
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 26 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/MhAiCw>

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

JULIE BISLAND:

Good morning, good afternoon, good evening. Welcome to the Transfer Policy Review EPDP working group call taking place on Tuesday the 26th 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 Zak Muscovitch (BC), Steinar Grøtterød (At-Large) and Daniel Nanghaka (At-Large). They have formally assigned to Arinola Akinyemi (BC), Lutz Donnerhacke (At-Large) and Raymond Mamattah (At-Large) as their alternates for this call and for remaining days of absence.

As a reminder, 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 view only chat access.

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

As a reminder, please select everyone when using the chat feature in order for all participants to see the chat and so it is 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. 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. As a reminder, those who take part in the ICANN multistakeholder process are to comply with the expected standards of behavior. Thank you, and over to our chair, Roger Carney. Please begin.

ROGER CARNEY:

Thank you, Julie. Welcome, everyone. Before we get into our work today, just a couple of things, I guess. The next few weeks are going to be probably, as you've noticed, maybe quite a bit of reading in between our regular session. So staff is ramping up their production of all of our documentation. So it'll be important to stay on top of that, as staff releases those over the next few weeks.

Additionally, I think that there's going to be a lot of review. And also, I think this is a great time to touch base with your stakeholder groups, and make sure that any items—so if anybody

has any questions or comments or concerns, let's get them documented. But I think again, over the next two or three weeks, we're going to have that amount of time to review the documentation and then flag anything for further discussion. So it'd be good to get with your stakeholder groups over the next two or three weeks to make sure that we're getting everything flagged so that we can discuss it too, so that we can get the initial report wrapped up.

I guess along those lines, I'll open the floor up to any of the stakeholder groups that may have had some discussions over the past week or so that they want to bring forward and get addressed with the group. So anyone have any comments or discussions that they want to bring forward to the working group?

Okay. And I think I will turn this part over to Emily. So she can walk us through how we get to our initial report delivery here, which is on the screen of June 15. And I will turn it over to Emily.

EMILY BARABAS:

Thanks, Roger. Hi, everyone. So one thing I wanted to highlight before we get into dates, because you'll see the dates and they're pretty tight, I just wanted to highlight that to the extent that it's difficult for groups to provide their input in the coming weeks, this is only an initial report. And so there is an opportunity during the public comment period for additional input to be provided.

So, ideally, now is the window for that input. But of course the public comment period is also an open space for input from groups as well as individuals.

So here are the dates that we're looking at working backwards from the target date of June 15. for the initial report per work plan. What we're going to do is deliver to you, you probably saw on Monday, that staff sent two things.

One was a document with a summary of all of the recommendations as they currently stand from the various working documents. And that's so folks can get a sort of head start on looking at everything as a package.

As mentioned in the email, we ask that you don't comment or put anything in that document. That's just for reference. And that helps us ensure version control. But you can share that with other people. It's available for viewing so that you can see everything together and check for anything that's missing, or coherence and so forth.

We also sent what we call boilerplate language for the report. So this is the standard sections of the initial report that are included for every report that you'll see from the GNSO. So this is the background, information about the methodology, participation, and so forth. So everything except the sort of core elements of the recommendations and charter question responses.

The idea here is that everyone can get a head start this week on looking at that language, I don't expect it to be controversial, but it's good to get familiar with it. And if you have any feedback about the structure of the report, or any of the content in those sections, we provided a spreadsheet for you to drop that in. And let us know. There are line numbers throughout the document. And you

can use those as a reference point, so it's easier to find what you're talking about.

The next milestone is this coming Friday, what we're going to do is drop in all the responses to charter questions and draft recommendations that have been produced on an iterative basis over the last year or so. It shouldn't be a surprise, this is just content we're moving from the working documents to a single location. And it's going to be in Word, simply because that is the document template that we have. And it's difficult to move back and forth between Google Drive and Word. So we're going to work from Word at this point on.

So what you'll do is you'll get that document this coming Friday. And there will be a two-week period where everyone can review the report. We'll also provide a document where you can provide your feedback. So it'll be kind of a table format, sort of like the spreadsheet you receive for the boiler boilerplate language this week. So that was a preview sort of a test run of the methodology we're using. And we'll ask you to work with your groups and work individually and provide that input, and then we'll have time until—so we'll have four sessions after that to go through all of the input.

There's a community webinar scheduled for June 2. That's during prep week for ICANN 74. And that's to share what the working group is expecting to publish. And then the target date is June 15 for the publication of the report.

So just going through the dates of some of our upcoming meetings, we're expected to just discuss some of the outstanding items on losing and gaining FOA and auth info codes this week.

Next week, we're going to look at the NACK recommendations from the small group and go through all of those, you'll be getting those on Thursday this week. So in two days. They're just finalizing them now.

May 10, we'll look at post registration and post transfer locks and additional security measures. There will be some changes probably as a result of each of these calls. And so we'll give you iterations of that Word document with adjustments. And if you're providing feedback, you'll just tell us the date of the document you're referencing and the page number and we'll cross reference it so it's when it comes time to review those it's clear what you're referring to.

There will be four calls, four weeks to review the outstanding items that people have identified. And then the report is expected to be delivered during ICANN 74. And the hope is that the focus of that ICANN 74 session will actually not be on the phase 1A topics but an introduction of the phase 1B topics.

So that's what we have in terms of timeline. I did have, actually maybe I'll pause here and then I had one additional item that maybe I'll follow up with in a moment, but maybe we can do questions. And Roger, do you want to facilitate this part?

ROGER CARNEY:

Great. Thanks, Emily. Mike, go ahead.

MIKE RODENBAUGH: I just need to say I think two weeks for constituencies to review a PDP initial report is just not enough. And then staff is giving themselves a month to finalize it. It just doesn't seem right to me. And I don't frankly see what the rush is to put out an initial report in the middle of an ICANN meeting, no one's going to read it. And therefore, what is the rush here? I'm just not seeing it. And I don't like the notion of going back to my constituency and saying, here's a very beefy, very important report that we now have two weeks to draft constituency comments on. It's completely unrealistic.

ROGER CARNEY: Great, thanks, Mike. And I think that the next two weeks, really three weeks from yesterday, but the next three weeks is really just to flag things, it's not necessarily to get into those discussions, it is to take the time for this working group, and their stakeholder groups just to flag items. And then that actually, next four sessions that we have, will be talking about those things that got flagged.

