ICANN Transcription
Transfer Policy Review PDP WG
Tuesday, 21 December 2021 at 16:00 UTC

Note: 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.
Attendance and recordings of the call are posted on agenda wiki page:
https://community.icann.org/x/gwiHCg
The recordings and transcriptions of the calls are posted on the GNSO Master Calendar page
http://gnso.icann.org/en/group-activities/calendar

JULIE BISLAND: All right. Good morning, good afternoon, and good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group call taking place on Tuesday, the 21st of December 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 apologies from Zak Muscovitch (BC), Sarah Wyld (RrSG), Daniel Nanghaka (At-Large), Catherine Merdinger (RrSG), and Steinar Grøtterød (At-Large). They have formally assigned Arinola Akinyemi (BC), Rich Brown (RrSG), Lutz Donnerhacke (At-Large), Jody Kolker (RrSG), and Raymond Mamattah (At-Large) 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 e-mails. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only. As a reminder, when using the chat feature, please select everyone in order for all participants to see your chat and so it's captured in the recording. Alternates not

Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.

replacing a member should not engage in the chat or use any of the other Zoom Room functionalities.

Statements of Interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now. If you need assistance updating your Statements of Interest, please e-mail the GNSO secretariat.

Please remember to state your name before speaking for the 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 multistakeholder process are to comply with the Expected Standards of Behavior. Thank you. Over to our chair, Roger Carney. Please begin.

ROGER CARNEY: Thanks, Julie. Welcome, everyone, and thanks, everyone, for coming to this late year meeting. Great attendance today so that's great to see. Just a reminder, there won't be a call next week. We'll get started back up that first week of January on January 4. So let's go ahead and jump in.

First off, is there any one that wants to talk about any discussions that are occurring with their stakeholder groups, any information they want to share that they've been discussing or came up with any comments that they want to give the group? I'll open the floor to anyone now. Berry, please go ahead.

EN

BERRY COBB: Thank you, Roger. Berry Cobb from staff. Just let everyone know that the project change request was adopted by the Council last week, which was to move in the denial of transfers from Phase 2 to Phase 1A. We're updating the project plan and other materials to account for that and it'll be on our agenda here very shortly.

ROGER CARNEY: Great. Thanks, Berry. Jim, please go ahead.

JAMES GALVIN: Thanks, Roger. Jim Galvin, Registry Stakeholder Group for the record. Just a quick update, I owe a message to our mailing list here. And I apologize that I haven't gotten to it. I had drafted a summary of stakeholder group comments about the addition of the gaining registrar's IANA ID in the poll message to the registrar of record. I do want to send that here.

I want to call out one detail here. One of these that did come out in the summary is that it turns out there's a few different ways to do that, and the Registries are going to have a bit of discussion amongst ourselves on the technical side to consider the different ways in which that particular bit of information could be provided. Because there are a couple of options. I mean, there's at least two. One is change the existing ID field to have the IANA ID or add an additional optional element of some sort. And of course, there are a number of details that go with either one of those choices that impact implementations. Now, all of that is going to impact registrars, too, whichever choice is made. But we're going to have a bit more discussion about that and come up with a more

considered single proposal, which we will then bring forward to discuss more carefully with registrars probably through the TechOps group, unless maybe we want to do that differently here. I don't know. The discussion at the moment was leaning towards doing it that way. And then hopefully we'll be able to do all of that in a timely way that will feed into whatever we need to say here properly, but maybe the details of the timing of that we can get to in the new year as we go down this path. I hope that made sense. I just wanted to give that heads up about that and then we'll have to figure out what we need on the policy side to match whatever technical details get worked out. Thanks.

ROGER CARNEY: Great. Thanks, Jim. I think that doing it, as you said, through TechOps makes sense. I would probably suggest, though, that however that discussion ends, I think it would be beneficial for this group if, as you described, at least two scenarios of doing it. If both of those were presented, at least, that way a policy can decision. Even if the TechOps leans one way or the other way, at least the policy knows why and what the other options were, just to confirm that they see that it makes sense as well.

JAMES GALVIN: So thank you. I'll just volunteer to be happy to at least give the reports and say here what needs to be said. I can already tell there'll be multiple people from this group that I'm sure will be part of that discussion on the other side. So we'll get full coverage of the issues and details here to bring them forward. But I'll try and make a point of being in front of that and at least making it visible

so that we can have the discussion that needs to be had here, too, if that's okay.

ROGER CARNEY: Great. Thanks, Jim. You bet. Thanks. Okay, anyone else before we jump into working on our recommendations? Okay. Thanks, Berry and Jim, for that. That's good stuff. All right, let's go ahead and jump into the TAC recommendations that we've been working on for a couple weeks now. I think we've made some really good progress and cleaned it up. Obviously, I think there's some cleanup yet to happen. But I think that we've gotten to a good spot of identifying some areas that had to be cleared up. And actually, I wanted to start on Recommendation 3, just as a reminder that this is still open for looking for language that better describes this concept. So again, just to those that are looking at this, if they can take a look at Recommendation 3 and come up with any language they feel is better suited here. Again, that's been open for a while, but we'll see how that comes out. But I know that there was some discussion, especially on the second part, but also on the first part of this. So whatever anybody can come up with on Recommendation 3.

But most of the work last week, we jumped down to Recommendation 5, and one of the things we identified last week was maybe this recommendation was getting too many components into it and maybe there was actually multiple recommendations in it. So staff took a stab at kind of splitting this up into the multiple concepts that were in Recommendation 5 and kind of split them out to try to make them easier to read in and

EN

consume. So I think if we take a look at Recommendation 5 now, you'll see that it was broken out into a couple parts now.

One of the big topics I think that we talked about would be what are we trying to solve with this recommendation? I think at one time, and maybe it wasn't even in the small team that talked maybe about brute force attempts here. And is that what this recommendation is trying to solve? Or is it trying to solve a more problematic registrant usage issue of just not doing it correctly or maybe a small error somewhere on the losing registrar or gaining registrar side that's not handling the TAC correctly? Is that what this is trying to solve? Is that that user issue or is it trying to solve the not so much a user issue but just a brute force security issue? Are we trying to solve both possibly? I know there's some several people that question the fact of, is even brute force on transfers even an idea? Is that a concern that's in the community? And I think that's a valid question is that are we trying to solve a problem that really doesn't exist by trying to solve brute force? And again, I leave that open. Obviously, the implementers here know better if that's an issue or not. So I think that that's the two questions for 5 that we really have to answer is what are we trying to solve? And if it's both, that's fine. If it's just one, let's focus in on that one. But if we're trying to solve brute force and the user experience kind of thing, or if we don't see that brute force is an issue, should we focus on just solving the user experience idea? Theo, please go ahead.

