
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 19 October 2021 at 16:00 UTC

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JULIE BISLAND:

Good morning, good afternoon, and good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group call, taking place on Tuesday, the 19th of October 2021. In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room.

For today's call, we have all of a sudden from Crystal Ondo (RrSG) and James Galvin (RySG). We have formally assigned Jody Kolker (RrSG) as their alternates for this call and for remaining days of absence. As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite emails. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only.

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As a reminder, when using the chat feature, please select everyone in order for all participants to see your chat and for it to be captured in the recording. Alternates not replacing a member should not engage in the chat or use any of the other Zoom room functionalities. If you're an alternate not replacing a member, please rename your line by adding three Zs before your name and add "Alternate" after your name, which moves you to the bottom of the participant list.

Statements of interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now.

Seeing none, if you do need assistance updating your statements of interest, please email the GNSO secretariat. Please remember to state your name before speaking for transcription. Recordings will be posted on the public Wiki space shortly after the end of the call. And as a reminder, those who take part in the ICANN multi-stakeholder process are to comply with the Expected Standards of Behavior.

Thank you, and over to our chair, Roger Carney. Please begin.

ROGER CARNEY:

Thanks, Julie. Welcome, everyone. Let's go ahead and jump in. Just a few things to provide updates on and I guess we have it on our agenda here. One of the things I just wanted to mention was we'll have our ICANN72 session next week, same date. Looks like about an hour, hour-and-a-half, later, actually. We kept a good time there it looks like. Excellent.

There are some comments back and forth about the presentation which helped out, so we've made some edits. We can take a look at those later or we'll get them sent out to everybody.

The final thing is, again, just like we try to do every week, open up the floor to any of the SGs that want to bring anything forward that they've been talking about over the past week or so, just to get anything out there and we can start discussing it, if anybody has any concerns, comments, suggestions from their stakeholder group discussions. I'll open the floor now for anyone that wants to bring anything forward.

Okay. Well, then, we'll go ahead and jump into our main discussion today, which is talking about additional security mechanisms. It's kind of a broad topic, really, as pretty much anything fits here. But really one of the big focuses here is going to be on the locking. Then obviously any other additional things we can think of, which again as we've gone through this process we've picked up a few things. Again, making the TAC a little better, a little more consistent standard, things like that, which again we've talked about and they're going to be recommending. But anything else that anybody can think of that will help improve the transfer flow from a security mechanism-wise perspective ...

The big part of this is the locking and if it's mandatory or if it's suggested. If it's allowed, what should be allowed and what windows are available there. I think those are the big things.

We introduced this last week, the charter question. Hopefully, everybody had a chance to look at this and think about it over the past week.

Again, it's fairly well known, the locking. I guess the big concern—and I think we see it kind of in some of the suggestions later on here is some registrars impose the 60-day lock. Some don't. Some implement something in between. But I think it would be good to come to a standard here so that registrant experience the same no matter where they're at or at least as close as we can get it to being the same no matter what registrar they're with.

Zak, please go ahead.

ZAC MUSCOVITCH:

Thank you, Roger. Roger or anyone else, just provide me a little bit of background information about how the locking policy fits in with the second phase of the working group because I saw that it was clearly part of the second phase. I also see it's part of this phase under this charter question, so I'm wondering are we dealing with it here, are we dealing with it there or are we dealing with it under both phases? Thank you.

ROGER CARNEY:

Great. Thanks, Zak. Maybe I'll turn to Berry and see if he's got a response to that. Berry, please go ahead.

BERRY COBB:

Hi, Roger. I missed part of this but I think I understand the question. The initial discussion here will of course occur on this aspect, and given our current schedule, we're going to be exploring the opportunity of bringing few of the phase two items here into phase one, because at least at this point it looks like

we're ahead of schedule, and to be in more of kind of a complete package around the transfer policy. That way we don't have to go back if anything changes in phase two, but that decision hasn't been made yet. I'll confer with my other colleagues to get you a more specific answer to that about how we might be able to address some of that aspect from phase two into here.

ROGER CARNEY:

Thanks, Berry. I'd just like to add, just to go along with how we've really been conducting this, I think if we get into a certain level of detail, maybe we'll pull back and hold off until later. Or if the working group is up for it at the time, we can dig into it. But I think as many at least high points that we can hit and discuss, even if we have to bring it back later, the better that we get it identified now and numerated so we can make sure that we discuss them all the way through.

So, to your point, Zak, I think that really let's open this up and see where it goes, and if we get too crazy off the path somewhere, maybe we pull back and wait for a later time. But I think let's try to discuss whatever we need to with the locking and the 60-day windows and things like that now. At least get them identified, and again if we need to push them, we'll push them. But I prefer to get them open now and at least discussed a little ways. So, Caitlin, please go ahead.

CAITLIN TUBERGEN:

Thanks, Roger. This is Caitlin Tubergen from ICANN Org and I wanted to just provide a little bit of more context behind Zak's

question about what's being discussed in phase one and what's being discussed in phase two. And I believe the answer to that question is the additional security measures document is asking if a mandatory locking should be required in the policy. It isn't currently.

In phase two what's covered is reasons for NACKing a domain name transfer and revisiting the current existing reasons and if anything needs to be added or subtracted. So they're certainly inter-related.

But the question in phase two is wider in scope because it has the group reviewing every reason for NACKing, not just the 60-day lock.

And I think this question was something that was—the question that is before the group now in phase one was as a result of surveyed feedback. Some survey respondents had noted that this should be required, that most registrars had instituted this practice anyway, but it's not uniform and the question is: should it be? If so, why? If not, why not? But I hope that provides a little context into the difference between the phase one and phase two angle of this question. Thank you.

ROGER CARNEY:

Great. Thanks, Caitlin, for drawing that distinction there. Zak, please go ahead.

ZAC MUSCOVITCH: Thank you, Roger. Thank you, Caitlin. So, I get it and I'm not adverse to seeing how things go with this discussion. Who knows what level of agreement there will be on this approach and I'm willing to investigate that with you all of course.

But to Caitlin's point, yes, these things are inextricably linked, so it's difficult to see how we can discuss this in the limited context here and more broadly down the road.

To me, this is a fairly significant issue. It's really the issue that concerns me and why I joined the working group in the first place, other than getting to listen to you all experts on all these other topics.