So I don't know that we're making this review in two weeks, and then months to prepare it, I think it's more of let's flag things that we want to discuss further. And again the document will probably end up being 30 pages or so, it's not going to be really big. But just to flag those things. And then we'll spend those next four sessions discussing those things. So I think that that's the important difference. We just want to get everything flagged so that we know what we need to look at and what's actually, everybody's comfortable with already. It's more of the important things of flagging those things that still open questions on that we need to address. So hopefully that helps, Mike.

MIKE RODENBAUGH: A little bit. I just I don't see why we're pushing back from the publishing a report in the middle of an ICANN meeting and working back from there. I don't see, frankly, what the difference is whether we put the initial report out in the middle of the ICANN meeting or two months later. And as long as—we need to feel like a group that we've had enough time to talk about things. And I'm telling you that at least for my group, two weeks to review a report is not enough time.

ROGER CARNEY: Okay, thanks, Mike. Other people have concerns on that timing? Berry, please go ahead.

BERRY COBB: Thank you. To build on what Roger was saying, the two weeks are for the big type of items that you still may have concerns with the draft recommendations, which the group has been coalescing around for quite a while. And I think that that goes back to the first slide about how important it is that representative members are taking back and collaborating with their groups as these recommendations are getting formed.

Further, the May dates or these review of outstanding items, is not just only for staff to try to put together the report. There are several iterations and opportunities for groups to contribute to the contents of the report through those four weeks, the whole working group will be doing that.

As Emily noted, at the end of this week, you're in essence getting the full report, where things stand with the recommendations as they exist today.

Finally, I'll say that the public comment period is not opening in the middle of the ICANN meeting, it's opening up at the end of the ICANN meeting. I'd also note that these dates have been communicated via our project plan for a while. Should we miss this key milestone, it will affect further downstream work of starting work in phase 1B and ultimately would impact or likely impact the delivery date of our final report.

And I'm not going to say that this is the end of the world or that these dates are the end all be all, but we did commit to those dates. If for any reason, as a last resort, there is an option to do a project change request with the GNSO Council to extend the dates but the reason why we have a more regimented structure and plan to guide the work and policy development is because there are so many other competing policy efforts going on. And so the delays in our work here have impact on staff and community resources elsewhere, and that's why it's very important that we continue to try to hit our target dates. Thank you.

ROGER CARNEY:

Thanks, Berry. Yeah. And again, I think that something to stress here. I don't think that we're trying to squeeze this in before ICANN. I think that this was all along our goal, was to track to this. And I don't think that we've wavered on that except I can't think of anything that we're waiving on there. I think this was the plan going forward.

And again, I think the important part is it's not two weeks to review this, we're taking the next six weeks that we're going to be reviewing this, it's just that we want to flag those big items, as Berry mentioned, in the next two or three weeks so that we can make sure that we're hitting those in the following four weeks. So any other comments or questions on the schedule? Okay, Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. I'm not seeing anyone else. So this is a slight pivot, but connected to the items we're discussing right now. So as we're working this week to, as I said, put the pieces together from the various working documents that you've all had access to now, since early days, and one of the questions that we had is just about structure and wanting to check it all with you.

So there are a couple of recommendations regarding what we've been calling the 30-day lock. But it's really a restriction on transfers for 30 days following registration and following an inter registrar transfer. And currently, we've been talking about those as sort of a quote unquote, additional topic, but we've been looking for a place to house those in the report that logically fits.

And we think the place to do that is under the topic of denying or NACKing transfers, because the reasons for denial include two items that are very much connected to that. And so at its core, this is about reasons for denying a transfer. If anyone has concerns about that, we'd love to hear it. I don't think it's a something that should be problematic. But once you see it in the report, of course, if it looks like it's problematic, you can let us know. But if anyone

has concerns about that for the moment, let us know as well.
Thanks.

ROGER CARNEY:

Great. Thanks, Emily. And I see support in chat for that placement as well. And I think something Emily said, and I think I've said it before on calls, is I want to try to get away from the term lock, just as we got away from info auth code, password, try to be a little more specific to what we're discussing. And you know, this is a window where transfers are not allowed. It's not a lock per se.

Now, register registries and registrars may enforce that via some type of locking on that. But we didn't want to get into that here. Because that's not necessarily a policy thing. It's just the policy is that there's a period of time where you can't transfer. So I think we wanted to make that distinction there.

Okay. Before we jump into our list of work items, I just wanted to bring up that Sarah had sent out a proposed language for our old rec three, which is now recommendation seven, I think. And I don't know if Sarah wanted to talk this at all. But she did provide this to the list a few days ago. So if anybody has comments as well, but I'll let Sarah go first.

SARAH WYLD:

Thank you. Hi. The goal of this suggested text is to do a couple of things. We all I think agreed that it should not be ICANN Org establishing or changing those security requirements. I think we all agree [—I agree that ICANN Org agrees.] So there we go. And so this puts it in the hands of the registrar and registry operators and

specifically mentioned The RFC that's all about TAC security, which is a really great RFC.

But I know that there are concerns around best practices, which I had forgotten when I sent it. Thank you to Owen for reminding me. And so I think if people could suggest how to change it so that we don't have best practices, which can, I think create some liability concerns, that would be really good. Thank you.

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

OWNE SMIGELSKI: Thanks, Roger. Yeah. Just to follow up. I was the one who raised that to Sarah. And I recall it was raised several times during EPDP phase two, we're talking about doing best practices. And apparently, in some jurisdictions, failure to follow best practices as they're defined could open up a party to legal liability. I don't know if it was civil or criminal.

So I don't recall specifically which jurisdictions, but there was concern that we looked at. So I would prefer to get some different wording in there. I just raised the issue yesterday, Sarah, I apologize. I didn't come up with a suggestion. But I'm happy to come up with a better idea so that we don't put people in a bind. Thanks.

ROGER CARNEY: Great. Thanks, Owen. Yeah, and to Sarah's point, I think that even when [inaudible] recommendation, we had problems with suggesting that ICANN take this work on themselves and ICANN came back and said obviously, they had the same concerns that we were having. So I think that we should come up with something. Again, the best practice, as Alan mentioned, has been avoided impasse, so it would be good to avoid in the future. Theo, please, go ahead.

THEO GEURTS: I'm going to disagree slightly here. You know, that is basically the point of best practices, that you make sure that your organization keeps following best practices. So you are indeed compliant with several laws out there. Because if you just put in best practices, and you're just going to ignore everything, and there's no consequence to it, then you might re rephrase best practices to something like, well, we put it in here, but we're never going to pay attention to it. That cannot be the case here. So I understand that there might be some legal liability to best practices, but there is a logical reason for that. Thanks.

