
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 11 October 2022 at 16:00 UTC

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JULIE BISLAND:

Okay. Good morning, good afternoon, good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group Call taking place on Tuesday, the 11th of October, 2022. For today's call, we have apologies from Sarah Wyld, RrSG, Keiron Tobin, RrSG, Zak Muscovitch, BC, and Mike Rodenbaugh, IPC. They are formally assigned Rick Brown, RrSG, Jody Kolker, RrSG, Arinola Akinyemi, BC, as their alternates for this call and for remaining days of absence. As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite emails.

All members and alternates are promoted to panelists. Observers will remain as an attendee and will have access to view chat only. If you've not already done so, please change your chat selection from host and panelist to everyone in order for all participants to see your chat and so it's captured in the recording. Alternates not

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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? If so, please raise your hand or speak up now.

And seeing no hands, just as a reminder, please state your name before speaking for the transcription. Recordings will be posted to the public WikiSpace 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, and over to our Chair, Roger Carney. Please begin, Roger.

ROGER CARNEY:

Great. Thanks, Julie. Welcome back, everyone. It seems like forever since we've met. It's been a few weeks now. But before we jump into our agenda today and continue our discussions where we left off at ICANN, I just wanted to talk about a few, I suppose, more administrative things.

With the schedule that we've been looking at, it looks like, and I can have Berry talk about this a little more that probably early next year we'll be going to Council with a PCR, a project change request to extend the timeline a bit. It looks like we're going to be spending more time on comments than we had expected. So I think that it depends on how well we do over the next couple months, but it looks like we're probably going to be doing that early next year.

And speaking about the next couple months, in order to get back on track, the good news is spending more time together. The bad news is having two meetings a week to spend more time together. But we're going to look at doing our normal Tuesday and maybe later in the week, maybe a Thursday. I don't know if we settled on a date. May a doodle poll come out to try to pick an exact date, but I think we are shooting for Thursday sometime. Berry, was there anything you wanted to cover on the PCR or the project, I guess, the instance? Berry, please go ahead.

BERRY COBB:

Thank you, Roger. Berry Cobb. So just to build on what Roger said, doubling up on meetings is our only possibility to for any attempt to meet our original deliverable date. And our next primary one is middle March, which is focused more on our Phase 1B policy topics. But as Roger noted, and for a variety of reasons, we're very behind schedule for concluding our Phase 1A work. So I think likely that it's highly probable that we would miss our milestone date even with doubling up meetings.

So it's just a question of how much we can rein in our delayed schedule. That said, we have a chance to do it, and I encourage the working group to consider that. And why Roger mentioned probably January is to allow us time to try to make up and recover for a lost time. So in this context, let's just hypothetically assume that we would need an extra three months to complete our Phase 1 work.

In isolation of just this Transfer Working Group, that's probably not a big issue, but the main reason for project change request is

because we also heard the whole GNSO community has many other projects that are also ongoing. So any delay of our schedule here impacts the larger environment of all of the other work that is considered a higher priority within the community. So that's something to take into context. But what does that mean for us here within the Transfer Working Group?

You know, when we complete the Phase 1A or the Phase 1 work, we're not done because we still have a Phase 2. And when you think about the looking at this overall timeline to accomplish and address all of the charter questions and develop recommendations that would be sent to the GNSO Council, we're already committed to work well into 2024.

And so these extensions not only impact projects outside of us, but it also means more time commitment to the group here. So it's really getting into a pay me now or pay me later a situation. And in the aggregate, it benefits us all if we can leverage opportunities to make up for lost time.

And then finally, with respect to the project change request there's also some risks that we need to be aware of in thinking about the full package of delivering to our charter. The original plan was optimistic in that we would be able to wrap up all of the recommendations around Phase 1, ship off the final report to the GNSO Council and it can start to diverse its process of going through the Board and into implementation. However, we're starting to see signs that some of the topics that are designated in Phase 2 and not trying to presuppose any outcomes but some of those topics do have some element of risk that could affect some of our Phase 1 recommendations.

So when we do approach the December, January time frame, we'll also probably be having a discussion about exactly what that means and whether the change request should start to acknowledge that fact and determine an updated plan for what is the best path to deliver the overall package to the GNSO Council. So more to come with that in future meetings. But at the end of the day, we're severely behind schedule, and we need to look for methods to recoup time. Thank you.

ROGER CARNEY:

Thanks, Berry. And yeah, just going off of Berry's be it we pay for it now or later. And really I'm suggesting that starting in November that we go to twice a week. This group is ultimately the ones that are responsible for delivering this. So if twice a week to catch up is not acceptable to the group, then we'll have to look at that. And as Berry said, we will have to change, make a PCR for those decisions. But my hope was that we would go to two days a week. Berry correct me, we are six more sessions in by the end of the year, and that may help us.

Yes, Diane. And that's what Berry was trying to touch on. Steiner's message in chat about Phase 1A and b. The original intention was Phase 1A and B would go as soon as were done with them, and then we'd send it to Council, and then we would actually go and start working on Phase 2 when Council deliberates and then they get sent to the Board and they deliberate and all that.

