ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 10 May 2022 at 16:00 UTC

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JULIE BISLAND: All right. Good morning, good afternoon, good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group call taking place on Tuesday the 10th of May 2022. For today's call, we have apologies James Galvin (RySG), Theo Geurts (RrSG), and Prudence Malinki (RrSG). They have formally assigned Beth Bacon (RySG), Jothan Frakes (RrSG), Essie Musailov (RrSG) 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 forum. The link is available in all meeting and by emails. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only. If you have not already done so, please change your chat selection from hosts and panelists to

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everyone 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? Please raise your hand or speak up now. Seeing none, please remember to state your name before speaking for the transcription. Recordings will be posted to the public wiki space shortly after the end of the call.

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

ROGER CARNEY: Great. Thanks, Julie. Welcome, everyone. I don't think there's a whole lot of opening remarks. Just a reminder, I saw yesterday probably a couple emails from Emily and from me about the homework of going through the initial report draft and flagging items that need to be updated or discussed in any way from the group so that we can process those flagged items over the next few sessions that we have.

Again, we'll talk about anything that anyone's got flagged on there, and try to get clarity put into the document so we're in good shape by the time we go to public comment later next month. So other than that, I think that 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, any new items or anything they want addressed, or at least discussed in the group. I'll open up the floor to any of the stakeholder groups at this time.

Okay, great. Again, any conversations or anything that any groups want to bring, please feel free to, we'll try to get them addressed, either [on the call you bring them to] or as quickly as we can. Again, the reminder on the homework, it's due this week. So let's get it done this week so that we can start next week working on those flagged items and cleaning up the draft so that way, we can get it ready. So again, take your time and get that done this week so we can move forward next week.

And I think we will jump into our work items. I think Emily will take us through some of the highlighted items in the in the recommendation, some of the items that we know that we purposely kind of left and said we'll come back to it and talk about, but there's just a handful of them. Emily, please go ahead and take us through those.

EMILY BARABAS: Thanks, Roger. Hi, everyone. So I've dropped the link into the chat. This is the summary of recommendations. It's a document you've hopefully all had a chance to take a look at. But it brings all our recommendations into one place. So that's a good place for us to use as reference for this call.

You'll probably have noticed that there's a few items highlighted in blue here. These are items that the group had previously discussed and said we'll come back to this down the road after

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we've had a chance to go through all the topics. And some of these are still outstanding and they warrant additional discussion. So we'll just run through each of those. And after each one, we can pause for discussion.

So the first item is in preliminary recommendation 4 and specifically 4.3. This is the question of whether the IANA IDs of getting registrars should be included in the notification of transfer completion. And potentially, if that is included, the working group would or could put in a recommendation about the registry provision of that IANA ID and gaining registrar name and how it would be given to the losing registrar. So I don't know if additional context is needed for that or if folks kind of remember that discussion. But I'll pause and see if there are hands and Roger, maybe you can facilitate any comments on that. Thanks.

ROGER CARNEY: Great. Thanks, Emily. Yeah, and I kinda remember a lot of discussion on "Oh, this would be kind of nice to have." And then there was the discussion on how do you actually get that data? And I think that that's kind of where we left it, was the registries were going to take that back and see if that was something that they could easily grasp and send back in the EPP poll message or not. And maybe I'm getting that wrong. So if anybody remembers it differently, please jump on. But I think that's where we had left that. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah, I think just in regards to this, we do need quite a bit of work from the registries just to see if this is possible. As you said, Roger, I think the onus of this is really kind of on them. Because it's obviously an affiliate of ICANN, IANA, but in terms of maybe it might be worth just, if staff or something could maybe bring someone from IANA, just to see if there's any current kind of updates that they're doing. I know there's quite a bit of work going on with IANA at the moment. So I just don't want to kind of get the registries to be involved with everything and then find out the certain updates that are being changed are kind of problematic or anything. So I think it would be good if we could potentially just bring them in for maybe 15 minutes or so just with updated work and also potentially kind of have their say as well, just in regards to this. Thank you.

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

SARAH WYLD: Thank you. Hi. One comment of substance and one of form. Candidly, I agree with Keiron, it really does seem like we need the registries to support this so that we can support it. Otherwise, it just doesn't seem super feasible to include the IANA ID. And then just in terms of format, the domain name and then the IANA ID, maybe there could be separate points in that bullet point list just because they are two separate items. Thank you.

ROGER CARNEY: Thanks, Sarah. And that's probably true. This highlighted text is optionally bracketed. So if we get to that, maybe you're right, that makes more sense as a separate item. Steinar, please go ahead.

STEINAR GRØTTERØD: Hi. If I recall correctly, isn't it a purely technical enhancement that needs to be done? Because the registry doesn't see the ID of the requesting registrar in the EPP command. So this was kind of a long shot to trying to get that information and distribute it in the communication between the losing and regaining registrar. So if I recall correctly, I think it's purely—we're missing some feedback from the Registries Stakeholder Group on that. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Yeah, and again, this does fall into the registries' purview. I think the issue lies with in the poll message today, sometimes the correct data is there, but it's not necessarily consistent. And I can't remember exactly what that was. But there was there were some differences there. And maybe Rick can tell us. Thanks, Rick, please go ahead.

