

**ICANN
Transcription
GNSO New gTLD Subsequent Procedures Sub Group A
Thursday, 07 February 2019 at 15:00 UTC**

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<https://audio.icann.org/gns0/gns0-new-gtld-sub-pro-sub-group-a-07feb19-en.mp3> [audio.icann.org]

Adobe Connect recording: <https://participate.icann.org/p9d3ogap86f/>

Attendance of the call is posted on agenda wiki page: <https://community.icann.org/x/fZsWBg>

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Julie Bisland: Okay. You can start the recording, too, on your end.

Operator: Recording has started. Thank you.

Julie Bisland: Thank you. Well, good morning, good afternoon, good evening, everyone. Welcome to the New gTLD Subsequent Procedures PDP Subgroup A Call held on Thursday, the 7th of February, 2019. In the interest of time, there will be no roll call. Attendance will be taken by the Adobe Connect Room. If you're only on the audio bridge at this time, could you please let yourself be known now? And hearing no names, I would like to remind all to please state your name before speaking for transcription purposes, and please keep your phones and microphones on mute when not speaking to avoid background noise. And with this, I'll turn it back over to Robin Gross. You can begin, Robin.

Robin Gross: Thank you very much, and thank you for everyone who joined in today's call. Let me quickly go over the agenda. Okay. We will do an update to a statement of interest, and then we will dive into the discussion of the comments, in particular section 2.3.2 on the Global Public Interest. And then, if time permits, we will get into the next topic, 2.3.3, which is Applicant Freedom of Expression. And then, there's, of course, any other business at the end. So, that's our agenda for the day. Anybody have any comments or questions on that?

All right, then let's go forward. Is there any statements of interest that need to be updated at this time? All right. I don't see or hear anyone on that, so let's get right into the discussion of the public comments. And again, we're going to look at 2.3.2, which is the topic of the Global Public Interest. You can see the Google doc there. It looks like (inaudible) posted a link to it in the chat box, and then it's up on the screen there. The various comments that came in from the community on this topic, and we've got quite a few, so just please follow along, and let's start going through them.

So, the first comment - well, let's start with the question that's being asked, 2.3.2.c.1, and it's a question on mandatory PICs, Public Interest Commitments. And it says, "The Work Track is considering a recommendation to codify the current implementation of mandatory PICs as policy recommendations. In addition, such mandatory PICs should be revisited to reflect the ongoing discussions between the GAC Public Safety Working Group and the registries as appropriate." Okay. So, that's the question that was put out to the community, and we got a number of responses back from folks on that.

And the first one we've got here is from the ALAC, and it looks like it's in agreement with this question. ALAC has support for mandatory PICs, Public Interest Commitments. They say the ALAC supports the prospect of ICANN codifying mandatory PICs. Okay, so that looks like that's in agreement. Anybody want to weigh in on this comment? All right. I don't see any comments. It does look pretty straightforward, so let's go on to the next comment, which is from the Business Constituency, and is also in agreement with the proposition. It's at the top of the page there on mandatory PICs. Nothing other than just agreement is what we have on our spreadsheet here. I think it's pretty -- there's nothing really other than that that they said. Anybody have any comments on that?

All right, let's go down to the next one, from INTA, and this is also in agreement and showing support for codifying the mandatory PICs in policy. INTA would support the mandatory PICs being codified as policy recommendations. PICs have proved to be a valuable mechanism to seek to address concerns with new gTLDs, albeit that we might wish to see improvement. Okay, so this has been categorized as an agreement with the original proposition. Any comments, questions on that?

Okay. Let's go down to the next one, then, from the IPC. And this one is in agreement with the proposition, and also presents a new idea. The IPC has showing support for codifying mandatory PICs in policy, and emphasizes the need for mechanism to support predictable change and discussion. And then, the new idea that the IPC introduces here is, furthermore, as the Work Track has addressed and new to address potential developments in security and stability, it is necessary to have a mechanism that allows for predictable changes and further discussions from the community. Okay. I think that one's pretty straightforward. Anyone have any comments, questions on that? I see Jeff's typed in the chat, "I am not sure this is a new idea, really, support for predictability model." Yes, I think that's a fair characterization, as well. It's not terribly an innovative new statement to say we need to address further developments, security, instability, and that's not exactly a new idea. Okay. Anyone else have any comments on this one?