ROGER CARNEY: Right. Thanks, Theo. Lutz, please go ahead.

LUTZ DONNERHACKE: Do I understand correctly that you want to remove the icann.org as an organization to set the minimum standard for security requirements? So you want to remove to icann.org and want to do it all yourself? Who is in charge for updating the best practices?

You are only mentioning that the best practices are updated as appropriate. Who will define this?

ROGER CARNEY:

Great, thanks, Lutz. And I think that's a really good question, is, when you're talking about best practices, who creates the best practice and who maintains them?

Obviously, as you just mentioned, Org doesn't want to do that. And I think that we need to find that spot where that should be. And there's been suggestions of trying to go to the IETF. But you know, the IETF [inaudible]. There's a couple general RFCs related to this that can be used as support but not necessarily the exact implementation.

So I think that that's the line that needs to be done is figure out how do we get from these RFCs that mention and have good ideas in them, but how do you use those and how do you keep them updated? Excellent, Jim, please go ahead.

JIM GALVIN:

Thanks, Roger. I want to point out that there are there are two things going on here that we need to be careful about. I like Sarah's text in principle, but I do think that it needs to be split to acknowledge two different kinds of things. And I guess I'm going to volunteer here to think about this and come back and propose something.

ROGER CARNEY: Excellent, Jim.

JIM GALVIN: So the two issues that have to happen here is one of the issues is about the composition of the TAC. And there are, from my point of view, concerns around how randomness is done in order to do that. Now, I realize that this is covered a bit in 9154. But I had previously offered up that reference about creating randomness. And it's a very real thing, the ability to do that and to capture that properly.

That IETF document on randomness, yeah, someday, when somebody wants to sit me down and have a little party, we'll talk about why that document exists and all of its predecessors, because I caused the document to come into existence back in the early '90s in its first version, versus something else that I was doing that got wrong.

So there's some real words there that need to be called out. The other thing with 9154, which is more important in this group here, right now, 9154 is also about being able to exchange that new TAC value between the registrar and the registry. Yeah, thanks, Rick, in the chat, it's 4086. I couldn't remember the number off the top of my head.

Okay. But 9154 is about how that new TAC value is exchanged, as well as talking a lot about TAC management and the maintenance of it. And it also has that reference back to 4086.

And I just want to call out, and I hope that the registrars here recognize, and if not, if I'm stating the obvious, that's great. If not,

here is a pointer to you to check with your technical folks, just as we will need to do on the registry side, to realize that there is something that needs to be implemented there. And you need to first consider if this is what you want.

The policy recommendation is going to need to specifically state that you want to do it via the 9154 mechanism. So that's a technical consideration that we have to get behind here that we haven't called out before. And so I wanted to make sure to call it out. Hopefully, it's obvious. And if it's not, folks now know, and you should take that back to your technical people and consider that question. Thanks. And I will otherwise provide text as I said, I'll take Sarah's direction here, and I'll add to it. Thanks.

ROGER CARNEY:

Great. Thanks, Jim. Yeah, and I think that is important, that there will be definitely some work here for all the contracted parties to do. And again, just as a reminder, why, today people are using very easy passwords and password being that simple as 1 that we've seen in the wild and being used. So I think that the reason why we got here was all good intentions to add to the security here, we just had to come up with a way to formulate this.

And I don't want to leave too much for implementation. Obviously, the IRT can make some decisions on their own, but I want to be able to guide them down the path that we seem to agree on. So, Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. I just wanted to throw something else into the mix. From the staff perspective, one of the things that we're often looking at when we look at recommendations is about what it's going to look like in implementation. And one of the questions I think we have here with the proposed language is about enforceability, or compliance and kind of how would Org be in a position to make sure that contracted parties are meeting these best practices. So I think that that's something to consider and make sure that the wording reflects the intention of the group with respect to that. I think from the Org perspective we want to make sure that if something is intended to be a requirement, that it is indeed enforceable. Thanks.

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

KEIRON TOBIN: Thank you, Yeah, I guess, in terms of the onus is on the registrars and registries here. I'm just not sure whether taking ICANN Org out in its entirety is a good form of practice. I think maybe we should, as Emily just kind of mentioned, maybe there should be some mentioning that you can complain to ICANN in regards to that matter where we don't have to kind of bring them into it. But there is an established route, as opposed to kind of just suing registrars and registries, that ICANN kind of come in there and essentially moderate. Thank you.

ROGER CARNEY: Great. Thanks, Keiron. Yeah, and that's interesting. And I note Jothan isn't allowed to talk here. He did pop in a few things in chat about Tech Ops doing this. And I think obviously, I think what Keiron just brought up is maybe a good loop in, Tech Ops not being a formal ICANN working group or a group within ICANN. But if Tech Ops or some other group was the one to set the standard or update the standard, as Keiron mentioned, that they would have to go through some kind of approval process. Obviously, nothing like a PDP because that's what we're trying to avoid. But some mechanism that we can come up with so, Rick, please go ahead.

RICK WILHELM: Very good. Thank you, Jim. I'm going to throw a link to 9154 in the chat. It contains the pointer to 4.3 in support of Jim's earlier comment and just give some examples of some of the other obligations that come with the implementation of this.

Then, and just a brief comment related to that topic about compliance. I don't think that every requirement in the contract is testable by Compliance. But I'm not exactly sure about that. But I don't know that every thing in the contract is fully testable by Compliance. But I get the spirit of where that comment was made in. Thank you.

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

THEO GEURTS: I agree with Rick, I think it's also that ICANN Compliance would be in a situation that we're not in a position to actually move forward there. So basically, if you have best practices, and there's legal consequences, like in most jurisdictions, you already solved the problem, because it already forces you to move on to best practices and improve your security or whatever needs to be improved. That comes with the territory. Thanks.

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

JIM GALVIN: Thanks, Roger. As I think about this TAC management issue, I'm reminded of a question that I don't think we've settled yet. And feel free Roger to tell me that that conversation should come up again at another time. Doesn't have to be answered here.

But we were having this discussion about in a pure sense, there should be one TAC per domain name at all times, that's the way it should be. And we were having quite this discussion about multi domain transfers, and the need on behalf of a registered name holder to have one TAC per package of domains to be transferred together. Did we settle that whole discussion? And if so, could somebody just point me at the right place? You can do it in chat. Or is that a discussion that we still have to have, and is now a good time or not? Thanks.