RICK WILHELM: Thanks, Roger. So I've failed to consult with Galvin on this one. So I'm not prepared to answer definitively and I don't believe we have discussed this and have gotten feedback from the Registries Stakeholder Group.

I think that the information is available on the notification of transfer completion, because the IANA ID of the gaining registrar

is obviously there because that was the one where the transfer request came from. So I believe that it's known, because that's the origin of the transfer request.

Now, if it is included in there, that would be a change. Now, if that would require a change to the EPP code, or to the EPP standards, I'm not entirely sure. So we'll have to get back to the group on this one. And I apologize that we're not prepared to do that.

I would offer that from the looks of what I see highlighted on the screen, it looks like the registries would be being asked to provide a link to a webpage in every transfer completion request, which seems to me at first glance to be a bit redundant. And I'm not sure why the text where it says and link to ICANN [inaudible] registry would maintain webpage. ... is available, I'm not sure why that is required, why it couldn't just be the domain name and the IANA ID of the gaining of registrar would be the one that would be the only data required. If anybody could comment on that, that would be useful. Thank you.

ROGER CARNEY: Great. Thanks, Rick. I'll just repeat what Sarah put in chat, because I think she answered how I kind of remembered it as well. It was the registry would provide the IANA ID back and the registrar would provide that link in their communication.

RICK WILHELM: Oh, so that notice of transfer completion is destined to the registered name holder. Right. Oh, okay. I couldn't discern what

was coming from the registry and what was coming from the registrar. I see. Sorry for the confusion there.

ROGER CARNEY: No problem at all. And again, I don't know that we'll get this resolved before public comment. And as Sarah said, maybe this becomes a different line item and we make this an optional line item when we go to public comment with it. And then the registries can respond to that in their comments. And that might be the easiest way to get from here to there. But I was going to ask Jody to jump on if he could, and any more insight on the use of these IANA IDs? I think there was a field difference, like there's a couple of different fields in EPP that get used. And I think it kind of gets confusing. But if Jody can jump on and just provide some technical clarity there.

JODY KOLKER: Thanks, Roger. I can. There's only one registry that I know of right now that returns the IANA ID in the message that comes to the losing registrar to determine where that domain name has been transferred to. It's basically just the client ID. And only one registrar uses the ICANN ID as a client ID. Otherwise, what we see from registrars is the client ID usually contains—it can either be an identifier that says like for Tucows that would say Tucows. But otherwise, for some registrars or for some registries, it's just a number. It's like 86732145. And it's not related to an ICANN ID in any way. But only one registry at this current time returns the ICANN ID as the client ID. What we would need from a registrar standpoint is every client ID would have to be the IANA ID, or the

registries and registrars have to work out a way to get the ICANN ID returned in that message. T Hanks.

ROGER CARNEY: Thanks, Jody. Yeah, and I assume those other ones are probably—it's probably an internal client ID that they've created as a reference lookup on their own site. So yeah, so I again, I think that that's just something that the registries have to get back to us on, Registries Stakeholder Group. And again, I don't think we'll get it resolved in the next month. So I think the goal here will be we understand what this is. Let's take this to public comment as something that's suggesting and looking for comments on, if that makes sense. Okay. All right. Emily, you want to take us to the next one?

EMILY BARABAS: Sure, Roger. Hi everyone. And I just wanted to add, I think as we prepare for bringing things to public comments, the group should start thinking about how we want to present this in public comments. So you know, you can have bracketed text and a question to the community. We're thinking about this. Is this a good idea? We could remove it from the recommendation, I think that's probably the cleanest and have a question underneath that says the group has considered whether the IANA ID should potentially be included, here are the implications, what is your input on this? I think that might be the simplest way to do it. Or we could obviously—the third alternative is to remove it altogether and not ask a question about it. But as we go through these items,

if there are things that will be unresolved at public comment, it's helpful to get input about how to frame it in the report itself.

ROGER CARNEY: Great. Thanks, Emily. And actually, so I'll throw this out for everyone. You know, I like Emily's second proposal there of pulling it out from this recommendation, and asking around and everything, but then asking for input on that. I think that makes sense. Okay, please go ahead, Emily.

EMILY BARABAS: Thanks, Roger. So then the next item is also under the same charter question and was about the retention and maintenance of records. So there's a charter question that asks about a paper trail. And the working group has a relatively short response on that, which is this currently. And I think this has come up in the context of the notifications and in the context of TAC provision, to what extent, if any, should the working group recommend any specific items around producing a paper trail that can be used for compliance and auditing purposes. And I'll pause here. Thanks.

