen. I do agree, it could provide with some straight examples of what could be mirrored. But you know, the ccTLDs, they are governed by very different entities. And they have very different drives. Thanks.

ROGER CARNEY: Great, thanks. Again, I think the key here is what are we going to take to public comment? And I think obviously, we can take a set of these, it'd be better if we could take a limited set for sure. And that limited set being one is the best option. But if we can't get to that one number, as Berry said, we should document in there why 30 is a better choice or why 10 is a better choice, or why we can't decide as well and we definitely can document the fact that we still have a discussion open on the possibility of a quick undo and what that timeline looks like. And we'll obviously want to add in



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there that, okay, we want these to be the same, just to for consistency from a registrant aspect. So, Rick, please go ahead.

RICK WILHELM:

Thanks, Roger. And you sort of got towards what one of my questions was. This is largely for curiosity, I wouldn't necessarily think that the registries would care too much about it, other than if it gets into something where the registries have to be having enforcement or something like that. But what Jothan has been commenting in chat about the impetus and the rationale for 30 days being a credit card cycle, is there a kind of a singular argument for why 10 days is a good reason? I mean, we've got 50% of the people like, why is 10 days good? Just for the purposes of discussion. Thank you.

ROGER CARNEY:

Thanks, Rick. And I would just say that the only reason 10 days is because we backed that up from rationale that the AGP being five days, when that starts, when that stops. It's a little squishy depending on if registry does midnight, or you know what that midnight is, is that Zulu time. And we didn't want to be pushing that. So I think that the 10-day was kind of the minimum and the rationale to go from 10 to any other number, we didn't hear a lot about until now. So I think that that's the good point is if we can get some rationale that says 30 makes sense—I think we have rationale that says we can't do it less than 10. So is there a number—and I think there was strong support that 60 days seems too long. So how do we get from the bare minimum 10 that we think it is and we have some fairly good rationale for to a number

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that people are comfortable with and what is that rationale for getting to that number? So Jothan, please go ahead.

JOTHAN FRAKES:

Hi, thank you. I think there are different business models inside of the registrar business and they serve their registrants or their resellers in different ways. Many of the reseller model registrars who predominantly are working with resellers, perhaps even bulk registrant support, take prepayment and hold payments where there's balances that are drawn back against. Same thing with registries typically are prepayment rather than invoice.

And so there are certain players in this market that have surety of payment already established and designed into their business models. Now, there's also consumer facing registrars. And I'm probably taking too many words to say this, however, I want it to be clear for everybody that many times that transaction is real time. And it's being billed at the moment of registration, renewal, inbound transfer, whatever. And it's not until a billing cycle occurs that somebody might recognize that somebody else could use their credit card or there's some other type of activity where they would initiate a chargeback or an inquiry.

The rationale for 60 days was that it would guarantee to cover a billing cycle. We see in the 45 day grace period, post renewal, that that leaves room for those types of things to occur in the domain name lifecycle. If we set this to 30 days here, or at least have 30 days, it may still miss a billing cycle. 45 days would make sure that based on the timing of the registration that a billing cycle did occur in some point inside of that timeframe.

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And the other point I wanted to make is that this is absolutely tethered to whatever rollback or undo, fast undo or whatever we call that, that we shouldn't be talking about these two things in isolation. And finally, when we do talk about rollbacks, we do need to make sure that we do create certainty for title for the domain owner. I just started bundle all those up and drop them. Thank you.

ROGER CARNEY:

Thanks, Jothan. Okay, any other comments on this? I think this discussion and again, I think that the polling that the other stakeholder groups have done in between, I think is leaning toward the 30 day. I know that a lot of people like the 10-day and that's where we left it. But I think that discussions now are at the 30 day. But I think the important thing is how do we justify that 30 days?

Again, I think we have good justification for at least 10. So I think that we need to come up with the rationale that 30 days makes sense over others, and I don't know why a lot of people are saying oh, wow, we want to tie these together, which makes perfect sense. And if we have reasons for that to be 30 days, that makes sense too. But I think we have to come up with that rationale that says okay, this is why we got to 30. And again, I'm not opposed to 30. I'm not opposed to 10 or leaving it at 60. I do agree with most that 60 days seems like a long period. And I don't like the fact that it's inconsistently implemented. There's no direct requirement, it's an option. So Theo, please go ahead.