But with the so many tie-ins to Phase 2, I think that the idea is, and again, I think we'll make this decision early next year. But I

think the idea is, to wait to give that to Council until we get a better grasp of the Phase 2 impact on the Phase 1 recommendation. So I think Phase 1A and b, the Phase 1 report, final report, we're going to delay sending the Council until we have a better feeling of the Phase 2 work. Berry, please go ahead.

BERRY COBB:

Thank you, Roger. Berry Cobb. Just to be a little bit more precise, we could still send a Phase 1 report to Council, but hence we would advise the Council not to take action on it. That way, we at least have proven that we've achieved the milestone as originally planned or outlined. But because the Council wouldn't take action on it, and if for any reason, Phase 2 recommendations did impact some of the Phase 1 recommendations, we would still be in a position to revise those as necessary to get to a level of consensus that's required in the group. And then in essence, both Phase 1 and Phase 2 recommendations would be considered as a whole package at the Council level.

The way it's set up now, if the Council were to adopt Phase 1 recommendations and traverse that process, it would make it more challenging to try to course correct any Phase 1 recommendations if it's sitting at the Board or if Org has the token to try to start implementing some of those things. And when we put the chartered together in these phases it wasn't foreseen at the time that any of the topics in Phase 2 would necessarily be impacted by Phase 1, but I think in some of the initial deliberations and the initial recommendations that that risk is now on the table.

ROGER CARNEY:

Great. Thanks for the clarity, Berry. Yeah, and I think again, looking at it optimistically, yeah, we're going to get Phase 1A or Phase 1 right and Phase 2 won't make any changes, but realistically, we can see that already when we talk about the work in Phase 2 that there's potential impacts there. So I think that there's definitely going to be a delay in the Phase 1 looking for approval on it.

As Berry said, it doesn't hurt and actually gives Council some more time to look at it to send it early, but we're not going to ask them to action it until we're more comfortable with Phase 2. If that's at Phase 2 initial report, maybe by the time we do that and get comments back, that's when we can do it or maybe we have to wait until the end and it makes more sense then, but we'll see at that time.

Thoughts, concerns from anyone? Again, I'm looking to add an extra day a week starting the first week in November. I don't know if staff has that exact date or not, and continue that on through until the end of the year, and then we can evaluate at that time. I'm hoping that we're caught up and done with our comment review and back to change of registrar, but we'll have to see. Thanks, Emily. November 1st is our first Tuesday meeting, and then we'll try to follow those up with additional meeting in a week. Rick, please go ahead.

RICHARD WILHELM:

Isn't that, yeah, Catherine just said it. It's during CP Summit.

ROGER CARNEY: Yeah. That we've already managed to work around that, Rick. Yeah. Good point.

RICHARD WILHELM: Yep. Okay. The following week is IETF, but I'm not sure. I think that only impacts a limited subset of folks. Awesome.

ROGER CARNEY: Yep. Great. Thanks, Rick. Yeah. Yeah, you're right. We did talk about that, and it would be after the summit. Any other comments or questions? Rick your hand is up, but I assume that's still an old hand. Thank you. Theo, please go ahead.

THEO GEURTS: Yeah. So if you go to an increase in meetings, is it maybe indeed or perhaps is not even possible due to whatever operating procedures. I'm not sure. But I would suggest that if we increase the pace, we also increase the number of people perhaps, so we have a bigger pool of people to rely on. I mean, I'm hearing November extra meetings. I'm already going in my head, can do that, can do then, not available then. So it's going to be a strain for me in November already and December is going to be an absolute nightmare that I need to rely a lot on an alternative member.

ROGER CARNEY: Great. Thanks, Theo. Yeah, that's a good point. I mean, there are alternatives, alternates, I should say, that members can use.

But to your point, is that enough? I think we'll have to see. I mean, the thought right now is we're going to try to grab the time that the accuracy scoping team was using on Thursdays and use that for our extra meeting time so that, hopefully, people had already have possibly that blacked out or arrange for that.

Anyway, again, that's not set yet. We're going to make sure that that works. But good point, Theo. And I think if we get into that, we'll have to look at that to see if more alternates are appropriate or not.

Okay, anything else from anyone? Okay. Again, I'm hoping that not only meeting twice a week, but meeting twice a week, and then, hopefully, that drives a little more homework as well, or at least work on list, not necessarily homework, maybe more work on list so that we can get through there and get back on track. Speaking of getting back on track, I think, Staff, is there anything else we need to cover before we jump into work? No?

Okay. Let's go ahead and I guess our work product now is going to focus on where we left off at ICANN75, and that was clearly about the gain and losing forms. And I think that a lot of focus was on the losing, but I think it impacts the gaining just as well. And there was several discussions at ICANN75. And since then, they have happened around this. On list even, thanks Theo for posting and those that have posted to that.