I do want to express a little concern that this issue receive its due attention and its due discussion. So I'd like it to be as properly and comprehensively reviewed as possible, and if we can do that in the first phase, all the better. But if it's also going to be dealt with in the second phase, I do have some concerns. Thank you.

ROGER CARNEY: Great. Thanks, Zak. That's actually something that, as Berry mentioned, we've been looking at. If those pieces that, obviously, we can discuss at different times, but if it's better to discuss them together, what pieces in the later phases make sense to try to pull forward if we can, obviously.

So yeah, I completely agree with you and it's something that we're looking at for sure. Again, like I said, I think that, really, it's open for discussion here, and if we get too far down and people don't want to get that detail now, maybe we can pull that back and just

hit the high level pieces of those things before we really drill into them.

But noted, Zak. Thank you for your comments. Kristian, please go ahead.

KRISTIAN ØRMEN:

Thank you. I think we need to at least look at all the different reasons for a domain to be locked because ... Well, both because there's different reasons, but also we might want to solve them and take some of them away.

As far as the reasons why a registrant or an account holder go in and lock and unlock the domain in the registrar control panels by themselves, that's one feature. I don't know if we kind of need that since we can only transfer when there's an Auth ID, and if there isn't an Auth ID all the time, in the future maybe that's not needed.

And then there's the different types where we have locks like after registration, after transfer, after owner change and so on, and some of them are maybe important and we want to keep, but they all serve different purposes and we really need to look at them one at a time and not just the locking in general because I'm pretty sure the answer could be different from each type and where in the [cycle] of the domain registration we're looking at. Thank you.

ROGER CARNEY:

Thanks, Kristian. Lutz, please go ahead.

LUTZ DONNERHACKE: I have a problem understanding what the purpose of such a required lock is directly after a domain transfer. If a domain is locked for a certain period of time, the only possible transfer which can be done is a transfer back to the original registrar, if I understand correctly.

If that's the case, do I understand correct that the whole 60-day lock period is simply to prevent that the domain is transferred multiple times, so that the direct transfer back to the original registrar is no longer possible, so we are dealing with a sophisticated attack here and that's why we have lock for a certain time? This is correct? Or is it possible to transfer a domain back under dispute policy from an [arbitrary] registrar or only from the last registrar?

So if we can only unwind one level of transfer, a mandatory lock period after transfer is really needed and required for the registrant because it takes some time to notice that something has gone wrong. Not all people who owns a domain is able to watch the domain registration closely, so there is a reason for the registrant to have mandatory lock period in order to bring back the domain if it was transferred illegally.

Do I understand correctly that this is the real cause behind the 60-day lock? Yeah, no?

ROGER CARNEY: Thanks, Lutz. And I'll let others speak to that. I think that's one of the main reasons. I don't know if it's the only reason for a 60-day lock, but I think you're touching on part of it. And maybe even

Kristian touched on it right before you. Is that need still there? But I think that, as you started to describe it, that's the important part of this. Rewinding it once or even tracking it through one registrar is fairly simple, but then once it starts bouncing to five to ten different registrars within a short period of time, that's where it becomes difficult to track down and get everything.

Again, I think that's one of the reasons for the 60-day lock and I'll let everybody else talk to that. I think there's other reasons that people use it for, but that's definitely one of the reasons. Thanks. Zak, please go ahead.

ZAC MUSCOVITCH:

Thank you, Roger. So, of course I agree that we need to examine the solutions and the reasons for the locks, but might I suggest that we start off this discussion—of course I defer to you, Roger, and the rest of the group, but might I humbly suggest that the first order of business when looking at the locking is to ensure that we're all on the same page about what the policy currently says?

For example, in the blue highlighted text under the charter question, it correctly states in my view that the transfer policy does not currently require mandatory domain name locking.

From looking at various FAQs from some registrars and even—I don't mind saying this because ICANN staff has grown thick skin at this point—but there's even some cross information on certain ICANN pages about this and certainly on some registrar's pages. There's a lot of misunderstandings by registrants about this. It's a

difficult transfer policy to understand and comprehend as it is currently written.

So I think that the first step is to make sure we all understand what the transfer policy currently says and then move into the different kinds of locks and rationales for locks, and then ultimately the real question is whether they should be mandatory or in the discretion of the registrar or whether there should be some greater uniformity and consistency about these policies. Thank you.

ROGER CARNEY:

Great. Thanks, Zak. I agree. It's great to have that knowledge of what the current policy states. Again, staff did right above this charter question pull out of the current policy all the related information specifically to the locking. And as you mentioned, it is not a mandatory item today. And to your point, I think some people think it is and some people don't. But as the policy is written, it's not mandatory today to do that. Even beyond that, there's some other mechanisms for locking that you can override or not override when you're doing change of registrant and things like that.

So, I agree. It's important to understand what the current policy states, and like you said, everybody is on that same baseline so that we know when we're looking at it.

But I think also, to your comment of what we need to be looking at, I think you have it right. And we also need to look at is there anything else that needs to happen? Not just what it says today but is there improvements on it, not just making it standard, mandatory or not, but is there a different lock that we should do?

Should it always happen within a certain period? Who has control if it and things like that? Are there better improvements there?

And I think a lot of the question and response, below will get into a lot of those items. Keiron, please go ahead.

KEIRON TOBIN:

Thank you. Just in regards to the information that ICANN provided a while ago. I think it was maybe the second or third meeting that we requested from Compliance just in regards to the amounts of numbers of where ... Does anyone recall the exact number of how many accounts were physically hacked and maybe pushed from registrar to registrar? Because I know a lot of internal stuff, they have their own kind of policies and procedures in place in regards to opting into certain locks and giving registrants that opportunity. But maybe we could actually look at the data that ICANN currently holds in regards to from compliance as to where maybe someone has hacked an account and how many registrars have been pushed through to that. We could use that as some form of basis to maybe look into the locks a bit more. Thank you.

ROGER CARNEY:

Thanks, Keiron. And I don't know if anyone from staff wants to jump in on that or not. It's something we can definitely ask and see. I'm not sure how specific the compliance ... Owen will let us know his experience anyway how specific they were on those things. Owen, please go ahead.