ROGER CARNEY: Great. Thanks, Jim. And actually, we didn't settle that. But we did have a good discussion on that several discussions. But what we have settled on is there is one TAC for each domain, as you mentioned, but Sarah did provide some possible language. And again, she wasn't advocating one way or the other, I don't think, for a TAC that can be used, as you mentioned, in a group transfer, one TAC for 10 domain transfers or whatever it is. She did provide some language there. But we did not accept that or get to agreement on that. So I think that's still an open item.

JIM GALVIN: Okay, thanks. My only follow up comment then is yeah, my concern in all this is just to make sure that we highlight the—or my suggestion for the group here, but I do think it's important coming at it from a security point of view, that you highlight the security implications of doing that. There's a particular feature that you get out of one TAC per domain name. But I fully understand the need to serve the customer. And it's just important to understand what that means when you do that, one TAC for multi domain transfer. And as long as it's documented and everybody knows what they're doing, then I think that's all we can ask. So I guess I do want to—when we come back to that, we'll get into that again. Thanks.

ROGER CARNEY: Great. Thanks, Jim. Okay, again Sarah just provided this, as people mentioned, maybe updating words, Jim was going to have a look at this, obviously the technical standards, we know where the technical standards come from. But there's a gray area of

implementation of technical standards. And I think that that's what we need to come up with is, okay, who can do that? Who can update that? The technical standards will update themselves, ICANN doesn't have control of that. That just happens through the IETF.

But it's this group that decides if those technical standards are applicable for our needs. But you have to take those standards and then actually use them in an implementation. And I don't mean that you code to it, but you actually have to make decisions about those standards of how to use them, because it's not as simple as just using it, because there's a lot of options in all those standards.

So I think that that's the key, is, is there a group we can use that can provide that knowledge of how to use those standards to get to our goal of secure TAC here? And how do they update that on a regular basis?

So I think that, yes, we can use the standards. But we need to take that one step further and say, Okay, who's going to tell us how to use those standards correctly for our security measures? And how can they update it? So I think that that's what we need to look for in here.

So Sarah, your comment in chat, is Tech Ops the right group? I don't know. And again, I don't think they have an official status in ICANN, but I don't know that that is needed either. But if they don't have an official stand in ICANN, then I think we get back to I think Keiron mentioned it about looping ICANN in on it so that Tech Ops comes up with a great way to do this but it still has to be

approved by the contracted parties and by ICANN to be able to be used.

Okay, again, I think we're moving in the right direction on this. I think Sarah got us going in the right direction. We just need to kind of get those answers. And hopefully Jim will provide some more when he takes a look at this and can provide some language for us here.

So any other comments or questions before we move on from this? Again, this is still a work in progress. I think we know the intent here, we just have to come up with the correct wording and the correct placement. So Lutz, I don't know if Jim can talk to that if that's appropriate for SSAC to come up with something similar to that.

JIM GALVIN:

So Roger, if you don't mind, I'll just jump in. I just said something in the chat there, too. Steve Crocker is supposed to be part of this group. And I know he kind of dropped off after we got past in the early part, not being able to fold in DNSSEC as being a critical part of things here. And so he kind of stepped away.

Now, he doesn't represent SSAC. But he is from SSAC in principle. And on behalf of this group, I think that if we wanted to try to get something out of SSAC, we should probably try to make that happen. We should ask and just bring the questionnaire and put it out. You might get some people who might have something they want to say, maybe they could come and say a few words or something.

SSAC does not really have a process for any kind of formality to answer questions like this without a long-winded process for getting to a conclusion. I don't know. We should ask Steve and ask him to say something to SSAC. I don't really want to be that liaison. I'm here on behalf of registries.

ROGER CARNEY: Great. Thanks, Jim. Rick, please go ahead.

RICK WILHELM: While I certainly respect the SSAC entirely, I would offer a plus one to what Jothan said, I would be careful a little bit about going to SSAC. Because one, their job is to advise the Board, not just to sort of offer to be a technical expert group for sort of random topics, no pun intended related to this issue here.

And we need to be a little bit careful, because these are commercial topics that impact the registries' and registrars' businesses. And you might end up with advice that then you end up having to or being obligated—you might feel an obligation to implement that you might not want.

So maybe, as Jothan suggested, take it to Tech Ops first and get some feedback there. And then still see if there's an open item that needs discussing, but just randomly going to SSAC, you might get feedback that is more complicated than it needs to be. Thank you.

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

BERRY COBB: Thank you, Roger. And apologies if this gets into beating a dead horse, but I do want to reinforce Emily's message earlier. And I'm really thinking way ahead of when this gets to an IRT. And I believe yourself, Roger, as well as Sarah can appreciate this, with how current IRT for the EPDP phase one is going. And I know that we're going to be working on updated text here. But I'm struggling to see how any of this text without a may or must in it would even be a candidate to be text within the transfer policy, the future one other than perhaps an implementation note, and if that's the intent here, then we probably need to make that clear that this isn't necessarily a consensus policy recommendation but a suggestion.

And again, the main purpose for the original deliberations and how this recommendation got formed was to increase the security profile for what used to be auth info codes that we're calling TAC now, and Roger, I think as you noted, RFCs, the implementation of them has a fair amount of gray area. To my knowledge, there's no specific enforcement if RFCs are followed to a certain degree or not. And I'm just having a little challenge to see how ICANN Org could do anything about this, if they were to happen upon a transfer incident, where these particular RFCs or a clearly out of bounds type of TAC were being used, there would just be simply nothing here for Org to enforce against this. So I do encourage the group to think about this in the next rewrite. Thank you.

ROGER CARNEY:

Great, thanks, Berry. Yeah, and I think everybody's kind of getting to the same point of we need to be a little more specific here. And again, not just what the specific—we talked about it early on, we can say it's got to be 32 characters and it's got to be this and that. But we wanted to make that more adaptable, and more long living than what we think is great today and breaks tomorrow.

So I think let's take another stab at this. And I know Jim was going to take some wording out of this too. And take a look at that. So let's take another look at it and keep going and see if we can get somewhere with what's brought up today. So again, I don't think we're going to solve it today. Let's look at it and work on it and make some suggested changes over the next week or so.

Okay. Let's go ahead and move on from this into our work for the day. And I think we were going to go over our lists of open items. Okay. Perfect. And I think I will just turn this over to Emily so she can keep going down our list for us.

