

**GNSO  
Inter-Registrar Transfer Policy A PDP Jun08 Working Group teleconference**

**7 October, 2008 at 16:00 UTC**

**Note:** The following is the output of transcribing from an audio recording of the Inter-Registrar Transfer Policy A PDP Jun08 Working Group teleconference on 7 October 2008. Although the transcription is largely accurate, in some cases it is incomplete or inaccurate due to inaudible passages or transcription errors. It is posted as an aid to understanding the proceedings at the meeting, but should not be treated as an authoritative record. The audio is also available at:

<http://audio.icann.org/gnso/gnso-irtp-a-pdp-20081007.mp3>

<http://gnso.icann.org/calendar/#oct>

**Participants present:**

Paul Diaz - Elected as Working Group Chair - Networksolutions Registrar c.  
James M. Bladel - Godaddy Registrar c.  
Marc Trachtenberg - IPC  
Barbara Steele - Registry c.  
Sébastien Bachollet - ALAC

**Staff:**

Olof Nordling - Manager, Policy development coordination  
Marika Konings - Policy Director

**Absent - apologies:**

Michael Collins - CBUC  
Mike Rodenbaugh - CBUC Council Liaison  
Glen de Saint Géry - GNSO Secretariat

Paul Diaz: Thank you. Welcome everyone. This is Paul Diaz. And Glen cannot be with us today so I will quickly go into the roll call.

On the call today we have as I mentioned, Paul Diaz from the Registrar Constituency and the Chair, Barbara Steele from the Registry Constituency, (James Bladel also from Registrar Constituency and (Sebastian Bachollet from the (ALAC). And wonderful, I believe Marc Trachtenberg from the IPC has just joined us.

And thank you Marc because with your presence I think we now have the quorum of working group participants.

Of course from staff as always we have (Marika Konings) and Olof Nordling. Yes, and just going over past notes and attendance, we normally have nine or ten participants. If we're up to five I guess we'll take the lower number and claim we have a quorum today. So this will be a official.

A couple of administrative issues for everyone, as you're all aware the deadline for constituency statements is last Friday. We've received statements from the intellectual property constituency, the registry constituency in registrar constituency - hoping that we might see something from the business constituency. Fortunately their reps aren't on the call at this moment but we will reach out back to them, hopefully get their official views for the record.

(Marika) has already put together a summary of the position statements that were received, the comments. She's put them both on the public list as well as our working group list.

If you haven't already, strongly ask that everybody take a look at that, understand the positions. I think there's a good degree of consensus there. There are also some additional things that constituencies are looking for and whatnot. We will need to discuss them.

At this point I think what we'll do is probably wait in the hope that we get business constituency views. And so we'll wait until we have the draft of the initial report. And that is scheduled by the 17th of this month, you know, the idea of being that we have time to mull it over at least what will that be, one maybe two calls before we all head off for ICANN Cairo. And there will be opportunity to hash out issues at that point.

For the call today since we do have a quorum now, the hope is that we would start focusing on some of the terms, details of issue Number 3, the partial bulk transfer question before the working group.

Before we get to that though, just want to circle back and ask are there any additional points, clarifications, et cetera on Issues 1 or 2 that anybody wanted to make to add into the call?

All right. And then before getting to three, Olaf if we could ask you, you said you had some additional feedback from your colleagues at Swedish Registry?

Olof Nordling : Right indeed. Following the request at the recent call for just checking up - following-up on their system and given their position and - well advance position when it comes to use of the (NS sec), the question was raised whether there is any potential benefit from the (NS sec) when it comes to transfers.

As I mentioned earlier, the transfers in the Swedish context, well it's an emerging matter. They have not had registrars in the true sense from sort of a (detail D) perspective but rather all registrants have registered directly with the registry.

And the registrars have supported the new registrations basically but they haven't had a particular function in relation to the registry.

So they're introducing a registry registrar team. And the question then arose whether the (NS sec) would be of any particular use in that context or could facilitate it or so. And I put that question to them.

And well they thought long and hard but they couldn't see anything. But maybe that will emerge in due course. But so far, well the answer to that plane question is bluntly no...