THEO GEURTS: On that same question about brute force, I don't see it as an issue. But it could be right. So what would be the quickest way

EN

about this to get that information? I haven't seen it in the statistics that ICANN Compliance came up with. So I think it's actually a question we should ask the stakeholder group. Is this an issue? Do you see this happen? And if it happens, is it happening a lot or not? So I think that is basically a couple of questions we need to ask the stakeholder group like, "Is this real and is it a thing?" Thanks.

ROGER CARNEY: Great. Thanks, Theo. As I thought about it a little more, it seemed that maybe our registry partners are probably the best ones to answer this. Because today they would be the only ones that really see this besides possibly a good gaining registrar that's being used, obviously. But, to me, it seems like the registries would have the most facts on this, most information on this. I don't see how ICANN would even have information on this unless it's just a bullet complaint from high level. So, to me, if the registries see this as a possible problem, I think that's when we address it. So I'll leave it there. Any thoughts? Berry, please go ahead.

BERRY COBB: Thank you, Roger. I was contemplating or doing some thinking about this and I am kind of curious how much of an issue this is or really is not in terms of brute force. Maybe it was more applicable under today or yesterday's world when the TAC or the Auth-Info Code would be generated basically around registration in many cases. But given our subsequent recommendation where the TAC is only generated at the time of request and given the additional recommendation about it being a more complex code, for lack of

the proper term. I mean, in those terms, it almost seems, yeah, you could try to brute force this but I don't see how it would be even remotely possible that you could, given the complexity of the code. It's not sitting around somewhere where it could have been compromised. Anyway, just some kind of initial thoughts whether do we really even need to go down this road?

ROGER CARNEY: Great. Thanks, Berry. And thanks for reminding us that obviously we've changed the TAC considerably from how the Auth-Info works today to how it's going to work, and as you mentioned, even if it's not occurring today, those changes will add even more of a barrier to that occurring in the future, at least brute force kind of ideas. Jim, please go ahead.

JAMES GALVIN: Thanks, Roger. As a single anecdotal point of view about all of this, I really think that brute force—I mean, I've never heard another registry talk about it and I know that we have never identified, in my experience, brute force transfer attempts per se. But I really think this is more of an ordinary operational issue for a registry. I don't think that there's a broader concern here. One of the things that occurs to me is, if a registrar is doing those kinds of brute force attacks, registrars probably can't even ask each other if any of this is going on and if they've seen the problem, right? Because if you're a bad actor, what are you going to do, tell everybody you're being a bad actor? This is a case of, if you have an accredited registrar who's being a bad actor, okay, only the registry can see that if it happens or you've got some other kind of

hijacking going on, somebody has hijacked a particular registrar's credentials and they're doing something off on the side. Either way, only the registry is going to see it.

And I'll observe that—I've never heard another registry talk about this, but I will say that from an ordinary operational sense, you all know what the dynamics, we all know what the dynamics of our own systems are. You're going to notice a certain set of things. Have they flagged that too many Auth-Info attempts should jump out and be monitored and be seen and dealt with? I don't know. And if they do, maybe they've talked to people individually about it. And in that respect, a registrar might hear the information. My message here really is just that I think this is just an ordinary operational thing for registries to deal with. They monitor their systems and they're aware of where things are going in terms of what's used and what's not used and how it's used. If this was an issue, it certainly would have risen to the surface before all of this. And if anything like this happens, it's dealt with in a one-off kind of way. I really just think it's an ordinary operational thing and doesn't need attention here, honestly. Having said that, if you really want us to ask the Registry Stakeholder Group, I can ask and see if anyone's willing to say anything about it. I just can't imagine we're going to get anything out of that. That's my own personal opinion. Thanks.

ROGER CARNEY: Great. Thanks, Jim. You must have answered Theo's as well or mentioned the same thing as Theo. Okay. So from this point on, let's assume this is not a brute force recommendation here. This is a more of a user experience recommendation. And let's make

sure we clean it as such and we can eliminate the idea of brute force. If that comes back up, we can address it. But as Jim says, all the registry systems do have operational and limits that they place on their front ends anyway. So they will catch it. It may not be specific to transfer but they're going to catch those abuses in their operational management anyway. Theo, please go ahead.

THEO GEURTS: Just on the mention here regarding the notification sent to the registrant. I'm okay with that despite previous objections, but I was wondering if we could sort of bake in an exception. If you're talking about domain name theft, it usually involves account take over. Your registrar account will be hacked, your e-mail account will be hacked, and that is pretty easy to do nowadays because AppSec is pretty bad. If I see these notifications come in from the registry, I want to do a quick investigation before I notify anybody because I might be dealing with a criminal who is by mistake entering the wrong Auth-Code or TAC by mistake. And that could be a very valid data point to pivot off from to see what is going on here. I don't want to sort of alarm that person that we are on to him. So I think there should be conditions there that a registrar can make an exception to not send that notification immediately. Thanks.

ROGER CARNEY: Great. Thanks, Theo, for the input. I see Richard's put in a comment in chat, asking about this notification just going to the registrar of record and not the gaining registrar. I think that the gaining registrar should be receiving the "notification". Every time it fails, they'll get back a failed attempt so they should know every

time they issue the TAC to the registry, every single time they do it, they're getting a response back from the registry saying it's invalid. So I think the gaining registrar should be notified but I'll open that up and see if anybody thinks that a notice should be sent to the gaining as well. I just think that that's probably covered in the normal operation. So I think that we're covered on that side. Thanks for bringing that up, Rich.