OWEN SMIGELSKI: Sure. Thanks, Roger. I don't know how much granularity they're going to have going back because when we processed ... When I was there, I would process ... Everything was in a transfer bucket. We did put a flag to indicate unauthorized transfer which is generally ... Could include domain hijacking. My recollection is that there were pretty much two kinds of scenarios you had, where there would be say a web designer who would register a domain name on behalf of a customer, then there'd be a dispute and there was a transfer that was not authorized.

Then the other bucket was people who had generally their accounts compromised along with an email account and then there would be the hijack there.

So I don't know exactly how much data they may be able to get going back historically because I think the additional metrics were put in place only within the past few years. Thanks.

ROGER CARNEY: Great. Thanks, Owen. It's something we can definitely check with—I think they presented as most detail as they really have. But we'll check and make sure. Holida, go ahead. Holida, we cannot hear you talking.

HOLIDA YANIK: Sorry, I was double muted. Thanks, Roger.

ROGER CARNEY: Thank you. Not a problem.

HOLIDA YANIK: I agree with what Owen said right now. The situation is currently the same. We are seeing the cases, most of the unauthorized transfer cases are about the domain names hijacked by the web designers, the former employees and about hacked domain names by third-party illegal players.

But currently I won't be able to tell you about the details, statistics. I will review the information, the data that we have presented to this group earlier and we'll see what I can do about the more granular data. Thank you.

ROGER CARNEY: Thanks, Holida. Lutz, please go ahead.

LUTZ DONNERHACKE: An additional question from the viewpoint of the registrant. If you do a transfer in order to take over a domain name from other owner—so legally—you want to do two things.

The first is to transfer the domain to your inventory, and the second is to change the owner. We run into problems with automatic 60-day lock, so it was not possible to change the owner for 60 days after the transfer, which is a little bit hard to explain. Can we make it possible that we are able to change the owner after a transfer while keeping the lock? Is this possible?

ROGER CARNEY:

Thanks, Lutz. I know that a lot of people experience what you described. And I think some people try to make the workarounds for that. But I think our current proposals allow for that, as in whoever the current registrant is, is not necessarily known to the gaining registrar. The gaining registrar is just collecting the information from the TAC holder. If there is a change of registrant at that time, that should be able to be handled automatically at the same time. At least that's my perception of it and maybe someone else has a different look on it.

But whoever has that TAC that is providing it to the gaining registrar will put their information in, or whoever's information they want. They have to sign the agreement. It'll be whoever has that TAC will be that. Theoretically, that would be the new registrant. Thoughts, people, on that—anyone? Berry, please go ahead.

BERRY COBB:

Thank you, Roger. I don't think that this is necessarily thought, but I guess looking back in time, I believe this lock for 60 days was either part of IRTP Part B or C. I can't remember which one. As you noted earlier, Roger, the primary intent here was in the case of unauthorized transfers, that it would mitigate the hops to multiple registrars.

In implementation of that policy, I think the effectiveness are the intent of the lock for 60 days was somewhat watered down or lessened. And I believe when we look out there in the environment today, whether it's change of registrant or an entered registrar transfer, you had the ability to opt out of the lock. I believe that is what causes a lot of confusion out in the marketplace, let alone

the fact that just the way certain transactions that are behind the transfer seem appropriate for a lock where some don't. So I don't think there's much disagreement there that it is a very confusing aspect in the marketplace.

But ultimately, the implementation of it is very inconsistent and primarily because of the ability to opt out of that lock before conducting any of the kind of transaction.

The second thing I'd like to just mention, and kind of as a reminder about data, which was also part of IRTP Part D, that this never really got implemented. But it was very clear in those policy discussions back in those days that we were absent or didn't have actionable, meaningful data by which to make some of the policy recommendations and the very intent of that recommendation was to be able to collect this data, most of which is not going to be visible from contractual compliance but only visible from the registrar community and now we're back here again looking for data around unauthorized transfers, where the details of that data still only reside with registrars.

So, I guess my point here is, first, I thank Holidia for trying to take an extra effort in going through their contractual compliance system on unauthorized transfers. I think it probably won't reveal much, but to fast forward to one of our other charter questions, I believe in either Phase 1B or probably Phase 2 is again to tackle how can we collect data in an aggregate manner, specifically around this aspect of unauthorized transfers, so that if we ever do need to review the policy again or at least when the policy is up for review some five, six, eight-plus years from now and ICANN staff does a policy status report, remember this conversation now

because that's going to inform our deliberations when we get to this charter question of how can the ICANN community in some way obtain this information to better inform the effectiveness of the policy recommendations we're implementing here, as well as to inform any future review. Thank you.

ROGER CARNEY:

Thanks, Berry. Berry did bring up a really good point. It's one of those where transfers in different models are different. I'm actually glad ... I'm sure Theo and Keiron didn't get on for this, but I'm glad that they put their hands up because I can have them answer this as well. How do the resellers—is there any issues about the 60-day lock with the resellers? But also, in the secondary markets, when you're actually purposely trying to move it from one person to another, but then there's a logical third step that, once it is moved to another person, they're going to move it again to their preferred registrar wherever. So it could be in the short-term period a legitimate three or four changes happening on that one transfer.

I think Berry brought up the different kinds of models, different ways that these transfers go through. So I think we've got to think about all those.

And I'd just like to point to chat. There's a lot of good discussion going on and we'll get back to that. I think there's a lot of good questions and comments in there.

Theo, please go ahead.

THEO GEURTS:

Thanks. Berry just brought me back to the decision-making, policy-making working group where we are actually going down the road to get actionable information, so you can use it within a working group like this.

You can turn it also a little bit around. If I look at the resellers with us and if we are looking at domain name hijacking, etc., I do not have any information about it. I don't. I'm not in a position or I don't feel that I'm in a position that I should write this all down and make note of how many times it is happening because it is not happening, in my opinion. So I'm not making any statistics on what's going down. I have a lot of other statistics on a whole set of different problems. I do have a lot of information about there. But if it's not a frequent problem, I do not write it down.

And I can't speak for Compliance, of course. I don't work there. But I would somewhat think—and maybe this thinking can be corrected if I'm incorrect. But if it would be a major problem that there are unauthorized transfers happening multiple times a day, then I would sort of think that ICANN Compliance would have a sort of broader set of information on why that is happening, how many times it is happening and what are the specific cases and the specific buckets for it.

