
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 19 July 2022 at 16:00 UTC

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DEVAN REED:

Good morning, good afternoon, and good evening. Welcome to the Transfer Policy Review PDP Working Group Call taking place on Tuesday 19 July 2022 at 16:00 UTC.

For today's call, we do have apologies from Catherine Merdinger (RrSG), Prudence Malinki (RrSG), and Owen Smigelski (RrSG). They have formally assigned Jody Kolker (RrSG), Essie Musailov (RrSG), and Rich Brown, (RrSG) as their alternates for this call and for their 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.

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All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to View Chat only.

If you have not already done so, please change your chat selection from Hosts and Panelists to Everyone in order for all participants to see your chat and so it is captured in the recording. Alternates not 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. Does anyone have any updates to share? Please raise your hand or speak up now. All right.

Please remember to state your name before speaking, for the transcription. Recordings will be posted to the public Wiki space shortly after the end of the call.

As a reminder, those who take part in ICANN multistakeholder process are to comply with the Expected Standards of Behavior.

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

ROGER CARNEY:

Thanks, Devan. Welcome, everyone. Before we jump into our agenda here, just a couple thing I wanted to talk to real quick. As we're getting into the Change of Registrant discussion here, we've been going back and forth but I want to make a few things known, or to at least seed the idea in the back of everyone's head that Phase 1A created quite a few new or enhanced mechanisms for

the inter-registrar transfer. And I think that some of those still apply or affect the Change of Registrant concepts as well.

So I think that when we look at improving the Change of Registrant, I hope everybody's looking back at the Phase 1A recommendations and seen some of those recommendations being a positive effect as well on the Change of Registrant. So as we go through changing anything in this Change of Registrant Policy, just take note of those things.

The one that pops up front of mind to me right now is the five-day window to provide the TAC. You can do a lot of due diligence there, and obviously if there's recent Change of Registrant information, it's worthwhile for the registrar to look at that and see if there are any issues with this or if that makes sense.

Again, I think there are several recommendations out of Phase 1A that have effects on the Change of Registrant. So I think, just take that to ... Look at those recommendations again and see how there's an impact on the Change of Registrant as well.

And along with that, in Phase 1A, we've talked about a dispute mechanism for Change of Registrar. And I wanted to make sure that everybody has that in mind that, yes, we are planning ... The idea is that there will be a fairly robust dispute mechanism. Not just for Change of Registrar, but anything in this realm of transfer or transfer of ownership or physically transfer from registrar to registrar.

The goal is ... And I think to move forward with our discussion on Change of Registrant, just keep in mind that, yes, we are planning

to—again, seed the mind of, yes, we know there's going to be [a robust] ... What that is exactly we don't know, but we know there's going to be a robust dispute mechanism. So just keep that in mind when we're talking about this so that in a Change of Registrant, the information may also lead into one of those dispute mechanisms. So just, again, thinking about any changes that we make to the Change of Registrar.

And I think, besides that, let me open up the mic to any of the stakeholder groups that had any discussions/comments within their own groups that they want to bring forward for this group to know about or comment on or take under consideration. So I'll open up the mic to any of the stakeholder groups that want to make any comments.

Okay, great. And again, we'll try to do that as much as possible. And thanks, Berry, for that quick note. I was just going to actually mention that we've got this one and three more meetings before we take a break. And during that break, staff will actually write in their report on the public comments that come in on Phase 1A. And during that time off, we can take a look at that report plus the comments that are coming in. There have already been several comments posted, so it's good that it's getting some look at it. So again, this meeting and three more. And then we'll have a few weeks off. Just so everybody knows.

And lastly, before we jump into our agenda, I know that Mike had sent an e-mail, I think last week sometime, with some ideas. I don't know if Mike's on. It doesn't look like Mike is on today. But I wanted to see if anyone had any comments on Mike's e-mail from

last week. Let me grab that. Last Tuesday he sent it. Let's take a look.

It's about the 60-day lock being optional now, and he's questioning. If it's optional, then why do we need to do anything with that? So I didn't know if anyone had comments to Mike's ...

Thank you for posting that in chat, Emily.

I didn't know if anybody had any comments. I didn't see anything on the mailing list, so I wanted to see if anyone had any comments here. And we kind of talked about it. One of the things, the lock being somewhat optional is that consistent feel for the registrants. You know, it seems to be outside of that where at one place you may get a 60-day lock and at the next registrar, you may not.

So I think that's one of the reasons this group has identified that [it would be better to change]. But I didn't know, I wanted to open it up and see if anyone had comment to Mike's e-mail from last Tuesday.

Zak, please go ahead.

ZAK MUSCOVITCH:

Thanks, Roger. Yeah, Mike's e-mail got me thinking a little bit that if we had a 30-day lock, for example to keep it consistent with the other two, but we increased the useability of the opt-out—so for example, opting out any time and even more conspicuous than it was before, perhaps along those lines—it would have the effect of

allowing anybody to affect a Change of Registrant notwithstanding that the 30-day lock is essentially a default.

But then based upon Mike's e-mail, it got me thinking, well, if anyone can essentially opt of it at any time, what purpose or utility does the lock have to begin with? And that's a genuine question. That's what I'm kind of wondering to myself, if anyone has any thoughts on.

If you can opt out of it effectively and perhaps more effectively than you could previously, what reason would there be to have the 30-day lock as a default? Maybe there's a perfectly good reason to have it. Thank you.

ROGER CARNEY:

Thanks, Zak. And again, I think that, on that line, I'll point everybody back to the Phase 1A recommendations. There are some of those recommendations that will help here because, to your point, if the ability is to not really have a lock, then why is that even part of the policy.

So I think if that's what needs to be answered here, again I think the optional part, I think, is the constituency part that we're trying to fix. But to your point, Zak, if there is an option to opt out, does it even make sense to have? So I think that's a good question.

Keiron, please go ahead.

KEIRON TOBIN:

Yes. Just in response to Mike's question [of that]. In terms of if the registrar ... So, I'm actually in favor here of removing this in its entirety and just going a little bit further down to his second point. If a registrar did want to impose that lock, they would have every right to do so. Obviously, it would be optional, but that would be down to the individual registrant to choose who or what kind of registrant they want to be with.

So to his point, yes, if we want to remove it, registrars can still choose to opt in to something like ... Well, they could still choose to do that. But again, that would be down to the individual to choose as to what registrar they wanted to go with. Thank you.

ROGER CARNEY:

Thanks, Keiron. And a nod to that. I don't remember who said it last. [inaudible] give them credit if I remembered, but I don't. The discussion of a Change of Registrant is a little less—I can't remember how it was said last week—a little less stressful or impactful than a Change of Registrar because it gets a little more difficult to correct or trace that once it goes from one registrar to another. And if it stays at the registrar, it's a lot easier to handle, to maintain if there are any issues with it.