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THEO GEURTS: Yeah, I do wonder about a couple of things, though. You know, these payments are usually real time. Imagine that it is a fraudulent transaction, it was a stolen credit card. You know, as a registrar, you still have a loss at that given moment. Even if it's 10 days, 15 days, 20 days, it doesn't really matter, the money is gone, because you will have a chargeback. And you already have costs incurred at a registry level. So you might be able to get that back. But you know, I don't really see the issue here on extending the time beyond 10 days. But it could be me. I mean, we are a wholesale registrars so maybe I don't fully understand the problem. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Okay, so and again, I think that the group is definitely leaning toward 30 days [and 30 days synced] because of post transfer and an undo window, again, that we haven't fleshed out completely and we won't for quite a while. So I think that if that's where we're going, I still think we have to have rationale as to why we get to that number. And again obviously those things matter, is, yes, we want to make it consistent. And if one has it, then there's logic for one and being consistent is a fairly good logic as well.

So I think that, again, we came up with rationale for at minimum 10. If we're setting it 30, I just think we had to have the rationale that says, this is how we got to 30. So I would say from staff's need here that the reason they posted the question is, I think this group was leaning toward the 30 days. And I think that again, the polling done at other stakeholder groups is leaning towards 30 days. So I think that we can go with that, but we just have to come

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up with the rationale within the next couple of weeks of how we got there.

Okay, I think we've fleshed this one out pretty good. So, again, a great discussion. And reason for the poll questions is to drive these. So Julie, if you want to give us the next one, please.

Okay, so now we're doing the post transfer discussion here. So the question is, should a transfer lock be required after a domain is transferred to a new registrar? So post transfer lock here, window of time that after a transfer occurs, should there be set period after that they should not be transferred again?

And I don't know if anyone has questions or talking points here. Again, this is the next step of the post create post transfer lock. So this is the post transfer. Is there any comments on this question? Sarah, please go ahead.

SARAH WYLD:

30 days. I'm going to say that I have changed my mind over the course of this call from 10 days to 30 days. I definitely think that for a post transfer, I think a lock is important after a transfer, specifically because of the potential of domain theft. And 30 days is probably a good length of time for a fast undo process. So although we're not making that decision yet, I think it sounds like we need to anticipate where that decision is going to go. I feel like this is probably a reasonable sort of middle ground to choose. And then you know, if we create a fast undo process and discover that it needs to be different, we can make a supplemental

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recommendation to change this, but I'm going to say 30 days for everything. Thank you.

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

KEIRON TOBIN: Thank you. Yeah, just to kind of—so the 30, the issue I have with 30 days is that if you are to buy a domain on the marketplace, and the registrant needs to transfer it in order to get to the owner, then they have to wait another 30 days to transfer it out back to their registrar of their choice, which seems a little long in terms of that, so just thinking about the marketplaces. I just think 30 is a little too long. But I do get other people's points around 30. Yeah, I'm kind of still 50/50 as to whether 10 or 30. But I definitely don't think it should be anything in between. Thank you.

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

JOTHAN FRAKES: Yeah, to kind of build on the aftermarket thing because there is an aftermarket. It's not really something that ICANN regulates. But we do want to be thinking of the registrant whether that's a registrant who registered it under a normal path or through an aftermarket or secondary market, there has to be some certainty of title and transfer of title. And so we want to find that happy goldilocks number for whatever the total period of time is perhaps lock plus

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undo so that new registrant who purchases the domain name does not have a registrant put the domain into aftermarket, have the domain transfer, and then use some kind of rollback to inappropriately take the domain back and count the money. So there's things here we want to find a sweet spot on figuring this out.

And it kind of came to my realization, I think Sarah wisely put this, that perhaps rather than us discuss what that lock period should be, that we talked about what the lock plus undo period is now, and then let the undo period be determined in phase two. So we're not actually working with a specific number that might allow us to have the debate later. But whatever it is, we should set it at a fixed number of dates. And we should set it so that it's industrywide, not just per registrar and not per registry, so that it's clear to everybody in the ecosystem. Thank you.

ROGER CARNEY:

Great. Thanks, Jothan. Rick, please go ahead.