Okay. One of the other points here is we've talked about setting a threshold, and we haven't decided on that number like in 5, bullet one here. We'll get to that number at some point and we'll solidify that. But the idea of the saying that that number is whatever it is, we'll say 5 since it's in here. But once that's reached, then bullet two starts off. I'm not sure bullet two is saying what—I can't remember who suggested. I think maybe, Jim, you suggested the continuation of notifications to the losing registrar, sponsoring registrar. The bullet two is saying in each one after a notification is sent to the losing registrar. I'm guessing that most registrars aren't going to want a poll message, especially if it is a system error in the gaining registrar or whoever is creating a thousand of these and the poll message comes back a thousand times. So I'm not sure that that's doing what—whoever suggested that, I thought it was Jim but you don't have to claim it, Jim, if you don't want to. I think that notifying the registrar of record at a certain interval and say 5 here, I don't think the notification for every successive one seems to make sense. I don't know if it's every fifth one, or however that said, but it seems like everyone after that seems to be not what was intended. Jim, please go ahead.

JAMES GALVIN: I'm chuckling a little bit because, yeah, I was the one who said that for every successive attempt, whatever the limit is has been reached, you should send it off. But I think from a from a security point of view, that would be the right response, and that's what you would do. And from the registry point of view, it's not at all challenging. If you're going to offer one notification, you might just offer one every time it happens. However, in the spirit of making this a better experience all around, as you said, Roger, from a user experience point of view, I'm open to thinking about what the right way is to handle this.

So here's a different concrete suggestion. Maybe the path here is that what the registry does is after whatever number of failed attempts, it then disables the transfer and it negates the code and it tells the gaining registrar that, "Sorry, transfers are not allowed here," forcing the gaining registrar to have to go deal with the registrant. They need to reach out to them and figure out what's going on. Whether or not the registry negates it in some way in order to fail it going is fine. I mean, I accept that the registrar our record, they're not interested in getting a thousand whole message of attempts that are failure, they didn't want to lose the customer in the first place. So the right way to think about this from a user experience point of view is what kind of action do you want in order to get the situation fixed? Let's assume it's a happy thing that's going on, it's a happy path. It really is the right registrant trying to do the right thing, and for whatever reason, something is confused. What's the right way to get that situation fixed which might require getting a new TAC or something, but think about it that way. If you just want to have one message—if you only send one message, you probably have to not allow future

TAC attempts or you've got to deal with that situation in some way. I don't know. But you folks are the ones who have the registrant issue so I'll back off from the security point of view and just say, "What do you want your user experience to look like and how do you want to affect that?" Thanks.

ROGER CARNEY: Thanks, Jim. I know we kind of talked down the path of removing the TAC or locking the transfer at that point. But I think that the discussions we had came down to that creates another security issue of someone that just wants to block, try to transfer multiple times. So, I think we've moved away from that. And as you mentioned earlier, Jim, I'm hoping that most gaining registrars, they do at least a decent job and customer facing responsibilities. They will actually jump into after so many attempts of a transfer and say, "Are you okay? Is there something wrong here?" And hopefully they reach out, not necessarily as a phone call or anything like that, but as a message back on the transfer saying, "There's been several attempts here, do you have the code right?" or whatever it is. Again, I'm hoping that gaining registrars have that, as you mentioned earlier, the operational mindset of watching that and seeing and communicating to their possible new customer or whatever it is. So I think that that's going to be handled from their side.

I think that maybe as an alternative to successive attempts, what if we said after the presentation—and again, I'm just going to grab the number that's in here, 5, I think we still had to come to that decision. But after the fifth and every fifth after that, a notice is sent to the registrar of record. That way, it still leaves it open and it

EN

still puts the onus on the registrar of record. And I'm not saying what they need to do. We'll talk about that in a bit, but it puts the onus on the registrar of record. Again, I'm hoping that the gaining registrars, they're pulling in new business that they're watching these closely. Just thoughts on that? What if we change bullet one and two to a bullet that just says after the X number of attempts in that X number of attempts successively that a notice is sent to the losing registrar? Crystal, please go ahead.

CRYSTAL ONDO: Thanks, Roger. I guess my question is we don't have any data about how often this happens, and to Jim's point in chat, I guess I'm just concerned about the noise it's going to create, if it happens more than we anticipate because we don't actually know how often this happens, whether it's fraudulent or not. I just don't want to sign us all up for registrars all of a sudden getting tons of e-mails that then they just ignore because it's too many.

ROGER CARNEY: Okay. Thanks, Crystal. Other people's thoughts on this? I don't exactly remember where this came up from. And I thought it came out of this small team, just ideas that they had talked around, and I thought we had agreed that it made kind of sense back then. Maybe we're talking ourselves out of this recommendation all together. But I think that what we've landed here is trying to give the registrant the best customer experience here as possible during this transfer. So, Keiron, please go ahead.

KEIRON TOBIN: Thank you. I think we have some substance behind the number. So I think just any kind of research to validate it so that registrants don't end up becoming kind of just bombarded because I do agree with Crystal. But I think if we could find any form of substance that would help us guide that number that would be accurate, I would be in favor of it. But I just think we need to kind of look into it a bit more. Thank you.

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

KRISTIAN ØRMEN: Thank you. I have no idea where this came from. But personally, I would really like it. I think it's quite often that registrants of some reason get the wrong TAC. It could either be that they type it wrong or they get it wrong from the reseller or the registrar, and it's just a bad registrant experience. I think this can help solve this because then the losing registrar is in the know that their costumer thinks they have a TAC that is not right. But again, I don't know where it came from but I really like it. I think it's a good idea to have this recommendation. Thank you.

ROGER CARNEY: Kristian, just a follow up. I see Crystal in chat mentioned maybe it makes more sense just to do it on the one time the notice to the registrar of record and not continuously do it. Whatever that number is that we've come up with, and again, I'm just going to say five for now, there's just one notice sent to the registrar of record and then they have that option of—we can talk about that

KRISTIAN ØRMEN: For me, it's fine with just one. I think it's helpful to improve the registrant experience. If somehow there is a system that just keeps on doing the same error, it's not very helpful to fall for the losing registrar to get a thousand of those, and maybe send it off to the registrant. That would be crazy. So I agree that one could be enough. But yeah, I think we should keep the recommendation, definitely.

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

JAMES GALVIN: Thanks, Roger. One of the things that occurs to me here is thinking a little bit about what problem we're trying to solve. I think that the registrar of record needs to know in one particular circumstance if an invalid TAC was presented. And that is they need to know that an invalid TAC was presented if they don't have any knowledge that the domain name is transfer eligible. I mean, if the registrar of record set the TAC, then there's nothing that they can do or should do or might want to do, I would think, with respect to an invalid TAC being presented. Their job is done. I think that the real onus falls on the gaining registrar. If they're getting bad return codes from the registry about the TAC then it's up to the gaining registrar to deal with that in some sensible way. The only reason the registry would want to tell the registrar of

EN

record is just in case something bad is happening. So, if you get a transfer request from a gaining registrar and there's no TAC set, well, that should be something, that's an event that's worthy of pointing out. A lot of people should be notified about that because that seems really wrong. And so you ought to make notifications go around. But other than that, I think the onus is on the gaining registrar to fix it. It might be interesting to present a single notice to the registrar record just because, but other than that, I think we're overthinking all of this. Thanks.