So, in my feeling, since we don't have that data, I don't think there is a real urgency here when it comes to domain hijacking in the first place. So the whole 60-day lock, I don't see it as a very helpful tool to mitigate such damage in the first place. Thanks.

ROGER CARNEY: Thanks, Theo. And again, I think that when you start talking about hijacking or any of that related, that number is, in the overall scheme, relatively small number wise, but I think the issue is the impact can be fairly large when it does happen, so it's one of those ... Is it a high risk? It's not really a high risk. It doesn't happen often. But it's a very high impact when it does happen, so it's one of those where you have to balance it and think about it, and maybe even ... We can take a look at the discussions from the last IRTP and see what their discussions were around that 60-day lock, and again we know some of it but we don't ... What were their discussions and why did it lead to that spot is probably somewhat important. Keiron, please go head.

KEIRON TOBIN: Thank you. Just to echo Theo's thing there. I completely agree. I think there doesn't seem to be any issues from our side and I think the way it's written at the moment, it's perfect. It's kind of left down to the registrar. Obviously, that registrar was having numerous breaches, I believe ICANN would be obviously more present and probably push on them for more information. But I think as it stands at the moment, it doesn't additionally add any kind of ...

Yeah. It's perfectly [inaudible] and I think the registrars are clearly making enough effort on here, because if they weren't, they would be told off by ICANN for compliance matters. So yeah, I think the way it's written and left down to the registrar, which is right for each registrant as well, because I mean as much as people are saying that it should be mandatory—X, Y, and Z—you've got to think there's different business models out there, like you've mentioned, and marketplaces where maybe someone has a

domain that is pushed into their account and that's to verify that that domain has been acquired by that registrar and then pushed out maybe numerous days later and back to their preferred registrar.

And thinking on a wider scope, there's many domainers out there who move domains around to multiple registrars. So I think it's all right in terms of the way it's written and I agree with I don't think it's any additional security mechanism. That's my perspective on it. Thank you.

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

LUTZ DONNERHACKE: For the low number of complaints, that's not surprising in my eyes because most of the illegal transfers are initiated by insiders, as we were told before, by webmasters or by ex-employees or somebody else who was intimately involved in the domain holder environment before.

So, in most of these cases, I think nobody is going to ask from ICANN process to make a transfer undone. They are going to the people who initiated a transfer and make an immediate pressure to them to correct this. So, most of these cases will be handled in a local environment and will never be seen by any Compliance department.

So, it's very good information to know that external attackers to domain or external people who transfer a domain [inaudible] are

not a problem in the current environment. That's very good information.

On the other hand, there was some questions about secondary market or different models of making business with domain transfers. From the registrant point of view, I don't see any interest in such a business. So from this point of view, I would say we shouldn't care too much about these business models. We should not [ease] some business models which are solely playing around with domain ownership. I don't think that's not necessary that we weaken the security of the long-term domain holders for these businesses. Thank you very much.

ROGER CARNEY:

Thanks, Lutz. I think, again, going back to a lot of discussion in chat—and we should get back to some of that because I think we're starting to confuse some things and we can clarify a few things here. But I want Holida to jump in here and respond, so please, Holida, go.

HOLIDA YANIK:

Thank you. I just want to bring up another reason for low numbers of unauthorized complaints with ICANN Compliance. It is that not all the registrants in general or the registrants with lost domain names even are aware about ICANN and compliance and complaining to us and may not be able to file complaints because they don't know about this venue.

For this reason, compliance data may not reflect the real unauthorized transfer and hijacking cases that are happening

within the industry in general. So sometimes we are even seeing complaints from reporters complaining about a domain name lost maybe 10 or 12 years ago even, because they found out about ICANN just recently.

ROGER CARNEY: That's a good point, Holida. I'm sure a lot of registrants don't at least attribute—even if they do know, attribute all the different connecting parts. Not that it's right or wrong. It's just that they don't. Theo, please go ahead.

THEO GEURTS: When we are talking about these unauthorized transfers, so they do happen. The problem is not that large, in my opinion. But if it happens, and as has been said before, the impact is usually very large. So I think you basically should be dealing with the issue of the impact more into the section where we start discussing on how to claw it back and make sure that a business is not being offline for several weeks before everything has sorted out. I mean, you want to have a clawback function there that works very efficiently and swiftly so you mitigate the damage for such persons who lost the domain name. That doesn't have anything to do with how well or not a transfer lock works, so I think if you talk about the damage for the registrants who need to have the domain name back, that is better addressed to the clawback function. Thanks.

ROGER CARNEY: Thanks, Theo. That's a great view that you're taking there, looking at it from the other side of this. I just wonder if there's something from the front side that will help that clawback—and maybe it's not lacking, but maybe it is—that helps that clawback process.

Again, the big concern is always not—not that it gets transferred to somebody else one registrar away. It's when it gets to four different registrars, five different registrars in five different countries and it gets to be a more complicated clawback process.

I think it's a good view, though. We have to look at it as both sides of this. As you mentioned, it not being a huge number of these that occur. So put the onus in the correct spot here. Thanks, Theo.

Zak, please go ahead.

ZAC MUSCOVITCH: Thank you, Roger. Just to touch on a thought that I had as a result of the points Theo was making. And I've raised this once before in chat but I just want to leave you all with the thought, rather than try to sidetrack the conversations. I think it's going in a good direction, so I don't want to sidetrack.

But I do want to put the thought out there that some of the pressure on registrars to deal with clawing back these domain names could be ameliorated or even substantially eliminated if there was a better means of putting the onus on aggrieved registrants to claw back their own domain name with just a transfer dispute resolution policy that the actual registrant can initiate and invoke rather than put the burden on the registrars.

I want to throw that out there. That's a possible counterbalance to some of the burden that registrars may feel about having to deal with these [errant] transfers and that in turn would possibly encourage us to put less emphasis on the so-called security via locks on domain name transfers if we knew that there was this other procedure available to provide redress. Thank you.

ROGER CARNEY: Great. Thanks, Zak. That's really good thoughts there. Definitely something to look at, as you know. Who can initiate or even who should be initiating the different processes? Greg, go ahead.