RICK WILHELM:

Thanks, Roger. I think that the first scenario we were talking about where someone purchases a domain registration, and then they move it to a registrar for purposes of selling it, so they're essentially flipping it, and then they sell it on the aftermarket and then it would have to stay that aftermarket registrar for 30 days before the subsequent purchaser who's buying it from the flipper has to let that 30 day clock expire, that seems to be solvable easily by the person who's flipping it just waiting 30 days for their

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timer to expire before putting the name on sale, and then it can be transferred immediately upon sale. Did I get this scenario of that correct? And then I have another comment right after that. But I just want to make sure I understood the scenario, correct.

ROGER CARNEY: Jothan, please go ahead.

JOTHAN FRAKES: I know a little bit about this. So I'll tell you. So Rick, in the example you gave, the aftermarket activity, typically, a listing or a placement would happen minus the transfer. So you're not initiating a transfer in order to participate in the marketplace, there would be whatever transaction where a sale would consummate, would occur—and the transfer is typically part of the consummation of an aftermarket transaction.

RICK WILHELM: Okay, so that means that the existence of the timer isn't interfering with a new purchaser, post flipper, moving the domain registration to their registrar of choice?

JOTHAN FRAKES: It could, because the duration of that waiting period may affect the escrow period before funds might be released in some cases or things of that nature. So the rollback period could ultimately affect it. A lock period could as well.



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RICK WILHELM: Right. But if I as the one who's flipping the name, if I just wait for my transfer lock to timeout before I put the name up for sale, that's how I get around that. In other words—

JOTHAN FRAKES: For creation, that's true. So there'd be a lock period post transfer, that depending on when you require it, it may also factor into this.

RICK WILHELM: Yeah. But regardless, I just let those locks timeout before I put it up for sale on an auction site or an aftermarket site. And then if so and so comes along and purchases a registration, they can transfer it out at will because it's no longer subject to any locks.

JOTHAN FRAKES: So that's correct. On the creation or the inbound transfer. So then, when the domain is purchased, the buyer then would have a lock affected once they would transfer it and/or do whatever rollback.

RICK WILHELM: Okay. So the second thing, so I think we're in agreement to Sarah's point. So the second thing I want to offer is that when we think about balancing protections here, I think that we would want to balance the protections in favor of the average registrar and the risks related to domain name hijacking rather than optimizing around the use case of the aftermarket. So I think that's sort of how I would summarize it. Hopefully, that was clear enough. Thank you.

ROGER CARNEY: Thanks, Rick. Zak.

ZAK MUSCOVITCH: thanks, Roger. This stuff is really confusing to think through. So I'm not raising my hand with an answer, more of a kind of a question. So if there's a change of registrar lock and we're just looking at that in a vacuum, that is simply a change from registrar, not change from registrar A to B but from B to C. It's that second jump that we're concerned with because there's a lock when there's a pre—when there's a recent change of registrar.

But in the case of a change—and I want to bring up change of registrant to look at it side by side—most change of registrars would coincide with a change of registrant in that B2C scenario, I would think. So in other words, yes, whilst someone might register a name with Tucows and then transferred to somebody else who's at GoDaddy and then that registrant at GoDaddy, maybe they want to transfer it over to Namecheap, that might happen and maybe there's a good reason to prevent that, for theft as Sarah pointed out, or maybe that isn't a good enough reason to prevent that customer from deciding to change registrars.

But my point really is, I guess, is that if what we're kind of trying to anticipate is when the customer isn't moving their domain name from one registrar to another, but they're transferring the ownership of it, which is the change of registrant lock, and if so—so I'm trying to think through how we can look at change of registrar lock in a vacuum. Because really, we're talking about

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most of the time, a change of registrant lock, which is coinciding with the change of registrar. I've confused myself, hopefully someone listening can make some sense out of that. Thank you.

ROGER CARNEY:

Thanks, Zak. Yeah, and I think that that does get a little confusing when you're talking about, obviously, not the post creation, but the post transfer, or that secondary transfer that you're talking about, where it's most likely both a registrant and registrar change.

But I think just going back—the last five minutes or so has been focused on our last question, not this question. And I think our last question we settled is, okay, we're going to say 30 days, and we just need to come up with reasons for that 30 days. And if it doesn't work and 10 days is better, I want to see those reasons why as well. And we can document that and get it documented in the working document.