ROGER CARNEY: Great. Thanks, Jim. Actually, Jim, I think you're bringing up something Jody may have brought up a couple meetings ago about when this is actually triggered, I think Jody brought up the fact if there's still a lock on it, and as you mentioned, there's no TAC in it. That's a different scenario than the user experience scenario that we're talking about here. This is more of trying to help the registrant do what they wanted to be done, and I think that that's what we're kind of talked about here. We have to bound that with those other ideas. And to Jim's point, is that other idea a bigger concern or not? It is a valid question. I think that's something that the group should think about. Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. I'm a firm believer that for me as a registrar with retail clients that I want their experience transferring away from me to be at least as good as when they become a client. I think that's the only way I can get them to return later. So if I get a notice like

this that one of my clients got a TAC, get a notice that one TAC have been used, I am going to set up a system that sent a mail to this registrant and saying, "Well, we can see that you're trying to transfer away and your gaining registrar have used one TAC. If you need a new TAC or any other help, please reach out to us. That's how we create a better registrant experience. And me as a losing registrar, I should be involved in that better registrant experience. So I don't agree with Jim here that it's only a problem for the gaining. Like you should really focus on the registrant experience in all states of when your customer is still with you. Thank you.

ROGER CARNEY: Great. Thanks, Kristian. Theo, please go ahead.

THEO GEURTS: I like Jim's thinking the other way around regarding some obligations for the gaining registrar. I also agree with Kristian. I think customer experience should be good even if you're the losing registrar. And I was thinking along the way when you mentioned that Jody mentioned the locks, but we also have a situation that—and this was also mentioned that there will be domain names that don't have a TAC. And there could be situations that we have domain names without a TAC and a gaining registrar will shoot invalid TAC requests to the registry. And that is a little bit problematic in the sense of already sending notifications to a registrant because you could have a situation that you have a reseller who didn't have coffee on Monday morning and is moving some parts of its portfolio to a new

EN

registrar and, for whatever reason, just shoots a whole bunch of requests in for domain names that don't have a TAC created. I know some resellers put Auth-Codes in Excels at keep them for years so you could have situation that somebody should send a whole bunch of requests. I don't think sending a request to the registrant then a notification that your domain name might be getting stolen is the right way about it. I mean, that's bad user experience. So you want to have some kind of option there, again, to investigate. Maybe as losing registrar, I want to get in touch with the gaining registrar and ask, "What is up? What is happening here?" before we notify our customers. Because it could be human error, some kind of error, technical error, you name it, and there's actually nothing happening. There's no domain name being stolen. It's just something that is generating an error on the registry side. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Again, I'll let Jody talk here after I'm done. But I wonder if we shouldn't add language that talks about if there is no TAC. We know the registry is going to fail it but should there be anything done? Obviously, the registry is going to fail if there's a lock. Should there be language that talks about that aspect or is that just going to be assumed? I mean, that happens today, if it's locked, the registry is going to deny the transfer anyway. But I don't know if we need to add language in here. And to Jim's point, the flipside of that where someone's sending in Auth-Codes, when the domain is locked or when there is no TAC set, is that more of a concern? Does that need to be addressed or not? Because the registry is going to fail them all anyway. So is that a concern to

EN

JODY KOLKER: Hi. Can you hear me?

ROGER CARNEY: Yes. Thanks, Jody.

JODY KOLKER: I just have a question for Jim and I'm hoping we can just have a little conversation here about a statement that he's made in the chat. If there's a lock, you shouldn't even be able to set a TAC. Because what I'm curious about is, in order to set the TAC, the registrar is going to have to remove the locks. But in that case, are we expecting that when a TAC is set that there will be no locks on that domain name until the domain name is transferred away? Because I guess what I was imagining was that a registrant would come in and get their TAC and we would set it at the registry, but we may put locks back on the domain in case the customer does not want to transfer it immediately. And we would want them to transfer it immediately but I'm not sure that every registrant is going to do that. I'm just curious what Jim was thinking on that. It looks like Theo's asking. He's got a hand up, too. Thanks.

ROGER CARNEY: Thanks, Jody. I'll just jump in real quick before anybody answers. I think Sarah kind of brought up the same idea, or someone did,

anyone? It's just things to think about as we talk about this. Jody, please go ahead.

that possibly the TAC would exist with a lock, as you kind of went through it, Jody, in certain scenarios. So I think that that has been brought up, so it's a good thing to discuss. Theo, please go ahead.

THEO GEURTS: I'm thinking along the way that Jody is thinking. If domain name is locked then you cannot set a TAC. I think that's going to cause operational issues. You could have situations where a registrant goes like, "Hey, I'm going to create a TAC for no good reason." And that could be resellers that go like, "Oh, that customer is perhaps going to move his domain name, I will remove the lock." And you could actually have resellers come up with ingenious inventions like, "Okay, if you create a TAC then we just got to remove the lock before the TAC creation." I mean, that's easy to set up and you actually lose some of your valuable protection for the domain name. So I wouldn't say if there is a lock on a domain name, you cannot create a TAC, I wouldn't go that far. You could actually end up in a worse situation that you have less security because you have no control over what logical steps can be done there. You are dealing with users. You're dealing with human so you can have human error slipping in all kinds of forms. I would be very cautious there. Thanks.

ROGER CARNEY: Thanks, Theo. Jim, please go ahead.

EN

JAMES GALVIN: Thanks, Roger. Let me take Jody's question on and just say I don't have an answer for you. Let me turn it back around to this group to answer the question. I think we all know and recognize that there is an intersection between transfers and locks. So I'll concede that I spoke rather hastily, without thinking it all the way through here, this idea that you should not have a lock if you set a TAC. Way back in the beginning, when we first started all of this, I do remember actually making that statement a long time ago prior to a lot of the discussion we've already had. So I think we're all a little more steeped in what's going on here and now as I sort of take all of that together and ask the question.