I think that we need to get this solved then. This is probably our biggest item to work through, I think. Multiple vectors here. When we looked at it and we talked about it, I think that when were at ICANN75, we came up with several possibilities. But I think the

glaring thing was it sounded like that we didn't want to get rid of the losing FOA completely, maybe not in its current form, but keep a function of the losing FOA in that meeting that the registrant would have the ability to deny a transfer in flight before, really, before it becomes an automatic thing.

So I think that what we talked about at ICANN75 and the discussion since then that I've had, people are looking at how to have a type of losing FOA. And again, not necessarily the same prescribed losing FOA as it is today or even at the same time, or there was discussions around it being optional, optional for the registrant, or optional for the registrar. There were a lot of good ideas, and I think that when went through this process early last year actually, I believe when we did it was 30.

Today there's a five-day window that the registrars get to provide the TACK in a five-day window at the end with the losing FOA that the registrant gets to deny a transfer or actually accept it as well. That we combine into this the one forward, I guess move the forward to the process of a five-day window at the beginning that the registrar gets to provide the TACK to the registrant, but also the registrant can use that five days, obviously, for whatever due diligence they felt needed.

And I think when were talking about, again, not getting rid of the losing FOA, I should say, getting rid of the function of the registrant to deny a transfer or accept it. I think that we have to look at those combinations of ideas of, okay, does it make sense to move that with that same window and that where we would discuss last year a notification of TACK request, and then that provides a five-day window for the registrar.

So one thought is, okay, at that five at that TACK request or transfer request, is that a possibility where there we say there's a mandatory notification to the registrant? And then that starts off a possible losing FOA kind of feel. Or should it be separate and a separate time period? And again, or one of the ideas and I don't really remember who brought it up was, make it optional for the registrant to say, okay, yes, I want this or I don't want this. And how that works, I don't know. It was just an idea thrown out there.

So I think we have the losing FOA up on the screen now. So I guess here's the gaining. And I think that one of the ideas here too that came from leap of faith was the idea of the registrants going to a gaining registrar and asking for a transfer to be initiated to them. There's obviously some pluses to that and obviously some minuses to that.

And I think that that's the balance we need to work on, is finding okay, does that make sense? Does that not make sense? Is it not possible? Does it add more problems to it? Does it solve? And I think that that's where a lot of that can happen. If that makes sense, then it changes things around a little bit, quite a bit, actually. So I think that solving that concepts is important so that we can finish those other discussions. Jody, please go ahead.

JODY KOLKER:

Thanks, Roger. This is Jody Kolker for the record. So one of the issues that George was bringing up was that, I think a counterpoint to what Theo had said was that the registrant could go to the current reseller or registrar, whichever it is, and he could

or they the registrant could request a TACK from the gaining registrar to be used to transfer the domain name.

Now I'm just thinking operationally what that would involve. That would involve the registrar or the reseller back end, whatever it is, to contact the registry, to create a TACK, or to set at a TACK, whether it's created at the registry or a registrar, the gaining registrar sets a TACK at the registry to be used for a transfer away.

Now, a kind like some of the registries to speak up on how they would imagine that this would work. Because what I'm seeing in my head is that the gaining registrar would need to contact the registry for a domain name that it does not own, that is not the registrar for [00:24:12 -inaudible], to set a TACK that would then have to be used.

Now is the registry going to only allow one TACK to be used for that? And then how long is that TACK good for until it is used? Would every registrar be able to set a TACK of their choosing at the registry, or would only one TACK be allowed to be used? I think there's just some operational issues around us that should be discussed before we allow the gaining registrar to set that TACK and what would be required of the registry to be able to only allow one of these.

And then how long is it good for? And then, I mean, could one registrar actually just say, "Hey, I'm going to set a TACK on every domain name available because I plan on transferring them all, and then no one can transfer any of them because that TACK is already set." I think it's a huge operational issue that I don't think

we've quite scratched the surface of what it would take to implement what George is speaking of. Anyway, thanks.

ROGER CARNEY:

Great. Thanks, Jody. No. And that that that's exactly what I want to talk about is those things. And you started describing how I thought that it would have to work. I think the gain registrar would have to set the TACK at the register, and to your point, what's that policy around that? But I think that in that instance, yeah.

I mean, there's a lot of potential there for some disruption, but I think that there has to be. Is there a way to get consent from the registrant prior to the gaining registrar making that request at the registry? And, again, how you follow through with that is compliance check or whatever, but, again, just trying to think down that path. Thanks, Jody. Theo, please go ahead.

THEO GEURTS:

Yeah. So this is Theo for the record. So when you look at the proposal, I don't think you can cherry pick it. Like, this is a good thing. Maybe we can use it. I see holistically, it's intertwined, the entire process. At least that is how I read it. Like, you need to follow all these steps to get to that solution. So you can't just go, like, we're going to discuss only this section or this section and then vote, yes or no, you need to take the proposal as a whole. And that means that this working group has to make a decision how we go about with this proposal.