But again, this group has been moving from that 10 days to 30 days ever since we set it at 10. So I think that that's important to notice. But I think that what we've said is we're settling on 30 days now. And we just have to come up with the reasons for that 30 days. And if someone wants 10 days, why the 10 days is better, and we just need to document that.

But again, let's get back to this question. And this is about post transfer, and it's just a simple a lock or not. We're not talking about time here. Should there be a lock post transfer? And is there any questions or comments on this before we vote on, is there a post transfer lock?

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Okay, let's go ahead and answer the poll question, just for the active members. And I'll give everybody a couple of seconds. But then we'll go into the responses. Thanks.

JULIE BISLAND: Sorry, Roger, are we back to three?

ROGER CARNEY: Yes, we're on three, Julie.

JULIE BISLAND: Okay. So I ended the poll.

ROGER CARNEY: Okay. Do you have results?

JULIE BISLAND: I do.

ROGER CARNEY: Okay, so I think everybody was on the same page here. It looks like one person thought maybe there isn't a need for a post transfer lock either. But I think we have definite direction here showing that there should be a post transfer. If the person that voted no wants to come online and say why, please do. Again, it shows a pretty obvious direction here for us to go. Zak, please go ahead.

ZAK MUSCOVITCH: I'll admit that was my vote. That was the vote on behalf of the BC. And the BC's comment was that the lock does not appear to be a significant concern as it would usually coincide of the change in registrant lock, however, registrant should not be prevented from transferring domain name from one registrar to another even after a recent registrar change unless there's another type of lock at play. That's the rationale.

ROGER CARNEY: Thanks. Great. Thanks, Zak. Okay, let's go ahead and jump into our next question, Julie. So again, we're back to the timeline here, the window. And I think that from the beginning, we thought that the consistency aspect was important, and not necessarily have to be. It's just people thought that that was a good way of making it consistent from a registrant and implementation making it easier, as well, but from a registrant aspect of knowing, okay, it's whatever it is, it's 10 days, or it's 30 days or 60 days, just so that it's consistent. But obviously, there can be different reasons here why time makes sense. And then we can look at the time to the other aspects as well. So, Keiron, please go ahead.

KEIRON TOBIN: Thank you. I wonder if we could quickly create a 3A question just because I believe, I think from what I gathered from the group here, the majority of people here would like some continuity between both. But if people are now saying that they were originally going to go with 10 days or 30 days, and then it starts to

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change, I think it kind of makes these questions obsolete. So maybe a 3A kind of, do people want continuity between kind of the post creation lock and a transfer lock?

ROGER CARNEY:

Great. Thanks, Keiron. Any other comments? Okay, yeah. And again, I think, to Keiron's point, the continuity, we've talked about that from day one, I think that actually one of the first things I said was making it more consistent for the registrant aspect. So I think continuity was generally agreed upon throughout the whole thing.

Now, again, I know we've specifically talked about if there's obvious reasons why there's not, then that makes sense. But it's been consistent throughout the months we've been doing this, the continuity was important with the knowledge that it didn't have to be if there was reasons for it. But you know, the goal of being consistent I think, was well established across the group, so. Okay. So any other comments or questions on choosing a window of post transfer? Okay, I'll ask all active members to go ahead and vote, and then we'll discuss the results shortly.

Okay, Julie, if you want to show us the results, please. And as I expected, I'm sure some of the 10-day people from number two are now voting 30 days. So I think that that's consistent. And I think the important thing here is again, I think we're settling to 30 days, we just had to have that rationale as to why 30 days and why not 10? Or why 10 and why not 30? I think the obvious one is the 60-day everyone feels is a little too long. It doesn't achieve any other results, besides just delaying it. Where the 30 day seems to

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still, as I think some people mentioned in chat, address the abuse issues or the possible abuse issues.

And again, recognizing the fact that the majority of transfers go through with no issues when you look at it. So we're talking about those few that do pop up. So any comments on the results here? Again, I think that 30 days was quite expected for me after our discussion on poll question number two. Keiron, please go ahead.

