

**ICANN  
Transcription  
EPDP on the Temporary Specification for gTLD Registration Data Small Team #1  
Wednesday, 03 October 2018 at 13:00 UTC**

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Coordinator: Recordings have now started.

(Kurt): Great. Welcome everybody, and again I apologize for the slight delay in getting started. Thanks for attending this additional meeting, small group meeting, of our group.

So the purpose of today's meeting is to discuss the charter questions that have to do with the distinction between legal and natural persons. And I think the document that's been provided is pretty handy for that discussion. I would - we're lucky to have (Gina) and (David) from CBI on the call so they'll be I was going to say helping, but more than that. And - there you go, (Gina).

And - don't worry about it. And so I think these documents provide the information that's required. You know, in answering these charter questions we may or may not get down to the issues that will really resolve any of the things we're trying to accomplish here. So, you know, we'll certainly pay attention to and answer the charter questions but also attempt to answer the handling of legal versus natural persons.

So the document you see has -- and I think it's scrollable for everyone -- has, you know, besides the charter questions has the latest data protection board advice that went into some detail on it and then listed the - lists the pertinent temporary specification sections and then the input that was provided in the early input, so I think that's good.

So on - I - this is - these small group sessions are a little bit unique in how they're conducted but I'm just going to ask (Gina) from CBI to start the conversation for us, if it's okay with everybody.

(Gina): Great. Thanks, (Kurt). And good morning everyone. It'll be good to hear from all of you today. So I think the way we just want to start this off is just to hear from people, hear from you how your - what your thoughts are around the charter questions and use those as our guiding guideposts to kind of get the issues on the table in the interest of the different parties.

So you can see those before but the first one is should a contracted party be allowed or required to treat legal and natural persons differently and what mechanism is needed to ensure reliable determination of status. And then I think following that is, you know, is there a legal basis for contracted parties to treat legal and natural persons differently and then what are the risks associated?

So I don't know who wants to start but it'd be great to hear from some of you on these particular issues and maybe, I don't know, (Margie), you might want to kick it off. I know in our face to face, you know, we deferred this and you had brought this up a few times. So maybe you could kick us off on your thinking on the question.

(Margie): Sure, and thank you for putting this together. I think this was a great idea to have these small groups. And essentially, GDPR and the communications we've received from the European Commission and the board emphasized

that GDPR does not apply to legal persons. And so what - and this has a very large impact on the number of records that are redacted.

And so from our perspective we believe that that it's a reasonable thing to actually make the distinction that it can be done through a self-designation and that in fact this is already done in ccTLDs and even in some gTLDs. I understand that for example .nyc has put in an RSEP to make the distinction between natural and legal person in the Whois. So we have tacit report in the domain names industry.

It's consistent with the law and it ensures that the GDPR is not applied beyond what it's intended to apply to, because there's a lot of reasons for keeping the legal information available to the public for, you know, consumer protection and all - things like that. So that's kind of my thinking as we take a look at this issue.

And so what I would suggest is that we would think about having some sort of process flow in the domain name registration process where you ask the registrant to self-designate and you also provide a notice explaining, you know, the difference between the legal person and natural person and what it means, and then to the extent that there is information, put in for the legal person you can certainly speak their consent. So that's kind of how I've taken a look at this. I think the risk is minimized if you do those things.

(Gina): Okay. Thanks, (Margie). So it sounds like from your point of view it's really tied in just to the GDPR. There's not any other, you know, like organizational interest or stakeholder interest tied to this. It's just compliance.

(Margie): It's more than that because the reason that it's important is usually the legal persons are engaged in, you know, commercial activity so it brings up other issues like consumer protection and those sorts of things, a transparency for, you know, companies that are doing business online. A lot of other laws kind of address those sorts of things and recognize that there's an importance to

having that information available. So it's more than just GDPR but I think it affects the balance of why we would, you know, keep that information in the public space.

(Gina): Great. Okay, James, it'd be great to hear from you. I see your hand's up.

James Bladel: Thanks, (Gina). Good morning everyone. And thanks, (Margie), for kicking us off, and it looks like I'm the only contracted party punching bag - no, Marc's here, okay. Hi, Marc. So I actually agree to some extent...

Woman: (Unintelligible)

James Bladel: So I actually agree with a lot of (Margie)'s points. I think we need to do a better job of making a distinction between registrants who are individuals and registrants who are legal persons or legal entities or whatever. You know, from a, you know, I originally, many, many decades ago, was more of a developer and I think that the term - the field currently used is registrant organization, which is an overloaded data field because it's meant to determine whether or not the registrant is a legal person and, if they are, what that legal person is called and what the type is.

And all of this is kind of on the honor system from the registrant, so it's kind of a big mess. And I agree that we need to do better and I think that this EPDP could be the occasion for, as an industry, saying, you know, we need to make this distinction because these folks need to be treated differently.

And I think where (Margie) and I probably diverge in some areas is on one is that while this is a very clear distinction under GDPR, the guidance from the Europeans that, you know, be careful you don't even, you know, even for a domain name that's registered to a legal person might, you know, someone might submit personal data and you can't just kind of treat it as an all or nothing, and I think that makes our job a little bit more complicated.

The second thing is, is that there are other privacy laws coming down the pike. I think the e-privacy -- what is the new thing called, somebody who might know this is a little bit better -- doesn't make a distinction between legal and natural persons. So I think we want to make sure that whatever we recommend or put out in there in this report isn't obsolete, you know, before the ink is dry and keeps pace with the changing regulatory environment.

I do think however, and I think this goes to our charter question, is should contracted parties be allowed or required to treat legal and natural persons differently? Absolutely allowed, absolutely not required. And the reason is because we have a massive install base of folks who just really just don't understand the distinction.

And so cleaning this up for our install base going forward in a reliable way that we can trust the distinction is captured correctly and reflected correctly and all that stuff is going to take some time. And so essentially saying, "Well we're going to make Compliance whack registries and registrars on the head if they don't get this right," is - I think is kind of wishful thinking and certainly does not scale.

So that's kind of my original - my just off-the-cuff take here is that I think we should do more here. I think that we can use this EPDP to, you know, put some markers down and say we need to have a better and more robust facility to allow registrants to identify themselves and for registrars and registries to capture and retain those distinctions, but I think, you know, simply putting requirements into a contract does not make it so and does not clean up this decades old confusion that we have. So, thank you.

(Gina): Thanks, James. Marc, let's hear from you.

Marc Anderson: Thanks. Marc Anderson. I put my name up because James pointed out me out there so I feel like I had to jump in. But I agree with a lot of what (Margie)

and James said there. You know, I think they made some good points so I'll try not to repeat what they said but, you know, rather try and expand on them.