GREG DIBIASE: Yeah. I was actually going to suggest something similar to Zak. When we're talking about the clawback, what are we really talking about? I think it's the registrars being comfortable that the aggrieved party is correct, basically. If someone alleges, "Hey, this was transferred and it was unauthorized." If the registrars are certain that it's true, I think most will be happy to come back, but a lot of times it's fact-finding mission or getting certain assurances from the registrant.

I'm wondering if part of the solution here could be—I don't even think it needs to be mandatory, but creating a type of form for registrants that says, "I affirm I am the registrant. I affirm ..." They make certain statements to put the registrars at ease, I guess, to help this move faster, because—and I think Theo said this. This isn't strictly technical. This is we just need to improve the coordination between registrars, so I'm wondering if there's some

standardization we can do there. Here's a form or a process a registrant can follow. Ultimate decision-making authority is probably with the gaining registrar, but we can at least provide some resources for the registrant.

ROGER CARNEY:

Great. Thanks, Greg. And again, we're starting to get a little past where this charter question is going and I don't necessarily want to stop this discussion because it's all good points that we're going to have to bring up at some point.

But again, I think the main point of this question isn't about a 60-day lock or anything like that. It's just, should a lock be mandatory on a create/transfer? Should there be a lock that's required or not? And I think I've heard several people say the way it is today is good, but I've also heard it not being standard is also a tripping problem where you can transfer a name in or create a domain somewhere and transfer it ten days later is a little confusing from the registrant standpoint. So I think that some of those things are what we need to identify.

But specifically, this question is when a domain is created or transferred, should there be a lock and should it be mandatory or not? And to get to some of the locking and maybe some of the lock professionals here—I don't know, Theo, Jody, or anyone else wants to jump in. We're not talking about a registry lock that is something different. That takes on a different avenue and I think that what we're talking about is that client lock that gets put on, again I think stats somewhere here show like 60 or 70% of registrars put that lock on create.

Again, I think that to focus in on this charter question, that's what we're trying to answer is on a create or transfer, should a lock be done and should it be mandatory or should it be optional? Just to get to the answer to this.

Again, I don't want to stop the discussion on others, but I just want to let everybody know that's what this charter question is really focusing on. Keiron, please go ahead.

KEIRON TOBIN:

Thank you, Roger. I totally agree. I think as well, just to add some context to maybe people who aren't always familiar as well is that when—I presume that most registrars follow the same practice. I don't think I've ever come across a registrar that hasn't. But when we do receive information in regards to an unauthorized transfer or stuff like that, while registrars actually investigate as well, transfer locks are actually usually placed on the domain, so it does actually add an additional security measure where it's being prevented from transferring while registrars investigate with the registrant, and as well potentially with the other registrar that may be involved.

I just think it's worth noting that background knowledge there as well and that it isn't just a kind of instant where someone can transfer it while it's away or X, Y, and Z. It's just some good background for information for people to be aware of. Thank you.

ROGER CARNEY:

Great. Thanks, Keiron. Yeah. Good information. Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. I just wanted to repeat what I said earlier, that the transfer after—sorry, the lock after registration and the lock after transfer are two very different things and need to be handled differently by this PDP since the reasoning behind them are so very different, so we can't really take them together. Thank you.

ROGER CARNEY: Thanks, Kristian. Yeah. I think that, to your point, identifying what those differences are is important. To your point, I don't think when you're registering a brand-new domain that you're worried about the hijacking aspect of it. It's that transfer that happens that transfers multiple times is where the hijacking problem pops up.

So I think delineating those two different concepts like you mentioned there is important, we just have to see what those reasons for the locks are on a create and what those locks are for the transfer and if they make sense and if they should be required or not. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you, Roger. I just want to touch on one comment you'd made about the confusion and/or frustration by registrants about inconsistency. So the issue for many registrants, business registrants for example who are buying or selling a subsidiary or a new acquisition or secondary market participants, what they tend to be confused and frustrated about in my view is not whether the locks should all be mandatory or whether they should all be discretionary, but the real question to them or the problem for

them is when they see that—they want to be able to have the discretion, obviously, not have it be mandatory, because making it mandatory will stop a business deal from happening sometimes for 60 days because it can't close until the domain is unlocked to move it to the purchaser's registrar.

So they want it discretionary in my view, but the question really is the inconsistent application of discretion. So for example, one registrar, you'll be able to call up your account rep or contact the helpline or opt out online, and that can immediately eliminate the transfer lock problem in that particular case.

But then at other registrars, it's different. They'll say that this is a mandatory ICANN policy, we can't do anything about it. Or whatever the explanation is. So I think that in my view, the question isn't whether it should be mandatory or discretionary. It should be discretionary. The real question is what parameters or guidelines or requirements there should be on the exercise of that discretion so that consumers, registrants, businesses are able to have either a consistent application of this discretion across all registrars, or alternatively, transparency about what the registrar's policy is up front so that the registrants can select who they do business with. Thank you.

ROGER CARNEY:

Zak, just to follow up, are you speaking of—and again, just trying to jump onto the prior discussion—on a domain create or on a transfer? The discretionary idea. Are you saying both?

ZAK MUSCOVITCH: The create date, I really haven't seen much evidence of registrants wanting to move the registration within 60 days of creating a hand-registered domain name. I'm not aware of those kinds of issues. On the other hand, I'm not sure what the reason is for locking it for 60 days on a new create either. But my focus is on the inter-registrar transfer after that 60-day period has already lapsed.

ROGER CARNEY: Okay. Thanks, Zak. Okay. Caitlin, please go ahead.

CAITLIN TUBERGEN: Thanks, Roger. I think a couple issues may be getting conflated. Or it might just be that I'm confused here. I invite others to keep me honest here, but my understanding of the current policy requirement is that registrars may deny an inter-registrar transfer if the name has been created or transferred within 60 days. So it's optional. Therefore, a registrant should be able to move the name. But registrars do have the discretion to deny the transfer. It's not consistent across all registrars, and that's what we're wondering if that should change, or if it should be consistent or if that should be removed entirely.

And as Roger has noted—I see that Kieron has written a domain cannot be moved if it's registered within 60 days. I thought that it was optional under the transfer policy, that registrars could deny but are not required to, to NACK the transfer. But that was my understanding, that there are certain instances where registrars must NACK the transfer, and that's if a domain is locked subject to

a UDRP complaint. But if it's locked subject to registration or a new inter-registrar transfer, that it's optional and doesn't have to be denied in that instance.