Paul Diaz: Okay.

Olof Nordling : ...as far as they can see. Thanks.

Paul Diaz: Thank you Olaf. Yes, yes. You know, we all discussed last week I don't think any of us had the really strong technical background to have answered the question. Much appreciate your reaching out.

But unfortunately what at least I understand as being - I kind of suspected that would be the answer. But perhaps as the standard evolves and depending on the particulars of implementation, perhaps there will be something in the future that might help this group.

We'll just keep a distant eye on it but again, appreciate your following-up on that for us.

All right. And again, it didn't seem anybody had additional thoughts or comments for issues 1 or 2. Let me ask the group, have you all had opportunity to see the summary that (Marika) has produced?

If so, could you just weight in are you comfortable with the way it's been summarized? Do you feel that it actually - accurately pardon, accurately captures the position particularly if you can speak for your constituency or based on your memory of what's been discussed by colleagues here or your own interpretation of what you read, what has been posted?

Are there any concerns on the treatment, the summarization of issues 1 and 2 as it currently stands in (Marika)'s draft?

Barbara Steele: This is Barbara. I think that it fairly summarizes the registry's constituency position.

Paul Diaz: Thank you Barbara.

Barbara Steele: You're welcome.

Marika Konings And this is (Marika). I just wanted to point out as well that for the issues for the initial report I expect to provide more details to some of the issues.

This was a summary that was intended for the public comment box. So it's a bit shorter than I would perceive for the actual report.

So if anyone is concerned that certain details have been left out, I do hope to bring them back in the report itself.

Paul Diaz: Excellent. Again, it struck me as a very, very strong first effort. So I don't think you're going to have much to add (Marika). But certainly if anybody does have extra nuance and detail they want to see added, there will be opportunity in future calls or certainly reach out directly to (Marika) as she will be working on that draft with the goal of having the first initial report ready by the 17th of this month what is that, a little over a week?

All right then, if I - if we can then I'd like to turn our attention to issue Number 3 that's still before us. Again, based on these comments that were received whether public or from constituency statements, there does seem to be a consensus for taking out this issue of a partial bulk transfer.

However as is noted in those various comments, you know, folks do want to have a better understanding of what exactly it is we're talking about. And I think it would help if as a working group we can begin to flush out what these terms may be.

The question or a concern that I have for the group - I'm always very sensitive as chair. I don't want my personal view to unnecessarily drive the discussions. Though I'm asking the group the - in our charter that question asks whether the policy should incorporate provisions for partial bulk transfer.

It then defines or begins to define I should say partial bulk transfer. But

the question was sort of whether there should be.

And the concern that I have for the group is is it within our mandate to flush out in detail what those terms may or may not be or should we limit ourselves to simply saying, you know, we had consensus for further work. And this question of the detail, this partial bulk transfer should be deferred to some other group that would be specifically chartered with hashing out a policy.

What is the thinking of the members up on the call today? How do you all want to handle this one?

James Bladel: Paul, this is (James).

Paul Diaz: Sure (James), go ahead.

James Bladel: I think that we should at least take an attempt at making some recommendations towards the definition of partial and bulk if only because the - if we were to defer that to another group there is a possibility that the definition may cause some of the constituencies to rethink what their consensus position is.

Paul Diaz: Very good. How do others feel with (James)' point of view?

Barbara Steele: This is Barbara. I would agree with that. I think we can put some guidelines around what it would entail, what the definition should be.

But I don't know that we should get into a lot of detail. I think that, you know, just as my statement that I submitted for the constituency indicated that it should be left up to the market how we make that

available to registrants for instance.

But I think that, you know, there are some high level guidelines that you want to put around as far as like what the bare minimum of the information that would need to be provided between the registry in the registrar relative to a bulk transfer that may work as well.

James Bladel: And Barbara, to add to that, maybe if we defined what a partial bulk transfer is not or what is not considered within the scope of that definition then what would in your constituency statement, what would cause a reengineering of a existing functionality and therefore should be excluded from any detailed definition.

Barbara Steele: I think you could get into that. But I mean if you start defining what it's not then that's pretty much an open door for a lot of information.