ROGER CARNEY: Great. Thanks, Emily. I think that maybe Sarah was the one that brought this up originally a long time ago about the retention and maintenance. And I think we ended up getting to a spot. I think it took us a little while just because everyone was thinking about it. But after the processes that we created and the notifications, I think that the spot that we got to was that we didn't have to make a specific call out that the process was self-documenting as it was

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going along and these steps will automatically be providing an audit trail. But again, that's just how I kind of remember it being talked about. Any other comments from anyone else? Or maybe they remember slightly different. Holida, please go ahead.

HOLIDA YANIK: Thanks, Roger. I want to reiterate compliance standpoint regarding this recommendation. So for compliance, we are supporting inclusion of this requirement relating to retention and maintenance specifically of transfer related records into the policy, because it is both important in terms of investigating complaints and enforcing the policy effectively because it is intended to protect registrants. So most registrars provide the TAC code through the control panel. Sometimes TAC request is made through the control panel and the TAC is sent via email for example. And we also see that many registrars make it just available and seen in the control panel when the user logs into the control panel.

So if all mandatory notifications are sent and provided to the registrant, to the RNH, but the TAC is retrieved by the reseller for example, the registrant may be losing some kind of intended protection. And as compliance, we have seen and investigated multiple complaints when reseller staff transferred away the domain names by updating TAC code without RNH's authorization and without any notifications to the registrant.

So, when investigating such cases, we would require evidences relating to when and by whom the control panel was accessed. And since these types of records are not specifically contemplated

in the RAA agreement or the current policy, we are facing some challenges when requesting such records from the registrars.

So to recap, for us, for compliance to be able to obtain all records relating to transfer transactions, including providing the TAC code to the registrants, it is crucial for us to have such requirements. Thank you.

ROGER CARNEY: Great, thanks, Holida. Comments on that? Again, I know that we touched on this a while back. And again as noticed here, we know we just left it open for later discussion. And again, maybe it's not solvable here. But is it something that's worth taking to public comment or is it something that the group doesn't feel needs to be solved? I mean, Holida makes a good point on the needs of compliance there. Rick, please go ahead.

RICK WILHELM: Just one brief comment. There's another requirement elsewhere that the registry is not allowed to store the TAC. And so we would need to be careful that whatever records requirement that we're imposing, that the policy imposes upon the registrars that it doesn't come into conflict and causes security issue where by this recordkeeping requirement causes a bunch of TACs to get stored. Thank you.

ROGER CARNEY: Thanks, Rick. Yep. And that's a good point that the registry should have actually truly no knowledge.

RICK WILHELM: Sorry, the registrar is not allowed to store the TAC.

ROGER CARNEY: Yes. And the registry cannot retrieve the TAC either.

RICK WILHELM: Plus one.

ROGER CARNEY: Okay. And I think in chat, if you've been following along, Emily's posting on this and the current response is the working group doesn't believe there should be around this. But, again, Holida's point, give us pause to think about, is there anything specific we need to add to account for something like that?

Okay, so we are currently answering this, and I'm sure that we'll get comments on it if people don't want to agree or disagree with that. So. Okay, I think we can move on. Emily, is there another one there?

EMILY BARABAS: There is. So the next one, actually, we have highlighted preliminary recommendation 7 because there's still ongoing discussion on that one, although I think since Jim is not on the call, there may not be further discussion just yet needed on that. And perhaps we defer it unless there's additional inputs that folks want to provide around requirements for TAC.

ROGER CARNEY: Great, thanks, Emily. Yeah. And again, I know, Jim Galvin provided some of this original language here. So and he hasn't been good. He's had some personal commitments. So he will be back next week. So we'll little prompt him for his thoughts on this and I'll send him a note actually later in the week just so he can be prepared to take a look at this and provide any input.

And I think we're still kind of stumbling on how technical to get this. And again, mostly to say what we wanted to say but also be enforceable is that border line that we're trying to stay within there. So if anyone has further comments on it, great. And again, I know Jim and several others had talked about it on list. So if anyone has other comments, feel free to bring them up now or on list in that chain, would be great. Jothan, please go ahead.

JOTHAN FRAKES: So we just received some pretty heavy feedback about the change in TAC or auth info codes in the Registrar Stakeholder Group. And I know this is a little late for your call for feedback. But I did want to bring it in.

There was a concern expressed by one of the members of RrSG related to auth info codes and the TAC and the change that we're making here, in how it would be stored or how it would be changed. And I think it's pretty substantial, the feedback that they gave, really related to some of the current behavior of auth info code and how it's used with respect to securely validating registrants that would require the storage of the code and be

pretty radically affected by the changes that we're proposing with the TAC.

There's a lot to go through, because it's quite a long report. But essentially, it looks like there's a necessity on their part to store the auth info code at the registrar. And it looks like it's not—with respect to recommendation 7, it has to do with the expiry timing, I think that's later in 11. So it covers quite a few of these. So I may intervene a few times with their feedback. But they essentially identify a situation where they're using the auth info code as it exists now today as a means to validate a third-party registrar's domain owner is in fact the registered name holder. And they outline a scenario whereby using DNS or other methods is ineffective in contrast to using this. So I think it's worth a review. I'll see if it's okay to forward this to the transfer review group to see this. I'll forward this to the list. But I didn't have the opportunity to do that mid-call because it literally just arrived.