So there's a user experience issue to be addressed here. I leave it to this group to sort out what you want to do. As a concept, I don't think that locks can be present if you set a TAC, if you want the transfer to occur. I mean, otherwise, how's the registry supposed to know? You want the registry to allow the transfer to happen, but if a TAC is presented by a gaining registrar but there's a lock on it, well, now what? You want the registry to magically know it's supposed to approve it? How does it make the distinction between a lock that makes a transfer eligible and a lock that doesn't? That's a question that I put here.

So what I really meant as I'm thinking to myself that if a TAC is present, the domain name should be transfer eligible. That's sort of the overarching first principle that I would think is true. But now you get this question of, okay, I get the operational side, especially on the registrar of record, you'll like those locks because you want to protect the name until you actually want the transfer to occur. And you don't really want to leave it vulnerable to transfers. You

EN

only want the actual transfer they want to occur. So you don't want to necessarily transfer. So this idea that I'm going to open it up to transfers, I take all the locks off, and then I put the TAC out there. But then you're right, anybody could take it. I mean, anything could happen at that point. You've got a window of vulnerability.

I don't have all the answers here. I think it's a user experience issue. I do observe that from a registry point of view, some registries offer lock services, and your registrars know that. Registrars had their own lock services, registries have their own lock services. What's the interaction there? The registry is having a lock service that registrars sell on their behalf and accomplish. Then the registry sets a lock on the name. The intent of that in general is to impose a manual process on being able to do a set of things to a domain name, whether that's updates or it's probably transfers to deletions. You have all of those locks available. Well, what are all those parts supposed to look like here?

As I think all of this through, I spoke a little hastily way back when and just now. Jody called me on it, and that's fine, because he's right. There's an intersection here and we haven't played through all the scenarios yet. What you want the user experience to look like and what kinds of options you want available. Now I have a registry point of view to also represent that registries can have locks and they sell that lock service. How does that play into transfers? I don't know the answer yet but now I'm thinking about that. As I'm sure you all are, too. Thanks.

EN

ROGER CARNEY: Great. Thanks, Jim. I think what I've heard so far is that the lock overrides everything. So if the lock exists, the lock decides. But I'll throw that out to the group to see if they think that's different. I think that the one issue Jody is trying to get around is should the TAC be able to be set at the registry with the lock on? Or even if it has to come off, can a lock be put on? I think he's saying that it should be able to be put on even if there is a TAC there and that the lock actually overrides the TAC at the time. Theo, please go ahead.

THEO GEURTS: Regarding the registry locks, I suggest that we don't include it in this policy for several reasons. That is a very specific lock. It is usually part of a package of a security feature that is being sold. There's a lot of nuts and bolts to it. You can actually quite expand on registry locks and really improve security for registrants there. So if we go down that field, that's going to be an absolute mess, I think. But on the other parts, there is a lock present and a failing TAC, I mean, that is a situation. And maybe I am completely oversimplifying it. But currently, as we have now, we have Auth-Codes, we have locks of domain names. And if somebody tries to transfer a domain name with a failing Auth-Code and the domain name is locked, then there will be a message returned that the domain name is locked. And such messages are implemented by, I think, every registrar because they will return to the customer, "You need to remove the lock first." And we have FAQs. Every registrar's website has an FAQ and usually there is the, "What do I need to do to unlock the domain name?" because I can transfer a domain name. So I think we've got that part covered. So I don't

think we need to get more meat on that. I mean, we just adopt the current situation that we have now. That can be a valid TAC but if there's a lock, it needs to be removed. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Just as a reminder, in today's policy, it does state that the registrar of record has to remove the locks within five days or provide a mechanism for the registrant to be able to remove their locks themselves. Again, that's in the current policy today. I don't know that we've addressed that completely yet so we still need to talk about that as well. Jim, please go ahead.

JAMES GALVIN: Thanks. I'm just going to continue thinking out loud a little bit here. I think that this policy is going to have to say something about the presence or absence of registry locks. You might not have to put a lot of meat on it but I think you have to say something. As I think through this in my mind, a registrar, their locks have to not be present. A registrar has to remove their locks in order for the domain to be transfer eligible. Otherwise, as a registry, I want to know what I'm supposed to do. If a TAC is set and there's registrar locks on it, then what happens when I get a transfer request and the TAC matches? What am I supposed to do with that information, given that the registrar has got it locked? I don't know how to respond to that. That has to be an automated thing. I mean, it really shouldn't be anything but an automatic response. I don't want that to invoke some kind of manual process.

On the other hand, I can imagine that—to get to what Theo was saying, I think it was just Theo who was just talking and suggesting—okay, so if the registry has locks on the name, then the registry may have other reasons for it. But I'm talking specifically about the optional registry lock service here. It needs to be understood, this policy needs to say something about the fact that something is going to happen. There needs to be a possibility for the gaining registrar to present a TAC to a registrar unlocked name for the TAC to match. And in this case, the registry has to notice that it has its locks. And now again, what's supposed to happen there? Is it that the registrar of record should have arranged with the registry to remove those locks in advance or does that now cause whatever process external to all of this which must have existed for the registry to have to deal with on the gaining registrar? The gaining registrar might get a response that says "Registry locked." Now you have to go do something external to the request. I'm just thinking through, practically speaking, the kinds of scenarios here and I think this policy has to speak to at least a little bit as to what's supposed to happen. Thanks.

ROGER CARNEY: Thanks, Jim. I think Rich actually put it in chat was what I was going to say and I think this is what I've heard is. I think no matter what reason it's locked for, that first check is when a gaining registrar request to transfer, the first check is if it's locked. It doesn't matter what they pass in, you pass back domain is locked—Jim, I assume you guys differentiate between a registry lock and a regular lock in that transfer request. But if you don't, it still comes back as domain is locked. Maybe you do it or not,

EN

that's up to the registries, but there's really no reason to actually check the TAC if it's locked. It's just a response back that it's locked. If it's not locked, then obviously you go through the process and check the TAC. That's what I'm hearing from everybody anyway. Theo, please go ahead.