All right, let's go on to the next comment from Neustar, and it is a mix of both agreement and concerns. Okay, the agreement, it says, "Neustar supports the implementation of mandatory PICs only where they are standard and enforceable in a meaningful way and can be rationalized in light of ICANN's mission as stated in the by-laws." And then, the concerns come in where it says, "We do not support any additional mandatory PICs." Okay. So, that seems pretty clearly both agreement, on one hand, and concerns on the other. Anyone have any comments on that characterization? Okay. I'm not seeing any hands or hearing any voices, so hopefully I'm not talking to myself. I will continue to go through.

All right, so we've got the next comment from ICANN Org, and this one presents a new idea, or rather additional considerations, perhaps. "If mandatory PICs are to be codified as policy recommendations, it would be helpful if the PDP working group could provide

guidance on, (1), what the categories are for; (2) -- sorry, what the categories of strings are -- (2), the process and criteria for applied-for strings to be put into the categories, including who makes the decision implications on the evaluation and string contention processes; and (3), what contractual obligations are for each of the categories. ICANN Org assumes that the changes referenced in this preliminary recommendation are intended to be made applicable to registry agreements for gTLDs and subsequent procedures only. It would be helpful if the PDP working group could confirm this assumption."

Okay. Surely we're going to have some comments or questions on that one. Anybody want to weigh in? I see Jeff's typed in the chat. The last sentence is not a new idea but a theme throughout to identify that everything applies forward, not retroactively. All right. I think that's probably confirmation that this applies to new gTLDs only. Anybody else have any thoughts on this comment? All right. I don't see or hear anyone, so let's go forward.

The next comment is from the Registry Stakeholder Group and is characterized as a new idea. The Registry Stakeholder Group says, "In future rounds, it would be far more advisable to draw a bright line of finality. Once those matters are considered and concluded by the full community, including the GAC, thereby reducing the risk that an individual application, or a group of applications, will be held in limbo for an extended period. This will improve predictability, avoid delays, and otherwise maintain an orderly process." Okay, so that's been characterized as a new idea. Anyone have any comments or questions on that? All right.

I don't see or hear any, so let's go on to the next comment, which in the dock that I'm looking at is line number 11 in the Google doc. And it's from the United States Postal Service, and it is characterized as agreement. "Support for PICs, which help preserve the public interest" -- the USPS says, "Public interest commitments in connection with new gTLD applications are useful and proper. These help preserve the public interest and public trust in the Internet. They also offer opportunities for applications that might not otherwise succeed to move forward." Okay. Anyone have any thoughts on that comment or its characterization?

Okay. I don't see or hear any, so let's look at the last comment in this sub-group on line 12, from -- we'll call it the Public Interest Community, and it is flagging divergence with the proposal. And this comment says it does not support the recommendation, believes it consists of IP policing of Internet content. "Mandatory PICs - no, the working group should not recommend that specification 11, section 3A be adopted as a policy recommendation. It encompasses intellectual property policing of Internet content, which is beyond the scope and mission of ICANN." Okay, so that one's characterized as divergence. All right, I see Jeff has typed in the chat regarding the Public Interest Community, seems to only diverge with respect to spec 11-3A, but what about all other PICs? Good question. Well, it says no to mandatory PICs here, but I think I have to really go back and read it a lot more closely to have a more thorough answer. Cheryl suggests we would ask someone, presumably one of the authors. Good idea. Let's try to -- let's see if we can't get in touch with them on that. And it looks like another question has been posted in the chat from Catrin Ohlmer, says, "And the USPS only supports the PICs as such, not making them a policy recommendation?" Okay. So, presumably, we could ask them that question, as well, try to get some clarifications on some of these points that folks are not quite sure about what is meant. That's a good idea. Anyone have any thoughts or comments on these, doing that? Okay. Well, I don't see any, so I

will take that as agreement and go forward. I see Jim Prendergast has typed in the chat, "I believe Anne Aikman-Scalèse submitted those comments on behalf of the USPS, so could ask her." Okay, that's really helpful, good to know.