ROGER CARNEY: Yeah, that'd be great if you could forward that along. Again, I know that when we talked about our first couple meetings of the auth info discussions, we talked on this subject about how this field was being used and by whom. So again, I think that if you can share that, that would be great so everybody can take a look at it. And as I think about it, I don't know what this group can do about it specifically as they are using a field on their own basis, I would say, and not a community driven use of the field. But it's still a concern that we need to address. So if you can share that, Jothan, with the group, that would be great.

JOTHAN FRAKES: Will do. I just want to get their permission. Thank you.

ROGER CARNEY: Thanks, Jothan. Again, we'll touch on this when Jim Galvin gets back, some of his original wording here. So we'll touch back on this real quick next week as well. So Emily, please take us to the next item.

EMILY BARABAS: Thanks, Roger. Next up was 9.2. This was another item that we had some input from Jim on. So perhaps we'll defer that one as well, Roger, unless you had something else to touch on here.

ROGER CARNEY: And actually, I think If there was some discussion—I don't remember Sarah or Rick maybe, did you guys have some additional wording on 9.2 that I saw? Rick, please go ahead.

RICK WILHELM: There might be a little bit of additional wording that we may want to add around the particulars of the one-way hash, because it is possible to technically use one-way hashes of varying quality. But one of the comments that I think that in the last call, I made some comments to help people understand the differences between one-way hashes and encryption, or that might have been Galvin. We're rarely confused, but often confused. Think about that one for a little bit as you ponder the transcript.

	But I don't know how specific we want to get here in 9.2, because otherwise, we might say that we're getting too prescriptive. I will say that 9154 does provide information about this thing, it does include language along these lines, or I remember making that comment about this along with the fact that it includes some other recommendations. Thank you.
ROGER CARNEY:	Okay, great. Thanks. Any other comments, Emily, go ahead, take us on to the next one.
EMILY BARABAS:	Thanks, Roger. I was just going to briefly touch—this is not necessarily a discussion item, but from the last call, there was some discussion about adding a few additional words to preliminary recommendation 11 to tie it to recommendation 7. This built on Jim's suggestion, but I believe Rick suggested an alternative that was a little more condensed. So just pointing that out in case there were any concerns about that suggested wording. But otherwise, we'll just consider it a friendly amendment. Rick, is that a new hand?
RICK WILHELM:	Exceptionally stale hand. Sorry. And I think that that is the friendly amendment that you would put in there. Thank you.

EMILY BARABAS: Thanks. Unless there's anything else on this one, I'll head on to the next one. Okay. And then this was connected to preliminary recommendation 13, which is about the TTL. Originally, the group had discussed having a minimum and a maximum TTL and eventually settled on having just one, a standard TTL of 14 calendar days, with the ability of the registrar record setting the TAC to null under the circumstances provided below.

There was some discussion about whether there should also be a recommendation to set a policy requirement that the RNH has at least a minimum period of time to complete the transfer. And that was, I believe, to potentially protect against a sort of nefarious actor setting or resetting the TTL so quickly that there wasn't a possibility of completing the transfer. So don't know if folks have further thoughts on that. But I think it was an item that the group wanted to return to after the other recommendations had been firmed up a bit. Thanks.

ROGER CARNEY: Great. Thanks, Emily. Yeah, and I do remember this discussion happening of the theoretical bad actor registrar who follows the policy correctly and gives the TAC out and then sets it to null basically as soon as they hand it out. And I think if I remember right, in one of the other recommendations, we talked about the registrar being able to set this to null at any time with the registrant agreement, agreeing to returning it to null. So I think we've got this handled, but I don't know if it needs to be more clear with a minimum or not. Again, I think that's where we left it when we left. It was, okay, yeah, maybe, maybe not. And I think at this point, I don't think we need it, but I'll leave it open to everyone to talk

about. Anyone, comments on this? Okay. I think that we can remove this item and we don't need it. Rick, please go ahead.

RICK WILHELM: One thing, just that it occurred to me in 13.2, we probably want to allow the registrar of record to set the TAC to null if they've got some sort of language, good reason to do so if they think that there might be fraud involved. So in other words, they get a request for a TAC, they grant the TAC, and then all of a sudden, they realize that wait maybe that wasn't the registered name holder, we're going to take back, we're going to set the TAC to null, i.e. invalidate the TAC that I just issued, which does not fall in line with either of the two bullets and it's not necessarily in agreement between the registrar of record, it's sort of unilateral. But they're just preemptively NACKing the transfer, essentially by voiding the TAC. So that might be already captured. I think Sarah was part of the group that went through the reasons why registrar may deny, so this might get mixed up in that. I'll probably defer to her. She's probably sharper on this than I am.