Now what I have done sending a couple items on the list, I shouldn't have done that. I regret it immediately because it goes, we already going down a path, like we're starting to poke holes in it. And the further we go into that process, we are going to maybe consume a lot of time to see if we can make this work on an operational level. And Jody just gave an example of that it could be heavy impact.

I would say given the past experience on the IRTPC, we already know that even though the policy itself looked like it was just a few pages, but on an operational level, it was massive. A lot of registers completely underestimated the work involved. And to be sure, but we are currently proposing in the 1st Phase that has already a big operational impact. There's going to be a lot of work to do here, but we as a group need to make sure, what are we going to do with this proposal? Are we going to stay on track with what we've got, or are we going to alter the course with the big risk that we run into operational challenges over and over?

I mean, we as a group, we haven't looked at this on a very technical level. There is some chatter in tech ops, but that is about it. And given the huge impact, I would say we need to come up with a direction here. Now whatever that direction is, I will follow it. I mean, that is rule of the group. But I'm just pointing it out that we need to do something with it, and we cannot cherry pick the comments here. Thanks.

ROGER CARNE:

Great. Thanks, Theo. Yeah. And I think that you're going down the right path there and that you have to look at it. I don't know

that having to take the whole proposal as at one entity makes sense. Because, I mean, I think that the more heads that get into it, they can see where issues can arise. And can you solve those to make the system better or not?

And I think that that's the whole goal of the comments is another head outside of this group provides a comment and it's like, okay, did we look at that? Did we talk about it? We didn't talk about it. Let's talk about it and see if it makes sense. If it does, if there's credit to it and it provides more security or if it doesn't provide any more security, I mean, just we document that and we say that. But I think you have to look at something that the group didn't look at.

But to your point about as a holistic thing, I don't think the proposal has to go as a detailed. We had to follow everything that's set in there because some things may not work, and we could see that. But the general concept of starting a transfer at a gaining registrar versus a losing registrar [00:30:03 -inaudible] three or four things where maybe it doesn't work or maybe not that it doesn't work, but that it needs to be identified how that works.

And I think that that's the task for us is to look at that. I think that, again, we've never discussed doing it from the opposite way, if it's from the gaining registrar. And I think that that's our responsibility as a group is to look at that and say, "Okay, does it make it better? Is it more work? Is it more onus on the registrant? And you got to look at all those. But I think you had to look at it because if we would've thought about it last year, we would've went through the same process. So, Jim, please go ahead.

JAMES GALVIN:

Thanks, Roger. Jim Galvin, Registries, Stakeholder Group. But I'm going to take a step back here and speak for myself and ask some technical questions and security questions for us. Coming back to first principles, what problem are we really trying to solve here? I mean, without judging and digging in on some of the really important questions that have been asked by George and also even here in this discussion by the folks here, Jody and Theo, I don't know that we need to evaluate George's proposal in detail.

And I say that because if one of our goals in this first principles of trying to solve our problem here, is we're trying to make incremental changes. We're not trying to do anything radical. We're trying to make things better. Certainly not make things worse and maintain whatever security and business processes we have.

I think at first blush, George's proposal is obviously a radically different solution. Now we can examine what he thinks his solution solves, and we can ask ourselves whether or not what we're proposing here addresses that problem space. What I see George proposing is he seems to think that registrant issues and the registrant market are not properly addressed. He appears to have registrant control concerns.

My personal opinion, I think that we have thoroughly vetted what we believe are the issues for registrants, and we have found a way to continue business processes, as we know them, actually improve them, and thus not only get a little better security out of it,

but also a bit more streamlining. So that strikes me as a benefit. And in any case, there's no negative support for George's concerns.

And I think that's my primary point in all of this. Not that there's anything wrong with what George is proposing, I just think that the concerns that he doesn't think are addressed actually have been addressed. And what we should take away from this is one of two things. One, let's examine what it is he's concerned about and confirm for ourselves that we have addressed them.

And then two, I think that we should add a little more rationale and discussion about why what we're doing is the right thing and does meet our needs. So for example, I want to focus on one particular detail here for us. I think that we have stated for ourselves along the way here that all of this system is fundamentally the keystone issue here is access to the account at the registrar or reseller. It really doesn't matter which, okay.

And that is the basis for which all of this works. Everything that we're doing derives from the fact that you've got controlled access to the account. And I think with that, we can think about what kinds of features and services we want to mandate for registrants. But what we have completely meets the needs of ensuring a secure transfer. And we can streamline this in any way that we want. And I won't go into more details here.

I mean, I could say a lot more about these five-day grace periods on each side and whether we want them or not in relation to the actual FOAs. But we've had that discussion here. And that's

where I'm going. And I think that if we're going to maintain that Keystone issue, that's it.

Part of what George's related to, one of some of the things he speaks about, is that particular cornerstone issue. And he's trying to find magic ways to deal with issues that are there. That's my assessment of his proposal. And not that there's anything wrong with that, but I think we have to take ourselves to first principles. We have fundamentally decided that a keystone element to what we're doing is that access to the account is assumed and that's on an individual registrar and the registrant chose their registrar and that's the starting point. Everything we've done is built on that, and it's an incremental change to what's already there. And I think that's its biggest feature. Thanks.