You know, James talked about sort of, you know, the jurisdictional challenges and he pointed out rather correctly, you know, this is an EPDP, you know, specifically for GDPR but we certainly have to remember that there are, you know, there are places where GDPR does not apply and there - and some of those places there isn't a distinction between legal and natural persons.

And so, you know, whatever, you know, I think this sort of echoes what James said is, you know, whatever we end up, whatever our challenges, our final recommendations are, I think we need to be, you know, be aware of the fact that, you know, contracted parties are dealing with many different jurisdictions.

And so, you know, my first point I guess is to make sure that - is we need to make sure that there's flexibility to deal with the fact that in different jurisdictions there are different requirements that need to be considered. And so while our focus is obviously GDPR, we can't look just at GDPR in considering this.

In - the other, I want to point out, you know, fairly, you know, I guess somewhat related to what James is saying, you know, he mentioned the organization field, you know, as something that exists and could be used as a way of differentiating, but certainly it's never been used that way as a way to clearly differentiate between a natural and legal person.

And, you know, I think my point there is that, you know, we have, you know, we have a huge, you know, existing base of registrations where there's no way to easily tell if it's a natural, a legal person or a natural person acting on behalf of a legal person.

And, you know, that's the other challenge is, you know, while we may, you know, desire a way to, you know, clearly and quickly differentiate between natural and legal persons, we have to recognize the fact that for contracted parties sort of backfilling that requirement across hundreds of millions of existing registrations is not an easy lift.

And so, you know, that's going to, you know, that's going to severely, you know, limit what we can do with existing registrations and something we have to keep in mind when we're looking at whatever our final recommendations are.

I guess I'll stop there. I think that's probably a good starting point, just sort of highlight some of the challenges we're looking at as we figure out what our final recommendation should be.

(Gina): Thanks so much. (Alex)?

(Alex): Yes thanks. Good morning everyone. This is (Alex). So it sounds like to me we have a path forward here. I think there's more we are agreeing with than not, which is encouraging. And I think, you know, we believe, IPC believes that legal person registrants should be able to, and we think require -- we could discuss that -- to self-identify and be informed that, you know, that the GDPR and data privacy rules apply only to natural persons.

With regard to the contact information that legal persons make, we believe they should be informed and encouraged to use data, whether it's email or otherwise, that is non-personal, for example using things like admin-contact@example.com as their email address.

I think this is a kind of user experience type of thing and there's going to be a lot of updates to that just to be compliant with GDPR with regard to informing them of the purposes, right, the exercise we're doing in parallel here. I think even if it turns out that a legal entity wants to use their name or personal

information in this legal person entry, if you will, they should be able to do that with consent per the GDPR.

And then I think just to add and address some things that have been said by James and Marc, I think clearly if the way GDPR works if it is found or if a mistake has been made or has been found by the registrant that there's information in their entry that they don't want, they could always correct that. So I believe we shouldn't assume that just because -- and I don't assume -- but just because there's incorrect or personal information in GDPR that it can't be corrected and fixed.

And then regarding the issue about how we deal with the install base, I totally appreciate that that's an issue that we need to consider here and perhaps it's something that we do moving forward that during renewal that these new rules come in and clearly trying to address 100 million or more registrations in another way is much more challenging. And so I think there is - there are ways to kind of ease into this, which make life easier for everyone, contracted parties and the registrants also. So. Thank you.

(Gina): Thanks, (Alex). So I'm going to come back to you, (Margie). And, (Margie), a couple proposals and ideas have been put on the table that some complement and then some add to what you thought, what you presented, so it'd be great to hear, you know, what your thoughts are about those and just if you could integrate that into your comments. Thanks.

(Margie): Sure, although maybe (Loreen) should go first since she hasn't spoken yet and then I can respond.

(Gina): Okay. Thanks. (Loreen), do you want to go ahead.

(Loreen): Sure. Can everyone hear me?

(Gina): Yes we can. Thank you.



(Loreen): Great. Great. First of all I appreciate very much this format and everyone's tone and candor, which is very constructive. I agree with a lot of the comments shared by (Alex) and (Margie) and I'm very mindful of the concerns raised by Marc and James about, one, other laws that may not - other privacy laws that may not distinguish between natural and legal persons; and, two, the logistical and resource concerns about going back to clean up the database which has not at this point in time been very accurate or specific about distinguishing between legal and natural persons.

So I want to address both those concerns and maybe explore those a little more. I think this effort has really been focused on the GDPR, and although there's been a lot of discussion about trying to future-proof the specification and think about other privacy laws, the cold-hearted reality, at least in my view, is that we're never going to be able to anticipate exactly the contours of future privacy laws, and this effort is very much driven by what has to be dealt with now under the GDPR since that is the legal reality and also likely something that is one of the more stringent privacy laws that is apt to come into play.

So I think we do need to focus on the current landscape set by the GDPR which does distinguish between legal and natural persons and that it would be preferable to make this is a requirement rather than an option.

That said, I'm certainly hearing these practical difficulties and I wonder if there's a way to explore how the current changes that registries and registrars are already making in terms of sending out updated privacy policies and communications with their existing customers, if that can be leveraged in some way to both educate the customer base about what is it that is the difference between a legal and a natural entity in plain language; and, two, why folks should be encouraged to, one, update their information and make sure it's accurate and then, two, why they should be encouraged if they are a

legal entity not to use personal identification in their personally identifiable information in their email address.

So it seems to me there could be a way forward by making this a requirement but then also allowing for recognition that going forward that might be a much more stringent requirement, while backward might allow some flexibility to take into account that that may be a more time-consuming and resource-intensive process.

And so I would ask, particularly James, if you think that there are existing mechanism that you're already using in terms of communicating with your customers that can be leveraged to start this process of educating the customer base how to identify themselves as a legal or natural person and then, too, encouraging them not to use personally identifiable information in their email address if they are a legal person.

(Gina): Thanks, (Loreen). And it looked like James' hand went up so maybe when we get to him he can talk about the mechanism that GoDaddy or others are using that are effective. (Margie), thanks for waiting. We're going to go back to you.

(Margie): Oh, thank you. And thanks, (Loreen), for your comments because I think you covered a lot of things that I wanted to cover. Obviously it's going to involve, you know, if we get to a point where we make it a requirement or even an optional thing, either way it's going to require a change of systems. And, as we all know, GDPR has required - I mean I work at a company that went through significant changes as a result of the requirements for GDPR.

Now we can talk about, you know, staging the implementation. For example you could have a process that applies initially just to new registrations and then over time we get to the point of, you know, of addressing the existing registrations through some sort of, you know, annual, you know, there's always a Whois annual notice that goes out. I mean there's certainly creative

ways of staging it, the implementation, and making it, you know, reasonable in a timeframe that, you know, that we all could agree on.