All right, so let's go forward. Now, we come to the next question, which on the document -- the Google document that I'm looking at is line 13, and this is question 2.3.2.c.2 on voluntary PICs, Public Interest Commitments. The Work Track recommends continuing the concept of voluntary public interest commitment and asking applicants to state any voluntary PICs in their applications. In addition, the Work Track supports the ability of applicants to commit to additional voluntary PICs in response to public comments, GAC early warnings, and/or GAC advice. The Work Track acknowledges that changes to voluntary PICs may result in changing the nature of the application except where expressly otherwise prohibited in the application guidebook, and this needs further discussion." Okay, so that was the question put out to the community for comment back.

And okay, it looks like our first comment again is from the ALAC, which provides support for the voluntary PICs, in agreement. It says, "PICs are a core part of ALAC's campaign for TLDs that have a high public interest worth. Therefore, the ALAC supports the prospects of ICANN codifying mandatory PICs. The ALAC also notes the usefulness of voluntary PICs from 2012 rounds in respect of applications for strings representing highly regulated sectors and, on this basis, supports the continued use of voluntary PICs in the effort to protect the interests of Internet end users." Okay, so that's been characterized as agreement. Anybody have any comments or questions on that?

All right. I don't see any, so let's go forward. The next comment is from the Brand Registry Group, and it is also in agreement and support voluntary PICs. The BRG supports. This will provide applicants an opportunity to acknowledge concerns and ideas from public comments not previously considered and to adjust where deemed appropriate by the applicant. Okay. Again, pretty straightforward support for the concept. Any thoughts on that? All right, not seeing any. Let's go forward -- although I've been speaking for 20 minutes now without hearing another human voice. I really hope I'm not talking to myself.

Cheryl Langdon-Orr: Robin, you're not. Trust us, it's just we're all mentally just (inaudible) all the agreements together, like, "Yeah, yeah, yeah, yeah, oh, okay, and there's something we'll talk about." It is not a monologue that is being wasted. In fact, you could possibly bundle them together and say A, B, C and D are all in agreement, and X, Y and Zed have agreement and new ideas if you wanted to, and that will cut your time in half. Cheryl, by the way.

Robin Gross: Okay. Thank you. That's very reassuring to hear another human voice. Okay, so let's go forward. Okay. The next comment is from Business Constituency, and it is also in agreement, support for voluntary PICs. "If an applicant volunteers a PIC in their application and this is taken into consideration when approving the application, the applicant should be required to implement the PIC, and it should be included in their registry agreement." All right. Any thoughts on that?

Okay. Let's look at the next one, and this is a comment from ICANN Org and is categorized as a new idea, additional considerations. And ICANN Org says, "In further discussions on this topic, the PDP working group may want to consider whether there should be a cutoff point in the program process for changes to the voluntary PIC in order to allow for the opportunity of others to file objections based on the changes, or whether a new opportunity for objections to be filed after a change has been made should be

allowed. Clarity on this would be helpful to ICANN Org in our operational planning to ensure that we have a (inaudible) as well as external providers, panelists, resources available to support the program." All right, any thoughts on that comment categorization?

All right. I'm not seeing any. Looks like we could take the next -- at least the next two together because they're both in agreement. We've got one from INTA, line 18 on the Google doc I'm looking at, and then on line 19 from the Registry Stakeholder Group. And they both have agreement with support for voluntary PICs. Not too much more detail here. At present, the Registry Stakeholder Group recommends no further mechanism versus PICs except to allow support PICs by registries in the application followed by an ability to add further PICs following GAC early warning rounds. Okay. Any comments on either one of those since they're in agreement?