And to your point, Keiron, yeah, it's one of those where, again, looking at that Phase 1A recommendations, if there's a Change of Registrant and then they're subsequently trying to transfer it, the registrar still has that ability to review and see if that Change of Registrant had an impact—suspicious or whatever it is—that they should provide the TAC or not.

So I think that it's a good thing to think about. Does it really belong or not? And I think that's a really good question. And it being optional, I think is a difficult part. It adds some flexibility there. But to Keiron's point, I think that we've already built in the ability for a registrar to question a Change of Registrant and then a quick transfer. So I think it comes down to does a lock take out the 60-day? Does a lock even make sense then?

Zak, please go ahead.

ZAK MUSCOVITCH:

Thanks, Roger. Just based upon Keiron's comments and Jothan's feedback as well, and to reiterate upon the point you made from last week that if we have a 30-day mandatory Change of Registrar lock—as we believe we do based upon Phase 1—then that would seem to be the security mechanism that can be most relied upon.

And in fact could be looked at as displacing the importance of the Change of Registrar lock. Because as you say, if there's a ... It would remain at the registrar for no more ... It couldn't change registrars more than that one hope because of the inter-registrar lock. So the security would be maintained because the domain name stays within that registrar for that hop. Thanks.

ROGER CARNEY:

Great. Thanks, Zak. Yeah. And another great example, I think, there are a couple of recommendations from Phase 1A that provide for that logical, "Okay, does that lock really need to exist for a Change of Registrant?" So, yeah, I think that's a very valid

point. And again, looking back at the Phase 1A recommendations, we may have already solved this without even getting into it.

Zak, I think that's a new hand. No? Okay. Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. Hi, everyone. It's Emily from staff. Because we're talking about a lot of different locks here and it's been a little while since we've talked about locks in Phase 1A, so just for folks who are either joining or who maybe need a refresher, is it okay if I just briefly mention what different locks we're talking about and how they're distinct? Just so that there are no crossed lines?

ROGER CARNEY: Thanks, Emily. That would be great.

EMILY BARABAS: So in Phase 1A, we talked about two different ... And we used the term "locks" but they're really not locks. We're really saying a transfer cannot occur for 30 days either following a registration or following a transfer. So that's a prohibition on an inter-registrar transfer. And in Phase 1B, we're talking about a lock after a Change of Registrant. So after either an update to certain fields or, actually, a change to a new registrant. And that's an inter-registrar transfer lock as well.

So if you have a case where a registrant updates their information—let's say it actually is changed over from a new registrant—and the lock did not exist, you would have that first

update. They would still be able to, for example, transfer the domain to a second registrar.

Then there would be an inter-registrar lock in place if Phase 1A recommendations go into place. But they still could transfer the domain to another registrant again during that period. It wouldn't prevent them from doing that. So it would prevent subsequent steps to additional registrars, but it would still no longer be at the original registrar and would be two registrants from the original.

So, just talking a little bit about which locks come into play where. I hope that helps. I know it's a bit confusing, but maybe we need to do some diagraming or something like that or the different scenarios. Thanks.

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

THEO GEURTS: Thanks, Roger. A question about registrar hopping. I hear it often in this group. I also hear it in different discussions regarding DNS abuse. Apparently, there's some registrar hopping there also. But do we actually have any numbers here where we can go, "Okay, it's happening 1,000 times a year. Or maybe 5,00 times a year"? Do we have any numbers? I think this answer is no, we don't have that. And I think that is a little bit problematic discussing some kind of security-based feature and we have no evidence or no facts to actually back up that this is actually working.

The ICANN community is always great in sensing a problem. I'm not diminishing the fact that domain name hijacking is not real. I think it's very real. I do wonder how many times it was actually a big problem. And, you know, back in the day, almost a decade ago when we were having these discussions, we were actually very good in coming up with a definition of the problem, but we never did the root problem analysis back in the day.

Yes, there was domain theft, but why was there domain theft? And if you look back in the history of back then when we discovered the problem of domain name theft, account takeovers from Gmail, Yahoo!, Hotmail. That was really, really easy back then. If you wanted to steal a domain name, you looked into WHOIS, picked up an e-mail address, and you just took over a Yahoo! account. And back in the day in the deliberations, nobody of us back in the working group ...

We didn't know that Yahoo! lost 3.2 billion data sets of usernames, e-mail addresses, and passwords. We didn't know anything of that. That was just really easy to steal a domain name back then. But those times have changed. It's completely a different ballgame right now. Thanks.

ROGER CARNEY:

Thanks, Theo. Yeah, and I think that, obviously, it's important to keep in context of the number of the occurrence. And I think that not just the occurrence, but the impact that it has. We've talked about that prior as well. Does it happen often? Maybe not often, as Theo mentioned. Maybe it's considerably less now.

And again, without know the numbers, I think that's what the feeling everybody has is. It has gotten better and it's improved over the time. But the impact, still, is a large impact. So even if there's only 10 of them ... And again, we've had some recent ones even this year that have had severe impact on business and customers and customers or customers. So I think you have to not look at just the number, but also the probability of what kind of impact it is.

I obviously want numbers, as Theo mentions. But in light of not having the numbers, you have to look at, okay, what's the probability of not having the numbers? You have to look at, okay, what's the probability? And if it does happy, what kind of impact there is on that.

Steinar, please go ahead.

STEINAR GRØTTERØD: Hi. I'm still having some sort of problem what to decide upon these locks after the Change of Registrant because from an end user and also from a personal experience, if I want to transfer my domain name, one of the first things I should do is actually kind of validate the data that is for this domain name at the present registrar.

If I identify that some of this data are not up to date or maybe there is an e-mail address that is not working anymore, etc., I might end up in a scenario where I have to wait for initiating the transfer because this is a change that triggers this Change of Registrant transfer lock.

On the flip side here is that if we remove the locks totally, it can be [gamed] in a way that I'm not sure we do have ... As Theo says, maybe we don't have the stats about that, but it can be [gamed] and it's a little bit more risky.

So I'm in limbo here. I don't know exactly. So I want to have some good thoughts on that one. Thank you.

ROGER CARNEY:

Great. Thanks, Steinar. And I think that is the issue. Right? I think, obviously, the majority or registrant updates are legitimate. And you can say the high 90-percent in that. But it is ... When the risk becomes ... And again, it's not just the number of them. It's the impact that it could have.

But I think, again, we're looking at this. Our Phase 1A recommendations provide, okay, if it does ... If someone comes in and changes something on their contact information and then transfers, well then it's locked for 30 days at the new registrar. So there is a period there of protection.