EMILY BARABAS:

Thanks, Roger. Hi, everyone. So as a reminder, the spreadsheet is a summary of items that the working group wanted to return to after going through all the topics for the first time. So some of these are items that we previously flagged. And the second set of items on this list are input from some of our ICANN Org SMEs, additional considerations the working group might want to take into account. So I'll share here the spreadsheet on display.

Where we left off, we had a couple of items of feedback on this recommendation we were just discussing, but I think we'll skip

ahead for now, and come back to this recommendation a little bit later.

So starting here on row 12, there was a discussion about whether there should be a recommendation that if a gaining registrar requests a transfer and an inter registrar transfer lock is in place, the transfer must not proceed.

This came up in the context of discussions on locks. But some working group members felt that this should be something that's included in the recommendations related to the transfer authorization code, and specifically under charter question b1.

So I'm just toggling now back to our working document to show where that would go. So it would go with these recommendations on security of the TAC. Here's the working document. And Sarah is asking whether it needs to be a recommendation. That's certainly for the working group to discuss just flagging that that was something that previously came up. I'll pause for a moment.

ROGER CARNEY:

Great, thanks, Emily. Theo, please go ahead.

THEO GEURTS:

Yeah, I agree with Sarah, that is exactly the purpose of the lock. And as soon as you start a transfer, you will get a message back that it cannot be done because there's a lock on it. I mean, that's already mapped out for many, many years. I think since we started using EPP back in the day, I don't know when it was, 1996. Somewhere along those lines there. You put a lock on it, you try to

transfer it and it will give you a message back. This cannot be done. So I don't think we need a recommendation on this. Thanks.

ROGER CARNEY: Great. Thanks. Any other comments? Jim, please go ahead.

JIM GALVIN: Yeah. So I want to be careful here. Are we talking about the client transfer prohibited or server transfer prohibited?

ROGER CARNEY: Anybody correct me, but I think everybody's talking about the client.

JIM GALVIN: Right. Okay. Thank you. Just want to be clear about that. Well, that's the implementation detail as opposed to what the policy might say. And maybe that distinction is important in that sense.

ROGER CARNEY: And it looks like Theo thought we were talking about both. So maybe both apply here.

JIM GALVIN: Well, and I think my concern here is I also remember we had quite some discussion about registries that offer registry lock services. Okay. And that is separate and distinct from any kind of lock

service, if you will, that registrars have, and now we're overloading this term lock. And that's unfortunate.

But that's the distinction between the registry lock versus the registrar lock. I thought that we agreed explicitly that any lock service the registry provides is independent of all of this transfer discussion. And in that context, my takeaway from that and understanding, please correct me if I'm wrong, right, is that the server transfer lock prohibited, transfer prohibited, would be allowed to be on the name because it is registry policy, how they're going to deal with the presence of a registry lock in the midst of a transfer, that we decided in this group here we were not going to address that. It was out of scope for this discussion.

And so it's important in this case to make that distinction here that you're talking about the registrar level of lock, not the registry level of lock, whatever the implementation of that happens to be. So it's a question. And that was my takeaway from where we were. Let's close on that. Thanks.

ROGER CARNEY:

All right. Thanks, Jim. And I think everybody's right here. I think that's the way we left this was—and again, if there's a recommendation needed or not, I think that's a good question. But I think the way we left this is if a gaining registrar requests a transfer and there's a lock, it stops, and it's up to the registrant and sponsoring registrar to resolve the issue, no matter what that lock is, it didn't matter is what we got to, was that lock can be put on for many different reasons. But the simple fact was if the gain registrar tried to process it, and there's a lock, it doesn't go

through, and then the sponsoring registrar and registrant had to resolve it. If that's UDRP, if that's court order, if that's just a regular client lock, or server, doesn't matter, it's up to the sponsoring registrar and the registrant to resolve it, is where I think we left it.

JIM GALVIN:

Right. But my concern here is the wording that's present here in the recommendation, because you can't say that it has to stop. Okay, that's not the right thing, because it might be that a transfer from a gaining registrar transfer request is a trigger to the registry to take action based on its local policy.

So it's not that the transfer stops, there's action to be taken. And if that action fails, then it stops. Okay. Or if it's a client lock, then it stops, that kind of thing. That's why I'm trying to focus on this here. I don't—stop is not the right word in there.

ROGER CARNEY:

Okay. Great. Thanks, Jim. Theo, please go ahead.

THEO GEURTS:

So I get where Jim is coming from. What you just said, Roger, is 100% correct. It has no bearing in the sense that if there is a lock, regardless what lock there is, there will be a response back, you cannot transfer domain name for this reason, this is the message we're going to give back to the registrant. If the registrant is confused about it, they will contact our support. And then we will figure out, well, it's this and this lock. So you need to do this, this procedure, whatever that procedure is. And that is why I'm

suggesting this is a non-issue, we shouldn't even have a recommendation, because we are already doing this for the last 20 years or something. So it doesn't require an extra recommendation, because we already sorted this out many years ago. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Sarah. Please go ahead.

SARAH WYLD: Thank you. I am mostly in agreement with Theo. But I would also like to point out that in the NACK reasons, we have one already that says that the registrar must not deny the transfer because the domain is locked, unless the registrant had the opportunity to remove the lock, which means if it's locked, you deny the transfer.

So there are some edits coming to the text of that recommendation. But the overall gist of it will remain the same. And I do think that maybe that is already our recommendation that covers the lock preventing the transfer.

Now, of course, that said, I kind of think that should include the server lock as well as a client level locking. I've unfortunately lost track of whether that is agreeing with Jim or not. But I do think that both of those should prevent a transfer. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. But I think that the NACKing reason is on the sponsoring side and not the gaining side. So I think that that's

one of the differences on that. So a sponsoring registrar cannot deny because of it. But if there is one at the time of transfer, then it's different. So Jim, please go ahead.

JIM GALVIN:

Yeah, sorry. Maybe I'm a little confused. Let me try to ask my question quite crisply, here. Wording matters here and what we say matters in this case, very specifically to registries. If a registry lock service is out of scope and its interactions with all of this are out of scope, then there can't be a recommendation from my point of view from registries, there can't be a recommendation that says something as simple as if I get a transfer request and there's a transfer prohibited lock on it, I must NACK and say you can't have it. It can't be that simple, because it's more subtle than that. I have to allow, as a registry, I have to allow for the receipt of the transfer to trigger potential actions on my part, if I've got a registry lock service.