Okay. And then, let's go down to the next one from Valideus, and it looks like this one is showing both agreement and concern. There's agreement that it should be permissible for an applicant to set out voluntary PICs in its application. However, it should not be mandatory to include all PICs in the application since that would impact on registry flexibility and the ability for the applicant to innovate. We support the recommendations that an early applicant should be able to adopt additional voluntary PICs in response to public comment, GAC warnings, advice. Additional voluntary PICs should also be an avenue open to the applicant to address objections." Okay. Any thoughts or comments on that one?

Okay, not seeing any. Let's go down to the next comment, which is from the Intellectual Property Constituency and is categorized as both agreement and also presenting a new idea. "Support for voluntary PICs is a mechanism to distinguish between competing applicants for the same string. Public interest commitments are a useful mechanism for distinguishing among competing applicants for the same string. And once the string is awarded on the basis of PICs being considered, ICANN compliance should monitor and enforce the PICs." Okay, I think that's all clearly categorized as agreement and a new idea. Any thoughts on that?

Okay, let's look at the next comment, line 22. For some reason, I'm having a hard time seeing who that's from. It's so large I can't see who it's actually from. Can somebody say who it's from? I just -- for some reason, on my screen both columns are blank.

Unidentified Participant: Public Interest Community.

Robin Gross: Public Interest Community. Okay, thank you. So, it looks like there's disagreement and concerns, opposition to voluntary PICs, believe they allowed applicants to make commitments to whatever party they wanted to curry favor from and were not reviewed, nor allowed public interest consideration and comment. Believes they should only be allowed and narrowly tailored to GAC and community concerns. Comment is let's stop calling voluntary public interest commitments part of the global public interest. They're not. Voluntary public interest commitments that are labeled individual commitments by applicants imperil free expression and due process. It goes on to suggest ICANN created a dumping ground called specification 11 and allowed applicants to place anything they wanted to commit to in this section. Unlike any other section of the applications, these individual commitments were never open for review by the public, and ICANN's Legal staff never reviewed them either. Instead, this laundry list of unilateral terms thrown in to the application at a chaotic time became a desperate attempt by applicants to curry

favor with anyone who they thought might help them through the application process. Okay, there's a lot of text here. It says that the PICs violated a huge range of human rights and civil liberties.

Okay, so I think it's probably pretty safe to categorize this as disagreement and concerns. Anyone have any thoughts on that? Okay, don't see any. Let's now go down to the -- yes, did somebody come in to speak?

Jeff Neuman: Yes. This is Jeff, sorry. Justine has a comment in the chat on 2.3.3.c.2, just to read the record, it's about an ALAC comment. There is also a not-inconsistent comment to PR 23222 (ph) itself. The ALAC strongly agrees. Voluntary PICs have proved instrumental in ensuring that some TLDs are operated responsibly. I just wanted to read that in. Thanks.

Robin Gross: Great. Thanks for that, Jeff and Justine. Okay. Let's see. Now, I go down to line 23 in the Google doc, and it's also a comment from the Public Interest Community. And agreement in a limited fashion and a new idea, believe voluntary PICs should only be allowed and narrowly tailored to GAC and community concerns. Only narrowly tailored voluntary commitments at the GAC, the Board, and the community to settle a specific pending issue should be allowed. And then, the new idea that comes in is all such individual commitments must be put out clearly and prominently for public comment as a revision to the public portion of the application which the public is already reviewing. All right. Any thoughts on that, comments, characterization? Okay.

Let's go on to the next comment from the CCT-RT, and it's categorized as agreement with also a new idea. To the extent voluntary commitments are permitted in future application processes, all such commitments made by the gTLD applicant must state their intended goal and be submitted during the application process such that there is sufficient opportunity for community review and time to meet the deadline for community and limited public interest objections. Furthermore, such requirements should apply to the extent that voluntary commitments may be made after the delegation. And here's where the new idea comes in. Such voluntary commitments, including existing voluntary PICs, should be made accessible in an organized searchable online database to enhance data-driven policy development, community transparency, ICANN compliance, and the awareness of variables relevant to DNS abuse trends.