But also, even before that can happen, the registrar has an ability to do due diligence on that transfer request and look at it. And it's like, "Okay, somebody obviously has hacked somebody's account and got in here." Or, "Okay, somebody just changed 'Sue' to 'Susie' or whatever, so it seems legitimate." So I think that we already have some mechanisms to allow for that. Again, we did it in Phase 1A.

So I think that to your point, Steinar, the issue is, yes, okay. A lot of people that do a transfer looking at their stuff and update it and

then want to do a transfer. And then it becomes a problem. And I think we've got some security around that that'll help afford that without a lock if that's what's decided.

Jim, please go ahead.

JIM GALVIN:

Thanks, Roger. Jim Galvin, Registries Stakeholder Group, for the record. Roger, I want to take what you said earlier about impact and make a couple of comments about how to evaluate that impact. The first thing that I would say is that there should be consistency. Logically, these things should all make sense.

I'm just sitting here and, in this context, just being an observer to this discussion, representing registries as opposed to registrars, and thinking to myself, you know, we're talking about a change which is a transfer. If you're going to have inter-registrar transfers and have a lock on it, it just seems to me if you're doing a transfer internally at the registrar, it's a transfer. And the rules should be the same.

And even if it's an intra-registrar transfer, which at least conceptually is what a Change of Registrant is, it just seems to me ... It just seems obviously to me in that sense that you would have the same locks in both cases. That's just the way that you do it, and it should be done that way.

And I like the scenario that—I apologize, I think it was Emily who just walked through—in all of this and how these two things interact with each other. And it just feels like that's what you want to do.

Which gets me to my second point about impact. I think, Roger you're right. There's a question here of what problem you're trying to solve. So what you're trying to optimize for here. So the reason why you have the 30-day lock ... I mean, you wanted a lock because you don't want registrar hopping. Well, it's not just about whether or not registrar hopping is a problem. It's also about providing a quality service to a registrant.

Registrants don't expect to get hijacked. And let's be honest. It's not just about Yahoo! or Hotmail e-mail addresses getting hijacked. Registrar accounts can get hijacked, too. So in trying to provide a service to the registrant, I think that you want some kind of lock because you don't want some kind of hijacking scenario. These things happen by accident. As you say, Roger, it's about the impact of that. It's significant to the registrant even if it doesn't happen that often.

So I think the quality question to ask ourselves here, I would think, in the discussion is if you're going to have a lock—which I think you should in both cases—maybe 30 days is too long. Or maybe not. I mean, what do you think is the best benefit in terms of serving the registrant? You're providing a feature to them in terms of consistency, and maybe protecting them from themselves more than protecting them from a registrar who's not as good about these kinds of things. It happens.

But that's the way I would think about this—providing a good service and making things the same. Thanks.

ROGER CARNEY:

Great. Thanks, Jim. And to you comment on just being an observer. I love the fact that we do have observers because they see things differently than some of the people that are in the weeds. So I think it helps out a lot.

And to your point on if it's a transfer, it's a transfer. I think that's where it gets into kind of a tough position. And Steinar's discussion of, okay, if I'm going to transfer something I'm going to go in and update my e-mail because I don't use that e-mail address anymore. And then I want to transfer it. Okay, that's not, as some would call it, a change of ownership. That's just an update to the registrant information.

The difficult spot—and [inaudible] part of our work that we're going to get to, but we'll get this discussion going here—is how do you decide or where do you decide a Change of Registrant is a change of ownership? Because to me, even when you describe it, Jim, a Change of Registrant is not a transfer. But a change of ownership at the same registrar is what you're calling a transfer. So I think that's the difficult spot, and you have to spin that to see when that happens.

Theo, please go ahead.

THEO GEURTS:

Yeah. To build upon that a little bit, the example that Steinar gave that is, actually, when we talk about offering quality, that is definitely the opposite of what we're going. I mean, the lock is very confusing for registrants. It also happens that when they want to

actually be a good registrant and having extra data, they actually get punished for it because the domain name gets locked.

And the worst case is that the lock remains in there just a few days before the renewal. So [they're stuck by] the renewal for another year because they can't move out. Maybe they forget about it and wanted to move out. So it's also a little bit anti-competitive, in my opinion.

But the lock is just causing a lot of grief and is still causing a lot of ... It's still generating a lot of technical questions to our support desks. I'm not the only one [inaudible], but I hear this from other registrars. It's still a hot topic. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Okay, any other comments? Thanks for throwing that in there, Sarah. And Steinar, for asking the question about what a material change is because it gets into our discussion—our agenda, really, today. So maybe we can pivot this discussion into our agenda 3 item here. If staff can bring up the table. Yeah, there we go.

So, talking about and getting back to, Steinar's ... I think that early on, maybe even at ICANN74, we talked about this idea that the lock period for a Change of Registrant is directly tied, proportional—however you want to say it—to what a material change is considered in today's policy. So it's one of those where if you change something materially on the registrant contact, then something should occur. If it's not, then I think that's where the fine line ... And Jim bringing it up that if it's a transfer, it's a

transfer. Or if it's just a registrant contact update, I think that's where the fine line is, and the difficult spot of can you even see that line as you're doing it.

So I think that when we walk through this, these items, what does really mean a change—as Jim was trying to describe it, a true transfer between registrar to registrar versus a transfer internally at a registrar. Where's that fine line of just a registrant contact update and a change? Is that even possible to discern on a regular basis? And if not, then [inaudible] on that.

So I think that's what [inaudible] trying to do is, okay, let's look at those things that could possibly be a material change. And maybe even today's policy doesn't list them correctly or identify them correctly. And then that's part of our goal here, to make sure that that we understand and deal with those appropriately.

I think if you look at this table, we're listing all of these. And again, I think that this is kind of an open-ended table because I think we can add to this if we say, "Well, if this is changed or if this happens, then it's so obvious" or whatever it is. So I think when we go through these, I think we can kind of rank these and see if it helps us get to a spot on ... And maybe it doesn't.

And maybe we're back to the same spot and it just says, all right, let's remove the lock. And we've got Phase 1A recommendations in place. We've got notifications in place. We've got a great dispute mechanism so the lock's not needed. Or if we find here that we can decide and make sense out of this, then maybe there is a lock in here somewhere.

So let's go ahead and take a look and see what people's thoughts are. Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. Hi, everyone. It's Emily again from staff. I don't have a lot to add because I think Roger explained this really well. But just to provide a little bit of context, I think one of the things we're hoping to do with this—and maybe it falls flat, and maybe it doesn't—is to take a step back from what's in the policy now and think about the current context as the circumstances are.