THEO GEURTS: Maybe just a little bit of a definition question. When I talk about a registry lock, that is for me a commercial service offered by a registry to add additional security to the domain name which cost extra money. There is always—let me rephrase this. With the registries that we offer the service for, there is a manual procedure in place with the registry which we have to follow before the registry supporting even does anything. All the checkboxes have to be met. If they are filled in, if they are squared, then the registry is going to do something for us. And when we're talking about [inaudible] locks, that is, in my opinion, a registrar lock which can be set by a reseller, which can be set by a registrant, which can be set by a registrar. Again, if there's a lock on it, that just needs to be a message back. "The domain name is locked, do something else first." And that is basically all there is to it, in my mind, and maybe there is a different registry lock vendors, a court order in place. But I think those are edge case scenarios. Because if that is happening, which happens from time to time, there is also a procedure there where we go figure out like, "Why did the registry do that?" "They send us an e-mail that there was a court order." Then we go back to our customer explaining this and this and this. Maybe your customer is a criminal. I don't know. I mean, those are edge cases. So I would like the registry locks out of

EN

scope of this working group. I agree with Jim. We could mention a little bit about it but I wouldn't go that far. Thanks.

ROGER CARNEY: Thanks, Theo. And thanks for defining that because I'm sure a lot of people on the call don't recognize it, didn't know there was even a commercial product out there that many registries provide that additional layer of security. As you mentioned, most of the registries require some manual verification process somewhere to remove that lock. But again, that's a commercial product lock that was built by the registries to differentiate between just that normal locking that happened. Barbara, please go ahead.

BARBARA KNIGHT: Thank you. Thank you, Theo, for raising the other reasons where a domain name may be locked at the registry level. And you were talking exactly about what I wanted to mention here, which is, oftentimes domain names can be locked because of the court order. I think it's important that we recognize that and actually respect those locks wherever they may be placed. My guess is that there's a valid reason either because the registrant wanted the lock there. But I think we need to respect that either at the registry or the registrar level. Otherwise, I think we're breaking the system a bit.

ROGER CARNEY: Great. Thanks, Barbara. I don't think that we had to differentiate too much on this because, really, it goes back to the losing registrar's responsibility. Let me rephrase that. It's the losing

EN

registrar's responsibility to resolve that, whatever it is. If it's a commercial registry lock, the registrant still has to go back to the registrar of record and resolve that. If it's locked for UDRP or whatever, the registrant has to go back to the registrar of record and resolve that somehow. And if it's just a plain client lock that was put on a domain created, they can go back and maybe to solve it themselves, but still have to go back to the registrar of record to resolve that.

I think all the locks that we're talking about, if there's a lock on that domain, the transfer fails and the gaining registrar is told that there's a lock, which means that the registrant has to go back to the registrar of record to resolve whatever that lock is. If there's more information, good, that can be provided because that will help the registrant and it'll help the registrar of record. But the simple fact is, I think, if it's locked, the transfer fails or stopped—I don't know what fails—the transfer is stopped, the gaining registrar is notified that there's a lock and the gaining registrar has to communicate that to their new potential customer that they need to resolve this with their current sponsored registrar. Jim, please go ahead.

JAMES GALVIN: Thanks, Roger. I want to be very precise about terminology here. I think that the registrar of record needs to be responsible for removing or resolving all locks that they were party to setting. And that means two things. One is all the client locks have to be removed before it sets a TAC. Also, as a secondary feature, if it was involved in setting a registry lock, it has to resolve that in some way. The resolution might be just that the registrant has to

EN

be reminded that there's an external process which has to be invoked, and we don't want to say a lot about that. Because it might be that they go to the gaining registrar, and then they issue the transfer request, there's no client locks, it gets a valid request so the registry says, "Good thing." Then it invokes whatever manual process is set up as part of that lock. But the registrant has to be expecting that and the gaining registrar then is going to get some kind of automated return code that says, "Okay. You've almost got it. Now you have to deal with this process." That all has to be sorted out, too, so there has to be a means of conveying that message. That also leaves open the possibility with Theo and Barbara were talking about here that if a registry's got it locked, that maybe the registrar of record doesn't know—I mean, they always could know, of course, but they don't have to concern themselves with that. They can still set a TAC, give it off, hand it over. The gaining registrar will get a rejection, "Sorry, it's locked, you can't have it." And that's a different error message then "It's locked, invoke this manual process." So that has to be part of all this.

ROGER CARNEY: Again, Jim, you described two of them. But I think you've actually described I think the three scenarios. Because the registry may lock the domain for a court order, whatever it is, and the registrar of record may not know it at that time. But to me, it's still the registrar of record's responsibility to—put this in air quotes again—"resolve" even if it is just explaining to the registrant, "Sorry, but there's a lock on it for a reason. And this is the reason." To me, that's resolution, if you can explain that to the registrant.

All lock scenarios, to me, the gaining registrars notified there's a lock and the gaining registrar will notify the registrant that there's a lock and that they need to resolve that with their registrar of record. Again, resolve may not be to the transfer but it's a resolution of that issue.

JAMES GALVIN: I want to disagree a tiny bit with the last thing that you said. I think that I want to leave the door open for the idea that it may be that the manual process that deals with the registry lock that's been set has to transfer from the registrar of record to the gaining registrar, which means that resolution might be just reminding the registrant that your gaining registrars are going to have to make some phone calls, if you will, in order to effect the transfer. That might be the process that has to happen. They have to settle all of that up. So the resolution might just be to remind them.

I also want to leave the door open. I don't know. You can disagree on this point. That is that the registrar of record might not—I don't know that they need to be obligated to tell the registrant that "There's a lock that I don't know anything about on your name." Maybe they can try and move it to the gaining registrar and the gaining registrar ends up telling them that. I don't know. That's up to the losing registrar whether or not they want to get involved in that.

ROGER CARNEY: That's a good point, Jim, because that can still happen. Good point. On the commercial lock, it surprises me that a registry

would allow the lock to be removed without the registrar of record's permission.

JAMES GALVIN: My point is that might be the process. But again, to go along with what Theo was saying, the real details of that are out of scope here. The only thing this policy needs to say is that the registry lock gets to stay. And when it gets to the gaining registrar, something's going to happen over and above this automated stuff here. That's what has to be visible in this policy. Ultimately, that obligates on registries that for any commercial lock service that they're offering, they have to account for this transfer process and decide what they want to do about it. That's just incorporated in whatever they do. But this policy needs to call out that registries have that responsibility if they're offering that extra service, otherwise leaving it completely open, right?

ROGER CARNEY: Okay.

JAMES GALVIN: You don't sound convinced, but I'm sure it'll sort itself out when we start writing words.