Okay, so it does seem to me that like we're seeing a little bit of a trend here in the sense that people want -- commenters are wanting the commitments to be made available to the broader community to be able to see what's happening, just personal observation there. Okay, and that wraps up that question. Let's look at the next question, which is number 2.3.2.c.3. "At the time a voluntary PIC is made, the applicant must set forth whether such PIC is limited in time, duration, and/or scope such that the PIC can adequately be reviewed by ICANN and existing objector, if applicable, and/or the GAC if a voluntary PIC was in response to a GAC early warning website (ph)."

Okay, so that was the proposal put out for public comment. And here's -- we've got some comments back. The first one is from the ALAC, and it is in agreement, not much more than that. And then, the next one is from the Brand Registry Group, and the BRG supports this recommendation also. So, those are two in support. And the next one down is from the Business Constituency, and that one just is in agreement, as well. So, I think we could take those three at least together and say there's agreement there. Any thoughts on that?

Okay. Not seeing any. Let's move on to the next comment, which is from the ICANN Org and presents a new idea or request for a clarification. It would be helpful if the PDP working group could clarify what is meant by "reviewed by ICANN," i.e. an evaluation, a completeness check, or something else. Okay, I think we could provide an answer on that question, request for clarification. Any thoughts or comments on the ICANN Org? Okay. I note Cheryl has typed in the chat, "This section is all agreement or new ideas/clarification points with one exception of divergence." Okay. Yes, as I look down through here, the next one is from INTA, and it's support, and followed by that is Valideus, and that's support. So, let's take those two right there, INTA and Valideus, and are in agreement with this recommendation, line 31 and 32 of the doc I'm looking at. Anyone disagree? Can we take those two? Okay.

And then, let's go down to the next one from the IPC, which is a mix of agreement and a new idea. There's agreement for the idea, or the recommendation, rather, and also believes that there should be time for comments from the community on the proposed PICs, as well as time for filing objections if the PICs change the nature of the application such that, by implementing the PICs, it falls within one of the grounds to file an objection. All right. Any thoughts on that? Pretty straightforward. Okay.

Let's have a look at the next comment. This one is from the Public Interest Community and is categorized as divergent. This comment does not support voluntary PICs beyond reasons indicated in response 2.3.2.c.3. No other forms of individual commitments, vPICs should be permitted for the reasons set out above. Okay, I think that's pretty straightforward divergent. Anyone have any thoughts on that?

Okay, let's go down to the next one from the -- does somebody want to -- did somebody want to say something?

Cheryl Langdon-Orr: Keep going, Robin, keep going.

Robin Gross: Okay. All righty. I thought I heard someone trying to break through the silence there. Okay. This is from CCT-RT, and it's agreement. All such commitments made by the applicant must state their intended goal and be submitted during the application process such that there is sufficient opportunity for community review and time to meet the deadlines for community and limited public interest objections. Okay. Any thoughts on that?

All right, I think we can then move on to the next sub-question in this set, which for me is on line 36 and is numbered 2.3.2.c.4, and here's the proposal. "To the extent that a voluntary PIC is accepted, such PIC must be reflected in the applicant's registry agreement. A process to change PICs should be established to allow changes that the PIC can -- to allow changes to the PIC to be made, but only after being subject to public comment by the ICANN community. To the extent that the PIC was made in response to an objection, GAC early warning and advice, any proposed material changes to that PIC must take into account comments made by the applicable objector and/or the applicable GAC members that issued the early warning, or in the case of the GAC advice, the GAC itself." Okay, so that's the proposal put out. And we've got--.

Cheryl Langdon-Orr: --Robin?

Robin Gross: Yes?

Cheryl Langdon-Orr: Sorry, Cheryl jumping in. I think Jamie's hand went up before we moved to that section. That's all.

Robin Gross: Thank you. Thank you. I did not see that. Jamie, would you please go ahead?