So the implementation side I think we could have flexibility to do that and so I wouldn't use that as a reason not to do it. With regard to the other laws, the other - I mean (Loreen) pretty much covered everything, but usually the other laws it's not natural or legal, they're making a commercial distinction. And so I think the risk is a lot less when we worry about what could possibly change with respect to the privacy.

I think most privacy regimes do not just automatically exempt legal persons without, you know, some sort of, you know, reference to commercial activity or something like that because of the consumer protection angle. So that's one of the things I might suggest is that we explore how this can be done in a phased process, recognizing that it is a big, you know, installed base that needs to be, you know, transitioned to the new - a new approach. So those are my suggestions.

(Gina): Thanks, (Margie). So, James, we'll come to you and if you could - if part of your comments speak to what you all have done or what you know of others that it's worked that's responsive to some of these concepts, that would be great.

James Bladel: Thanks, (Gina). And I think first off it's important to note that we're all kind of I think agreeing that this needs to change. I think that of course the devil's in the details on how it should change and, you know, what that change looks like. And in that I would just say I would caution against designing interfaces, experiences, and policy. We should keep it generic enough to capture our concerns but, you know, allow for implementation to suit the circumstances, the language, the regions and the business models and such.

But that said, so I think that - I'm glad (Margie) brought up the Whois data reminder policy, which is an existing policy that requires us to send an annual

notice to each registrant to review their Whois data for accuracy and make any necessary corrections or updates. And that is an existing policy that all registrars are required to do, and we do it at GoDaddy. And it is - it's a challenge, you know, I'll say with our customer base to get anywhere above 10% participation, you know, with those emails.

You know, we've tried everything, putting it in flashing, bold purple text, you know, to try and get attention. What happens is you're kind of this -- and I don't want to say I'm defeatist here but I'm just kind of laying out the reality -- you're interest this double-edged sword where you want to send as much as possible and be as prominent as possible in your communications to your users without tripping their spam detection, you know, whatever they're using to protect their inboxes. And so you kind of have to thread the needle there a little bit.

But anyway, that said, it is something that we could probably do a better job going forward. (Alex) and I are agreeing in the chat that registrant org is not the way to do this. It's just - it's this ambiguous squishy field that everybody puts something different in there. I think that we need to have some very clear, you know, data fields that says, you know, that what type of registration is this, is this a, you know, is this for an individual, a natural person, or is this for an organization or legal entity?

And if it is a legal entity, maybe even capture some more information, like where is it, you know, what's the jurisdiction, what kind of legal entity. And that will serve the dual purpose of, you know, actually capturing that information but also, you know, scaring away the folks who sometimes will aspirationally put (New Co) or something like that in the registrant org field because they want to create an organization someday but it doesn't actually technically exist right now.

I just want to touch on a couple of other quick points. (Loreen) mentioned, you know, that we're having some challenges with, you know, making this

specific to GDPR. And while I generally agree that we can't be chasing hypothetical future privacy regulations, there's a very real draft framework right now, the e-privacy regulations working through the EU, that will - that treat this issue differently than GDPR.

And it's not a kind of a question of if it will become real; it's a question of when, probably sometime in next, you know, 24 months. And so I just want to be careful that we are kind of - we have one eye on what's currently percolating through the EU right now because it is a moving target and, you know, we've been saying for a while now that GDPR is just the beginning of our nightmare. There's all kinds of new regulations coming out of Europe and elsewhere that are going to continue to complicate this. So we just - we have to be flexible and agile enough to address those if they come up. So.

But I think we're all just kind of violently agreeing with each other that something needs to change. How we change it is really the issue here, and I think that making this as a recommendation for optional changes that we can't, you know, necessarily put a registry or registrar's head on the chopping block of they get this wrong or if the customer doesn't understand what they're being asked I think is probably the right way to go.

So I don't know if I covered all the breadcrumbs that other speakers had asked of me. I hope I did. And if not, please throw it in the chat. Thanks.

(Gina): Sure. I'm still getting used to listening, chatting and all together, so. So I mean it sounds like a couple of you used like we're in violent agreement. I mean it sounds like with regards to distinguishing that everyone agrees that the registrants, you know, that there should be - that we should distinguish between the natural and legal, and the reasons to do it are, you know, consumer protection, there's transparency for companies online, and then there also is responsive to GDPR.

And it sounds like the distinguishing is challenging. There's some need for some flexibility down the line because there are laws, but I'm going to ask maybe that for the purposes of today we really just focus under GDPR and think about, you know, what you might agree to or recommend for GDPR and to kind of table the other laws and that - and even the EU privacy temporary, because it seems like it's hard to manage for all these unknowns and if we can think about what might work for you all as a recommendation on GDPR, that might help us focus, and, you know, cost and logistics. Those are all considerations.

So on the mechanisms, I'm wondering if we could talk a little bit more about, you know, kind of shapes of mechanisms. So I mean I've heard this idea of a phased. It sounds like the gathering information through the annual update policy has limited success. There's been the idea of having certain data fields that would allow the registrant to distinguish and, I'm just looking through my notes here, there's the idea maybe that parallels with that or consistent with that to encourage the use of non-personal admin@.com or whatever.

So are there other mechanisms or what mechanisms might you propose or recommend to be responsive to this? I don't know if you still have your - you put your hand up again or if you're still there. Or if that was your last hand.

Man: It was a new hand in response to your - no, it's a new hand.

(Gina): Go ahead.

Man: Okay. So it's just a response to your question. I think we should probably look at what recommended additional data fields in WHOIS, or RDS, or RDAP, or whatever we're going to end up using, what additional data fields would need to be captured. Something like registrant type or something, registrant status, something like that. And that we would capture that somehow in association with the registrant field. That we would make some,

and again I'm breaking my own rule here and trying to design it, an experience based on policy.

But it would be more of a question of based on what type of registrant is identified, it would pivot to the types of information that is collected. So for a legal entity, it would say what is the title of the person that would be a contact individual for this as opposed to capturing their name and whereas an individual, it would capture their name. So things like that I think that you would first and foremost identify what the type of the registration is and then, depending upon the response from the registrant, you would then pivot to some of these other questions.

I think I'll just leave it there but I just want to be clear and I think everybody is understanding that in a perfect world, we would do this going forward from some date in the future and then it would, A, somehow be reliable and then B, we would send out reminders as renewal, or whatever, or transfers for folks to convert legacy registrations to this new format and that we would get something higher than a double-digit percentage of success rate with that.

And that when our children and grandchildren are sitting in our chairs here that they would have a much clearer picture of this data. So that's just kind of my off the cuff thinking. Thanks.

(Gina): Go ahead, Marc.