So folks have talked a lot about some of the things that have changed since the original policy was put in place. And really just think about the problems that we're trying to solve and where there might be risks. These questions might not be exactly the right questions in these boxes. It may be that people are worried about malicious activity, but there's another risk. Right?

So please don't feel completely constrained. This is mostly a guide. But the idea is to think about if, for example, Registrant Name is updated in one circumstance or another, is that something we're worried about? Is that something that we should have concerns or rules about? And we don't necessarily need to do solutioning here. This could really just be about identifying the problem spaces, and then solutioning can come later if appropriate.

So please feel free to suggest, also, other ways to think about this. But that's an idea as to help guide the conversation. Thanks.

ROGER CARNEY: Excellent. Thanks, Emily. Yeah, and this first one may be a little more complex than it looks because I think with the EPDP stuff, Registrant Name and Organization are kind of more appropriately responsible now. So if there is an Organization going forward, they're a domain holder. If there's not, then it's the registrant name. So just something to keep in mind, I think. I think I have that right. Someone correct me if I said that wrong.

Jothan, please go ahead.

JOTHAN FRAKES: All right. Hopefully you can hear me okay.

ROGER CARNEY: Sounds great.

JOTHAN FRAKES: So what Jim was talking about, I think is patently reasonable with respect to "a transfer is a transfer is a transfer." I get that part. I think as we're talking about Change of Registrant, there's a level of differentially that we need to make. And I put this into the chat. There's a big difference between changing the information about a registrant, such as their e-mail address, organization name, etc.—contact details on a domain name—and the actual account within the registrar that the domain exists inside of. Right?

So if I transfer a domain to Account A at the Gaining Registrar and then that domain moves to a different account, like an account push within that registrar, that would really be an intra-registrar

transfer. But I'm just changing attributes of the domain contact, in either case—whether it's moved account or not within that registrar—those are really two distinctly different things. And I'm not sure if we're really going into any detail or if that needs to be dived into as far as an account push within a registrar. Thank you.

ROGER CARNEY:

Great. Thanks, Jothan. Yeah, and I think that we've [scrolled] down here. And the idea is [inaudible]. And again, I think that's a fine line of ... I mean, does that make sense? The tough thing is the account part. Right? Because that's not an ICANN-controllable thing. Right? Accounts is a business model that's being used at registrars. So I think that how that happens ...

Can we describe that policy wise? I think the only thing you could really say is that if it's a true change of ownership ... And maybe the registrar gets to decide that. I don't know.

Jothan, please go ahead.

JOTHAN FRAKES:

Well, and as I make that distinction, I realize that I'm talking about maybe a consumer-focused registrar where the public comes and talks to the registrar and two different people might have accounts.

But it's worth maybe making some distinctions in the case where there might be a registrar with reseller ... I know that we've got a lot of reseller-supporting registrars here with that business model. That may or may not have identical things to address, but I still

wonder if that is within the scope of what we're hoping to accomplish here. Or if it is just something that needs to remain within the registrar as far as how they would address that. Thank you.

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

THEO GEURTS: Yeah. I understand where Jothan is coming from. But bringing registrar account into the scope of the policy development process, I don't think we want to go there, actually, I think that's going to have some implications because it's uncharted. We never had registrar accounts or reseller accounts be subject to ICANN policy on the setup or that is managed, etc. So I wouldn't go there. That's just my opinion. Thanks.

ROGER CARNEY: Great. Thanks, Theo. I think that Jim kind of started this and kind of spun this a little bit. And thank him for doing that. The idea of being able to identify a change of ... And again, I wouldn't say "account" because I think that's a little too business model. A change of ownership I think is something within the purview of this group to discuss. And I think, along that, if a transfer is a transfer and if you identify that it's an ownership change as a transfer, do you do everything in Phase 1A? I'm assuming you don't because I assume you don't go through issuing an attack and all of that since it's intra-registrar. And nothing's changing ...

Or there may not be any changes at the registry to make this thing. So I think we have to be careful when we say “a transfer is a transfer” because I’m not sure that if we agreed that there’s a path for a change of ownership, that it would be the exact same as Phase 1A. Just thinking out loud. Thanks.

John, please go ahead.

JOHN WOODWORTH: Hi. I had I guess a couple comments to make. The first one is ... And I know we don't have a whole lot of control over the user interface, but if there is going to be a change that's going to cause a lock to happen, maybe warn the user before they commit to that to kind of cut down on confusion there.

The other comment would be potentially to bring up the concept of a trigger where you could make a change that is not going to happen right now, but it would be committed in the event of the transfer. So everything could be one simultaneously and smooth without preventing the registrant from making those changes in a timely manner. Thank you.

ROGER CARNEY: Great. Thanks, John. Volker, please go ahead.

VOLKER GREIMANN: Yes, thank you. To Jothan's comment, I think there's a certain logic to that, to looking at intra-registrar transfer, especially when it comes to resellers simply because when a registrant transfer a

domain from one provider to another—and explicitly not saying “registrar” here—that can be the case and often is the case that the domain, then, is only transferred between accounts at one registrar because back of house providers use that registrar as their back-end platform.

ROGER CARNEY: Yeah.

VOLKER GREIMANN: If they change from another provider to yet another provider, the process may suddenly be different for them because now it’s a registrar transfer. The registrant might not know because most registrants, let’s be honest, only know their direct provider. And no matter how clear they make it in their terms and conditions, most registrants will simply not read them, and therefore not know that. And they might be confused by that.

On the other hand, I think this is a much larger question that should probably be addressed not as part of the Transfer Working Group, but rather at a later look at some point in the future, if ICANN ever gets to that, to look at third-party providers that are not contracted parties that registrants may look at, such as resellers.

So I think that is a more holistic approach that I would prefer for that. Let’s earmark that. Let’s make a comment maybe that we have recognized, or that there’s a certain similarity at least from the registrant’s perspective; and that unity in process might be something that a future working group might look at, but that we

feel it's out of scope for this working group. Or something like that.
Thank you.

ROGER CARNEY: Great. Thanks, Volker. Keiron, you gave your spot to Jothan. Jothan traded up to get up in the draft here. Jothan, please go ahead.

JOTHAN FRAKES: Well, thank you, Keiron, for letting me hop ahead. It sounds as though I didn't describe ... When I was making the distinction between a Change of Registrant and a change of account as being two different distinct things, I'm not proposing that we dive into anything in this group that would relate to change of accounts at a registrar or going too deeply into the intra-registrar transfer or considering that to even be a thing, so much as saying that those are very different.