Jamie Baxter: Thanks, Robin, Jamie Baxter for the record. I apologize. It's taken me a second to formulate my question. But I wanted to go back to c.2, specifically the ICANN Org comment. I was seeking some clarification here, because it seems as though they're asking the group to consider whether there should be a cutoff point to voluntary PICs before we get to the objection process. What I would like to seek clarity on is are they then considering also putting a cutoff date on public comment, which includes letters of objection or opposition against community applicants? Because in the last round, those came in well after objections were completed. And if, in fact, voluntary PICs are there to help applicants move forward and get around some of the concern or opposition from communities or others, it seems that you can't put a deadline on one unless you put a deadline -- or a cutoff point on one unless you put a cutoff point on the other. So, I pose that as a question back to ICANN Org, is if that is their vision, or if there truly is an intent to somehow disadvantage the community applicants who are subject to comments well after objections are even over it as of last round. Thanks.

Robin Gross: Thanks, Jamie. Yes, that would be a helpful piece of information for us to find out, so we'll try to get that question posed to the ICANN Org for clarification on that point. Any thoughts, comments on that?

Okay, not seeing any, let's move on. So, we've moved on to the next question, line -- excuse me, question 2.3.c.4. And it looks like the first six comments immediately under that question are all pretty much straightforward agreement. We've got one from the ALAC, which it says is agrees, one from the Brand Registry, agreement. It says support for the recommendation. The Business Constituency, again, the same thing. INTA, INTA supports this recommendation. And then, the Registry Stakeholder Group supports the recommendation. Yes, there should be a process to change PICs that have been made. And Valideus also supports this recommendation. Okay, so those are, like, the first six underneath here, and they're all pretty much straightforward nothing but support. So, I think we can take those together. Anyone have any thoughts or comments on doing that?

All right, not seeing any. Let's go forward. And so, the next comment, which in the doc I'm looking at is the Google doc, in line 43, from the Intellectual Property Constituency, and is characterized as a mix of agreement and a new idea. So, there's support for the recommendation, and ICANN has a compliance role in showing that the PICs are adhered to is the new idea. Okay, I think that's, again, pretty straightforward characterization. Anyone have any thoughts on that? Okay.

And then, we've got a comment from ICANN Org with a new idea. It says, "It would be helpful if the PDP working group could clarify whether this is in reference to changes during the application process or after the execution of the registry agreement. If this preliminary recommendation is referring to changes after execution of the registry agreement, the PDP working group might also want to consider whether and how to address the elapsed time between the initial GAC early warning advice or objection and submission of the changes, as it is possible that circumstances could have changed during

the elapsed time period. Okay. Anyone have any comments on that? Okay, I don't hear anyone. All right.

So, the last comment in this section is from the Public Interest Community, and it is divergence or opposition to voluntary PICs entirely. The comment says it does not support voluntary PICs beyond the reasons indicated in the response 2.3.2.c.3. No other forms of individual commitments or vPICs should be permitted for the reasons set out above. All right, so I think that's pretty clearly categorized as divergence. Any thoughts or comments on that one? Okay, I don't see any.

So, now we go down to the next question set -- in the set, question 2.3.2.e.1, which is on line 46 of the Google doc I'm looking at. And the question is, "Do you believe that there are additional public interest commitments that should be mandatory for all registry operators to implement? If so, please specify these commitments in detail." Okay, the first comment in response to that question is from the NGPC, and it is expressing agreement. The mandatory PICs, however, may be expanded with a place to narrowly and specifically add a few items. So, if so required as narrowly tailored compromise with the GAC, the Board or the community to settle an application that has been otherwise blocked from moving forward, e.g., the highly regulated industries pointed out in dozens of GAC early warnings and to which substantive changes to the new gTLD were part of the compromise to move these applications forward. Note, such PICs would not then be voluntary, thus to the questions only mandatory PICs in settlements with GAC, Board, and community. No voluntary PICs for the reasons set out above." Okay.

So, this is characterized here as agreement, but I also wonder if perhaps there's also a new idea in there. Maybe it's a little bit of a mix. Okay, I see Catrin has posted in the chat, "The first paragraph seems to be either divergence or a new idea." Okay. So yes, maybe this one could use a little bit more work in terms of its characterization. Anyone else have any thoughts on that? Should we say there's some divergence here, some -- under new idea? I see Cheryl types in the chat, "Tending a tad to divergence, I think." Okay, so maybe we should add there's some agreement and some divergence. And possibly a new idea. Okay. Anyone else have any thoughts on this comment?