KEIRON TOBIN:

Thank you. Yeah, just in regards to the 30 days. I don't know how many of you on here have had domains. But there is nothing worse than transferring a domain and finding out that the UI on that platform is horrific. I won't mention any names. But we are then asking the registrant to essentially stay there for 30 days, which is 8% of the domain's life in terms of its one-year kind of renewal thing. And I just don't know how we're going to—I need some rationale as to why 30 days is right, as Roger said, and I'm kind of stuck between it. But I think if someone could kind of give me a solid example, then I'm maybe kind of persuaded, but at the moment, yeah, just 30 days seems—8% of the domains life. Thank you.

ROGER CARNEY:

Great. Thanks, Keiron. Zak, please, go ahead.

ZAK MUSCOVITCH:

Thanks. I don't have the answer to Keiron's question. I wasn't raising my hand because of that. So I look forward to hearing an

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answer. But my question was if the working group resolves it at 30 days or 10 days or whatever the period of time is for the post transfer lock, are we essentially saying that a willing registrar and a willing registrant who the registrar knows and is comfortable with whether that be a brand protection boutique registrar, or whether that be a public facing registrar dealing with a domain investor, that they simply can't allow another change of registrar during the post transfer lock no matter what, that's even though there's willing parties, and there's no issue of theft, that we're just going to stick with this rule in order to prevent the contingency of possible theft or other issues in cases that are unrelated to this? Thanks.

ROGER CARNEY:

Great. Thanks, Zak. And according to what we have, that would be correct, there would be no carve out for allowing something shorter than this time period. Sarah, please go ahead.

SARAH WYLD:

Thanks. Zak, to your question, I think the answer is yes. Generally, that would be prevented. Yeah. But also, I think that that discussion belongs in the fast undo part of our work, because we would need to talk about the circumstances under which changing or like a transfer undo is possible. Sounds like you were looking for transfer onto a different registrar. Yeah, I think the answer would be yes.

Keiron, to your question, I would say the reason why I look at 30 days as better than 10 now is because of the I think alignment with the fast undo process. 10 days is really fast. And seems to



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me like it probably wouldn't be enough time for everybody. So 30 days, a bit longer, not forever, but enough time, hopefully. And really like to me, 30 days does not seem that long a period of time if you don't like somebody's control panel. I have lived with terrible control panels for much longer than a month. And how many changes do you really need to make to your domain name in a month? Okay, thank you.

ROGER CARNEY:

Great, thanks, Sarah. And again, I just want to remind people— [Volker already] said this, but before Volker talks, I was just going to remind people, we're talking about some pretty edge cases here. Because again, most domains aren't being transferred at this time 30 days apart. So you're talking about a few, even if you look at just the ones that are transferred, not the whole domain market, but just the ones that are transferred, don't really even fit into these windows generally. So I mean, we're talking about a small percent that we're providing a solution to. So again just kind of going off what Zak said, is, is there a carveout for it? There's not. But again, I think we're talking about a pretty small percent here. But anyway, just my thoughts. Volker, please go ahead.

VOLKER GREIMANN:

Yes, thank you. Generally, I support the 30 days, but I can understand where Zak is coming from. I mean, if you're a domain investor, and one registrar invents a really new idea of how to market your domain names, but you have to transfer to them, then basically, you're locked out of selling your domain name and having the new registrant transfer it out to their preferred registrar

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for 30 days. So that's quite a substantial cut in the ability of a domain investor to pass on the domain name. So I'm wondering if the 30 days should be a general rule and there should be possibilities for exemptions in those cases where the domain registrant is well known and is verified, for example. But yeah, I'll not die on that hill, but I can understand where he's coming from and why that might be an issue for some registrants.

ROGER CARNEY:

Great, thanks, Volker. Okay, any other comments, questions? Okay, so again, I think what we've leaned here is the 30 days—and again, I think Zak and others have brought up, okay, is there—and actually, to be honest, I think someone brought this up a long time ago, when we were talking about, would there be specific carveouts to allow a transfer in the windows? And no one ever got to that spot or suggested anything. So I think that that's why it hasn't moved forward.

I know it was brought up, I just don't know that anybody acted on it and moved it forward. So it's something that obviously we can think about. Does it go in our report or not? I don't know. It can become one of the public comments back as to, is there a logical reason to add a carveout or exception for a transfer during the window? As Zak described, someone signs a piece of paper, whatever it is, however they get it done.