And I know we've had some discussions—I've heard some words here about don't need a recommendation, take it all out. If that's where we are in this, then maybe that's, that's satisfactory, here. But I'm just, sorry, I'm trying to be very careful about what's actually documented and what it says. Thanks.

ROGER CARNEY:

Great. Thanks, Jim. Yeah, and I think that that's where we're getting to, I don't think—what we're agreeing on is this isn't needed here. This isn't adding anything and may actually provide some confusing points. So I think what we're saying is—and let

me know if people disagree, that we drop this idea of this recommendation. Theo, please go ahead.

THEO GEURTS:

Yeah. And the reason that Jim brought up when it comes to a commercial service as a registry lock to prevent unauthorized transfers, and there's a whole process behind it, that is going to be sorted out by the registrar support team to figure out what the hell is going on. And that has always been the case.

I mean, we already face situations that we try to transfer a domain name, and we get the message back, you can't do this because there's a [inaudible] prohibited on it. Okay. Then the registrar is going to ask, why is that lock there? Then we go on to reach out to the registry. Why is that lock there? Is there a court case? Is there a UDRP? What is going on?

And then the registry staff support will go, "This and this is going on." And then we go back to the registrant and go, "Okay, here's the set of instructions you need to do first before you can transfer your domain name provided it is your domain name."

So that is why I'm saying we already have this documented in our FAQs. Our support staff is already aware of these issues, that when X happens, this is what we need to do. That is what I'm saying if this additional candidate recommendation is not required here. Thanks.

ROGER CARNEY: Great, thanks. Okay. I think we will drop this language. If someone disagrees, pop up and put a comment in or something. But from what we heard today, this is not needed. And we will drop this moving forward. So I'll turn this back to Emily.

EMILY BARABAS: Thanks, Roger. We're now in row 13. This is in response to charter question B2 but I think also is a broader comment. Contractual Compliance noted that for Compliance to be able to enforce any requirements, all requirements must be clearly enumerated and described within the text of a policy. So this is something that came up as we were discussing a few minutes ago. In this case, they're talking about requirements explained here in the recommendations regarding the generation of the TAC, setting up the TAC, and provision of the TAC the requirements for the TAC itself.

So I'll let her Holida elaborate if she needs to, but I think something to consider as everyone is reviewing the recommendations is whether this is in fact sufficient in terms of language to make sure that the provisions of the policy will be enforceable. Thanks.

ROGER CARNEY: Great, thanks. Yeah, and I think that one of the things we did early on was kind of separate this out and make it a little more pointed, I guess, which hopefully does allow for enforcement a little bit easier to see. So again, I'm not sure there's anything here unless Holida wants to say something about this. Otherwise, I think that

we're in pretty good shape on these as far as enforcement. And I guess I didn't even notice if Holida was on today. Yes, please go ahead.

HOLIDA YANIK: Thanks, sir. Yes, actually, this comment was in general referring to this section, specifically in response to the part where the working group members were expressing the view that the registry management of the TAC would be more uniform and the standardization and transparency needed for this part. Thank you.

ROGER CARNEY: Great. Thanks, Holida. Okay, I think we're good here. So I think we can move on. Thanks, Emily.

EMILY BARABAS: It's Roger. We're on row 14 now. This was input on 6.2, which now has a new number, it's 9.2. But this was about when the registrar of record sets the TAC at the registry, the registry must securely store the TAC using a one way hash that protects the TAC from disclosure. The input there was that the registry must securely store the TAC for the requirements specified in recommendation three.

I think that this may have been a slight misunderstanding, to be honest, because that recommendation is just about the composition of the TAC. And I think the reference to the RFC may have caused a little bit of confusion because the RFC also includes requirements about storage of the TAC. But here in the

recommendations, we've broken it out to have one recommendation about storage, and another about the composition of the TAC. So any comments on that?

ROGER CARNEY: Sarah, please go ahead.

SARAH WYLD: Thank you. Sorry, Emily. So what is the change being made? Or like, which row number are you on?

ROGER CARNEY: Number 14.

SARAH WYLD: So you're going to add that text that the registry must securely store?

ROGER CARNEY: No, Emily is saying that there's nothing to do with that, we're in good shape here.

SARAH WYLD: Oh, okay, good.

ROGER CARNEY: Okay, Emily, please go ahead.

EMILY BARABAS: Okay, I'm going to move on from this one. Rick is asking if this is saying a requirement for the one-way hash. I think the intention is that the person reading it thought that maybe the one-way hash was already covered in the recommendation about composition of the TAC. So maybe that's something to just think about, as folks are reviewing it and make sure that it's clear that that one recommendation is about the composition and that that's separate in the recommendations from storage of the TAC.

ROGER CARNEY: Rick, please go ahead.

RICK WILHELM: Yeah. And thank you, Roger. And just for clarity, for those that aren't—when they say it's stored in a one way hash, what that means is the registry stores it, but then they can't recover it. So it gets squirreled away and it can get compared to to determine equivalence. But the registry can't give out the TAC and say, "Here's what the TAC is." That's kind of the idea there. So it's a security mechanism. Thank you.

ROGER CARNEY: Great. Thanks, Rick. Okay, Emily, please go ahead and continue.

EMILY BARABAS: Thanks, Roger. And thanks, Rick, for providing that context as well. We're now on row 15. And this is another one from

Compliance on what is now recommendation nine. I'll flip over to that in a moment. The recommendation says that Compliance would like to see details about how information must be provided and any documentation that should be required. So flipping over to this recommendation now. Sorry, this is formerly six, now nine. Holida, is there anything else you wanted to fill in the gaps on there?

HOLIDA YANIK: No. Generally, Compliance made this input by considering the enforceability of this requirement and how the Compliance would be requesting the contracted parties to provide paper trails and relevant evidences regarding this. Thank you.

ROGER CARNEY: Thanks, Holida. Any comments on this? Again, I think the open questions on this were anything else to help or anything? I know we talked early on about retention of data and everything. But we never got to that spot of answering that. But Volker, please go ahead.

VOLKER GREIMANN: Yes, thank you. I don't know whether every single recommendation needs to be enforceable by Compliance. Most of these are basically intended to increase security and every registry and registrar's best served to implement that.

And while you probably can find a registrar or registry out there that doesn't do it the right way, I'm not sure if that really needs

enforcement action, or strict controls, audits and that entire program by ICANN Compliance. So let's look at those as recommendations for additional security, not enforceable policies that need to be followed up strictly and punished with the accreditation if not followed to the letter.