All right, so let's go on to the next one. The next commenter is the ALAC, and it is expressing divergence, does not believe additional mandatory PICs are needed. No additional PICs that should be mandatory for all registry operators at this time. But the ALAC opines that, if issues were to arise during implementations, it might be necessary to reconsider this question. Okay. Anyone have any thoughts or comments on that? All right, I don't see any more. And as I looked at the document, it looks like the next five comments in a row are also expressing divergence and also saying we do not support any additional mandatory PICs. There should not be additional mandatory PICs. So, specifically, I'm talking about the Brand Registry Group, the comment from Neustar, the comment from the Registry Stakeholder Group and Valideus, and the IPC. And they all say no additional mandatory PICs at this time. So, I think we can take those as a block for these purposes. Any comments on that?

Okay. I don't see any, so let's move on to the next comment, which is from the Business Constituency, and it says it does not seem to address the question. The BC says better promotion of the PIC process and the PICs themselves are needed. More needs to be done to promote understanding of the PIC process generally, especially in traditionally underserved markets. If a PIC wouldn't change an application, no need to reopen the comment. But if it is addressing a particular weakness or concerns of the community,

important to see that the PIC actually addresses that concern and has clear success completion metrics.

Okay. So, this one, its characterization is a little bit different. It says it doesn't really seem to address the question. So, let me see what people think about that comment and how we should characterize and handle that comment, moving forward. Anyone have any thoughts? Do we just leave it as "Doesn't address the question" and move forward? Okay. Well, I'm not seeing or hearing anyone, so I guess this isn't too problematic if we do that. Okay.

So, then the next question -- excuse me, the next comment is from INTA, and it has the same characterization. It says, "Does not seem to address the question." Okay, so anyone have any thoughts on characterizing the INTA comment the same way? Okay.

I don't see any, so let's move on to the next question in this set, which is question number 2.3.2.e.2, "Should there be any exemptions and/or waivers granted to registry operators of any of the mandatory public interest commitments? Please explain." Okay. Let's take at least the first three together because they are all in agreement with this proposal. And the first one is from the Brand Registry Group, and the next one is from INTA, and the next one is from the Registry Stakeholder Group. And they're all in agreement with that proposal, so I think we can take those as a block for these purposes. Any thoughts on that? ALAC too, yes. Yes. Well, I should have included the ALAC in there, yes, absolutely. Somehow I missed that one. Okay. Great, so the first six. Okay, so let's do that. I don't see any disagreement with that. They're all pretty much straightforward agreements.

So, let's go down to the first one that puts forward a new idea, and the doc I'm looking at, that's the Google doc, that's line 61, and it's a comment from Valideus. And while there is agreement, there's also a new idea. However, provided that this lower threat profile is taken into account when determining compliance with spec 11, S3B, it may not be necessary to delete this PIC. Okay. So, that's categorized as agreement plus new idea. Any thoughts on that? Okay, I guess we can move on, then.

And the last comment in this set is from the Intellectual Property Constituency, and it is also in agreement with the proposal. The IPC recognizes that there should be exemptions, waivers for single registrant-affiliated party only TLDs. However, the IPC also recognizes that single registrant-affiliated party only TLDs, such as exclusive use TLDs and Brand TLDs, should not be required to be subject to all of the commitments listed in the PICs. Okay. Also characterized as agreement. Any thoughts on that? Okay, not seeing any.

Let's move on to the next question, which is number 2.3.2.e.3, and it says, "For any voluntary PIC submitted either in response to GAC early warnings, public comments or any other concerns expressed by the community, is the inclusion of those PICs the appropriate way to address those issues? If not, what mechanism do you propose?" Okay. I'm seeing quite a few in agreement here, just quickly going down. The first one's from the ALAC, the next from the Brand Registry Group, the next one from INTA, and the next one from the Registry Stakeholder Group. These are all in agreement with the proposal, so I think we could take these as a block for this purpose. Any thoughts to that?