I think that in the meantime, what Volker had suggested is actually very patently reasonable. There are probably things about changing the registrant that might deserve a lot of attention, but I would probably propose that we limit what we do in this group as to that which touches upon transfer or might interact with transfer to keep things kind of tight here. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. And again, I think it was clear. Again, the account being an implementation kind of thing, there are reasons ... Some customers have multiple accounts and they may move a

domain from one account to another for whatever reason they have for management purposes or whatever. And the ownership isn't changing. There's still the registrant and all of that. So changing an account is ...

Again, it's an implementation thing. I think the change of ownership is something that is valid to discuss. And if you can draw that line or not, I think that's a big question in itself. But change of ownership ... Change of account, I don't think you can talk about. I think change of ownership makes sense. Just my thoughts there.

Keiron, please go ahead.

KEIRON TOBIN:

Thank you. So there may be many reasons as to why a registrar ... Well, if the domain wants to change their information. It may be that they've sold the domain. It may be for multiple reasons [inaudible] the control of [inaudible] for sure. I think one of the key things here is a domain push within a registrar. Just to clarify for everyone.

And that registrar is still accountable. They have all of the information that they need should a situation arise in regard to potential domain theft or anything in regard to that related matter. They wouldn't have to contact another registrar to obtain that information. It would all be visible for them. Or at least it would hopefully be under your RAA.

And just in regard to that, this is where it's breaking down. I think there seems to be a couple of confusions, so I just want to clarify what is within our scope and what isn't.

The initial 60-day lock—[technically], that's the core lock which is initially what we started with—is a Change of Registrant. And in my eyes, a Change of Registrant is essentially a more external thing to a different registrar. And I do clarify that some people may believe that a Change of Registrant can also correspond within that same registrar as well. But that's not how I view it. That is why I call it a domain push.

And just to kind of help people understand a bit more, I have placed a help article that we support. And you can kind of see the different as to the two different methods. Obviously, I think the majority of people there know exactly what a transfer to a different registrar may look like. But hopefully, if they still do not it will give some context to people. Thank you.

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

EMILY BARABAS: Thanks, Roger. Emily again from staff. So we can certainly go back to the definitions as they're presented in the policy. And you can fine those for easy reference in the working document here. What we're trying to do with the exercise here is to sort of break away from how things are framed and presented in the current policy. And we don't even go into the details here of, for example,

what is an is and is not a material change. So typos and those sorts of things.

I think what we're really trying to do rather than finding solutions for specific problems and breaking down those elements just for this exercise is to really think about where the problem spaces are, where solutions might be needed. So looking at, for example, if a registrant changes from one registrant to another registrant and stays at the registrar—doesn't transfer the domain to another registrar. It's just that one action which happens pretty routinely. Right?

Are we worried that there's a risk there that needs to be managed from a policy perspective or from an operational perspective? And how is it different, potentially, from a case where that change happens and then soon after that, there's an inter-registrar transfer? Are the risks different? Do the solutions that are needed, are those different? I think that's what we're trying to do here.

And we can look at specific fields individually, if it's easier to start there. So in the policy, there's a very specific definition of what a Change of Registrant is, and it includes both updates to individual fields as well as the more substantial change of ownership. But we tried to break down some different fields here to think about what does it really mean to make these changes and what are the problems associated with that, potentially? Thanks.

ROGER CARNEY:

Great. Thanks, Emily. And I think Emily kind of just reminded me that the first few times I read the Transfer Policy and got to

Section 2 ... Section 1 is the inter-registrar. Section 2 is the inter-registrant. And when I first read that, and thinking about that, it's like, okay, that means there's an ownership change. It's moving from one registrant to another registrant. And when I just read the title and, obviously, it says ... Oh, okay.

So that's not updating a name. That's changing the ownership of the domain. And technically, now someone else has signed an agreement that says, "Yes, I'm responsible for this name." So it's one of those, when I first read it, and then as you read the rest of it, it seems to cross those lines of ownership into a material change of the registrant contact information. So, yeah, I think that, again, the first few times I read that, I was like, "Oh, this seems like this." But it's actually ... It seems to have grasp broader than the title suggests of Section 2.

But to Emily's point, on this table we're looking at the individual pieces and does it ... And I think the appropriateness in the middle two columns here is, okay, is a registrant name change a bit thing, generally? But if a name change happens and then an inter-registrar change occurs, is that bigger? Does that change it? Is there a feeling that it becomes more important during a transfer or not?

And I think when you start looking at these things, as Steinar mentioned, it's like, okay, when I go to transfer a name, I usually update something. Maybe my address. Maybe I moved or whatever. So does that make sense to say changing your address is a material change? It's like, okay, but that's something that usually occurs.

And I think Theo even brought it up several calls ago about, okay, registrars are responsible under the GDPR to allow registrants to keep their data updated in a reasonable fashion. So I think that's also a thought you have to think about. Okay, obviously registrants have the right to update their information.

But then "are they being held back on doing other things inappropriately" is a good question. And maybe it is appropriate and we can back that up with facts that say, yes, it is appropriate to do it. But it's just something you have to think about.

So looking at this table, again, I think Registrant Name and Registrant Org are kind of tied together now with the EPDP registration data. Going with new registrations in the future, the owner will be one of these versus what it is today, which is kind of an unknown. If there's an organization name in the field going forward on new registrations, they'll be the owner even if there is a name in there. But if there's no organization, then the name will be the owner.

Theo, please go ahead.

THEO GEURTS:

Yeah. So looking at the table here, it also kind of depends on who is doing what. I mean, if you're a registrant and you change the registrant name because there's a type in it, that's no big deal. And I would answer "low" or "none," if that would be available to every question.

But if your account is hacked and a criminal is trying to steal your domain name, yeah, then everything is suddenly malicious and

everything is “high.” So you know, that is a little bit of the problem on defining what are we trying to solve here.

Again, you can put all of these categories and risk assessments on each field, but it still depends on what you’re trying to solve here. And that is problematic.

ROGER CARNEY:

Thanks, Theo. And to your point, I think that even if your account was compromised, to me if someone changes the registrant name and stays with the current registrar ... Is it problematic? Sure, it’s problematic. But is it difficult to remedy? No, it seems fairly easy to remedy because those contacts will be notified appropriately.

I think that when you look at it that way, it’s like, okay, yes, it could be problematic no matter who’s doing it. Or maybe it’s not problematic like you said. If the registrant comes in they have two-factor on their account. And they come in and authenticate and they update their name, that’s a pretty low impact. And again, the remedy seems fairly easy if it’s staying there.

And if it’s followed by a transfer to another registrar, is that the “High?” I’m not even sure if that’s high, given the fact that your communication has always been there and you’ve already notified them of the change, both the prior and the current. So I don’t know. I think that you can look at all of these and you can draw those lines and you can ... Even if it is someone that hacked your account, I think you’re still driving to the fact that, okay, the remedy is pretty easy here.