ROGER CARNEY: Great. Thanks, Rick. And I don't think it specifically spells out that they can do this explicitly. I don't think it says that. But yes, those denial reasons don't have to be denial reasons prior to TAC presentations. It's a denial reason at any point in the process. So Jothan, please go ahead.

JOTHAN FRAKES:	Hi, yes. So for recommendation 13.1, there was a question as to that this is a standard time to live, that there could be nonstandard time to live being defined longer than 14 calendar days. Is there room for that to be set higher?
ROGER CARNEY:	I don't think that there is anything longer than 14 days. I don't remember that discussion about being greater than 14 days. And maybe others remember it differently.
JOTHAN FRAKES:	The other comment I have is I support what Rick saying I think we do try to address that in some of them may and must wording around the denial of a transfer. However, I think it's a good safety valve to have the ability to set a null in the circumstances that Rick had identified.
ROGER CARNEY:	Alright, thanks, Jothan. Sarah, please go ahead.
SARAH WYLD:	Thank you. Yes, thank you, Rick, for suggesting that. It's remarkable to me that we continue to think of things we've missed at this point. But indeed, we do. The reasons why we might NACK a transfer—okay, I have some suggested text that we could add to 13.2. As part of denying a transfer request in accordance with the reasons listed in recommendations 19 to 22, which are the NAC recommendations. And so hopefully, that is helpful. Thank you.

ROGER CARNEY: Again, I think that we're bringing these up to talk about them quickly here. And again, if we're not hitting on something specifically that someone's concerned about, please remember to flag that in the homework of flagging the initial report so that we can spend time over the next month to discuss that and get it worked out. So if you're not feeling like you're getting resolution here, but again, please flag it and we'll talk about it in depth more then. Again, mostly wanted to highlight this to recover, make everybody remember what the topics were and why we're highlighting them. So Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. Just want to follow up on what Sarah was saying there in response to Rick. So there are different ways to deny a transfer, all of which are appropriate ways to deny a transfer. The most commonly thought of ways to deny a transfer is to say a transfer request comes in and then transfer is denied. There's an actual act of saying no, we deny this transfer. That's the most common one and the way people perceive it, but there is also other ways to deny a transfer.

And I know this comes up in the context of often when there's a domain name that's suspended and the account's been locked. So the customer who perhaps was selling illegal drugs online, the registrar locks it, they want to transfer it out, they can't get the auth info code. That is a way of denying a transfer because they're not able to get that information there. So I think in 13.2, if we set to null, that's just another way of denying a transfer and agree that

we can do it for those reasons that are in there, [inaudible] for whatever reason, you need to take that action. [That's the registrar the action takes that.] So I think that totally fits in under there. Thanks.

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

RICK WILHELM: Two things. One, maybe a minor one, does this allow the registrar to set a time that's shorter than the 14 days based on the gravity, importance of the domain name registration? So in other words, if they allow—or maybe that's covered in 13.2.

ROGER CARNEY: It is.

RICK WILHELM: Okay. The second thing, I just wanted to sort of voice this just for—we got some feedback from inside the Registries Stakeholder Group. And in 13.1, the coma enforced by registries, the Registries Stakeholder Group will come back more formally on this, but we're not agreeing on this point about the comma enforced by registries in 13.1. I think we've kind of flogged this topic pretty good here. So I'm not necessarily—although I'm happy to—seeking to debate it today. But I just wanted to sort of get it out there, let folks know that this is sort of where the registries are,

we'll come back more formally on it as necessary, but want to let folks know about that. Thank you.

ROGER CARNEY: Alright. Thanks, Rick. Jothan.

JOTHAN FRAKES: I just wanted to say that unless the registries would take this on, it certainly heavily dilutes the effectiveness of something like this.

RICK WILHELM: The registries disagree with that, Jothan. Thank you.

JOTHAN FRAKES: How is that, if the registry is not enforcing it, more effective?

RICK WILHELM: So I'll defer to the chair if he wants to get into this. I don't want to rabbit hole us here.

ROGER CARNEY: Thanks, Rick. Yeah, I appreciate that. And I agree, I think that that's a good discussion. And we can have that. We don't need to do it here. And Rick, we do look forward to the stakeholder group posting some official to that comment. And I think that we can work it from there. And again, it's one of those items that we'll see come in, and we'll have to work on. So great. I appreciate both Jothan and Rick there. Steinar, please go ahead.

STEINAR GRØTTERØD: I'm not saying that we should take the discussion. But can somebody please explain to me the effect of removing the sentence, enforced by the registries? Will it affect the calendar days? How will that actually affect the 13.1 recommendation? Thank you.

ROGER CARNEY: Great. Thanks, Steinar. And again, I'm not trying to get into this too much here. It doesn't change anything else. It just has to be enforced via policy via the registrars if the registries aren't able to account for this. So again, it's one of those benefits versus the cost risk factors. So we will wait for the registries' response on it, and the group can discuss it at that point. But the Steinar's point, it doesn't change anything else, the 14 day stays the same and everything. Or did we say 14 days or we're changing that to hours? I can't remember. But anyway, okay. Any other comments before Emily takes us to the next one? If there is a next one.