ROGER CARNEY:

Great. Thanks, Jim. And I would agree. I think you're right. I think that what leap of faith provided was it was a radical idea. And, again, not radical in a bad way. It's just a big change. And I think that it tried to solve, like you said, maybe several different things, but the key thing was to give the ability back to the registrant that they have today to deny a transfer before it goes through. Today they get an opportunity of up to five days to deny a transfer before it's finalized. And, again, they can make it quicker, they can acknowledge it and it can go away as soon as they acknowledge it and they can transfer it.

But in today's world, there's a confirmation period allowed to the registrant of five days to deny a transfer that they no longer have and are recommended. And I think that that's probably how, I

don't know for sure, but probably how the leap of faith proposal started. But it also, as you mentioned, Jim, thought about other things and went further. But it's not just leave of faith that brought this five-day window up. There there's several comments that are concerned about the registrant losing that ability to deny a transfer. So I think that that's probably a big key to that. So Rick, please go ahead.

RICHARD WILHELM:

Thanks, Roger. Rick Wilhelm, Registrar Stakeholder Group. Agreeing with the comments that Jim had made there. And I think that to the point that you were making there right after Jim's comment, Roger, your point was that I think that we can and should separate these things between the proposal from Mr. Kirikos regarding the so called breakthrough proposal and separate that from the idea of the losing FOA.

I don't find that from the concept of the breakthrough proposal, you had originally opened up this line of questioning about, like, how workable is it? I don't think it's that. It's doable in terms of could it technically be done. But is a practical matter. And from an industry perspective, is really impractical because the amount of investment it would take upon the registries and registrars to redo the transfer model in this way would be substantial and that juice clearly would not be worth the squeeze given the level of transfer issues that there are in the community currently.

And if the problem was so bad, and then I think that this group would have been tasked with rethinking the transfer process through from the beginning as opposed to talking about evolving

or perhaps incrementally improving the transfer process, whereas this group wasn't chartered to overhaul the transfer process from first principles. So that's why I think that this notion of the breakthrough proposal as it's described because it is fundamentally changing the way that the transfer flow works.

If this group had been given latitude to fundamentally change the way the transfer flow works could have looked at the way that telephone number portability works, whether it be in the United States in the landline and mobile spaces or in various places globally. There's another similar environment where we could have taken cues from the way that that works. But that wasn't the remit of this group. It was to evolve the thing in place. And so I think that we should just focus solely on this issue of the losing FOA and not really concern ourselves with this issue of any more of a revolutionary approach, because that was not something that that a group could consider. Thank you.

ROGER CARNEY:

Thanks, Rick. Taking those comments and the thought there, is it and, again, I think Jim called it radical and Rick called it revolutionary, and I don't remember what George called it in his leap of faith comment per document, but is it something breakthrough? There we go.

So we've got three good terms there. Breakthrough, radical, and revolutionary. And I think that they all lead to the same thing of it's a big change. It's looking at it from a different perspective, and it does fundamentally flip the process to a large degree system wise. And even from a registrant perspective, it would take some

good education to make that happen. But oh, sorry. Go ahead, Jim.

JAMES GALVIN:

Yeah. Thanks, Roger. Jim Galvin, for the record. And again, I want to reinforce the comment that I was making for myself. I said this in the chat. All right? Although, I feel bad about having called his proposal radical or even use those kinds of words, the key point that I'm trying to emphasize here is we don't have to judge his proposal at all. Okay, we don't have to do that. Well, not yet anyway. The first thing that we have to do is look at why he's making that proposal. What are the issues that he feels have not been addressed in what we propose? And then we just simply need to ask ourselves, have we addressed those issues or not?

Now, I'm asserting that we have, just my own personal opinion, and therefore, I'm comfortable saying no, to what George is proposing, and I don't even have to evaluate what he's proposing. Because I believe that we have chosen and move forward with a nice incremental change, which covers everything that needs to be covered. The problem we're trying to solve.

We've maintained security, and we have enhanced the process, streamlining the process, just as I said there in the chat in a couple of words. So we don't have to judge his thing. What we need to do is consider what concerns does he have and ask ourselves if we have addressed those concerns. That's the discussion to be had. And my opinion is, yes, we have, and therefore, no to George. But others may feel differently. So let's get some consensus on that. Thanks.

ROGER CARNEY: Thanks, Jim. Yeah. And again, I was going to take this down the path of again, this is a big change. This is something tackled. Go ahead, Rick. It's all right.

RICHARD BROWN: Hi. Rick Brown for the record. In answering all of this, and I want to thank Jim for everything he said. I agree almost fully. I believe here one of the major points is with the current transfer, once the authorization code is presented to the gaining registrar, a supposedly an email is supposed to go to the registrant called the losing FOAs saying your domain is pending transfer. The idea is that gives the registrant if they did not know about the transfer a chance to NACK it.