ROGER CARNEY:

Thanks, Kaitlin. I think you're exactly saying what I think Zak was saying. And Zak took it to the next step, that he wants it to stay discretionary but he wants it to be discretionary with a more standard practice to it so that at one registrar—and Zak said something that I've heard prior, is some registrars will claim that they can't transfer it because it's an ICANN rule even though the policy says that it's optional, but I know that I've heard the same thing, that some registrars say that they can't do it because it's policy. And I guess there's nothing wrong with that, it's not ICANN's policy though, it's the registrar's policy of the interpretation of the ICANN policy that allows them to not do it.

So I think Caitlin and Zak were kind of saying the same thing, that the policy is discretionary and Zak wants it to stay that way, and I think Caitlin is asking if it should stay that way. And if it does, that's fine, but Caitlin and Zak both mentioned, should that be a standard after [that is] a discretionary, or how can we standardize those discretionary things? So I think that's the big thing. Steinar, please go ahead.

STEINAR GRØTTERØD:

Yeah. Hi. My experience and also at the time I was a registry operator, it was that the 60-day lock after creation of a domain name was set by the registry with a server transfer prohibited

command based on the policy set by ICANN in the registration policy.

So I'm not sure—I don't understand this is optional when it comes to an inter-registrar transfer in that period. But I do read the chat, it is interesting. Thank you.

ROGER CARNEY: Thank you, Steinar. Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. To be honest, right on the spot, I can't remember the actual text in the policy if it 's mandatory or not. But I work in a group of companies that are both registrars and resellers, and we have recently also acquired other resellers. And in Europe, there are definitely many resellers.

So speaking a bit from the reseller point, being a reseller, you're kind of under whatever the registrar have chosen and quite often, the resellers' customer service will tell the clients that this is the rules and it's based on an ICANN policy, something like that. And maybe it's not a mandatory thing, but since that's what that registrar has chosen, then for that reseller, it is mandatory. They can't change it.

And also, we have good bulk transfer options for resellers to move between registrars. I'm sure that reseller customer service are going to keep telling the registrants that these are the rules and it's based on ICANN policy. Which it is, and also, that reseller can't really change anything about it. Thank you.

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

KEIRON TOBIN: Thank you. Just to go back to Steinar's question, he is correct. Domain [service prohibited] and stuff like that requires a registry to remove it. So there are certain areas where the 60-day registration lock does come into place. I believe ICANN kind of looked at a policy though in terms of what legal matters arise, and although both registries may choose to kind of opt into that, the registry would still be required in order to remove that lock as per ICANN policy. I think that's where people may be getting a little confused. So I hope that clears things up for people. The 60-day registration log is there for its purpose. And just to put out there as well, ccTLDs do operate very differently as well.

So I just want to make sure that everyone is kind of understood of how that operates. Thank you.

ROGER CARNEY: Keiron, do you know what policy that 60-day lock is in?

KEIRON TOBIN: I think it's—

ROGER CARNEY: Or anyone, not just Keiron. If anyone knows where that is.

KEIRON TOBIN: I think it's section 5.5. Maybe someone from ICANN is probably better to answer that. Five or six potentially.

ROGER CARNEY: Okay. Thank you. Barbara, please go ahead.

BARBARA KNIGHT: Thank you. I can't speak for other registries, but I can say that at Verisign, I believe—well, I can say for a fact that our systems have been designed to prevent a domain name from transferring for 60 days after it's been created.

I believe that that kind of predates even the current transfer policy. I've been here for about 18 years and I believe that the way our systems were designed, they always had that particular restriction. So even if a registrar were to contact us, we would not be able to override that because it is designed in the system.

That being said, in my tenure here, I have not seen—and I have a pretty good finger on the pulse of what goes on in our customer communications area, customer operations, and the complaints we receive. We don't get complaints from registrars about not being able to transfer a domain name in that first 60 days after the domain was created. And it may be just because historically that's how it's always been.

Unfortunately, I don't know if other registries have designed their systems that way. But as I said, I believe that even before the

current version of this policy went into effect, that the systems were designed that way, at least at Verisign. So I don't know if that helps or hurts.

ROGER CARNEY: Great. Thanks, Barbara. Zak, please go ahead.

ZAK MUSCOVITCH: What Barbara just said is consistent with what I've heard from some registrars themselves, is that the 60-day creation lock is not a policy that registrars are imposing. Even if they wanted to override it, it's done at the registry level, at least in so far as .com is concerned.

So if the question that's encompassed in this charter question is whether the 60-day creation lock should be mandatory or not in addition to the other locks of course, this would be a question that involves Verisign and the .com registry as well because as you've heard, this is the way it's done for at least 18 years and this is my understanding from registrars as well. Thank you.

ROGER CARNEY: Great. Thanks, Zak. And I think that, yeah, maybe this isn't even something we need to—obviously, it'll be good for everybody to know where that 60-day creation lock came from as far as the transfer policy is concerned. It doesn't talk about that except for that is a reason for denial, is a registrar can deny within that first 60 days if they choose to. And as Barbara mentions, most likely, registrars are doing that because as in for .com, registrars aren't

removing that lock anyway. But again, according to the transfer policy that we're worried about, it may deny on that 60-day creation and it doesn't talk about creating that 60-day creation. Kristian, please go ahead.

KRISTIAN ØRMEN:

Thank you. So can we get ICANN to actually find the text in the policy that says that Verisign have to put on this block or registries have to put on this block? It could be that it was removed in the policy at some point and Verisign just forgot to remove it, and all the registrars didn't care because they had to log into their systems anyway. It could be. But it would be nice to find the actual text so we can all be on the same page. And Lutz just put a proposal in the chat that all mandatory locks should just be imposed by the registry. And I would say I support that. If there is a mandatory lock, it's much easier the registry will just enforce it. Thank you.

ROGER CARNEY:

Great. Thanks, Kristian. Obviously, we'll look at it and try to find it, but if anybody locates the 60-day lock creation policy piece, please let us know because it would be good to know where it comes from and why. Again, the transfer policy obviously does not do that. The transfer policy is only concerned about the 60-day window in that a registrar may deny it during that time.