But for this purpose, for our purpose here, we're staying consistent, that post creation, post transfer should be a 30-day lock. And we need to document why that is, just like Keiron said, why is it that it's 30 days? And some of the logic was placed as if

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there is a quick undo, a 10-day undo period is probably pretty short. And maybe the 30 days is more appropriate for that action. And you would think that—and I don't know that it to, but it seems logical that that fast undo would fall within that lock period, just to make things more efficient. So Theo, please go ahead.

THEO GEURTS:

Yeah, quick question, though. What if we come to discover that there is actually no quick undo process that we actually can come up with? I mean, there is a very good chance. I mean, other parties have failed, other working groups have failed on that process. I don't see any reason why we would succeed. So I would be cautious to set timeframes on certain locks, depending on a process that we will never solve, like the undo process, or call back or roll back or whatever you want to call it. Thanks.

ROGER CARNEY:

Great, Theo. Yeah. And that's exactly the reason for bringing that topic forward, as at least a high-level discussion, was to talk about those two big items, really or to make people think about it, even if you're not talking about making people think about it is—okay, is it possible? Because, again, we know that IRTP thought it was a good idea and then wasn't able to implement it or even recommend it in the final report. Have things changed? I think so, I mean, even the process has changed, which may be pushing for it even that much more since the transfer is a more efficient transfer now. So again, the process and what else has changed environment, whatever it is, but we know the process is changing to make that maybe a higher priority and solution.

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But to your point, we haven't agreed on it. And that's why we brought it forward, was to try to get people to think about it. And can we get to agreement on it? That's a good question. And if we do agree on it, what is that time period? So I think that that was the only real reasons for bringing it forward, was just to get people thinking about it. Because we knew it would impact these timelines. Theo, please go ahead.

THEO GEURTS:

Yeah, so I understand your reasoning, but you've got to be realistic. I mean, yes, the process has changed a little. I mean, the process itself, as proposed is a secure way to transfer domain names. Except that same secure process is standing in the way when there is a domain name stolen, because that is not what was intended by the process. So now you're facing the same issue or you're facing the issue that a very good secure transfer process is suddenly being abused for many different reasons on a very different levels. And now, in that stage—and we are not there yet—we are trying to come up with a solution, which isn't actually something we can address because there are reasons on very different levels that enabled or made sure that domain name could be stolen. And we're trying to solve those reasons, which are outside of our capabilities within an ICANN process. So, again, I think we need to be very cautious to have any hope on a quick undo button. Thanks.

ROGER CARNEY:

Great, thanks, Theo. Okay, any other comments, concerns? Okay. I think we can move on from this and go to our next poll question,

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Julie. Okay, I think this is our last one. How should the lock requirements be implemented? And the options here, requirement in the transfer policy [inaudible] registrar lock requirements and the registry agreement for registry lock, or other, don't know, want to discuss. Again, we can talk about this prior to voting if there's any questions. Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. So I guess a question I have here, a little more registrar specific. But I know registrars are bound through the RAA to abide by consensus policies. And I think the same is also for registries, that they also have to abide by consensus policy. So I'm not really sure why we'd want to go through a whole process of negotiating the registry agreement to add something in there as opposed to when we could just accomplish it through the consensus policy change. Thanks.

ROGER CARNEY: Great, Owen, and you're specifically mentioning the second middle item there of the registry agreement update. So good question. Emily, you want to answer that one real quick?

EMILY BARABAS: Sure. You know, as I'm looking at this, I realize that maybe there's sort of two elements to this. One is about where the sort of primary place that the requirement is presented, and the other is about where the lock is held. So maybe to simplify this question, we just focus on whether it's a registrar or registry lock, and then kind of determine the specifics of exactly how that would look

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afterwards. Does that make sense? Just so we don't get bogged down, because it may be that the question is not phrased exactly the way it needs to be. Thanks.

ROGER CARNEY: Great. Thanks, Emily. Yep. So yeah, let's just ignore the agreement part of that second item and just say, should the registrar be the one responsible? Or should the registry be responsible? Theo, please go ahead.

THEO GEURTS: So I voted that, should it be on the registry level? Because if we do it on the registrar level, I think that that lock is used by registrars on multiple levels. And as it stands now, a lot of people can remove that lock. And if it's a registry lock, then we won't have that discussion or issue. So that is why I voted for it to be on the registry level. So we don't have issues on the registrar level. Thanks.