ROGER CARNEY: Thanks, Volker. Sarah, please go ahead.

SARAH WYLD: Thank you. So looking back at the feedback, Compliance recommends detailing how this information must be provided. I do not think that that level of detail is necessary. And then secondly, that the provision of this information must be documented. I don't think it is necessary to specifically require that the registrar document how they have provided the information, because the registrar must be able to demonstrate that they have done so. And so clearly, they will need to track how they did it and when, so that they can demonstrate that they did. But we don't need to tell them that they have to track that. I think that's understood here, in being able to provide information.

And in terms of how detailed the requirements should be for what they are providing to the domain owner, I think it'll be clear whether they did or did not indicate when the TAC will expire. And if they did, there's not that many different ways you could possibly do so to make it really necessary to have it that spelled out. I think it'll just come from the review. I hope that makes sense. Thank you.

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

RICK WILHELM: Very good. Thank you, Roger. Plus one to previous comments. To be clear, I don't disagree with the middle item here about the registry storing the TAC with a one-way hash. But I do want to note that it's an inconsistency with regard to getting into descriptions about security of the TAC.

I'd previously posted this link, which I just threw into chat, 9154 section 4.3. That section 4.3 item one contains this text, apologies for the line wrapping, which describes a requirement for the registry to store the TAC in a one-way hash, similar to what's said there in item two.

But as Jim Galvin would note, it's more specific, because it describes the complexity of the hash function and also the length of the random salt, which is something that you use to seed the random function.

And so in 4.3, there are other elements of the security mechanisms that would be used to protect TAC, including number three in that list, which says the authorization information, aka the TAC must not be stored by the losing registrar. And it also has other requirements.

So while I don't really object to including number two, it is interesting that this is one where we're getting into security

handling of the TA but we don't really go all the way into the details of other items related to security handling of the TAC.

I'm not necessarily advocating that we double click and go deeper, but what we might want to think about this question of are we going to touch on this one element of the registries' handling of the TAC when there are more elements that involve both the registrar and its communication with the registrant? Thank you.

ROGER CARNEY: Great. Thanks, Rick. And Theo was happy with that, sounds like. Jim, please go ahead.

JIM GALVIN: Yeah, so I just put a quick sentence there in the chat. And this is kind of the way as I'm thinking about how to write some words here for TAC management and such and reference the RFCs in a guiding principles kind of way as opposed to an implementation requirements kind of way.

And I'm going to do a pass over all of these things now that we're sort of getting down to the wire here and try to do this and try to do this quickly. But the idea here is the functional requirement. To say that it has to be a one-way hash is an implementation requirement. If the IRT wants to go down that path, let them sort that out and do that.

[Our work from a policy point of view needs] the functional requirement. Because one-way hash is certainly the obvious way to do this. And there are a couple of different one-way hash kinds

of mechanisms that could be used. And so the question becomes whether or not we're going to force all registries to do it the same way, or just as long as they meet the requirement, they're good to go. And I think specifying what the requirement is is the right model for us here. And I think that aligns with what Rick is after here, he's pointing out that that one document has some specific guidance as a starting point. But we don't have to call that out in the policy is all I'm saying. Thanks.

ROGER CARNEY:

So Jim, maybe I misunderstood what you've just finished there with. You're okay with the specifics here, or you would rather see it as the functional requirement?

JIM GALVIN:

You know, I'm not sure. Maybe I think I'll try and propose some thoughts for people to think about, and let the group decide where they want to go with it. From a pure sense, I'd rather it be a functional suggestion. Because I think that's the right way to do policy. Also, because algorithms change, maybe it'll be something different than one-way at some point in the future. And then you need policy changes to fix all of that. So that's the path that I tend to personally be on. So let me suggest some things and then you guys can decide by consensus what you do and don't like.

ROGER CARNEY:

Great. Thanks, Jim. Because as you were describing that, as Rick had mentioned earlier, and when you put that in chat, it's like, okay, I could see that functional. And then with an example of

one-way hash, something similar to that. But okay. We will look forward to some words from Jim. Words of wisdom from Jim.

JIM GALVIN: I don't know about wisdom, but I'll give you some words.

ROGER CARNEY: Thanks. Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. So it sounds like we're not going to propose any additions in response to that. Am I correct?

ROGER CARNEY: Nothing specific to that. But Jim is going to recommend some more functional versus specific technological—yes. Having some trouble today.

EMILY BARABAS: Got it. Row 16, this is another one from Compliance. They're suggesting to develop standard easy to use or easy to understand language for registrants around this additional information about when the TAC will expire and so forth. So the suggestion is to provide language to use in that respect. Sarah, please go ahead.

SARAH WYLD: Thank you. I think one of the principles, I guess, that we had set up earlier on or one of our goals maybe was that we did not want

to lay out a lot of really strict templates that had to be used. And instead, we were going to say you need to include these points of information in your messaging but the registrar can figure out how exactly to do so.

And for that reason, I do not think that we need to get more specific about how exactly the registrar should explain when the talk will expire, etc. Rather, we need to say it needs to be explained. And if anyone has a complaint, it could be addressed. But I think it's enough as it is. Thank you. Great.

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

THEO GEURTS: Yeah, and I agree with Sarah, that is basically how we started a discussion on these topics, that it shouldn't be too restrictive, because our marketing teams know exactly how to communicate with the registrant. So let's leave that up to us so we make sure that we don't have these very bad framed templates that are just sometimes impossible to use. Thanks.

ROGER CARNEY: Great. Thanks. And then I think Rick was kind of agreeing in chat there. And maybe not getting specific about what it says but maybe helping explain what TAC expiration actually means. Okay, Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. Next item is regarding what is now recommendation 13. One of our internal folks recommended using hours instead of calendar days for the expiration of the TAC. It's currently set at 14 calendar days, so that would be—well, a lot of hours. Thoughts on that?

ROGER CARNEY: I know we've gone back and forth on this in the group of calendar days, hours, business days. It is always kind of an interesting topic. I don't know. I don't know if calendar days is any different than hours. But I'll open it up. Jim, please go ahead.

JIM GALVIN: Yeah, I'm sorry. I wanted to go to the last half of the sentence, not the calendar days thing. The end phrase there of forced by the registries. I know we had quite some discussion about this at one point. And I know that in those early days, there was a meeting or two that I kind of missed. So it's interesting to me to see that phrase there.