Okay, I see Catrin has commented in the chat that the registry comment includes also a new idea, waivers could be a possibility. That's a good flag there. We can add that into the spreadsheet. Okay. I don't see anything more.

And so, the next comment was from Valideus, which is agreement with the new idea. The new idea is the following: in the event that a PIC is filed in order to resolve the concerns expressed in an existing objection, the objector should have certain limited time period to decide whether to continue with its objection or, alternatively, to amend or withdraw its objection based on the newly filed PICs. If the objector withdraws its objection based on the new voluntary PIC prior to the decision being rendered, the objector should become eligible for a partial refund of its objection fees. Okay, so that that's the new idea, but it's also in agreement with the proposal. Any thoughts on that? Okay, I don't see any.

And then, the last comment in this section is from the IPC, and it's expressing agreement, but it looks like there's also a new idea here. Let me just see what it says here. The IPC agrees that the inclusion of voluntary PICs is the appropriate mechanism for moving forward to address GAC early warnings, public comments, and other concerns, but only in the established process that allows for predictability and flexibility. The limitations and conditions on voluntary PICs should also be expressed beforehand, and any changes not foreseen at the time of inclusion or commitment should be further addressed in the process that allows for public input. Okay. So, I would say we've got agreement with the new idea on that comment. Any thoughts on that? Okay, I don't see any.

So, let's go on to the next question, which in the Google doc I'm looking at is line 70. And it's question number 2.3.2.e.4. "To what extent should the inclusion of voluntary PICs after an application has been submitted be allowed even if such inclusion results in a change to the nature of the original application?" Okay. So, we've got the first three comments at least underneath that proposal are all in agreement with that recommendation, the first one from INTA, the next one from the Registry Stakeholder Group, and the next one from Valideus, support allowing PICs resulting in change to the application. Any thoughts on those three? Okay, I don't see any.

So, let's go on to the next comment from the ALAC, which is both agreement and a new idea. The new idea says only to the extent that the voluntary PICs are introduced to address a GAC early warning or a GAC advice or an objection. Okay. Any thoughts or comments on the ALAC comment in its characterization? All right.

The next one is from the Brand Registry Group, which expresses agreement, also a new idea, allowing applicants the flexibility to respond to GAC early warnings and public comments even if this changes the nature of the application. Okay. I'm not really sure that's a new idea. It looks like pretty straightforward. I don't know. Anyone else want to weigh in on that? Okay, I don't see any.

So, let's go on to the next one from the Business Constituency, which is also in agreement and also proposing a new idea, which is each PIC has to be evaluated on a case-by-case basis to determine how it is changing the original application. If there is significant change, the PIC should be rejected unless a change has been made to the application first. The normal change process should be followed to evaluate the changes to the application in view of the new PIC. Okay, so that's agreement with the new idea. Any thoughts on that?

Okay. And the final comment here is from the IPC, and it's also expressing agreement with the new idea, which is such changes be allowed to the extent to allow flexibility in business plans but not to the extent of giving birth to a new application altogether. All right, so again, that's agreement with a new idea. Any comments? Okay. I see comment from Cheryl in the chat suggesting we should wrap here because we do only have a couple of minutes left in the section, and the next section has a bit of divergence, which may require some conversation. So, this does seem to be a good idea to wrap it up here.

I see Jim Prendergast had a comment in the chat also, agreement with the new idea but with limits. Okay, yes, I think that's right. And Martin says the BRG comment should be just agreement, not new idea. And Justin (ph) agrees with that. Okay, so that's some helpful feedback for us.

So, let's wrap this up here, and we can pick up here next time. And any other business? Going once, going twice. All right, I think we're good to go, then, and we'll continue next week with this same section and start the freedom of expression comments. Thank you all for joining. Bye-bye.

Unidentified Participant: Thanks, Robin. This meeting's adjourned. You can all disconnect your lines, and have a good rest of your day.