So I would almost prefer that we concentrate on what it, you know, what it is. Because wouldn't we end up, you know, defining a lot of things that may necessarily - unless there's some very obvious ones then obviously we'd need to preface it that, you know, it's it includes these specific things but it's not limited just to those as well?

James Bladel: Right. I think that if they were just some obvious ones that would cause as we said a reengineering of existing provisioning systems and facilities.

Paul Diaz: Okay, love what I'm hearing. And for what it's worth wearing my network solutions hat just as a participant, I'm in total agreement. I do think we need to flush this out a bit but not necessarily have to spell out in - like an attorney in great detail all the terms.

(Sebastian), Marc, are you both in agreement with this general direction or do you feel that we should go in some other direction perhaps?

Marc Trachtenberg: I think that's (acceptable).

(Sebastian Bachale): Yes I agree with the direction.

Paul Diaz: Okay very good then. Then, you know, why don't we start? And you know, one thing I meant to do for the group -- and I forgot I'm sorry -- is get the language out in front of everybody with the current transfer policy says in terms of its definition of bulk transfer. It's probably the easiest place to start so that we at least see what exists and can use that as our point of departure for this (partial).

And bear with me if we - going out to the wiki side. We have the -it's been a little while. Somebody - their eyes are quicker than mine. We have the existing policy do we not?

Olof Nordling : This is Olaf. I don't think we have any definition of anything other than the bulk transfer...

Paul Diaz: Yes.

Olof Nordling : ...which is the full the bulk transfer. So - but at the same time if we have - we've got a merger but nevertheless starting point in the framing of Issue 3.

So where it says partial bulk transfers that is - and here we've got a

first sort of embryo for a definition - transfers involving a number of names but not the entire group of names held by the losing registrar.

Well it is - at least it's a starting point for some kind of definition work.

James Bladel: Paul, this is (James).

Paul Diaz: Yes (James)?

James Bladel: I seem to recall an earlier message posted to the mailing list that described a registry service provided by one of the registries that was kind of along those lines. Is that correct? Was that affiliates or...

Paul Diaz: Yes, I'm trying to remember now.

Barbara Steele: NeuStar I believe does that...

Paul Diaz: That was NeuStar and I was going to say (Tim Alese) had alerted us to it so...

James Bladel: Right.

Paul Diaz: ...looking for, you know - all right let's - the thought is the current policy has terms for a bulk transfer. And bulk is defined as, you know, this is what I meant by, you know, sort of a starting point. Bulk is 50,000 names or more correct?

Barbara Steele: Well basically it's the portfolio of the domain names. The 50,000 comes into play to determine whether or not a fee would be charged by the registry to affect a bulk transfer. So if it's less than 50,000 names

there's no charge. If it's more than 6000 names then there's a \$50,000 charge.

Paul Diaz: Okay. Thank you Barbara. And those sets of clarifications I think are really key because we want to - or as a group, you know, put this as a question. Do we want to have a definition that a partial bulk transfer will equal pick a number? And if so if it's above or below that or not will there be any fees associated?

My thinking again as a network solutions rep to the group is I would prefer to see some of these detail suggested, you know, in writing to better understand what the working group, how it's conceptualizing a partial bulk transfer.

Then again do others feel that that's perhaps too much detail or something that they don't want to -you know, a direction they don't want to go in?

This is a discussion I was hoping that we would have that, you know, we'd begin to put some focus around what the actual terms of a partial bulk transfer might or might not be.

Marika Konings This is (Marika). I have a question in relation to what Barbara just said. Could the undesired side effect of implementing a policy relating to partial bulk transfers be that people then decide to have a transfer of first 49,000 names and then another 49,000 so it avoids the charge? Could that be a side effect of a policy like that or...

Barbara Steele: (Marika), this is Barbara. I would think that that could very well be something that could come up. You know, the way that it's stated in the

current policy because it's something that registries are directed to do by ICANN as a result of a registrar basically ceasing to do business, you really don't run into that problem in that scenario.

But I think that if we were to open it up for a partial bulk transfer that's more of an election and not really a requirement due to the de-accreditation of a registrar for instance, it could very well open itself up to that particular type of abuse.