EMILY BARABAS: So that's it for potential recommendations that the group had discussed. There was just one additional edit I was going to highlight from last week's call to make sure there's still support for that. This was under the reasons for NACKing. There was just a change, no payment to nonpayment under 3.7.3. So that was something that the group seems to support. And I just wanted to highlight that that's currently in the draft. And I believe that is all in terms of items that the group wanted to return to. Thanks.

ROGER CARNEY: Great. Thanks, Emily. Any comments on that? I know that we made that—and we didn't get any negative feedback to the nonpayment. And it seemed like it clarified some issues around it. But now that people have more time to think on it, any other comments on that?

Okay. All right. Well, thank you, Emily, for taking us through this. And again, we went through those fairly quick, but if there's anything that people don't think got resolved, at least didn't get resolved to their satisfaction, definitely flag those into the Google sheet so that we can bring it up and discuss it in more depth over the next few weeks.

Again, I know I'm being annoying about it. But that homework is important to get done this week. So it'll be the basis for our work for the next month. Okay. Thank you all for walking through that. I guess I'm going to drop this over to Berry if he's still on. Yes. So he can give us a look at the updated swim lanes, Berry, it's all yours.

BERRY COBB: Thank you, Roger. Okay, we reviewed through this swim lane, I guess probably three, maybe almost four months ago. And it has changed considerably since the last version. I did send this out in an email, I believe yesterday or Sunday. And just wanted to briefly go over the high-level components of it, of what has changed and kind of basically a few questions that are on the table.

So I'm just going to kind of breeze through this in a very high level. And then we can open it up for questions or comments and any input that you might have. As with any swim lane process diagram, we're defining the roles that are being played during this particular process. Every process has a start and has an end.

From the previous version—and I should note that this is really kind of a conceptual attempt to document the transfer process. In no way can we account for all of the fringe possibilities that may occur, very unique situations where a transfer may fail or may go through, but the objective here is to try to broadly develop a visual aid to aid the user or the reader of the report and the recommendations that are being made.

So, every one of the boxes where there is a preliminary recommendation in the final report, there will be a call out in red letters. The CQ stands for the charter question. The small alpha and numeric is the charter question number. And then the second line is either a recommendation and its particular numbers such as rec 9.1, or in this case about unlocking the domain at the account panel, the working group specifically opined about this and didn't make a recommendation. So I thought that it was worth highlighting.

So to kind of follow typical process documentation guidelines, again, there's the start, there's this end. And you know, there's some of these things that aren't directly in scope for our deliberations around the transfer policy but we needed to include those things to be able to get to an end. And so this is why in the front part of the process, you can't transfer a domain until the RNH actually registers it. They can't register it until they create an

account and pay the registration fee. They can't use it until the registry provisions the domain. And of course, there's a lot of things that go on behind the scenes here.

And we come up on our first aspect, which is recommendations 16. That is preliminary at the moment. But in general, after the domain is registered or created, that there's a restriction to transfer it for 30 days. But of course, then the RNH uses the domain until they decide to transfer the domain. We've included a part here about the expiration process, because during the upfront RGP, the RNH is still able to transfer the domain, it's not really within the scope of this working group [inaudible] anything having to do with the expiration. But it just kind of closes the loop and to represent here that you know, it is possible to transfer the domain when it is initially in its renewal grace period.

So the RNH would unlock the domain, and based on our new recommendation, would request the TAC. Now I'm going to stop here for a second, because if you recall from the previous version, these three particular items right here about the TAC being provisioned with the TTL and everything set, we're on the front part of this process flow. And it really wasn't until transitioning from, I believe, what was version 0.4 that we had sent the last time until what we've come up with now that at least for me, this exercise helped me better understand the impact of the change that the group is making.

And what I mean by this, and I think Roger touched on it on last week's call, that predominantly, not 100%, but a large majority of domains in the wild today have their auth info code generated when the domain is registered. And our recommendation here,

Rec 9.1 is all about that the TAC is not disclosed until it's actually requested.

And so when you think about that in real terms, it really changes the dynamic of how the transfer process is initiated and what potentially can happen before that TAC is revealed. So I just wanted to call that out that at least for me, I found that as a very useful and are kind of aha moment when thinking about this.

There's a secondary change here, which is a decision box that isn't related to any one of our recommendations. But in thinking about real-world terms of a transfer in the future, by a large majority of the transfers that occur, there are no locks that would prevent the transfer, all fees are paid or there's no nonpayments, there's no UDRP against the domain. The moment the registered name holder gets a hold of the auth info code or the TAC in this case in the future, they're immediately going over to their gaining registrar, setting up the account, the domain transfers seamlessly or basically has no frictions that would prevent the transfer from occurring, there's no troubleshooting to be done and it just goes along smoothly and the domain is transferred to the gaining registrar.