Theo, please go ahead.

THEO GEURTS: Yeah, but, you know, when you look at it from that point of view, we all—most registrars, I suppose ... I mean, I don't see a problem in reality. I just see domain name updates in our systems on every second, so to speak. People are changing the data a lot. There's a lot of transfers in and there's a lot of transfer out. And the majority is no problem at all.

It's not like with DNS abuse that we are flooded with reports every ICANN meeting where we see thousands of attacks. And it's not like with trademarks where we're seeing huge updates in trademark cases. We don't see any of that when it comes to transfer, you know.

And I would think if there was a real big problem with transfers, we would see it in the mainstream media. I mean, the last time I saw a domain name hijack, there was a registrar who was being socially engineered. That made the news for good reasons, by the way. That was a security company almost losing a domain name.

So that is serious stuff, but we don't see those reports over and over and over. So I recommend we go through this, but make sure that we don't come up with necessary requirements policy wise. Thanks.

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

BERRY COBB:

Thank you, Roger. To Theo's latest point here, I think we all hear you. And the reason for this exercise that Emily tried to lay out, at the end of the day, this group needs to come up with consensus recommendations to change any of the core.

As a hypothetical—and to Theo's point and to what Roger stated—it is a change of the name. Does it warrant invoking any kind of restriction from making a subsequent change or to transfer the name out of the registrar? And what we're attempting to do here is to methodically document the deliberations on whether this is feasible or not? Or I should say ...

Let me put it this way. If this group came to a conclusion that the definition of "material change" should be changed to no longer include the registrant name, here are the reasons why the group came to that conclusion. And that's what we need to get to here.

And the same would apply whether there's a change in the organization. And what does that mean when these happen? And what does it mean if the domain stays within a registrar? Maybe the company did change and it's a legitimate change. Does it still rise to the level that a restriction from future updates [and/or] a Change of Registrar is warranted? And that's what we need to thoroughly document to be able to justify any potential change to the definition, let alone the whole policy.

But I think it's clear that when we get down towards the bottom, especially a change of primary communication methods, it's still, I think, understood by this group that—you're right—most of those changes are legitimate. But when they aren't legitimate, the risk profile goes up a lot greater because the original owner of the

domain—the Registered Name Holder at the time of change—would no longer be in the communication loop of any transactions that followed that.

I know that it probably seems tedious that we need to go through and ... And this may not even be the best approach for trying to document the deliberations and rationale why this group may choose to undo part of this, but we've got to figure out a way to do it if we're going to get to any kind of change. Thank you.

ROGER CARNEY:

Great. Thanks, Berry. And again, this all ties back to what I've been saying over a few meetings. The 60-lock is a mechanism. And again, it's the action that's based off of ... And again, it could have been anything. It didn't have to be a lock. That's just what seemed logical at the time.

It's the action based on, as Berry said, the definitions of, okay, something substantial, a material change there. And again, the lock was just something that was brought up. It was just an action. What's the action based on the risk of these changes?

And again, I think over the last few meetings, it's been fairly clear that the working group says, "Okay, the 60-day lock doesn't seem like it's needed." But, okay, that 60-day lock was created because the definition of "material change" warranted that level of protection after the fact. So we had to go back and say, "Okay, do those things really warrant an action or not?"

And again, I'm not saying "60-day lock" because it could be anything different. But there's the change in certain registrant

information ... And maybe the answer is no. But does the change in certain registrant information dictate an action that should occur?

And something else that Emily, when she ran through her scenario—not the last time she talked, but before—brought up is something I never thought about. And I don't know if it matters or not. But we've already talked about a transfer from one registrar to another. A Change of Registrant probably can occur without any notice. We wouldn't know because the Gaining Registrar doesn't know about the prior registrant or whatever.

But the way Emily walked through that, I'm wondering. Once the transfer has occurred and there's a 30-day lock from creation or a transfer, does that lock prevent any updates to a change in registrant? Or should it? Or should it prevent some? Just thinking out loud, but anyway ...

Volker, please go ahead.

VOLKER GREIMANN: Yes, thank you. I think, personally, the 60-day lock is of limited use, simply because of the fact that the domain hijackings that we do see, which are usually inbound domain tracking, are of three main categories.

One is the registrar account compromise where either through social engineering or some other methods, the account at the Losing Registrar was compromised.

The second one is the e-mail account that was compromised. And for that, any lock for a change is useless because the hijacker will transfer the domain name out without any change of e-mail because they have access to the original e-mail.

The third is the hijacking by an authorized person, i.e., a webmaster or a former employee that has the account details—the keys to the kingdom, so to speak—and therefore the ability to affect a transfer.

These are all not preventable by the 60-day lock, but these are the ones that are currently the most prevalent. We can, of course, argue that the other types of abuse have simply disappeared because of the lock. But I haven't seen them previously either.

So for me, the question is, maybe instead of a lock, do we have a better way of preventing domain hijackings? Or if they cannot be prevented because of certain circumstances like the compromised employee, then do we have a better way to undo them that is safe and secure for all parties involved? Thank you.

ROGER CARNEY:

Thanks, Volker. And again, how I started this discussion ... And Jothan kind of put it in chat as well. He's calling it something different. But I want to keep with the terminology of dispute. When we get into Phase 2 and talk about ways to dispute the mechanisms of that, I think that applies across all of these—an inter-registrar, an inter-registrant, a registrant update ... I think the dispute mechanisms need to handle those.

And again, people have used different terms. And I want to just not use the terms but say it's a dispute of the changes that are occurring. So I think we have to assume that Phase 2 work is going to give us the dispute policy procedures that handle ...

And again, like Volker said, obviously there's nothing you can do to stop a disgruntled employee or whatever. But you can fix it. And that's the thing with the dispute mechanisms. How can we process them efficiently and make sure that we're accounting for all of those being able to be corrected?

Berry, please go ahead.

BERRY COBB:

Thank you, Roger. I appreciate Volker's intervention there because it's that kind of line of discussion that we thought that maybe this matrix could try to start to tease out. Because if we look in today's environment, all three of those were ... One way or another, the account got compromised. It doesn't seem viable that there's much policy that can be created to prevent that. Maybe there is. I won't claim to be an expert there.

But in today's world—kind of across those three scenarios—first because the implementation of inter-registrant transfer is, in effect, optional, or a path to opt out of it ... You're right, there is no mechanism that would cure that illegitimate transaction even if the 60-day restriction was applied, at best it slows the bad guy down. It may not prevent it, per se.