Marc Anderson: Thanks, Marc Anderson. Sort of listened to what all everybody said and Gina as you mentioned, you said violent agreement. I think generally we've agreed that it's desirable to be able to differentiate between natural and legal persons recognizing that GDPR is our focus, and though there may be other jurisdictional considerations, right, I think across the board it's desirable to be able to differentiate between the two.

And so I guess where we need to pivot to, right, as a subgroup is, okay, we agree we want to be able to differentiate the two but that with the existing mechanisms, we can't, at least not reliably. And (Margie) in her initial remarks noted that other registry operators, or sorry, other registrars and TLDs do this. So some CCTLDs have a way of doing this and you mentioned .nyc. There at least is a way to do that.

So I think where we need to pivot to is what policy recommendations do we want to recommend to the full group in order to achieve that. And so I think that's what we should focus on for the remainder of our time is given the general agreement and recognizing the challenges, some logistical and install-base legacy challenges we have to deal with. All right, what are the policy recommendations we need to make in order to sort of achieve that.

And so I don't have - if you're waiting for me to rattle of policy recommendations...

(Gina): I was waiting, Marc.

Marc Anderson: I'm sorry to disappoint. I don't have that. My point is let's focus the conversation on that so sorry, (Gina), I don't have that off the top of my head but that's what we're getting to, right, what are our policy recommendations that achieve our desired goal.

(Gina): Great. Well, it looks like James raised his hand so maybe he has some proposed language for us or proposed recommendations.

James Bladel: Yes, thanks. James speaking. I would caution against having actual language. So I'll just make some interventions now a couple times in a row, so I'll just kind of drop from here. But I think Marc is correct is let's focus on what we want to say or what can be said. And I think it's completely appropriate for this group to recommend I think that further work continue,



rather than essentially say that we are going to take on this monumental task between now and May.

I think it's perfectly appropriate to say, you know, there should be a follow-on effort to say that we'll - to put a marker down and say, there should be a fast follow effort to be in a group, to look at the operational issues associated with building out new facilities and restructuring the records of RDS to capture this distinction, to develop a process or a strategy to collecting this information reliably from registrant at time of registration, and at renewal, and at transfer. And what that would look at in terms of enforcement regime from ICANN.

And I think that we can probably put that - boil that up into really just a few recommendations that this is a problem. We all agree that we need to do a better job here but I don't know that solving it on the table is something we can take on in the next six months.

(Gina): Thanks James. Back to you, Marc, and if you could build upon James' suggestion that would be helpful.

(Margie): And this is Margie. Can I be in the queue? Sorry, I'm in my car so I can't raise my hand.

(Gina): Yes. Sure, Margie. Thank you.

Marc Anderson: Thanks. This is Marc and yes, totally plan to build on James' point because I think you raised a real good point there is just from a practical standpoint, I think we need to be maybe aware of our limitations. There's - we have - we're an expedited PDP. It's with some timeframes hanging over us and there are some things that we need to be cognizant of that need to get done at a maybe faster than light speed timeframe.

So I think James' point is well taken, and to build on that, we consider, okay, what - we have sort of phases. We have sort of Phase 2, what can we do as

part of our Phase 2 recommendations, what could we do as part of our Phase 3 recommendations, and then we don't have to boil the ocean here, particularly when it comes to how to handle the existing registrations. That is not a trivial list. And with something like that, we could recommend the GNSO take follow-on action, right.

So there are some problems we may decide that we can solve ourselves but there are some things that we may recommend to the GNSO Council that they initiate follow-up work on to maybe constitute a group specifically chartered and tasked to solving those specific issues. So I just, to build on what James said, I think that's a real good point. Let's be aware of our limitations and sort of where our focus needs to be given the time constraints and realize we have some flexibility. There are some things we can do ourselves and some things we may decide to recommend to GNSO Council they take additional work on.

(Gina): Thanks, Mark. So I'm going to go to Alex and then Margie, and then I'll come to you, Loreen.

(Alex): Thanks, (Gina). Can you guys hear me?

(Gina): Yes, but you're very soft.

(Alex): Okay, how's that? Is that better?

(Gina): Yes.

(Alex): So I agree that we need to focus on policy. That's our job. I think many of us who have been engineers in the past tend to, like a moth to a flame, rush to implementation issues. We need to avoid that. Clearly, the details and the timeline of implementation is a different story, right, including how to backfill things and the like. That's definitely another phase. But I believe we can

define what policy we want now from the pristine view of our ivory tower, if you will, ignoring the nitty-gritty details of implementation.

But I believe we could do that in the EPDP between now and May but agree 100% that how those policies and when those policies will be implemented, the implementation is a discussion best left for a different day. But I wouldn't want to put off agreeing to policy in this group here because I believe that's one of the things that we must be doing here. Thank you.

(Gina): Alex, what's your thoughts about - I mean there's kind of a couple policy recommendations on the table. I don't know if you feel comfortable with those. One is, I think James typed in the chat, provide the facilities (unintelligible) to make this distinction and then consider further work to address the operational issues and to distinguish at the registration and at the renewal. Are those shaping something that you would be able to support or you might refine?

(Alex): Yes, I think definitely. Again, there's a clear distinction between the policy that we're going to set here in the EPDP and how those policies will be implemented in the "real world" if you will. And I think as long as we come to an agreement on what those policies are, and I think we may have to - if we do want to discuss additional fields, that will need to be laid out in our policy. And then we leave for a different phase and for perhaps even another team the implementation of how this will all work to another phase.

(Gina): Great. Thanks. So I'm going to go to Margie on the phone and then back to you, Loreen.

(Margie): Sure, this is Margie. I agree with Alex. I think it's a mistake to wait to do it outside of this EPDP, because frankly, this issue has a huge bearing on how my constituency looks at the other issues. And so we're just going to have a lot harder time reaching agreement on some of the other issues that this

EPDP is facing if we don't have an understanding that something will be done with respect to the natural legal person distinction.

And I think if you think about some of the policies that we've enacted in the past at ICANN, I mean think WHOIS. That's still not implemented and that's been multiple years since the policy was adopted. Another one is privacy proxy. Same thing. And so I think we can get to a place where we make policy recommendations, understanding that they're just not going to be implemented (unintelligible) and that's okay. I think that our constituency understand that this is a big list, if you will, from the point of implementation. But if our policy recognizes that it will take some time to do this but that it needs to be done, then at least we've got the wheels in motion to do it and know that it will happen in the ICANN timeframe, if you will, right. Whatever that means when you deal with the level of the (unintelligible) that has to happen for this.

And so I would encourage us to do it perhaps in a later phase of this group so that we get through the other things first but feel that it's important enough that it needs to be part of this group.

(Gina): Margie, when you say it, you mean the definition of the implementation and the data fields and how it's done. Is that what you're referencing?