So that's the idea here, is to represent there's frictions to cure. And in general, if there are no frictions to cure, the TAC is provisioned with high entropy, the TAC is generated, a TTL is set, then the registry will come down, they validate the TAC, they'll hash it, it's securely stored at the registry. The TAC is revealed to the registered name holder within 120 hours based on—we're confirming that part of the policy. The registrar of record will send the TAC provision notice to the RNH within 10 minutes of it being

revealed, and that the registrar of record communicates that there's an expiration date to that TAC code. And then then the registered name holder will see the TAC presented to them in whichever manner the registrar of record chooses, predominantly, mostly through the account panel. But you know, there are other methods.

Before I move on to that, I thought I would just quickly go through this area of the process. And this is what I call the challenged box. And I don't think that this is a perfect representation of everything that goes on when trying to resolve an issue for why a transfer can't complete. But we're at least touching on some of the high points.

And the first is whether the domain is locked, either from the client panel perspective, or there's the UDRP lock, or there's the extra service of the registry locks. One way or another, if the domain's locked, we've got to figure out how to resolve the lock issue to allow the transfer to go through. A general type of task here, are there any other issues preventing the transfer? They're closely associated with the denial reasons as part of recommendation 14—I can't remember the recommendation numbers.

One way or another though, the idea is you're attempting to resolve or cure any of the issues that are preventing the transfer from happening. And then you come to the decision, do you proceed with the transfer? If yes, then you come back down here, and you're provisioning the TAC and eventually getting it released to the registered name holder. And if not, then you're essentially setting the TAC to null and you're denying the transfer which would take you back to the registered name holder still using the

domain. And then they kind of restart the process for whenever they choose to try to transfer it again in the future.

So one thing that I called out here is—and I know we talked a little bit about it in the earlier part of our call, is I'm still a little challenged myself about how to best represent the setting the tac to null when the current recommendation text indicates that there's some interaction with the registered name holder, and if they agreed to set it to null, that that can happen. But I think it starts to become more confusing trying to illustrate that type of interaction just for that one case.

But in all cases, it seemed that if the transfer was actually going to be denied or NACKed, that that would be a step to that. So I'm going to ask you to park that in your mind for just a few minutes. And I'd be interested in feedback about how, if this is good enough, or should we find a different way to better represent this.

And so then moving on, the TAC is provisioned, the registered name holder gets it, they initiate the transfer, they create the account, pay the fees, and the gaining registrar will submit the TAC to the registry operator, we get down into the responsibilities for the registry operator per recommendation 10, they've got to validate that it's the right TAC with the right domain name. If no issue, they're going to also scan if there are any other locks that may be applied to that. If no issue, then they'll go to basically change the credentials of the domain to the gaining registrar, add the one year registration, and I'll carry on in that in a little bit.

If for any reason, something is going to fail at the registry's realm of responsibility, both of these are—the TAC isn't valid, a no

condition, or that the domain is locked in a yes condition, it carries you back over to here. And these are the on-page references. And the idea here is that if I jump into this hole labeled B as in Bravo, I'm jumping into it. And like a wormhole, I'll jump out of it and come back into here.

So what I'm trying to illustrate is that there's this interaction between the registry and the registrar of record, to cure the frictions on the transfer until they get to a point where the transfer can proceed. And so this is why this decision box here is important, because if the registered name holder has already submitted the TAC through their gaining registrar, they're not going to be submitting a second one, at least not in all cases. So you jump into this hole labeled C as in Charlie, come back out, and then you're reconfirming, is the TAC still valid? Yes. Is it locked? No. And then we complete the tail end of the process.

So migrate the credentials, add one year registration, clear the TAC code because it can only be used once per recommendation 11, they'll send a poll message to both the registrar of record and the gaining registrar. The registrar of record is required to send a notification of the transfer complete per recommendation four. Per rec 17, there's a post transfer restriction for the same duration of 30 days. That is preliminary at this point.

And while not a recommendation, but it seems most likely, the new registrar of record or still the gaining registrar in this instantaneous moment, will likely also send some sort of notification that the transfer is complete.

Either way, the registered name holder receives that notification. And we reset the process going back to use the domain. So just in conclusion, and we don't need to resolve this today, but think about this setting TAC to null.

And the final thing, based on how the landscape has changed, because the TAC is not provisioned until it's requested, thinking about it in today's world, because the TAC is generated at registration, it seems plausible, or at least by my understanding, that before any kind of notification, that there's going to be an issue with the transfer, it's because the registered name holder has already done this at the gaining registrar and submitted the TAC, or the auth info code in today's world, has already submitted the TAC. And then there could be complications that would be a challenge to transfer, whether it's locks or whatever the denial reasons, etc.

But when I reconfigured the swim lane, there used to be a representation of an interaction between the registry and the gaining registrar to resolve any issues with completing the transfer. And I didn't include it on this version mostly because I created this challenged area here. But I do want to ask the group, is it worth still representing that there is a possibility of interactions between the registry and the gaining registrar to come complete the transfer? It wouldn't be a hard change to make. But I guess thinking again what this might look like in the future is, will that even happen or not?