ROGER CARNEY: Right, exactly. I think it will. And I think that's their next step here is to actually start writing some of that down. Again, I think we have the basic framework. It's just getting into those details of

when those happen. I think Rich actually has it in chat that makes it easy for us. Obviously, if there's a lock, it stops. The communication at that point becomes slightly something we need to detail out. And again, as long as everybody here agrees, there's a lock, it stops and something has to happen. If there's no lock, a TAC is provided and there's no TAC, obviously, that fails. But if there's a TAC and it matches, then the transfer goes through and it's done. So I think that, obviously, we have those steps. We just need to put them on paper so everybody can check them and put in place where those branches happen, as Jim was trying to describe there.

Okay. I think a lot of that discussion wasn't necessarily specific to 5. A lot of that discussion was bigger than 5 even. And we had to figure out where that goes, especially the idea of the document, if there's a lock, that overrides everything. So we'll have to work that out.

With going back to 5, I think what we've agreed to is—I saw several chats come up—that the second bullet can probably be removed. So we'll do that 5.1. There'll be one notice sent at, again, appropriate interval of how many attempts that are invalid. Again, this would be invalid attempts when there's no lock and the TACs just aren't matching. I think we've talked well beyond 5.1. Good discussion because we needed to have that about how the lock is interacting. I think we've agreed on some principles of that. We'll get it documented. The TAC can be set, there may be locks, it doesn't matter. It's when the request for transfer happens that that order of precedence will actually take effect.

Okay, jumping to 5.2 now. We're going to say that we set a good number for that how many times before an invalid TAC sends a notice. So now, we agree that a notice should be sent to the registrar of record. But I've heard some differences on what has to happen with that notice. If the registrar of record must notify—I've heard that—after five times, the registry will send a poll message to the registrar of record, and then the registrar of record must send a notification to the registered name holder. Now, I've heard other people say, "Well, maybe there's an intermediate step there that the registrar of record may be able to solve the issue before even reaching out to the registered name holder." So I think we need to clear up that language and somehow put that in place of the registrar of record has to take action, which may be notification to the registrant. Again, I'm not sure what that language resolved, the technical issue or whatever it is. Keiron, please go ahead.

KEIRON TOBIN: Thank you. I don't think a registrar should be required to reach out because sometimes just by looking at account, as a registrar you may be able to see something that doesn't necessarily require a response. So I think you should reach out. It's probably the wrong terminology. Looking at it from a different perspective, I think maybe that there is a point. I don't want anything like ICANN Compliance to be involved in this matter. I just think raising it to that point of having the word like most, I think, is just a bit of a step too far. Like I said, especially if there's something that we have an overall view that we can see where there may be an issue that is occurrent. Thank you.

ROGER CARNEY: Thanks, Keiron. You touched on exactly the issue I was trying to drive to. This is good for registrants here to have this idea in here but a recommendation that can't be followed up on, really, why are we doing the recommendation in the first place if there's no way to follow up on it? Your "must" to a "should" makes sense. But obviously, for Compliance, that doesn't help them follow up. So is there some other wording that the registrar of record has to document an investigation or whatever it is? I think Theo said something about investigation—oh, there's his hand—and they resolve it. And one of the things I was even thinking about, as Keiron was talking about, if we set this to five, the registrar of record sees it and the transfer has gone through. Obviously, they got it right on the sixth or seventh attempt and there's nothing to send to the registrant. It's complete. But that is the investigation that the registrar of record took and maybe they just have to know what that was so that Compliance could follow up if they ever had to. So maybe I just said what Theo was thinking.

Okay. So I think for 5.2, the discussion is around changing the "must notify" to "must investigate and document" and "may notify" or not should, even, because there's should if it was resolved. Theo, please go ahead.

THEO GEURTS: The more I look at this and just the input from Keiron there just now about ICANN Compliance, I'm thinking like, okay, my biggest issue is how many of these notifications will we get from the registry? Will that be one a week? Will that be a thousand a day, and what's going to happen then? And even a thousand a day and we must do something like investigate every bloody one of them,

EN

that is going to be mega expensive and we might all shut up our businesses and go do something else because the domain names will be pretty expensive then. So that is basically my problem and that trickles back to the entire thing, why are we doing this?

I remember back in 2013, I was in Argentina, together with Jonathan Zuck and Berry Cobb, also I think Pam Little, and we were on this charter team about data metrics policy making and making sure that we make decisions that we make policy based on statistics, on facts, on information, and not anecdotal evidence or figments of our minds or whatever. This is basically where we are going off the rails, I think. What are we trying to solve here? And if we have something to solve here, do we have numbers to back that up that it is a significant problem or is it a very tiny problem? I am sort of leaning towards thinking like if we don't know exactly what we are trying to solve here and just trying to come up with some security measurements, which we do not have any evidence for that is really an issue, I think we are way off the reservation here. Thanks.

ROGER CARNEY: Thanks, Theo. And just to get back with how we started this discussion that kind of got into a bigger discussion, but what we're talking about is that the purpose here is for the user experience, the registrant experience, not just being consistent experience but being a predictable and satisfying experience that, yes, they know that the transfer happened or they know that it didn't happen and for what reasons that it didn't happen. The process is being transparent to the registrant is the goal here. And to your point, we don't want to create—and then not even just for registrars or

EN

registries but for the registrant—a bunch of noise in a process that obviously has its own subtle issues to it. So I think that, again, the purpose here is the registrant experience and making sure that it's transparent to them that it happened or it didn't happen for these reasons or something went wrong. So I think that that's the purpose.

Kristian's comment in chat—and I see Keiron responded—but I think that maybe Kristian hit the right text here and that maybe it should be the registrar of record must investigate or notify the RNH or investigate the issue. That gets away from, okay, there can be quite a bit of automation done that drives that process. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Just coming back to Kristian. I think, to me, I would just leave investigate. If you're doing an investigation and you think that you need to notify the individual or the organization, then you can do so through what you found in your investigation. But I think that putting both in there such as notify, if ICANN Compliance was to get back out and was like, "Have you notified them?" and he was like, "Well, no. We investigated but we didn't find this," I just don't know how ICANN Compliance itself would be like, "Well, did you notify them or did you not?" If you're doing an investigation in general, that's when you would probably notify someone if they saw an arising issue. Thank you.