And then secondarily in today's world, the Auth-Info Code has been sitting there, most likely since the day that domain was

registered. So that's an immediate capability by the bad guy—I should say the bad actor—to continue to move forward with the nefarious activity. And I think this is why ... And this kind of gets into solutioning, which isn't really the point here.

But to Roger's intervention at the very beginning of the call, when we start to think about these ... Whatever the recommendation number is from Phase 1A—and it's certainly not solidified yet, but there seems to be strong support for it—the TAC isn't going to be just sitting there. It's not going to be revealed until it's generated.

So I think it would be prudent for this group to also think about, well, if any one of these things that are deemed a material change today, is there a way ... If the group still thinks that it's necessary for it to continue to be a material change, is it conceivable that the Phase 1A recommendation that the TAC not be revealed—based on some sort of edit or update—be considered.

And I don't know what the answer is to that. Maybe it winds up being a distinction without a difference because the customer, the Registered Name Holder can't get the code that they need to effectuate a transfer. But I think that's also very important. Why we even have Columns 2 and 3 here is ... Any of these transaction types from column 1, if they never have the intent to leave their current registrar, the TAC as we designed in Phase 1A doesn't even come into consideration. But in these transactions where there is a likelihood or an intent—whether it be legitimate or illegitimate—to move the name out of the existing registrar, what can be leveraged to the changes in Phase 1A to help improve or enhance the inter-registrant change of policy that we have today?

And just one final thing, which is kind of separate. And I know that this will be painful for folks on the call. But in trying to get my head wrapped around this, over the weekend I went way back in time, all the way back to IRTP Part B, and tried to put together or recreate in my mind what the breadcrumbs were that got us to where we're at today.

And just at a very high level, some of the things that I thought were intriguing is that coming out of IRTP-B is where this whole concept of change of control is what got introduced into IRTP-C when discussing the main charter question about how to mitigate unauthorized transfers.

And the whole point of the charter question, again, was how do we define a policy that can help minimize/mitigate unauthorized transfers. And interestingly enough, through all of those deliberations, getting to the implementation of the Change of Registrant Policy that we have today has so much more of that—I think is clear—that has impacted all of the legitimate types of transactions that we see here today that are defined as a material change.

And what was interesting in that transition from B to C—and I think it was even in the Issues Report—is that it was determined that ... There wasn't a number, but I think the term "often" got used. Well, "A Change of Registrar is often a change of control." And whether that's a fair statement or not, I don't know. Certainly, some percentage of inter-registrar transfer do equate to a change of control.

But at any rate, I find it interesting how that whole original line in the introduction on the concept of change of control led to where the policy is today. I think everybody on this group can admit or agree in principle or in general that the implementation of it has impacted the larger, legitimate transaction.

And finally, to my previous intervention, our whole point here is to analyze this in a way that is sufficient, that will improve the existing policy, and right some of the wrongs, for lack of a better word. Thank you.

ROGER CARNEY:

Great. Thanks, Berry. And thanks for the homework you went through. Just one comment. Jothan's been posting a few things in chat, and he says he thought the intra stuff should be handled by registrar policy. Which, I think if you go prior to the current policy, is the way it was handled.

I think that's true to a point, Jothan, in that, still, there has to be a way for registrants to have a path of confirmation or to dispute a change. And to me, it can't be just an intra-registrar policy because it may not afford registrants the ability to disagree with a change. But anyway ...

Theo, please go ahead.

THEO GEURTS:

So thanks, Berry, for taking us for a trip down to memory lane. And you are correct. When we were working on this policy, I think most Registrars believed back then in the day that the policy could

be simple in the sense that there would not be so much operational impact on registrars and registries.

And you know, speaking at my own capacity here, I truly believed that for a long time ... I mean, I think for half a year I had the idea that, "Yeah, this is doable. We can come up with a policy that isn't going to impact the legitimate users." And no, I was wrong.

So it turns out that it is actually very, very hard to come up with a very balanced policy that does have impact on the bad actors but doesn't have impact on legitimate users. And that is 100% correct. That is very hard, policy wise, to do. Thanks.

ROGER CARNEY:

Thanks, Theo. And let's make sure that Theo is right this time. He'll give us his knowledge coming through this. And I think everybody agrees with Theo that no matter what the intent was back then, how it got put into implementation didn't work well for the majority of this. And I think that's what this exercise is trying to do.

I think, again, the past few calls we've said the lock probably is not working as what was intended. So let's look at that and see if that's the right way to do it. And I think how you do that is you have to look at, okay, what created the lock or, again, the action? Not necessarily just a lock. It's whatever we want it to be. And let's look at those and see if those are valid still. And if they are, is there a different approach outside of a lock?

And maybe that approach is, okay, we've put in great things into Phase 1A and we're going to create a great dispute mechanism in

Phase 2. So maybe that's it. Maybe that's the logic, the rationale. But we have to look at why that was put in place and see if it still is in effect or not.

And again, I think something important is ... Thanks, Berry. Trigger and action. I think the important things is ... This table may not be the best way to do it. It was just an idea the staff and I came up with. And maybe this isn't the best format to do it in, but we have to come up with a way to, as Berry said, get to that rationale of, "Okay, we looked at these things and we don't think that they trigger any action."

Or we say, "If all of these things change, yeah, we think there's an action and it's not a 60-day lock." It's handled by Phase 1A's whatever. Or it's handled by the dispute mechanism we're going to create in Phase 2. But I think it's important to walk through those.

And again, if anybody has any other ideas on how to walk through these things, to talk about those, we're open for that. But this was the idea we came up with last week and thinking about it over the last couple of weeks just to try to get through those ideas.

And I think if you look at this charter, and especially the counts 2 and 3, and take a look at what Volker kind of put into it about, okay, you know there are different ways to hack something and get it. And I think that's where it gets into, "Okay, is it likely?" If it is malicious, "Okay, how big of an effect?" And you're got to think about if all of those three ...

And obviously, the simple path of this is just a registrant trying to update its stuff because they want to. I think you look at all of those as a factor as you start answering these questions. A registrant name? Is that really malicious? Most of the time, probably not. But if it is, does it raise the level?

It's like, "Okay, does it raise it up at all?" If it's that disgruntled employee that goes in and changes it, does that change a whole lot if it's still staying there?" Maybe. Maybe not. Is it hard to remedy it? Probably not. A simple name change if it's staying at the registrar. Now, is it difficult to remedy it once it goes to a different registrar? Maybe it goes up there. So I think that it's fairly easy to step through these.

And Sarah, that's a good point in chat. The lock ... The action may be a little out of place with what's being triggered. So I think that's what we've all decided. The current action is not the correct action.

And again, that action moving forward can be solved in multiple ways. And again, maybe we've already solved it. We just had to walk through those and talk about that.