I know that I have been pushing back against on behalf of registries, this idea that we want to enforce the TAC length, that should be an open call for registrars to manage that themselves. And so you should just set it to Null when you're done with it. And of course, registry will set it to Null when the transfer is complete.

So when was this settled? And I feel like I just need to have the opportunity to see how hard lined registries are in general on this issue before I commit to saying that this is done. Thanks.

ROGER CARNEY: Great. Thanks, Jim. And I think yeah, I think it was discussed. And I can't say if you were there or not, Jim, I'm not going to say that. But it was decided that this 14-day window was best enforced by registries. I think the only sole reason was that a lax registrar or system problem, whatever it is, could cause registrars harm if it was, again, what that is, whatever we agreed to. But I think the problem is if the registrar doesn't send it to null and for some reason it got missed, whatever, 28 days, and now it gets transferred away, that was the thing that they were looking to avoid. So Rick, please go ahead.

RICK WILHELM: Thanks. I'm pretty sure that I wasn't there when this was discussed.

ROGER CARNEY: You were not.

RICK WILHELM: I'll play my new person card. This is going to be problematic from the registrar from the registry perspective. Because if there's a requirement that it's enforced by the registries, then there's going to be situations at the boundary where the registry is going to get blamed for blocking the transfer and where the registry is—because of the ambiguity about when the 14-day clock started and stopped—well, when the 14-day clock started per the comment that Sarah made in the chat.

And so the notion that the registries are going to be monitoring this and that the registrars are going to be cleaning that up, that doesn't really seem to be making a lot of sense to me. Thanks.

ROGER CARNEY: All right. Thanks, Rick. Theo, please go ahead.

THEO GEURTS: Yeah. so I guess my thinking was the TAC gets generated, it gets passed on to the registry where it's hashed in some form, then it's going to be tagged by the registry or there's going to be some—you've got to put in the code, I now received the TAC, and we're going to put a timer on it for 14 days. And as soon as the 14 days run out, then I'm just going to invalidate TAC and move on.

And I don't see how that is going to be a problem in terms of enforcement. I mean, as soon as it is generated, it gets to be passed on, unless a registrar is going to wait here. But that will be very weird. And I think that if we put in the proper wording, I think we already have the wording that if a TAC is generated, that it must be passed on to the registries right away as soon as possible. So I don't think there's much of a problem when it comes to enforcement. Put a timer on it, and you're done.

ROGER CARNEY: Great, thanks, Theo. And I think that that was the thought at the time. And it's not that the expectation was that the registry would null this, it just would not allow the transfer if that TAC was set more than 14 days ago. So Jim, please go ahead.

JIM GALVIN:

Yeah. I want to walk through this scenario just a little bit. I'm sorry. Having talked about this issue, and thought about what registries are going to do here, to build on what Rick said, the problem we're going to have here is that one of two things has to be true on the registry side for all of this to work.

One is it's either what Rick said a moment ago, when he was responding, which is that you as registrars are not going to have any information about why this thing failed. The gaining registrar is going to get a NACK and that's going to be the end of it. And now somebody is going to have to start doing a lot of research here to figure out what the heck happened.

And now what happens is either as you're doing that research, you're either going to figure it out and imagine that, oh, gee, you tried to do this 14 days after I gave it to you. That's why you can't do it. Here, let me set another one for you. Or you're going to want to talk to the registry and confirm that that's really what happened.

Well, now you're going to talk to the registry, that means a registry has to keep logs and keep information around to keep track of all this. They need to know why they did that NAC and they have to somehow log that and have that information readily available to you.

Or are you talking about inventing a mechanism so you have that information? This gets to be more complicated if you're really looking for this. The simplicity in my really is that the registrar of record really does need to reset this at an appropriate time and

just keep it that simple, so that the registry's only job is about facilitating the transfer.

I mean, if TAC is there, it either matches or it doesn't. If you're talking about you want me to null it, I can null it after 14 days. Now I've got to keep track of the fact that I nulled it. I didn't null it as a result of a transfer completing. I nulled it as an action on my own part. And I've got to keep that information around for I don't know what amount of time now so I can report that if I'm ever asked, and I know about it.

Even if I keep a date out there. I mean, the principle here is the same regardless of the mechanism of nulling, keeping a date or whatever it is, I have to know this information.

And I honestly am not comfortable with that. And I don't believe that other registries are comfortable with this either. So that's really my point in this and why I keep pushing back on this idea here. There's more to be figured out here. If you're really going to ask registries to do this, there's a bigger discussion to be had. Thanks.

ROGER CARNEY: Thank, Jim. Rick, please go ahead.

RICK WILHELM: I'll try to be quick. So plus one to what Jim said. And then I would sort of offer that another alternative would be if the registries would just, quote unquote, just be allowed to reject a transfer similar that if the user did not provide an auth info code, there'd be

a similar way that you presented an expired auth info code, then the registries would have to track the update time of the TAC. And so that would be a change on the registry side where they would have to track the timestamp on the auth info code. And so it'd be adding an element there. And then there'll be a reason rejection to do that.

I mean, I'm getting into solutioning. But this is just how this would work. And then that would be an allowable reason for the registry to reject it. And then you would get into it would be 14 days exactly down to the second. And this kind of gets to the point that I think, Owen gave us the number of hours, but it would be that many hours down to the second. Thank you. It's still not desirable, right?

ROGER CARNEY:

Thanks, Rick. We've got three minutes. So Lutz, you have the last comment. Please go ahead.

LUTZ DONNERHACKE:

For the registrant, it's really complicated to extract those information of the TAC, the [opaque part] which is that the real cryptographic information, and the expiration date. How about prefixing the [opaque] part with the creation date so that every TAC has the format year, month, days, and then a lot of characters which are meaningless but useful for authentication? So everybody who is handling a TAC has the opportunity to see if it's expired or how many days might be left to use it.

ROGER CARNEY: Great, thanks, Lutz. Okay, so it sounds like some people need to think about this. Again, this has been in the recommendation for quite some time. And again, obviously, the registries are bringing up the points that that would have to change. But again, this has been in here for quite a while. So I would have expected registries to discuss this and push back already or come up with the solutions.

But that being said, it's something that I'm going to request the registries do, is take this back and try to work that out, either as the solution or come up with the reasons why it can't happen.

So we are down to one minute, so I will call today's meeting to an end and then we'll start back up here next week. Great, thanks, everybody.

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

[END OF TRANSCRIPTION]