EN

ROGER CARNEY: That makes sense. I think that that's the key on the wording is getting the right words of making it a big or. Someone's either investigated it, again, which I think can be fairly automated or notified and not making that either one more important than the other. If you notify them, maybe there is no investigation needed at that time. Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. I think it should be a really big or there. I think for some registrars, it would be easy to just basically notify the account holder or registrant there that's automated. If it's resellers, they can even just put a poll message. Like they just got a poll message from the registry, it's all done. They don't have to do anymore. For some registrars, it might be better to investigate, like whatever they like to, it could be manual, it could be automatic. As long as it's a really big or then the registrar have the option to choose either option. Thank you.

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

BERRY COBB: Thank you, Roger. Maybe a way to get out of this—and I think Roger makes a fair point in response to Theo about fact-based policymaking but we're at the same time trying to ensure the RNH experience here. So maybe a way to get out of this, because it seems like there's some hesitancy about strengthening a policy requirement here, but at the same time, I think there still needs to be some closure to what should happen to 5.1. So instead of a

EN

5.2, this be changed to an implementation note that can, of course, accompany the future transfer policy for this section that basically the text would still continue as is. But notifications in 5.1, the registrar of record should investigate the issue and where appropriately notify the registered name holder, so on and so forth. And that way, we're closing the loop on the customer experience but not necessarily creating an extra requirement that may be near impossible or maybe even useless for something that Contractual Compliance would need to try to investigate or audit. That's kind of where my thought is at.

ROGER CARNEY: Great. Thanks, Berry. I think that's the point we have to be careful on is trying to create a requirement that can't be enforced. I think that there's no sense in really creating a requirement that can't be enforced. So I think we have to think about that side of it. Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. First, a response to Berry, and then a comment I forgot before. With my experience with compliancy, if it's a "should investigate," then they will ask how did you investigate. So that is a requirement if we put that in there. That could be a problem. If you just put one in the TAC, to relay a notification from the registry is like super easy to do. It's really easy to show compliance. For some registrars, it makes more sense to investigate the issue instead of just blindly relaying the notification, and that's great. But if we put "should investigate," registrars will have a compliance requirement that Compliance would ask, "How did you

investigate?" So I don't like that text and I would like it to be changed.

The comment I forgot before was that—well, I don't have the exact numbers but from daily operations at the registrars I work with, I can say that we have a lot of transfer request where the auth ID is wrong. So that happens all the time. Quite often, it's error that either the registrant got the wrong auth ID, maybe by system error but it could also be that they copy-pasted it wrong with like a space in the end or where the one should be something else, the B should be 8 or something like that. So it happens all the time. Thank you.

ROGER CARNEY: Thanks, Kristian. I suppose that brings me to a follow-up question, even though we haven't solved this quite yet. But a follow-up question on what that notification to the registrar of record should entail? Should the notification include who the gaining registrar is that's asking for it? As Kristian just mentioned, should it include the last TAC that was tried to the registrar of record so that they can do that simple "investigation"—and investigation here in quotes because it can be automated—that says the TAC doesn't equal the TAC that we had or however that works, and can easily send an e-mail saying, "Okay, you'll see your transfer but you're using a wrong TAC," or whatever it is. Or to even get to—feels concerned about maybe a reseller has a bad Monday, no coffee, or whatever it is. And maybe they get a thousand poll messages because they tried to transfer a thousand domains away. And for whatever reason, got the TAC wrong or just blanked it or whatever it is. The reseller or the registrar there can investigate and see that

it was their own fault, and there is no communication that has to happen. So I think that if we make that a big or but a must still, to me that solves the problems of the notification that people bring up and the issue of is there any way to enforce that recommendation.

So just my thoughts, throwing it out there. We've got six minutes left. So please, anybody with thoughts on that, tell us what you have so we can update this wording as best we can before we meet in two weeks and everybody forgets about it. Theo, please go ahead.

THEO GEURTS: I'll just applaud the closing thought on my side. I'm really looking forward to the new language because I'm a little bit confused where this all this is going. But again, we are making a recommendation which we do not know what the operational impact will be if we start doing investigations. And that big question mark, that is, in my opinion, a threat to our business models. So we need to be extremely careful what we are going to put there.

The reseller who didn't have its coffee on Monday morning, that is not just an anecdotal example. People are just—sometimes I do not know how people even think because they just do something, they just enter a whole bunch of domain names and they don't even add a Authorization Code with it. That just happens. Many years ago, when we had our first backend system, we didn't even had a check on it. So we had all these resellers just trying to do it without an Auth-Code. And nowadays, we have all these

EN

validators and checks in place, etc., to weed out all those human errors. But even now in 2021, we still see stuff that goes like, okay, nobody predicted that somebody would do this, and that just happens. And that will never go away, in my opinion. Regardless what kind of software you use or whatever platform, there will always be people who will surprise the heck out of you, and you just cannot anticipate that. So be cautious with it. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Just to echo what Theo said as well. I think it will be interesting to see where we actually ended up going with this. It does have some benefits as well such as, for example, if a [turf] comes in or if there's a notification of a stolen domain, if we've investigated, we're already kind of one step ahead, just to be aware of it. But again, I think the language here needs to be crystal clear, just to make sure that we don't essentially end up shooting ourselves in the foot. Thank you. Thanks.

ROGER CARNEY: Great. Thanks, Keiron. Okay. Any other comments? Okay. So I think we did a good job. I was hoping to get further but I know we discussed a lot outside of this recommendation. So I think that was great. I think everybody got onto the same page, especially around the locks, which we're going to discuss soon enough anyway. But I think that was a good discussion today. We will be coming back to 5 again, not just 5.2, Keiron, but we'll come back

to 5 again because we'll have some rewording here going on. But yes, hopefully our next discussion is more fruitful as far as moving past this. I think it was a great discussion either way. But yes, we'll revisit this and hopefully we get to the rest of them as quickly as we can. But good discussion. It's only going to help us moving forward as we write down some of these interdependencies, so that's good.

All right. Any other comments, questions? Great. Keiron, good post in chat. A good homework again, talking about number three, which we haven't talked about any wording suggestions there. But also here in number five, any wording or idea/thoughts here? Obviously, good homework for your holiday seasons. We'll meet again in two weeks and we'll pick up here where we left off.

So if there's nothing else, next call is January the 4th at 16:00 UTC. Great. Thanks, everyone.

[END OF TRANSCRIPTION]