Okay, Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah, just in regards to the creation for the 60-day. I've just been through a couple of RRAs, and I think a lot of it is down to the actual initial registrant data. Because obviously, we change or update data, then it also sometimes requires a lock as well. So I think it may stem from there originally, but don't quote me on that. Like I said, ICANN are probably best to look into that, but my guess is it would be something to do with the initial data of the new registration. Thank you.

ROGER CARNEY: Thank you, Keiron. And it's a good tie there, so appreciate that. Okay. So let's get back to the charter question and say, thoughts on—Zak has already provided that he'd like the locking to be maintained to be discretionary and that a registrar may deny for these reasons and actually may put a 60-day lock on after a transfer. But, anyone else have thoughts on that? Is there a group that wanted that to be mandatory? Zak, please go ahead.

ZAK MUSCOVITCH: Just to clarify, my position, Roger, is that I believe that discretion has to be retained by the registrars because they have to be able to determine when this is a bona fide transfer, when it is not, facilitate their business. So that's why it ought to be discretionary in my view. But remember, the caveat that I mentioned to it being discretionary, it can't be unfettered discretion. There needs to be some consistency and some requirements for how to exercise that discretion as widely as possible amongst registrars so we avoid the kind of inconsistency and frustration that registrants have run into on occasion. Thanks.

ROGER CARNEY: Thanks, Zak. And again, I think that Zak's presented it as let's leave it discretionary, and that's what this group will do moving forward unless someone has obvious disagreement with that or reasons why it should not be. But to Zak's point, given that they have that discretion, how do we standardize on the available options with that discretion? Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. I've just put it into the chat, but I wanted to voice it as well, that because we are looking on future policy and so it's not super important what is and where the exact text is, but the problem is if we have text that would prevent a transfer that is within some other policy, we need to be aware of it. And that might need to change as well. Because if this lock on the registry side is somewhere else, then we definitely need to look at it and figure out if we can get that policy changed as well or if we need a new PDP for that or if we just have to accept how it is. We really do need to look into it. Thank you.

ROGER CARNEY: Thanks, Kristian. And I agree. I think we need to know where that comes from and why. And again, I don't think that we have to change that specifically. If this group comes to that agreement, the more current policy overrides the policy anyway and we just have to specify that when we do the policy, that, okay, there is a 60-day lock over here but for this reason, if you transfer it then blah-blah. If that's what this group comes to, I think we have ways to solve

that problem. But to your point, we still have to find out where it is so that we can address it.

Going to jump back to our charter question now that we're an hour into our discussion today. So we're saying we don't think there should be mandatory locks. That's our position, is we're saying we don't think there should be a mandatory lock on this transfer. So it should be a discretionary lock. Keiron, [inaudible] I've got at least those two that think that that's true. So if anybody disagrees with that, that's why we're here, is to discuss the reasons behind that.

Okay, so I think if we go down in this document and start looking at some of the questions—and yeah, let's start here with question seven and see what some of the comments were on some of the surveys and earlier on so we could at least address or think about what those comments are. And maybe that helps us go with a certain direction. What methods do you see to mitigate domain name hijacking outside of the IRTP framework?

Some of the methods currently used, obviously, domains are automatically placed—and again, this is someone's viewpoint here—and remain in registrar lock status once the registration or transfer completes. And again, we kind of talked around this a little bit around if it should be after the transfer or is it more appropriate that the mechanisms behind fraudulent transfer are better placed for this?

And Zak is talking about maybe a registrar has a reason to lock this. And maybe it's even the opposite side, maybe it's we default lock these but if I have this reason, I don't lock it. And if those reasons are common, that there's no lock put on it, maybe that's

an approach as well. Maybe the default is after a transfer, it's locked, but if it's part of a secondary sale or a known multi-part transfer, you don't lock it so that it can move forward. But maybe the default is that it's locked. Something to that effect.

I don't know what thoughts are on there. And I don't know, Zak, if you had ideas on how to kind of standardize those discretionary decision points if a registrar is or isn't going to lock it, are there a finite set of scenarios that at least generally fit? Theo, please go ahead.

THEO GEURTS:

Yeah. So when you're looking at something like somewhat methods or practices that are being used throughout all the fields and business models, having domain names placed on a registrar lock, that might be workable for some registrars but basically, when you boil down to it, if it looks like what somebody suggested there, two-factor authentication is required for all accounts in our portal and a little bit later on, somebody put down we only allow you to make updates if you have multi-factor authentication on, those are basically your core security features. Make sure that those accounts are almost next to impossible to hack or at least very difficult.

That is your core security, so to speak, and then you can have all this other stuff like I want to have a written confirmation—it's not necessarily handy but I can imagine that small registrars will use that, could be very handy as an additional feature. Placing the domain names on lock, that's an additional feature also.

But those features just described are not core features. So if you want to have good security, you need to make sure that everything is locked down on an account level and that somebody cannot just enter the account and make necessary changes and start doing updates and retrieving auth codes. I think that's basically in a nutshell how you want to approach this. If you want to have a real good security, you need to start with a basis and that's with the account, and that is something only the registrar can do. Thanks.

ROGER CARNEY:

Thanks, Theo., and yeah, just to jump on the two-factor and multi-factor processes, one of the things to keep in mind is typically, when you start talking about multi-factor, it's what you know, what you have, who you are kind of ideas that create the multiple factors, and a lot of times, that's handled electronically, somebody has a phone number or a code that goes through e-mail that comes back, however that is, it's still multi-factor. If someone logs into the portal with their user ID and password and can remove locks and request a transfer, there's really not a multi-factor there unless someone pops up and says, okay, prove this is you or however, do you have this?

And again, I think people get stuck on multi-factor as being electronic when multi-factor could be a less technology advanced—really, a written piece of paper is another multi-factor feature, they have to request it and then they have to sign for it. Those are two different things that they have to do. So just something to think about when we start talking about multi-factor stuff.

Berry, please go ahead.

BERRY COBB:

Thank you, Roger. I think we don't need to do it now and I believe staff is likely going to take on an action about building out a table so that we're clearly talking about the right locks at the right times, but when I read like the question here, domains are automatically placed and remain in registrar lock status, once the registration end or the transfer completes, versus—and to Kristian's point earlier, there is a different lock applied on a create versus a lock that might be applied as part of the transfer, and he even suggested that there might not even be an EPP status code between those but some sort of flag that is raised for the registrar to NACK the transfer.