Paul Diaz: An important point. Does anybody have any thinking on how we might avoid such a gaming situation?

Barbara Steele: Well it could be just for a partial bulk transfer because it's more for business reasons, not necessarily because as I said, a registrar is going out of business and it's, you know, in that particular case it's, you know, in essence to protect the registrar.

You know, maybe it's just, you know, an automatic. There will be a charge that would be a per name charge. It may not be as deep as, you know, what you would have for a regular registration fee. But - and I don't know that we would actually want to define what the charge is. I think market forces probably should dictate that. In fact I don't know that we could actually dictate what that price would be here because it would almost be - well I believe that it would be inappropriate to do that.

But, you know, I think that it should be left up to perhaps the individual registries. And then if the registrars are obviously marketing this to their registrants then again, market forces could dictate what the charge should be.

James Bladel: This is (James).

Paul Diaz: Go ahead (James).

James Bladel: Barbara, to your knowledge, does the existing policy have restrictions that for example the losing registrar must transfer the total of all their domains under management so they cannot retain any registrations with the registry after conducting a bulk transfer?

Barbara Steele: The way it operates today that is the case. I mean as I said, the language within the transfer policy just - and, you know, I have it here in front of me, basically just stipulates that it's the transfer of the sponsorship of all the registration sponsored by one registrar as a result of in the first case an acquisition of that registrar of its assets by another registrar or two, lack of accreditation of that registrar or lack of its authorization with the registry operator may be made according to the policy following procedure.

So I mean this basically contemplates that it would be the entire face of domain names under management by the registrar that's losing the names.

James Bladel: Okay, and secondly with your idea of there being a fee but we would not specify that some kind of per name fee associated with a partial bulk transfer, do you envision that that would or probably would not include an extension of the expiration date?

Barbara Steele: The way the bulk transfer tool if you will, that the registries use to affect a bulk transfer operates is that it does not set the date forward nor

does it charge the registration fee.

James Bladel: Okay.

Barbara Steele: Fee - that it happens to go above the 50,000 name threshold that's defined in the policy today, that's actually - it's assessed separate from the actual process.

James Bladel: So it's not a programmatic fee. It's something that's happening separately.

Barbara Steele: That's correct, that's correct.

Paul Diaz: Okay. I'm taking notes if it's a little quiet. All this background is very helpful.

The concern just, you know, for the group to consider, if we come back with a recommendation that the - sort of the let market forces decide leaving pricing issues to be determined by the registries and registrars involved in the particular partial bulk transfer, --- this is a question for the group, are we -- do we need to have at least some additional guidance?

What I'm thinking is, you know, some terms it would say that you have to maintain the - just so they're the same sets of consistency, equal treatment of registrars. I guess to play devil's advocate I could, you know, match a situation here where people will cry foul if a larger registrar that, you know, is perhaps very interested in attracting more business to its registrar, you know, cuts a deal with a registry operator to offer very attractive pricing of partial bulk transfer.

That price is determined or justified based on projected volumes. A smaller registrar may balk and say wait a minute, you know, just because I can't generate those volumes, why shouldn't I have a similar deal?

You know, for the group I'm a little concerned that if we leave everything to "market forces" we may wind up running the risk of creating a multi-tiered playing field where the larger players will be able to get better deals than smaller ones.

Anybody else share that concern? And if you don't think it's really an issue we need to worry about please explain to me why because I honestly think that this will be something that could very quickly be raised leveled against us if we were to make a recommendation right now that it should just be based on market mechanisms.

Marc Trachtenberg: This is Marc. I think - I share that concern but I guess one question I have which is somewhat related is if we discussed this I can't recall so please someone remind me.

Did we ever discuss why these partial bulk transfers shouldn't be subject to normal transfer fees?

Paul Diaz: No we haven't Marc and that's a totally fair question.

Marc Trachtenberg: Because I mean I think it's one thing to say you should build in a facility for, you know, registrars or, you know, some people suggested registrants be able to take to leverage, you know bulk transfer for, you know, the ability to freely transfer domain names but, you know, I think

that's a separate question from whether we should just - the fact they'll accept that there's no cost for this. You know, the fact that there's no cost for it now it's used for a totally different purpose and it's a totally different context.