ROGER CARNEY: Great. Thanks, Theo. And just a reminder, the specific action here, I don't want to get into much that detail, I kind of wanted to leave it as basically, should there be a window? And how that window is enforced, I think, is—maybe we get into it or maybe we don't and leave that for implementation. But should the registrar enforce the window or should the registry enforce the window? And again, lock here is not being specific to a specific type of EPP status or anything. So, Jim, please go ahead.

JIM GALVIN:

Yeah, thanks, Roger. Notwithstanding your last comment about implementation is not being discussed here, this is just about the concept of whether registry or registrar should support it. So let me respond in this way. I don't think that registries have enough information to really properly support this. And if the intent would ultimately become using any of the mechanisms currently directly available to a registry—so for example, the actual registry EPP locks, then I would go down the path of your overloading registry specific rules and guidelines about how they manage the elements that they have, in particular, their registry locks with a need or purpose of the registrars.

And that doesn't feel right to me. So that's a concern that I have. I mean, in general, I think this transfer stuff really does belong to registrars, we've said that from the beginning on behalf of registries, and so on behalf of registries we're steering away from wanting to have an active role except where absolutely necessary.

This doesn't feel like an absolutely necessary case. And I'm concerned, as I think ahead about how it would be implemented to what that would look like, because I certainly wouldn't want to overload mechanisms that registries already had for their own purposes, to support something at the registrar. So thanks.

ROGER CARNEY:

Great. Thanks, Jim. Rick, please go ahead.

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RICK WILHELM:

Yeah, so let me plus one what Jim said and just elaborate a little bit more on that. So right now, for example, if a registry finds that there's a name that's being abused, one of the things that the registry may end up doing is preventing that name from being transferred, being updated, remove it from the zone.

And the mechanisms by way that it does that is by turning on various EPP statuses, that is server transfer prohibited, server update prohibited, and then also taking it out of the zone. And so what Jim is sort of offering is that this situation, regarding using those locks, those same mechanisms in order to enforce what is not necessarily a registry policy but something related to inter registrar transfer is, as Jim said, literally an overloading and reusing of those mechanisms.

And thus, if the registry is in a spot where it has to lock a name for abuse, it becomes difficult for anybody to tell why a name has this transfer prohibited lock put on it or some other locks put on it. So just elaborating on what Jim said, in a sort of "yes, and" fashion. Thank you very much.

ROGER CARNEY:

Thanks, Rick. Yeah, and again, overloading, obviously, from a nice technical coding aspect is a great solution. But when you talk about data, that does become a big issue. So it's something of concern. And that's kind of why I wanted to stay away from the idea of a specific lock here and talk more about a window of time that it should be imposed versus talking about a specific status or something. Theo, please go ahead.



THEO GEURTS: Yeah, I'm slightly confused so I'm trying to make sure we're not creating some confusion here. My approach was just simple based on the fact when I look at registry operators like Donuts or Radix, or PIR, when a domain name is transferred, or created, they put a lock on it for 60 days. So my thinking was pretty straightforward. If they do it now, why is there no discussion unless I'm missing a vital piece of information and I missed a part of the discussion. Thanks.

ROGER CARNEY: Thanks, Theo. Any other comments, questions before we jump into answering the poll question that some of you probably already have? Jothan, please go ahead.

JOTHAN FRAKES: I am seeing from a number of people that they would like to kind of change the way they vote after this discussion. Is that something others would be interested in or make it possible? Because I submitted my vote but I think I waffled in the midst of that discussion.

ROGER CARNEY: No waffling, Jothan.

JOTHAN FRAKES: I'm being honest with myself.

ROGER CARNEY:

Okay, yeah, let's go ahead and drop this question and see if we can pull up and start it over. Can we do that, Julie? Okay. Thank you.

Okay, so we've had some good discussion. Again, ignore the agreement part of registry but looking at should the registrar be enforcing this window or should the registry be enforcing this window, is kind of the question here. And again, we've heard things from both sides about which one's which. And there's been a lot in chat. So if you've been reading chat, that may help your decision here as well. But let's go ahead and vote. The active members, please go ahead and vote on the registrar doing it the registry doing it or maybe not knowing that. So let's go ahead and take some time to vote and then we'll talk about the results.