In the new system, since the TACK has already been given and the TACK is the approval, the real bat window is not there. I'm not saying that they shouldn't have secured their account, all of that I agree with. But since when a TACK is requested, we send notifications, meaning we, the losing registrar, send the notifications saying, here's your TACK, and we're sending them to the old and new if there was a change recently.

Why don't we simply instead of sending the TACK with that notice, send a, hey, we got a notice to obtain the TACK, yes or no? And then if you get a yes, bam. The registrar send the TACK, everything goes on. And now in a way, this is replacing the old losing FOA into the new TACK process. That acknowledgement that's pseudo required in the current transfer policy. And I was

just wondering if that's something that might be able to address this, just a quick update to our process, and then we can move on with that instead of us spending weeks debating George. Anyway, I'm sorry. Yeah, that's my point. Just wondering what the group thinks.

ROGER CARNEY:

Great. Thanks, Rich. And I think you're starting to touch on some of the options that were brought up about how does that feel and where does it fit in? Should it be mandatory? Should it be optional? And if optional by who? And all those kind of smaller issues once we get to that. But I think you're right. And I guess, I want to jump back to Rick and Jim's intervention, Theo, and Jody.

I wonder looking at the leap of faith comments, if something like that should and I'll even and I know he's an alternate today, but pose this to Jonathan too, should something like this go to tech ops and have tech ops vet this and see and work down the process of, okay, what policies need to be affected, what systems changes are going to happen, does it improve here and there or not?

And, again, just thinking outside here, thinking it doesn't make sense for the community to look at this more in-depth and walk through those paths to see if it is a good idea to make a big change like that. But let me go to Emily first. Emily, please.

EMILY BARABAS:

Thanks, Roger. This is Emily from staff. And I hope I'm not speaking out of turn here, but I did want to, just in looking back at

the proposal, just note that the leap of faith proposal has a number of different elements and some of them are complementary, some of them stand on their own. The proposal for the [00:47:26 – inaudible] or the alternative to the TACK or the potential complement to the TACK, I think that that particular proposal, if I'm reading correctly, was intended to solve the problem space of the TACK being vulnerable to theft and could potentially exist alongside the losing FOA.

And I think that the goal from George's proposal was actually to have both, so the [00:47:53 –inaudible] and the losing FOA side by side, whereas some of his additional proposals are for example, making the losing FOA optional, adding additional elements to that. That's more about the five-day window in this question of the current recommendations no longer having that mandatory window in which someone can reject a transfer that's unwanted. So I hope that's helpful. And if I've misinterpreted, please let me know. But it does seem like there may be some different goals associated with different elements of these proposals. Thanks.

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

RICK WILHELM: Rich Wilhelm, Registry. And Jonathan's probably going to comment on this also. But I don't think that it's a good use of time to send this the proposal, the overall proposal about fundamentally changing the transfer model to invert it and have it

be driven by the gaining register. I don't think it's a good idea to take that to tech ops because the answer is going to be it's a lot of work, which the group already knows. None of the protocols and none of anybody's code is set up for that. It doesn't need meetings at tech ops to have this group wait for an answer from tech ops on that.

ROGER CARNEY: Oh, and Sorry, Rick. I wasn't I wasn't thinking that. I was thinking tech ops take this on and look at it and we move on with our work. But tech ops working at it as a principle. I'm sorry?

RICK WILHELM: What is it?

ROGER CARNEY: Take a look at the idea of changing it and looking at a transfer from a gaining register.

RICK WILHELM: That's what I'm saying. That's what I'm saying.

ROGER CARNEY: But I I'm not saying we wait for them. Whatever they decide, we're already done.

RICK WILHELM: I'm still saying that. I don't I don't think that's a good use of tech ops stuff. Because it's like, I could have write the report right now. Yeah. Interesting. Possible. A lot of work. Really don't know the full ramifications of it. We know this much. Everybody's code is going to have to change. There'd be a long transition process. Education process would be steep. A lot of security vulnerabilities, some known, some unknown, blah, blah, blah, and then that goes on for, like, eight pages. Right? And I just think that the group has better stuff to work on. So that's my two cents on that.

And on the issue of the eliminating and the losing FOA, I think that Jim and I have discussed this, and I think that is the case where logically I think that Jim is right where you have the account. If someone compromise the account, they can change all the contacts, and therefore, the loose thing FOA is going to be irrelevant anyway because that's going to be compromised. But I think that this is also going to be one of those cases where FUD, fear, uncertainty, and doubt, is going to win out over logic and reason. And there's not any amount of convincing that is going to be able to be done. And so losing FOA is just going to have to go back in there so that it turns into belts and braces. Thank you.

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

JOTHAN FRAKES: Hey. And thank you for inviting me. Can you hear me?

ROGER CARNEY: Yes. You sound good.

JOTHAN FRAKES: Okay. I'm at a conference, so it's loud to pardon if there's background noise. Okay, so thank you for inviting me to speak because I am an alternate. I really default always to the most modest changes we can make with respect to any of these systems because they've been baked in for decades, many of them. And I think from a security perspective, introducing a lot of wholesale changes is always a bad architecture.