And I think one of our outcomes here is not only determining whether or not a lock should be mandatory or optional, those kinds of aspects, but I do think it would behoove us to make sure we're using the proper terms or more precise terms as it relates to how they would show up in the agreements and maybe be much more clarified.

So one of the things that I would ask for homework from everybody is to at least start to review through these different EPP status codes. And when we're talking about a lock—because it's what we would see through an RDDS query that would provide the different status that would indicate whether a domain is locked or not. And across a few of these different statuses, it uses a general term of "lock" but one may be a registry-placed lock versus a registrar-placed lock versus a client-based lock, but none

of the status codes actually have “lock” in their title. You have to depend on the definition to figure out exactly what that means.

So I think it would warrant us to, after we get through this initial exercise, that we try to be hyper precise exactly about what either part of EPP status codes are being used that are connected to “lock” the domain or prevent it from doing X, Y or Z, and I think that that will help make it much more clear from a report perspective when we go out to public comment, but then ultimately, are there opportunities to explore about making it more precise to registrants out there?

So if I log into what you term as a portal, Roger, if I want to go unlock domain, I just see kind of a very easy peasy transfer lock section and click this button to unlock it—not suggesting we need to change that or that’s probably not even in the picket fence, but there’s so much to unwind around what is and isn’t locked across all of these different phases and parties that just keep referring to this as the domain is locked does not suffice.

ROGER CARNEY:

I completely agree, Berry. Yeah, I think that that’s very important. And as Kristian mentioned and as you just brought up, a lot of times, you will see, if you went into the WHOIS or RDAP response, you wouldn’t see a status necessarily, even if the registrar was saying “But it’s within the window so I don’t have to do it.”

And likewise, you could go into an RDAP response and see that it’s client locked, but all you have to do in the portal is say

“transfer” and then the registrar does the work behind the scenes and says, “Okay, yeah, it’s valid to be transferred now so I’ll take the lock off so that it can be transferred.” And the registrant doesn’t even know if it was locked or not. That was just one additional level of security that the registrar felt was necessary or wanted to provide, even though it wasn’t inside that window, it was just for all times that there was a lock on it. And once it goes outside that window, if it’s still locked but the registrar knows that it can be transferred or other things can happen, so it’s allowed. So, very good point, Berry, and I think that that would help out a lot, a chart that says the different types of locks and what applies here and what doesn’t. Kristian, please go ahead.

KRISTIAN ØRMEN:

Thank you. And just to answer very clearly on Berry’s question, no, you cannot always see the EPP status that the domain is locked. It’s very common that a domain can be registrar locked without it being visible anywhere, since if we have a NACK reason, that’s basically also locked, but the domain is not locked but we would NACK it automatically. So it is locked but you don’t see it’s locked.

Then the next thing is, if we have time limited TACs or auth IDs or whatever we call them, is there actually a reason for the client lock? Because if there is no auth ID or the TAC, the domain is basically locked because you can’t transfer it.

The next thing is, is it good security to show in the WHOIS or RDAP if a domain is transfer locked or not? Because if we show now it’s open for transfer, now it’s not open for transfer, I don’t see

why we want that public. Personally, I would like that to be removed and just not show it, because you don't want to tell publicly people that you're about to transfer a domain. Security-wise, that's a bad idea. Thank you.

ROGER CARNEY:

That's a really good point, Kristian, because that's the same reason why early on when someone would type in their user ID and password, a lot of people would tell them which one was wrong and as we know, that just helps out whoever is trying to break into it know that they got one of them right so they just need to hack the other piece of information. And likewise here, the more you share, the more you make it open to people that are looking to abuse it. And does it provide any additional help to those that are using it correctly?

So that's a good point to look at. And an interesting point on your TAC versus lock versus maybe policy, because even if there's not a lock placed on a domain today, the policy still allows for registrars to deny it if it's within certain windows. It's kind of covered under locks, but it doesn't have to be an explicit EPP lock, it's just a lock in policy that says I get 60 days to do these things so I can deny that.

And again, what Berry brought up was, okay, here's the lock and here's what we'd—I think we have to chart this out just like Sarah did for us in the transfer flow, start working through a process that says, "Okay, here's the locks, here's the time periods, here's the policy, what makes sense."

And again, today it sounds like we're leaning toward leaving locking discretionary. And again, if you read down further here, there's some stats about most registrars are locking it no matter what anyway. So it's one of the things that discretionary or not, most domains do get locked. I think the interesting part that Zak brings up is, okay, but what if you don't want to? How do you get around that? And I think in a standard way. So I think that's the key to come up with here.

Okay, going through these questions, continuing through these answers to these questions, I think we covered most of seven. That looks like someone answered they have an internal five-day lock, which is interesting. But again, part of the discretionary, I'm guessing. And two-factor, again, we talked about the multifactor. Someone that's got account managers that are closely [inaudible] and again, to me, this just brings in the other possible multifactor fronts that may be not necessary electronic.

Okay. Again, some of this looks fairly a manual process, as in the last bullet here, they have an internal audit policy. Once premium names are transferred in, the transfer contact has to provide valid documents to prove—again, that gets into some specifics here of what a premium name is for that registrar or registry and there's a different step taken here that they do.

Okay, let's go down to question 13. Do lock domains by default. Upon registration of a name—

KRISTIAN ØRMEN: Have you seen the time?

ROGER CARNEY: Yes. We're going to get through this, Kristian. We're just going to read this real quick. Again, close to 70% responded that they turn on lock by default. Ideal transfer—and this matches a lot of what we were talking about so far.

Okay, so we are out of time. We made it through this document a little forcefully, but I think we got a lot of good things out of this, and that we need to do a little homework, find out—and again, anybody that can come up with it, obviously, we'll be looking, but where did the 60-day registry lock on—the same registry, just because I think that's where it's coming from, but it's the 60-day creation lock. But also start stepping through the different locks and where they're at, who handles them, what windows are around them, and if they're needed or not. So I think that's the big thing.

Thanks, Julie. The next two calls, again, next week at ICANN 72, and then we skip a week and we'll be back two weeks after ICANN. All right. thanks, everyone. Sorry about being a minute late. Appreciate the good discussion today, and we'll talk to everyone next week at ICANN 72.

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

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