And then the final question here is I noted that this was a useful exercise for me, I always think in a more visual oriented manner. Is this worthy of including it with the initial report as an appendix,

or do you think that it'll be complicated for the consumers of the initial report and providing feedback, that we don't include it and we just keep it a working group tool? So I'll stop there and turn it back to you, Roger.

ROGER CARNEY: Great, thanks, Berry. Yeah, and again, I think I'm not necessarily either pro visual or not learner. But I know visuals are such a huge thing for a lot of people that to me, this is excellent. And I would definitely support putting it into an appendix as a reference.

And to your point, does that possibly complicate things? I don't know. It may. I don't think it makes it any harder than someone trying to read it out of the language. So it's just my personal opinion. But so Berry does have a few open questions. And again, I think he's tried to handle almost everything here. And obviously challenging to document something in a swim lane when it's so flexible that swim lanes really don't hold it well. But Berry did a good job, especially with his a little Dr. Strange portals here that he pops in and out in different worlds here. So it's good. Any comments to Berry on this? Rick, please go ahead.

RICK WILHELM: One, amazing work, Berry, this is extraordinarily difficult stuff to do, having attempted this kind of thing in similarly situated stuff before. I would offer that one of the challenges when one is doing these sorts of things is getting exact equivalence between the written text and the diagram. And if we're going to include this, we would need to do a super duper careful read to make sure that

there's not any contradictions or errors, because obviously, the text, the prose governs, but we would want to be really careful not to mislead folks.

I didn't catch anything as Berry was talking through it and when I looked through this before, but obviously, one viewing is one viewing. I would also note that this is largely a—my terminology—sunny day view. And a lot of what we do in the document is rainy day stuff. But that still does not mean anything to diminish the staggering level of work this is, dozens and dozens of hours. So really great work, Berry, and plus one. Thank you.

ROGER CARNEY: Thanks. Rick. And yeah, I agree this is a more positive view of the transfer process. Sunny, as you call it. Which is kind of scary, because it's kind of a scary diagram to begin with. So this is a scary diagram on the easy side of stuff. So just my thoughts. Steinar, please go ahead.

STEINAR GRØTTERØD: Yeah, hi. Sometimes I've been asked by the At-Large community to kind of describe the basic elements of an inter-registrar transfer. And I really tried to do this in a simple way and taking the pure fact that there's a domain name owned by one guy and has been, that guy wants to transfer it from registrar A to registrar B and just a few steps and trying to identify some sort of minimum requirements that needs to be done to do this in a safe and good way.

And that's more understandable for the general public than getting into all this, what about, what will happen If something happens A, B, C, D, and this more like Berry described as frictions to cure. I think it is excellent for our group. But for the public comment, we need also to identify kind of an easy, straight forward, understandable diagram. Thank you.

ROGER CARNEY: Great, thanks, Steinar. And to your point, I know that even when we started this process last year, staff has always maintained, at least in presentations and things, a fairly straightforward—and I think they got it down to one slide even of a transfer process, especially how it is today. And I know that early on, there was some work done on that, one slide kind of thing. But yes, to your point, this is really good for this group. Does it mean a lot to everyone else? Again, as Rick mentioned, this is the sunny thing and it's still pretty complicated. So other thoughts? Berry, please go ahead.

BERRY COBB: If it'll help, I can use some storm cloud and rain and lightning pictures to put on here to reduce the sunniness. But thank you for the feedback. And yeah, well, before we go to print with this, I'll do another sanity check on the text used in the boxes to make sure they reconcile. And I think if we do include it as an appendix, we'll put a disclaimer or intro paragraph that you need to fully understand what this one box means. You need to read the recommendation text for it being authoritative to this representation.

ROGER CARNEY: Great, thanks, Berry. Other comments? Anyone? Okay, thanks, Berry. Again, great work there. Okay, that I think is our agenda today. Is it not? Okay, one last reminder, the homework assignment, get the items flagged out of the initial report that you want further discussion on, clarification, that needs to be more clear.

And again, I don't want us to get into a deep dive discussion on these. we've talked about all these things for months now. But I do want to make sure that it's clear and that if there's an item that needs some more explaining or more leaning toward our discussions around it, I think those are the things that we want to do over the next few weeks.

Again, we're not going to get into deep dive discussions that we had for the past 10 months. We're not going to do that in the next month on any of the topics. But if there's something wrong, we're going to flag that and make sure that we're clear about it when we go to public comment that, hey, this is still an open item or not an open item.

So again, that's what the next month is going to be spent on, is making sure we're clear when we go to public comment on where we stand and where the recommendation stands. So again, take the week, make sure if you haven't already done it, flag it, put it in the Google doc so we can get working on it next week. And for that, I will give everyone 15 minutes back to their day. And we'll see everybody next week. Thanks all.

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

[END OF TRANSCRIPTION]