As far as these proposals, we as a group jumped in and took on the wording of the RFC and how this should work as the RFC has defined it. And it did eliminate FOA. And I'm picking up at least in a lot of what being discussed that the form of authorization was something that we may want to take a look at and consider just with respect to what might change. And that's another of the changes that we're talking about.

So with respect to -- should [00:52:40 – inaudible] seek this one as a discussion, I think it's worthwhile since we will be meeting in just a short number of weeks here, that maybe we add that to a topic. I don't know that we need to necessarily make it a critical path issue for this group to work, but maybe invite people if they have some strong objections or feelings that we would be able to take those, collect those, and bring those back to this group or form some a letter of opinion, to help in constructive ways to help move this forward rather than to be like a stopping block or something that would be a wedge in the road.

I think I look towards Jim's logic and wisdom about can we table this till we understand more of what's going to be in Phase 2, where we know what maybe rollbacks look like or some of the safety mechanisms that we're introducing as part of this before we make wholesale ideas or recommendations about what this is all going to look like. But there is a strong sentiment that the FOA change is pretty substantial and maybe taking some of the agency away from registrants.

And I know that this is meant with respect to both Jim and Rick that as authors of the RFC, you work at registries and not necessarily as close of a connection to the registrar relationship with the registrant and some of the issues that we face. And there may be some inputs we get as far as the tech ops conversations around that that might help to ensure that that's something that could work. So thank you.

ROGER CARNEY:

Great. Thanks, Jothan. Rick, I assume that's an old hand, but I'll go to Jim, and thank you, Rick. Jim, please go ahead.

JAMES GALVIN:

Yeah. Thanks, Roger. Jim Galvin, for the record. So on this issue with the losing FOA and whether or not that functionality that it has should be kept on or not, I agree completely that registrars have the relationship with registrants, registered name holders. I mean, it's up to you guys to think about collectively what you want your consensus to be in how you have to present to registrants.

My observation to make here is what I take away from George's proposal in particular is adding additional rationale and discussion about what we're doing. And in particular, what I would do is expand on the words that map the fact that the functionality of the losing FOA is covered by the 30-day lockdown after transfer.

As I said in the chat, I tried to lay this out in the chat. I mean, we can certainly have discussion about whether you still want a five-day period in front. That's an issue I'm not going to die on. Because registrars here, you're the ones who have your relationship with registrants and so you need to decide what you think is best for the industry, if you're going to mandate something like that, because it certainly is no harm done to have it.

But I observed that that five-day window, again I mean, that's interesting, but we're talking about a 30-day lockdown on the other side, you can't retransfer for 30 days. That's more than the five-day window. And if after the transfer completes, you send the same notifications, both on the losing and the gaining side for whatever contact information is left, because, again you're assuming that the account hasn't been hijacked and all that hasn't been changed. Okay? You're getting the same benefit out of that five-day window. And that's my technical observation. That five-day window is equivalent, and in fact, it's even less equivalent because it's smaller than the 30-day lockdown after transfer.

And then, yeah, there's work to be done about how the appeal and process comes back. But we'll figure that out in Phase 2. I think that we simply have to add the rationale that explains that is the losing FOA, that 30 day lockdown period mandating it across the Board, that's the losing POA with the notification. So thanks.

ROGER CARNEY: Thanks, Jim. And I'll just, again, prefaces with the scope of this. And again, I think we all know that what we're talking about is a fairly small number in the whole scheme of transfers. But it's still important because it's very impactful, sometimes when it does happen. And I think, Jim, to your point, on the 5 versus 30 a day lock after, I think the problem is there's been a disruption once it gets to the 30 days. And then it becomes a high level of effort compared to the 5-day denial. The five-day denial stops it, nothing happens.

The 30 day now a lot of people are going to have to get involved and a service may have stopped and things like that. So I would say they're not equivalent, but to your point we purposely discussed that 30 day and left it in there so that it couldn't be moved. But I think the 5-day window serves a different purpose. And that's to cut it off before there's a disruption or before many people have to be involved to get it resolved. Jody, please go ahead.

JODY KOLKER: Thanks. This is Jody Kolker for the record. I'm just going to pile on to what Roger said. Yeah, I do not see this 30-day window and the five day window as being anywhere close to being the same thing. Once the domain is transferred away, the DNS has changed. Imagine that you're United Airlines and its ua.com that's now gone.

Now you've just taken that website off and there's no security that's going to get that back. Now with that 30-day window change, that's great. The domain is gone, it can't be transferred away, but the DNS has changed. And now you've got millions of travelers that can't get home. You've got a website that is completely down that nobody can use.

So comparing that 5 day window when the registrant can actually deny that transfer. So the 30-day lock down. Unless we're going to put a whole lot of information into this 30-day window, like, basically, the registrar calls up the registry and says to change the DNS back right now. And I mean, right now, not wait for a tribunal to be brought together the three days that it takes. I mean, imagine this happens on Christmas Eve, Christmas night, New Year's Day, New Year's Night, whatever. That five-day window and that 30-day window are just not even close to being similar. Thanks.