(Margie): I think we could develop during this PDP, and I would encourage us to do that, the policy. So whatever the policy is related to the natural legal person distinction, however high level we can do. The thing that will take time is the implementation and I think our policy can recognize that. I think it can say that we believe that this is an important distinction to make and to build into the WHOIS. We recognize it will take time and a separate implementation group will be set up for it. But to me that's a far different ask than asking for a separate PDP at the GNSO to develop this process.

Because I think that's what I'm worried about. If that's the case, it won't happen for a very, very long time even - and that's just not acceptable given what's at stake here and the ability to get this resolved now.

(Gina): Thanks, Margie. Loreen, go ahead and then I've got James next.

(Loreen): Thanks. So I wanted to get a little bit of clarity. It seems like from our discussion and the violent agreement that there is consensus around the idea of having a required distinction between legal and natural persons going forward. I did want to sort of get an answer to that question to make sure I've understood people's positions, one. And then two, I would agree with Margie and Alex that we can set the policy, the goal so to speak, of having the historic database updated in a staged way as a goal for further action.

I think I agree with Margie and Alex that it wouldn't be a heavy lift to state that policy, and even state some timeframes after discussions with contracted parties to better understand what needs to be done. But again, I think it would be very helpful to have some input from Mark, and James, and other colleagues going forward about brainstorming how the existing communications and existing systems can support this since we know that there are renewals. At the time of registration seems like the easiest time and that would take care of the going forward.

So we also know that there are renewals and we also know that there are these yearly communications. So it would be helpful to understand when James says that it could take maybe five to ten years to get a better sense of why is this such a heavy lift if there are existing communication systems to check in with customers on a periodic basis about the accuracy of this information, why this would be such a heavy lift. That would help me out.

(Gina): Thanks, Loreen. So James is next. So I'd like the breaking out to see if -- and I put it in the chat -- do folks agree that we have a requirement going

forward if the implementation process is satisfactory? And then to speak to the challenges of using the existing systems. Go ahead, James.

James Bladel: Hi, thanks. James speaking and I just want to point out that Loreen and Gina sound somewhat similar on the phone so I was a little confused there.

(Gina): Oh, sorry.

James Bladel: But just a couple of quick points. I think that we're getting closer to something. I think that we can -- and I can just say tentatively without checking in with anyone besides myself -- that we can probably agree that there should be some high level recommendation in this EPDP that would kick off an implementation work that would say, it's desirable to make this distinction in WHOIS. It's necessary to make this distinction in WHOIS. That we need to start building those facilities to make those distinctions and we need to build an implementation plan to both capture this going forward and also go back and retouch existing legacy registrations.

I just want to point out the reason I said it would take so long. First off, I think we heard about PPSAI and thick WHOIS and why they've taken so long to implement. Well, the reason is because they ran smack dab head on collision with GDPR. So they're kind of stuck until we solve this. So I don't - as bad as ICANN is at actually turning policy into reality, I don't know that those are the best examples because they're stuck because of the work that we're doing today.

And to Loreen's point, we have this annual touch. We have a certain percentage of registration that renew, although registration can be registered for up to ten years. So there is a segment of our customer base that will renew a registration for ten years and not touch it and not respond to communications. We can require registries and registrars to send those notices and to send those communications. The challenge is getting folks

who are otherwise compliant with all of the rules and policies that were in place when they registered, getting them to act on updated changes.

So I think that's the operational challenge. I don't think -- if I'm understanding everybody on the call -- I don't think we have to solve that on this table. That's something that the implementation of this would have to consider and look at. But I do think that it would be an extended period of time before this is cleaned up. And I think that we can say, look, this is something that we believe will be necessary. This is something that is relevant to at least the GDPR and possibly other privacy frameworks and that we should take a look at how we would implement this going forward and how we would implement this on legacy TLDs.

(Gina): So James, can I just put you on the spot? This is (Gina). I'm sorry because I sound like Loreen. Are you compatible with having the requirement on a go-forward basis?

James Bladel: Thanks, (Gina). I don't know what we mean by requirement. I mean if the policy says that we're going to - we want to make this distinction between legal and natural persons, and it's useful to make this distinction. And that in order to do this that we'll have to make some changes to the information that's captured, retained, and displayed in WHOIS or whatever successor system is, then yes, that should be required.

I think that where we get a little squishy is, well, require who to do what. Require registrars to ask the questions of their customer? Absolutely. We can do that. Require registries to dutifully collect the information from registrars and put it in their systems? Sure, we can require that. Require registrants to tell the truth. We can try. Require registrants to answer the question. Require registrants to understand the different of what kind of an entity they are. That's where I think we start to say, well, we can put those requirements out there but who do we punish when they get it wrong. Who's accountable for those requirements.

So I think we can start with just the high-level things, like Margie is saying. And I think coming from Facebook, she appreciates and recognizes the challenges of doing this at scale. I think nobody is struggling with this more on a global scale right now than Facebook in terms of understanding who is using your systems and what kind of a person they are, or entity, or group, or if they're an individual or an entity, or even a state actor is kind of all up in the air and you kind of have to take what they give you and then find some way to vet it in a reliable way.

But I think it's really just a question of what is the requirement and who is accountable to those obligations.

(Gina): Thanks. This is (Gina). Next in the thread is Marc and then back to Loreen.

Marc Anderson: Thanks, (Gina). This is Marc. And first, I feel like based on how the conversation went, I want to clarify that I wasn't necessarily advocating for taking anything out of our scope. I was just pointing out that we have flexibility and options. And so I wasn't advocating for us not addressing this or necessarily putting it into a subsequent follow-up policy, just pointing out our options there.

So with that out of the way, I want to build on what James said. Just stating it's a requirement for registrars to differentiate between legal and natural persons simply isn't enough. We could agree with that requirement in principle but the implementation of that requirement needs much more detail. If you put a requirement like that on registrars then every registrar is going to implement that differently.

James said earlier, the devil is in the details, right. We all agree in principle it's desirable to differentiate between legal and natural persons but we need to be much more specific in how that needs to be accomplished. And so I think that's really the point James is making. It's not enough for us to just



agree on that principle and say, okay, it's a requirement for registrars to differentiate between legal and natural persons. That doesn't get us far enough.

(Gina): So March, how would you - and let me just add this. Are you comfortable with the idea of requirement on a go-forward basis if we could figure out sort of the satisfactory manner for implementation, like figure out those pieces?

Marc Anderson: Absolutely. We've all agreed in the call on the principle. I think we all agree that it's desirable to differentiate and that's - and we want to have that ability moving forward. So the principle of saying that is fine. But just saying, like I said, just saying we require - what exactly are we recommending. Just saying it's a requirement to differentiate the two doesn't go far enough.