So I think from my perspective I would like someone to justify why someone who wants to transfer a large number of domain names shouldn't just pay the normal transfer fee and it's a business cost.

Barbara Steele: I think that that would be fine if the expiration date of the domain names are going to be pushed forward by year because, you know...

Marc Trachtenberg: Well certainly, certainly. I mean I'm not - that's what I'm talking about, the normal transfer process.

Barbara Steele: Okay. But I guess if we - if at the registry and if it looks as though this is something that the registrars can engineer and, you know, just some them through as a group if you will, a group of domain names, then I guess that's a possibility.

But there was the concern that if they came through the normal process where there could be I guess the option for the losing registrar to deny the transfer, then it could be problematic.

At the registry we do not have the ability to process a transfer charging the fee and pushing the date forward accept as contemplated by EPT and the normal mechanism for processing that transfer.

Marc Trachtenberg: But I think I'm making a separate point which is, you know, I think what we're discussing is trying to create some facility which allows, you

know, technically the ability to, you know, do these bulk transfers.

But my point is that I think that's separate from the pricing issue. And I just don't see why, you know, we can't create some kind of technical facility that allows bulk transfer yet to keep the existing, you know, price structure which includes, you know, moving the expiration date a year forward.

Barbara Steele: That would require development by the registries in order to create a mechanism to do that.

Marc Trachtenberg: But isn't everything we're talking about here going to require some kind of adjustment by the registries and probably registrars?

Barbara Steele: It depends. If it were to be rolled out the way that NeuStar rolled it out where I believe they get a list of the domain names and there's agreement between the registrars that they're going to be transferring between - they probably -- and you know, I can validate this with (Jeff Newman) or someone else over at NeuStar -- but they more than likely are going to be using the same tool that the rest of the registrars use in order to effect a bulk transfer which as I said, it doesn't push the date forward and it doesn't charge a fee.

So there would have to be engineering to code it so that it would function differently than it does today.

Marc Trachtenberg: But again, you know, like (this same thing) that everything we're talking about requires some kind of reengineering technically and socially and process oriented because the existing bulk registrar tool is not intended for, you know, basically what we're discussing using it for.

Paul Diaz: Barbara, can I ask you to reach out to NeuStar and just get clarification to figure out did they already incur any sort of engineering costs or are they doing it under the regular system just so we can have that as a factual point?

Barbara Steele: Yes, I sure will.

Paul Diaz: Thank you.

Olof Nordling : This is Olaf here. I'm just coming back to your initial concern Paul about equal treatment of registrars. Now that has of course to be seen against the backdrop of the registry agreements and the provisions for equal treatment of registrars which appear there.

But perhaps Barbara you know more about what the limits are in that respect.

Barbara Steele: Well I think you're right Olaf. I mean I think that, you know, all of our registry agreements, the com net registry agreements and I'm assuming the others as well have a provision in there that requires the nondiscriminatory treatment of registrars and us.

And so, you know, we do have an obligation to treat them all and operate so that they're all on the same playing field.

Paul Diaz: Okay.

James Bladel: This is (James).

Paul Diaz: (James) please.

James Bladel: Marc, one possible scenario that I was just thinking about -- and I'm not - I won't really flush this out -- but it might possibly challenge the idea that the regular registration or transfer fee should be involved with the year extension is that any case where a reseller is becoming an accredited registrar in their own right that's more of a back office type of a transaction that the end user registrants may not want to support or may not have a choice in that type of a transaction whether that happens or doesn't.

It would be conceivable that they would treat that transfer as a business cost. But transferring from the old registrar to the newly accredited registrar it's not always clear how they would recover those costs from the end user who would want something like that to happen transparently.

Marc Trachtenberg: I just don't see why that's everyone else's problem. I mean I don't know how it - I don't know, I'm sorry, a nicer way to put it. But that seems to me like I business cost.

If your business model is that you're a reseller and you decide that you want to change your model and become accredited, there's going to be certain costs involved with that.