Okay, sounds like Jothan's on his way to IHOP or something. So see if he voted before he left. Julie, can you share the results, please? Okay, so I think this is definitely leaning toward the registrars doing a lock. 80%. So I would say probably somebody doesn't know or didn't have an opinion on this one. And a couple of people thought the registry should enforce the lock.

But I think we've got pretty good agreement that the registrar here should be the one that is enforcing this window of no transfer. So let's open it up for comments, questions on the result. Theo, please go ahead.

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THEO GEURTS: On this very specific question, does the poll actually represent the registries in a fair way? I mean, there's only two of them I think on this call who were able to vote and the registrars are represented by 10. So there's a little bit of an imbalance there. Thanks.

ROGER CARNEY: Thanks, Theo. My guess is I know how the registries voted. So my guess is more registrars voted for registrar use than registry use. Just my opinion, though. Any comments, questions on this? I think we're leaning toward—and I think we have, I think that the locks—again, I think, have leaned toward registrar use anyway. But again, it's why we're asking, is to make sure that those discussions have produced those results.

So again, I think the voting here shows high level of agreement that the registrar should be enforcing these windows have no transfer. So however they do it. Again, we're not necessarily dictating that they have to, say, use a certain EPP here, we're just saying that they should enforce that no transfer.

Okay, any other questions, comments on this? Jothan, please go ahead.

JOTHAN FRAKES: Sorry, I'm really doing a lot here. So we're saying here that the registrars would have the ability to turn off or on the registrar lock. So if there is a policy that states it's 10, 30, 60, whatever the period of time is, would there be logic at the registry that would disallow our ability to change those locks, or are we seeing—because I almost see a combination of these being important to

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have here. As registrar, we want to be able to do whatever we're compelled to do with UDRP or other things that come from outside of this logic. But would a registrar be able to—if this is entirely upon registrars—be able to set something shorter than 10 days or 30 days or 60 days as far as a lock goes? Thank you.

ROGER CARNEY:

Thanks, Jothan. And I think the way I read this is technically, I think you're right, I think registrar could set it shorter. But then, obviously, that they would be violating policy and then a complaint can come against them for doing so. But yeah, technically the way I read this, the registries wouldn't enforce a post create or post transfer lock at all. And it's left to the registrar to enforce. And again, that's by contract, because we're required to implement consensus policy. So we would be in breach of our contract, basically, if we shorten the time period stated here.

Any other comments, questions? Running out of time here, but we've got a few more minutes. Okay, so I think the big thing we got out of this is, I think it's pretty straightforward answers. We're looking for the locks, obviously. Probably the big discrepancy, and I don't know how big it is, really, is the time window of that no transfer time being somewhere between 10 and 30 days.

And again, I think that not necessarily in between, I think it's either 10 days or 30 days is what I think I'm hearing from the group. And I think several people have mentioned, I've mentioned it, obviously we need rationale for why that is, obviously, if we set one to 30, I think there's a consistent model that allows the other one to be set

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to 30, or the other one to 10. Or if we have the logic, they can be separate times.

But the consistency obviously comes first and if we have a reason, then we can override that. But I think the big difference here is okay, what is it? Is it 10 or 30? And do we have support for one or the other? And it's throughout this conversation. And again, since we've resumed discussion of this, we've had some good indication that people want that 30 days opposed to the 10 days. But coming up with that rationale of why 30 over the 10, I think is going to be important, and we need to get documented.

Again, I think we have solid documentation for a minimum of 10. But if we want to move that from 10 to 30, I think we need to get more solid rationale for that. And I know that Sarah dropped off, but her big rationale was if we have an fast undo, that timeline is probably going to be longer than 10 days that she thought. So just things to consider. Again, I think that's the big thing. I think that we're leaning toward here, I think it was pretty high volume of saying registrars should be responsible for enforcing this.

But I think that that big question is that 30 days. We're leaning that way. And we just had to come up with a rationale for that. So I think between now and next week, if we can get people to document that in the locks working document, that'd be great so we can start moving forward on that. And again, we can move that behind us and get moving on to our future work.

Okay, we are at time, so unless anybody has comments, we will call this to a close. Okay. Great. Thanks, everyone. Have a good week.

JULIE BISLAND: Thanks, Roger. Thanks, everyone for joining. This meeting is adjourned.

**[END OF TRANSCRIPTION]**