Just to take what Alex says in chat here, our next task is to put words on paper that define the policy of what we have been discussing. I think that's exactly right. We need concrete policy language that defines how you implement that stated goal. A requirement to differentiate between legal and natural persons, that's aspirational. That's not implementable.

(Gina): Got it. Okay. So I mean, maybe we need an action item for somebody to - a couple people to chew on some specific policy that I'll pause on that. And then Loreen, why don't you go ahead?

(Loreen): Sure. This is Loreen so everyone knows it's me and not (Gina). I appreciate the practical turn this conversation is taking and there I think the input of the registrars would be particularly beneficial, since those, James points out with a smile, their constituency has the most riding on this question.

So I think it's a very fair point to say that it wouldn't be sufficient for us to stop at saying registrars are required to put mechanisms in place to distinguish between legal and natural persons for new registrants. It would be great if we could get some brainstorming about what would be some high level language

to include that puts a little more meat on the bones of that requirement, whether it's stating that there should be some sort of ways to encourage registrants to provide this information and some sort of consequences for the registrants if they don't. Whether somehow their registration is going to be contingent upon them supplying this information. And here, I'm talking about new registrants.

And as for the legacy registrants, again, we certainly could try to come up with some suggestions about what would be high level goals in terms of language that go beyond just saying this is a requirement, but saying that there has to be some procedures in place that ensure that registrants are -- incentivized is too mushy a word -- but that there's some skin in the game for registrants to make sure they provide this information because if they don't, there's going to be some consequence that they care about.

So I'm not really talking here in terms of slamming the registrars with enforcement actions if this doesn't happen. I'm trying to focus on what are the practical ways registrars can interact with their customers to make sure they get necessary information.

(Gina): Thanks, Loreen. This is (Gina). James, I'm going to take it to you, please.

James Bladel: Hi, (Gina). Thanks. James speaking. I think where we're landing, to just kind of respond to Loreen's request that we start thinking about what some high-level language might look like. You know, the first thing is we need to say that, you know, this group there's consensus around the idea or rough consensus or whatever around the idea that making the distinction, capturing this distinction and making it available is, you know, necessary and useful. I mean that's principle number one. I mean principle number two is that, you know, well registries, registrars, ICANN whatever should make resources available registrants. And this is very similar to their rights and responsibilities document and all the health and contact resources that we have to make available. I think we should also make available some resources that help

registrants understand the distinction between a domain name that is registered for a natural person or a domain name that is registered on behalf of the legal entity. I think that's the second one is help them. You know we, I think there is a general, well maybe I'm wrong here, but I think that there - sometimes we gravitate towards walking around the town with a billy club looking to bounce it off somebody's head when the fact is vast majority of people don't really know what the rules are and don't understand how they're supposed to comply even if they want to. So that's the second one is making some educational and health resources available.

And then the third one would be looking at what changes would be necessary in terms of the data fields that are defined and collected in Whois or some - or success or RDS system that and how they differ is depending upon how a registrant categorizes themselves. And then the third thing is once you've gotten those three buttoned up then - or then the fourth one sorry, would be to, you know, set some future date whereby all new registrations would be subject to this new framework and then some future, future date beyond that where transfers and renewals would also be asked to conform to this new framework. So that's kind of I think the pathway or the staircase that gets us from where we are today to a better place.

I think, you know, from step one to step three is probably something that we could knock out in this PDP. Step four is probably some follow-on work for the next couple years and step five will probably take me out to my retirement days. So that's just my thinking, thanks.

(Gina): Thanks James for that proposal. (Margie) thoughts from you and maybe you could build upon the steps that James laid out if possible in your comments.

(Margie): Sure. I think one of the - I mean, I think those are all great starts and the, kind of layout the complexity of what the, you know, of the issue. I think we can ask now as an example to for staff to summarize, get a summary of how ccTLDs address the legal natural person distinction because if you think

about it a lot of our registrars are already registrars in these ccTLDs. And so using instead of re-creating the wheel right using a framework that's done by .uk or .whatever and is already familiar to some of our registrars might be a way of making, you know, progress on the implementation side of it. And so that's something that I think we could recommend and really have the policy recommendation we could ask staff to do that now well, you know, in parallel with the rest of the work of the EPDP because that might actually help sort of shine, you know, a flashlight on what the policy could say. If we hear for example that this is how the .UK folks do it. This is how the .whatever does it and it seems like it's a reasonable thing to build into the policy. And I just think it would help inform the whole works so that would be my other suggestion.

(Gina): Thanks (Margie). And let me just take a second here and go to H4 of the charter questions. And this may be opening a new can of worms but what is, any thoughts on is there a legal basis for contracted parties to treat legal and natural persons differently?

(Margie): I'm sorry, I would answer that yes. Yes the GDPR makes that distinction and we can cite the provisions of GDPR that say that.

(Gina): Okay. Anyone else on that question?

James Bladel: (Tina) this is James.

(Gina): Yes go ahead James.

James Bladel: Yes I agree. Yes GDPR makes that distinction. It's not a blanket distinction if we look at the letter from the EDPV is that, you know, but they do make that distinction. I think there are other laws that don't make that distinction as we've discussed. But I think just generally there's utility in making that distinction. And as long as we have legal cover to do so, I think the question

is are we legally obligated to do it possibly? Are we legally constrained from doing it? I don't believe so.

(Gina): Thanks James. These is (Gina). Stephanie, to you?

Stephanie Perrin: Hi. It's Stephanie Perrin for the record. Can you hear me?

(Gina): Yes we can but please speak up.

Stephanie Perrin: Oh, okay I'll turn and shout. This business out there being a legal grounds in the GDPR, yes you can make that distinction but it's very complicated. We went into this in some depth during the privacy proxy accreditation issues PDP and then there was an attempt to identify the legal reasons why legal persons should not be able to use privacy proxy services. But globally it's a nightmare trying to sort these things.

For instance I am a one person federal corporation in Canada, my company. My name's however are registered in my own name so that they don't get tied up in the corporation. That's going to be the case for a lot of single entrepreneurs and home workers. They there for don't have to list on the Web site. They don't have to list on the Web site if they're not doing commerce financial transactions.

These complications make it not a simple matter whatsoever to distinguish between the two. I have spoken to the DPAs about this.. They have said yes, they're not trying to hit the Facebooks of the world but making that distinctions they're unaware of the complexity of how people register domain names generally speaking. Once you get into that complexity, make making that bright line just becomes a nightmare.

I would like to propose to you that in order to get around the problems, and you probably already covered this because you've covered a lot of ground already. I beg your pardon for being late. But really corporations that are

large entities that want to provide data and also have an identity theft problem ought to be authenticating and there should be some kind of capacity in the new directory services to accommodate that.