There's going to be costs in the accreditation process. There's going to be costs in hiring new employees, reengineering your systems. And one of those costs is going to be the cost of transferring all those domain names to your accreditation.

And so that seems to me a business cost in changing that model. There are also ways to avoid that which is they could transfer the domain names as they come to expiration.

Paul Diaz: Right.

Marc Trachtenberg: So I mean there's numerous other ways that can more easily be handled as opposed to making it a huge policy change, you know, in light of how difficult it is to change any policy in my opinion at least.

Paul Diaz: Yes. No, I think you made some very good points mark. Marc could I ask you can you - and it can be just very short. Can you post your question to the list only because since we don't have all of our members here today I think seeing it in black and white will, you know, hopefully get the creative juices flowing so that, you know...

Marc Trachtenberg: Which question's specifically?

Paul Diaz: Well the question in general, you know, how you led off. You know, if we're talking about partial bulk transfer why not just have the terms that currently apply for a transfer, i.e., you add a - you know, you pay for an next year and you get your expiration date pushed out for that one year term.

And if I understand your question, okay so then maybe there's some form of - some effort that the working group needs to consider in terms of how you might identify role of et cetera, some group of names but that the -fundamentally this would just be a standard transfer albeit with a, not a one off but rather, you know, some volume of names controlled by a particular registrar.

And I think the question that you're answering is one that may resound very strongly with other members of that group who aren't here today. And taking the unfortunate view that, you know, they may not have time to listen to the MP3 and whatnot. You know, if they can at least see it on the list and respond we can, you know, hopefully get a good debate, a good discussion going.

But just a short note that, you know, kind of lays out what - do we really need to create a brand new policy rather why not apply the existing terms in terms of costs and the date, you know. And then maybe we can come back and debate whether there, you know, there needs to be some way to roll up the names so that it's not on a one off process.

It's in previous calls that one at a time approach has been something that has been a source of frustration in the marketplace. And, you know, those who I've heard make that argument that it's frustrating, I've also made the point, the major point that you're making right now.

It's not that they're unwilling to pay for an additional year. That's not the concern. It's more I've got some volume of names, can we roll it up?

Marc Trachtenberg: Exactly. And that's why I, you know, would contemplate and would support, you know, creating a technical facility to be able to do the bulk transfers but not tainting existing terms for payment or an extension of expiration date.

Paul Diaz: Yes. You know, converse, just a thought that immediately comes to mind of course is if it's - if the group were to come to consensus that,

you know, existing terms will apply and, you know, we'll look at some other terms, I would argue that the marketplace already has that sort of solution in place.

There are registrars that actively, you know, work to basically do all that heavy lifting on behalf of a registrant, you know, prepare the transfer requests, roll it all up. And then of course the pricing for that is, you know, to the - for the market to decide, for those service providers to figure out.

Again, if we were to go down that route, you know, I would argue that it already exists. If we're not talking about changing the - or extending the current bulk transfer terms, i.e., no fee but no extension of the expiration date, if that's not on the table then that's sort of service already exists in the marketplace and as a working group we might not even have to go there.

Don't want to get ahead of myself, don't want to color the debate. But if you could Marc, just a quick question to the list and let's see if we can get some additional inputs in particular from colleagues who are not here today but I know have some pretty strong thoughts on this particular issue.

Marc Trachtenberg: Certainly.

Paul Diaz: That'd be helpful.

Barbara Steele: This is Barbara. I had a question relative to, you know, the registrars that are currently providing a service such as this.

What are you doing relative to the form of authorization or FOA? Are they doing a blanket FOA in order to satisfy the requirements of the policy?

James Bladel: That's a good question Barbara. I would have to find out whether we're doing some sort of a blanket FOA or if that's even aloud. We may be doing it iteratively and doing each one individually. I'll have to check into that.

Barbara Steele: Okay.

James Bladel: All right, Paul any experience from within network Solutions or...

Paul Diaz: I will check. Not that - I don't believe network solutions or its sister registrars are offering such service. But I'm not sure what our resellers may or may not be doing and any support we may lend them. So I will ask and give back to the group as well.

Barbara Steele: But it almost sounds as though this is becoming more of a product offering by the registrars to the registrants and then they would just continue to submit, you know, transfer request the way they normally would.