All right, I've said a lot now. Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. Emily from staff. I actually wanted to ask a clarification question to Sarah's comment in the chat, if that's okay. Because I see that Sarah is mentioning that the dispute process should cover these scenarios and the notification requirement, potentially.

So I'm curious. I mean, another thing to say in looking at this chart is that we don't need to go back and look at the foundational definitions of Change of Registrant. And this is really okay in terms of the definition. But the "triggers," as Berry said, are fine the way they're presented. And really, what we need to look at is just adjusting the action. Right? And as we said, a lock is one possible action. A notification is a possible action. A dispute resolution mechanism is an action. A due diligence step is an action. Right?

Recently I changed some things in my bank account, and the combination ... I think I updated a phone number and then I was looking for some historical records of my bank statement. And that particular combination of transactions triggered them to say, "Hey, you know what? Before you proceed, I'd like to call you and double-check your identity."

So thinking about that question of do we need to even go back and look at some of this definitional stuff? Or is it really just that the feeling of the group now is that the triggers are fine and the actions are either disproportionate or need to be simplified or something like that.

So we're definitely open to ways of diving into this in a way that's sort of structured and systematic. But we definitely need all of you to weigh in on the best way to do that so that, as Berry said, we can carefully document the deliberations and have a strong and solid rationale for any changes that are being recommended by the group. Thanks.

ROGER CARNEY: Great. Thanks, Emily. I think that's the important part, and I think that's where we're getting to. How can we provide that good discussion, that good rationale to say that the current action is disproportionate to a change of any of the information?

Jothan, please go ahead.

JOTHAN FRAKES: Thank you, Roger. As we look at this and we look at material versus nonmaterial, one of the places that seems to really be a place that could have affectation on the transfer, or at least a subsequent transfer, might be the telephone number or the e-mail address if those are used for notification and/or validation of subsequent transfers.

Those seem like those are material fields, specifically. And those are things that we currently use for security purposes or validation/verification purposes.

But the other elements of this area really data records within the registrar that may or may not be material. A lot of this seems like we want to have flexibility for people to make just honest, small, clerical changes. Maybe sometimes they've got a rotation of staff and need to change the contact but not the actual organization name. Sometimes the name is changing hands between parties within the registrar.

But the e-mail address is the one key place that would affect, I think, a transfer. And the telephone number in some cases where that might be tied to some form of SMS or other sort of multi-factor authentication. Thank you.

ROGER CARNEY: Thanks, Jothan. And you just hit on the point I struggle with. And there will probably be a lot of people on this call that will argue with me that it's still relevant today. But today e-mail seems like that key, but honestly even today maybe it's not even as relevant as it was last week.

And I think that, to your point on the phone number being so important for SMS, and I think that the important thing to me is, okay, however that contact is made between registrar and registrant [inaudible] contact mechanism changes—or not even the mechanism, but the information of that mechanism changes—that's the important factor.

And again, maybe some registrar wants to use Facebook or whatever, however they want to do it. And like you said, Jothan, maybe it's SMS or maybe it is an e-mail. I assume no one's doing fax anymore, but maybe it's fax. But again, e-mail is starting to fall into that fax group. And tomorrow, it's going to be something else that the registrar regularly communicates to the registrar via.

And I think that's the important key there. Whatever that regular communication is, when that changes, that's the bigger trigger. Like you said, changing the order or the name.

Steinar, please go ahead.

STEINAR GRØTTERØD: Hi. My lesson learned today is that, as the registrant, I should always keep my registration data accurate according to the GDPR

and the policies for the registries. But don't do it when you are thinking about doing a transfer. Do it in good time before even thinking about that.

And the other thing is that I agree with Theo, at least the way I understand him. We can't make a policy that prevents crime. Crime has to be sold in a different way than in a policy.

Looking back, thinking about all of the things that we do with financial transactions—communication with the bank, etc.—I have no problem changing my phone number, e-mail address, etc., there because it's a security mechanism to access to the bank that kind of puts everything in place.

Why is this so difficult for a domain name? Is it because there are some registrars that do have a different technical level or willing to take the cost of developing or implementing this kind of security service? I really don't understand.

But my take on this is, keep the data accurate but don't alter anything before you want to transfer it. That's it. Thank you.

ROGER CARNEY:

Thanks, Steinar. Yeah, and I think the important thing is, through your bank ... If you have multiple bank accounts, you know the process is different at each one. And I think the difficult part here for us is, is there a baseline that we can create?

And to your point—and I think others have said it—security is a business feature. So you go to a different registrar because you get a different service. But I think the important thing is, is there a

baseline that we can create? And maybe there's not. But that's the goal. What's the baseline we can create? And hopefully registrars have business models that'll support registrants, whatever they need.

We're just out of time, but I'm going to let Sarah go, please.

SARAH WYLD:

Thank you. I will try to be quick. So not sure about adding the phone number to the list of fields that are a material change, but worth considering. I would actually be open to reducing the trigger points to just a change to the e-mail address.

I do have to say, Roger, I think I disagree with something you said. I'm so sorry. I don't think that the trigger is an update to the point of communication. I think we need to define what specifically indicates who is the owner of the domain name. And changes to that is what triggers whatever process we decide is reasonable. So the point of contact isn't necessarily the owner of the domain name.

And finally, I do just want to flag that the list of what is a material change includes updates to the administrative contact. So we are going to need to update that list, regardless. Thank you.

ROGER CARNEY:

Great. Thanks, Sarah. And please disagree with me as much as you want.

Okay, we are out of time. Again, I think this chart obviously helped spur some conversation because we had great conversation. But again, I think the goal of this chart—and maybe we come up with slightly a different way on [inaudible] the way Sarah and Jothan were kind of talking—is to get to, okay, if we're going to change that action, let's look at what those pieces that create the action ... Are those correct or not? And then drive to a different action.

Or again, as Emily mentioned, maybe that action is already there and it's a dispute or it's already in Phase 1A. But again, I think next week let's look at this again, this chart here, and maybe we'll try to format it a little different. But we need to get to the rationale of why the action is inappropriate. And is there an action that's appropriate? And just identify those. And again, maybe there already created and we can use them. And I think that's great if we can.

But take a look at the material idea. And again, I don't want to focus on the eight that are in there. But whatever we feel is correct is important.

Okay. Sorry about three minutes over, everyone. Thank you. Great discussion. And let's continue it next week and get to the bottom of it. Thanks, everybody.

DEVAN REED:

Thank you all for joining. Once again, this meeting is adjourned. I'll end the recording and disconnect all remaining lines. Have a good rest of your day.

[END OF TRANSCRIPTION]