And this would also stop people who really don't understand the legal complexities of domain names versus being held by themselves or being held by a commercial entity that they cannot get sucked down that rabbit hole. The other point I'd like to make is that rights are also protected under the GDPR in the charter on which it sits for vulnerable groups. They're covered under the European Charter of Rights. And those groups and we're talking about journalistic associations, political speech, they're not commercial entities, they may be legal persons, they might be a group of volunteers. It's very difficult to figure out the actual category of those groups. But they need protection and they're entitled to the protection under sensitive data as soon as we start getting into contact person. So I really think that it's almost easier to fish out the big corporation than it is to determine the distinction in small entities. Thank you.

(Gina): Thanks Stephanie for those thoughts. Let's see if anybody, (Alex) I'm going to go back to you. And then I think I have some draft language to share and then I want to talk a little bit about the risk before I chime in. Go ahead (Alex).

(Alex): Yes thanks. This is (Alex). So I just wanted to just quickly respond to Stephanie. I think as a as someone who's a recently set up a sole proprietorship here in the US to do consulting I totally understand and appreciate kind of the issue that Stephanie raised. You'll notice that my registrations for my business are protected by privacy proxy because the address for my business is my home and I don't want that out and about although I'm sure it's not difficult to find elsewhere.

And then on the topic of privacy proxy I think it's important to remember that the very long drawn out contentious debate was about distinguishing between commercial and noncommercial Web sites. It wasn't really about the

distinction between legal and natural persons. So while they're related I think it's a separate, it's an important distinction and it's a separate debate and it's not 100% aligned with the discussions that happened in the past that the PP – in the PPSAI group. Thanks.

(Gina): Thanks for that clarification and that's probably like one of those distinctions in the implementation that could be made. So I guess I just want to check in on where we are. It seems like we've got some ideas in - for potential policy recommendations that we could at least take to the next stage with the large group.

So one is to distinguish between legal and natural persons as necessary and useful. Registrars and registries should make resources available to the registrants to understand the distinction between legal and natural entities. And registries, registrars ICANN should make resources available to help registrants understand the distinction between a domain name that is registered by a natural person versus a legal person or entity, you know, some educational resources and then there needs to be follow-on work to this EPDP to determine the timing and implementation phases. And that kind of has been brought up by a number of you of thinking through a staging or phasing process with I think James making some specific recommendations. Does that seem like they're kind of frames up potential recommendations? James I'll go to you next.

James Bladel: Hi. Thanks. James speaking. And I just want to note that I have to drop here so thank you everyone for this small group. I think we've actually cuts through some weeds and thanks (Gina) for leading the discussion. I just wanted to note that, you know, I'm offering, you know, I'm a single registrar based in, you know, the US and Europe and mostly focused on retail, small businesses and individuals. Mark is a very large registry of course but it doesn't - but registries have less nexus to this problem and certainly as a thin registry com in particular has almost no touch of this issue.

So I just, I'm pointing out that, you know, there may be complexities that I do not appreciate that are specific to let's say non-US registrar US registrar that operates exclusively as a wholesale or a brand intellectual property type function so just kind of putting all of those disclaimers down. And I think there are so many lawyers on the other side of the table that they can appreciate that I'm not, you know, I can't be speaking for all of the interests in the industry but I think we're headed in the right direction and I think I have a reasonable degree of confidence that I'm not going to get skewered by my own constituency for this, you know, for the proposals being made here today. So with that I guess I'll drop. I'll say thanks to everyone and thanks to (Gina) and I'll just kind of keep an eye out on this list for, you know, for some updated language. And I think we can just kind of poke that with sticks until it gets better and then send something to the larger group. Thanks.

(Gina): Thanks James. And we're going to go to (Rif) just so you know but we'll hopefully take that up with you later. Anything else on – I'm just Marika and (Kurt) I don't know if we want to put this kind of draft language up what you would recommend or should we send, you know, these kind of concepts or should we send that out in the follow-up email? What would you recommend (Kurt) or Marika?

(Kurt): So hi everyone and (Gina) thanks for the terrific job than everybody else. Thanks for the terrific constructive discussion. So we sort of just transcribed what James had augmented by (Margie)'s suggestion after that and so I think we should just plop it in the chat room or maybe not the chat room but wherever the staff plops this stuff, so we can look at what's been said because, you know, that can draw an initial reaction of close or not even close rather than wait for an email follow-up. And then I also think and this is been a really constructive session with people starting to drop off. We should bring it to a close pretty soon.

(Gina): Okay, that sounds great. Well maybe we can get some reaction to this language. And then the only other thing I was going to pick up was the risk



question as the charter question but we can always defer that if you prefer. So here on the screen, the main screen in the note in the central part is some draft language, kind of building off all of your good thoughts. So we'll just pause for a second and give everybody a chance to read this.

And I think what this would be is sort of a draft policy that we would take to the full working group. Isn't that correct (Kurt) because that's the kind of (unintelligible).

((Crosstalk))

(Kurt): Well or yes but I think what we want to do is hear from everybody here how if we want to continue this discussion before we release this to the group or not. So...

(Gina): Okay perfect.

(Kurt): And maybe and, you know, and we want to catch up with James too before we make that commitment. So we want to hear from these guys if - to let us know when, if and when we can let the language go.

(Gina): Thanks for that clarification. All right (Mark) thanks. Go ahead.

(Mark): Yes this is (Mark). I read through the draft recommendation. and I think, you know, I think my 2 cents like on next step is, you know, is sort of take us back to the full group and, you know, just sort of make sure we communicate to them that, you know, hey, you know, we met, we discussed this and, you know, we all agreed in principle that, you know, that, you know, the distinction between legal and natural person is necessary and useful. I think that's the first thing we did and the main thing we did right? And so the first thing is, you know, communicate that back to the group.

And then, you know, I think, you know, but I think there's more work to do, right and, you know, back to saying, you know the devil's in the details right. And the rest of this is, you know, the other bullet point there are details or maybe bullet points to help us get to the details such as consultation with ccTLDs. So yes, I mean I think this is in general captures what we talked about but, you know, getting it on paper, getting them out to the full group and communicate to them that hey, this is what we discussed is, you know, this is a logical first step and, you know, look at turning, you know, taking this and turning them into, you know, policy language that could be plugged into the template that staff has started is, you know, sort of a follow-up task.

(Gina): Thanks (Mark). This is (Gina), back to you (Loreen).

(Loreen): Thanks. This is (Loreen). I think this is a good start in terms of language. I'm not sure that it quite captures the point where I believe we did have consensus which is that for new registrars it would be a requirement to make this distinction, but then also a recognition that for legacy registrants there, - this requirement may need to be phased into account for the technical implementation that would be required. So I just wanted to make that statement because I don't think this quite captures the level of agreement that in fact we have in terms of new registrants versus legacy registrants.