Paul Diaz: It may be Barbara. And if there is on general consensus then I would say the working group is here to come out with policy recommendations, not product recommendations.

I mean we started our discussion talking about writing broad terms for a new policy that would envision an extension of bulk - existing bulk transfer terms in a partial bulk transfer environment.

If however the group by consensus moves to a view that hey, the existing transfer terms should apply, we just need to figure out a way to simplify the rolling up of the body of names.

That really is moving I think beyond our scope. It's becoming a product issue. And the marketplace already has in some instances supplying that need.

But it - this is the first time we're really substantively digging into Issue Number 3. You know, I'd argue let's keep the discussion going for a call or two and make sure that we're comfortable with whatever direction as group we want to take.

Okay, in that discussion I want to make sure that everybody's had opportunity to say their piece. At some point people are having ideas. It sounded like somebody else might be trying to get at additional thoughts right now.

Olof Nordling : Olaf here. And just an ancillary question since there are requirements for the various occasion and approval and such.

If there are sort of arrangements that registrars have today, it's interesting to know how they handle the individual approval or individual requests in one way or another. Because that's still a requirement - a requirement according to the policy.

So whether that's taken from some kind of blanket input from the registrant that please transfer all these domains and they can take care of the rest and it's taken as such a request or if there other steps that

are necessary to take. It's just in order to drill a bit deeper in how it's actually working if there are solutions out there today.

Marc Trachtenberg: Olaf I can tell you how we did.

Olof Nordling : Okay.

Marc Trachtenberg: I ran a registrar owned by a law firm, and it was a intellectual property law firm where we basically dealt with, you know, large portfolios for brand owners.

And the way we did it -- and I understand, you know, other companies like MarkMonitor and Net Names do it is essentially what you do is you taken through the portfolio and you, you know, use one of your own corporate email addresses as the admin contact or sometimes even as the registrant.

And so, you know, that way you're able to essentially, you know, manually do the transfers. And that's a service that the registrants pay for.

And so, you know, to have that option is kind of the difference between, you know, registering domain names at GoDaddy or registering domain names at a MarkMonitor. You're paying a higher incremental cost at MarkMonitor but, you know, MarkMonitor will do that service for you.

And a more concrete example of, you know, why that would happen is, you know, let's say we were trying to get a new customer and they had a large portfolio and the domain names were either at one of the

registrar or even several other registrars.

They have a certain amount budgeted every year to pay for these domain name registrations. And if we were to transfer this entire portfolio over immediately, they would obviously be charged the transfer fees. And that would, you know, damage their existing budget calculations.

So in that case what we would do is we would transfer over the portfolio, you know, month by month as the domain names were set to renew.

Olof Nordling : Okay yes. Well thanks for enlightening me. That's interesting to understand how it actually does work in practice.

But so you have both sort of the manual handling of simultaneously perhaps of the whole partial bulk. And that's being transferred or - and/or a staggered approach as they come close to expiring.

Marc Trachtenberg: Exactly. And, you know, to be honest that truly is dictated by the market. I don't know - I believe that some other registrars do this. I know I did it because, you know, the question becomes, you know, how badly do you want the business?

Yes of course it's nice to transfer over an entire portfolio immediately but, you know, will the perspective client pay for it? If not, then you have to adjust your approach to what they'll pay for and to still take over the portfolio.

So I mean I think the existing framework is pretty robust and can

accommodate various business models. So, you know, I don't think that we need to change so much for example that, you know, the pricing structures for transfers and moving forward expiration dates. I think, you know, the market will handle all that, that we need to make, essentially, you know, as few changes as possible while still facilitating, you know, potentially some sort of available bulk transfer.

Paul Diaz: Yes, very helpful Marc. The explanation I was also just making sure, you know, Margie Milam from MarkMonitor is officially a member of the group. I know she has schedule conflicts most of the time. But I was going to reach out to her and see if perhaps MarkMonitor would share in an email the process. But I think you basically explained it. That's my understanding of how they work.