(Gina): Thanks (Loreen). Back to you (Mark).

(Mark): This is (Mark). I just want to - I think this is a friendly tweak (Loreen) but I think I want to tweak what (Loreen) said. I don't think she means to imply that a legacy (deal), a legacy registration shouldn't have that distinction. I think it's just a recognition that that timing between new registrations and existing registrations will be different. It'll take some time to backfill existing registrants. So I think, you know, I think the desire is for this to apply to all registrations eventually but that, you know, we just sort of discuss that there's some logistical challenges in backfilling it and that different timing should apply.

(Loreen): That's exactly right (Mark).

(Mark): Okay. Thanks.

(Gina): Great, thanks for that clarification (Mark). So I'm just wondering, I know that (Kurt) suggested we sort of wrap. I just want to check in with others and may be (Loreen) before you, what you would recommend as the next step and then just hearing any feedback on this language. So (Loreen) what would you recommend as a next step?

(Loreen): I recommend as a next step that perhaps this small group takes a short amount of time to perhaps refine this language a little bit. You know, for example I think we are on the same page in terms of having this be a requirement albeit recognizing that the timing and implementation may be different vis-à-vis new registrants and legacy registrants. And I think it would be helpful to make sure that that's reflected in this current language. And then I think it would be productive to present this language to the bigger EPDP to get their input. Following that I think it would be very productive to have perhaps, go back to a small group that perhaps has more of our representation than just one registrar because I think that they're the most impacted group here to talk about what high level language could be used in the policy recommendation to make sure that we just aren't stopping and saying this is the requirements and the timing may differ but to make it clear that the registrars so should have some procedures in place to encourage and maximize ability that a registrants are actually going to know what it is they're being asked to do and then too that the systems in place, you know, incentivize registrants to actually provide this information so that the distinction can be made. That would be my suggestion.

(Gina): Thanks (Loreen). It looks like (Margie) is losing connectivity she just put in the chat. So she may not be able to join. So it sounds like everybody's been

circulating some language down - oh go ahead (Alex). I just didn't see your hand - and then I'll check it. We might go ahead and summarize.

(Alex): Yes, no worries. This is (Alex). Yes I think it would be helpful to put this in a Google Doc. I would - I do think it's just so the full group kind of understands what we discussed that we should as (Loreen) and (Mark) mentioned we should be - you should add some details around how we want to deal with new registrations and legacy, registrations. And that could be a sub bullet or somehow related to that current one on the list.

(Gina): Great.

(Alex): And then just real quick I think this is just a knit but I think we should move - it would make - it would flow better if the third bullet moved underneath the first bullet. And I could do the squeaks in the Google Doc but it's just - just thinking out loud.

(Gina): Thanks Alex. Okay Marika I missed you. Sorry about that.

Marika Konings: Yes, no worries. I know that sometimes happens so with being further up the list. So this is Marika. I think you a similar – in a similar vein as (Alex) said, it would be good for the group just think through the order and also kind of indicate, you know, what is dependent on each other because, you know, my understanding will be that you're making educational resources available, you know, only makes sense once you indeed figured out, you know, what you want registrants to do or what their abilities or possibilities are to distinguish between natural and legal persons. So again when you look at this language again and staff can put this in a Google Doc for the small group to work on you may want to make clear, you know, what is dependent on the different steps also when, you know, eventually this gets adopted and then also allows of course for staff to kind of map out what needs to happen when and what needs to happen first before something else can get started.

(Gina): Great. So it sounds like, you know, what might be nice in a Google Doc is to have the policies across the top that people can edit and then maybe on those section below so people can add insights and notes which would help inform potentially the - we can sort of edit those and help inform the large group.

All right, so it sounds like we've got a plan. We've got kind of a good set of agreement for stopping, thanks to everybody for contributing to that on the answering the charter questions and then building some potential, you know, some draft policy language that we can massage in the small group. And so staff will put that on Google Docs and maybe recommend a timeframe within which we should all look at that. And then it sounds like I mean I - it sounds like from talking to all of you that you - if we get to a good place with that that you're comfortable with that going to the full working group. And then depending on the input received there maybe reconvene as a small group with a special note to ensure that we've got some representation from the registrars maybe more than one person just this will impact them. (Kurt) or I don't know, does that sound okay to you as far as moving forward? And maybe you can bring us to closure unless there's something else you want us to pick up?

(Kurt): Great (Gina). Thank you so much. I think that we'd want to set a timeframe around the adjustment of this. So maybe in the, by the end of the week or something like that we could finish that up. And also I don't know if somebody from the ICANN support team can kind of draft an email to (Margie) and James. And I don't know if anybody else dropped off but as a courtesy to get them up to speed on what happened in the last 15 minutes so they're fully informed. But I know they can wade through the recording but that will take a little while.

So I think that with - so those are the two things I have setting a timeframe for this here by the end of the week. And then so we can turn it loose to the full group and bringing (Margie) and James up to speed fully so they know about

the task. So I think that's it for my part. (Caitlin) or Marika do you have any actions that you want to review or any other notes?

Marika Konings: Uh, yes this is Marika. So in response to your question we've actually taken a note although we've run out of space on the sides and we've actually taken a quite detailed note. And our plan, you know, like we usually do was to send this to the full group so at least the group is already aware of what is being discussed and as well what the action items are. And then, you know, similarly, you know, of course (Margie) and James would see that. And then we would separately, you know, set up the Google Doc and give editing rights to those on the call today to further refine and send us that. And does it align with the expectation of the group that the notes go out to the full group to review or is there an expectation that for now it just goes to those that were on the call?

(Kurt): So I'm sort of of the opinion that everybody's interested in how this turns out. Unless there's an objection by one of the people in the call now, I would say to release the notes to the full group because – but I can understand why there might be a reason to not do that. Does anybody have an objection to that? Okay so Marika we can talk about this off-line but I just mean as a courtesy to (Margie) and James that invested so much in the phone calls just, you know, you could whack off the last few minutes of notes so they're specifically up to, you don't have to wade through anything in there specifically brought up to speed on the last recommendations.

Does anybody else have any comments before we close? (Gina) thanks for the great job and thanks everybody. I think it's – I think it was terrific so thank you. Anybody have anything to say? Okay great. Thanks very much everybody. Have a great day.

(Gina): Yes, bye-bye everybody. Thank you.

Man: Bye now.

(Gina): Thanks folks.

Woman: Bye.

Woman: Bye.

Coordinator: Thank you. This concludes today's conference. Just remember to disconnect all lines and have a wonderful rest of your day.

END