Marc Trachtenberg: MarkMonitor was a lot more expensive than we were. So, you know, I have to possibly think that in most cases if someone went with Mark Monitor they could afford the cost of transferring over the entire portfolio.

But then again that's probably not always the case because, you know, when you have a portfolio of, you know, 10,000 names, it becomes pretty expensive to transfer them.

Paul Diaz: Yes and ultimately for the antitrust concerns that Barbara was hinting at earlier I'm far less interested in understanding their pricing structure and how they derived at them, just sort of the basic mechanics of the process.

And your point that by getting the - changing the admin contact to something controlled by the registrar so that they can, you know, do all

the FOAs and follow the terms of the process, you know, that's key if we can get that spelled out by them as well.

And of course we have your input site here right now. And I think that pretty much captures how the market is already responding to this need what exists.

Actual pricing issues we probably don't want to drill down too far on that because that's really - is proprietary on the part of the service provider. And it would be inappropriate for us to ever make recommendations or dictations about business models and pricing points.

All right, other thoughts? By my watch we have about 5 minutes left. A number of us have, you know, little issues to run down in the interim week.

I would like to ask the group right now though before we run out of time, next week the anti-phishing working group is having their annual conference in Atlanta.

I will be attending that. I believe Mike Rodenbach will be attending, perhaps others on the call as well on the regular call.

The question I have for the group is do we want to keep the momentum going and meet next Tuesday at our regular time or can we take a week off and follow-up?

I know I will be unable to breakaway from the APWG conference to chair this to even participate.

I've got a backup so if people would prefer to keep things rolling I think that's excellent and we can do that or if you feel that, you know, you want to take the time to mull over what we started discussing now and run down whatever the particular homework items that we have, that's good as well.

What is the group thinking, you know, with those who are on the call now? Shall we press ahead next week regular time, time and date or should we take a week off and then regroup? I guess that would be on the 21st at which point we would also have the initial draft report that we could start reviewing.

Marc Trachtenberg: Just one...

(Sebastian Bachale): And no - to your question (Sebastian), but I will not be available. It's our monthly conference of the Iraq. And then each month I will - I am not able to participate in these conference calls. And I will not be here next week.

Paul Diaz: So you're (unintelligible). Okay, so that's potentially three of us.

Others please. I'd like to poll everybody. You know, what are your feelings? And (Marika), I'm sorry, did I cut you off if you had a point as well?

Marika Konings Yes no, I just wanted to know that of course as we're still having discussions ongoing on the different issues that I probably need to insert some placeholders in the initial draft for issues that we are still discussing or haven't really reached a conclusion on.

So in that sense, you know, by skipping some calls it does mean that the report might not be as complete as it needs to be before it goes out as an initial draft.

Paul Diaz: Very important point. Others, just run down - I mean Barbara, how do you feel?

Barbara Steele: I'm fine with taking a week off. But I agree that it could definitely impact what the report includes.

So maybe we could do some work on the distribution list to address some of those areas maybe that you had some - or would need some clarification.

Marc Trachtenberg: That's a very good point Barbara.

Paul Diaz: Very good, yes.

(James), how do you feel?

James Bladel: I agree and I like Barbara's approach of just focusing the editing work and some of the homework items onto the list.

Paul Diaz: Okay. And Marc, how do you feel?

Marc Trachtenberg: That sounds good to me.

Paul Diaz: That's all right? All right. Then let's do that. I will send out a note to everybody on the list explaining that we're going to skip next week's

call; that is we will not have a call on the 14th.

We'll encourage everybody to continue the discussion by email on the list and that we will regroup on the 21st our regularly scheduled time.

We'll also be looking forward to whatever degree we have the initial report. And certainly we'll encourage business constituencies if they have formal comments they want to submit to try to get them in immediately.

And then of course the rest of us you know, if we had homework items, whatever we're calling them, to please run those down and post the results to the list so that we can keep those discussions going as well.

So with that I thank everybody for their time. And again, we'll send a note out. But appreciate everybody's effort and we will talk again on the 21st.

Barbara Steele: Thank you.

Paul Diaz: Everybody have a great day.

James Bladel: Thanks Paul.

Paul Diaz: All right, bye-bye now.

END