ROGER CARNEY: Great. Thanks, Jody. Rich, please go ahead.

RICHARD BROWN: Yeah. Richard Brown for the record. And I forgot, oh Jody was talking. I want to follow-up on that. I think with the new process we've created, right now there are two five-day windows. Remember, there's a five-day window for the registrar to give an authorization code, and then there's the five-day window after the transfer has been submitted to the registry, where the registrant has the ability to enact the transfer. So right now, that's 10 days.

So we tried to really get this front end process down to five. And by doing that, we got rid of that secondary five-day process.

So I think a lot of the feedback is registrants feel like they've lost something they've had. And they've had for a very, very long time. And that five-day window where they can acknowledge or decline and transfer is their agency and control. That's all they have. So I just want to go back. I think that if the losing registrar when a TACK is requesting can simply send a, hey, call it, the AC, MAC of the TACK. I hear. God, I can't believe I just said that. But that's my point. And we're giving that agency back to the registrant. We're not changing our process, and we're moving on.

And honestly, all the other technical points and everything that were made in that document from George, honestly, I agree with Jim there. I don't care about, and nor do I want to make even more new confusing processes. But this one whole where the registrants feel like they've lost agency on their domain, I think it can be easily plugged real quickly and we can move on and maybe move on with little more registrants working with us instead of yelling at us. That's all. But thank you.

ROGER CARNEY:

Thanks, Rich. Yeah. And thanks and you've kept up from your chat. I think the interesting thing for me was in that five-day window up front and you can go back and listen to the discussions we had. I made it fairly clear that I thought registrars would use that for their own due diligence. And the FOA being one of those things they could possibly do, it just wasn't a mandatory thing.

And I think that the question and, again, I think we've already solved the question of should we have the ability. I think like everybody is saying, we should have the ability for the registrant to have this functionality. Now is it a mandatory thing? Is it a registrar business decision? Is it something that a registrant can opt in or opt out of?

And to Rich's point, I always thought that that five-day window to provide the TACK would include looking, calling the registrant. If it's a three-letter domain, I'm guessing registrars are going to call the registrants and say, hey, are you sure you want this transferred? If there's certain locks on it, I'm sure the registrar is going to call. They've probably got their own processes. But is this just a business decision that a registrar should make and allow or and maybe if you go to one register, you have to go on to an FOA and do it or if you go to another registrar that at least let you transfer it away.

And again, I don't know if we as a community want to say, all registrars have to do it this way, or they have to do it this way, or they can have that flexibility. Again, I always thought that that five days, registrars were going to do different things depending on their business models. Some are just going to go ahead and transfer it away. Some are going to be more diligent about that transferring off. It's a corporate domains kind of registrar. Maybe they have to.

I still think there's fax machine somewhere. Maybe they had to have a fax or something sent in that proves it or something. But I think that that five-day window was perfectly set, at least in my mind, was set up to allow registrars to do their business as they

see fit, and registrants will choose the registrars that they want to work with based on those policies.

So that that's how I saw the five-day window. And, again, I don't know, as Rich is saying, should at request should there be a notification sent? Should that be mandatory? Should that be optional for the registrar? Should the registrant be able to opt in or opt out? Things like that. Berry, please go ahead. Sorry.

BERRY COBB:

No worries. Thank you, Roger. Berry Cobb. So I sense that the group is trying to get to a narrower place or more narrow place in an attempt to accommodate the leap of faith comment, kind of two points that the ability to NACK was no longer there as part of the initial report recommendation. And I think leap of faith was also quite clear about being able to know where that domain was being transferred. And I think I'm hearing the group recognizing those two potential gaps. The reason why I raised my hand is staff wouldn't be doing our job without a public service announcements.

So when we hear things like should it be mandatory, should it be optional, does it depend on, or does it allow for flexibility across the variety of registrar business models based on policies? Does it provide a mechanism and how registered name holders choose who their registrars are?

I think all of those are fair points, but the one thing that I haven't heard yet is that whatever the consensus recommendations come down to become consensus policies, and there's a mechanism, and I'm speaking on behalf of Compliance and Holidia on the call,

but certainly not speaking for her or her team is they perform this compliance function and we owe them to be very specific when we're getting into things about whether it's optional or not.

So I'll close with this statement that I do encourage the group to always have in the back of your mind. I think this was one of my personal lessons learned from EPDP Phase 1. No matter what you're offering in terms of the deliberation or an idea and as we get closer to the next round of forming our recommendations, that you always do it in the context of a must, capital must, a must if, kind of if something happens, then this must happen type scenario that talks about some of the optional stuff, or the maze. And the maze get pretty tricky because contractual compliance can't enforce on maze.

So if the group is leaning towards maze, then that makes things a lot more challenging, not only for us here in this group, but then how the Council considers them and then certainly how Org implements them and most importantly than how Compliance wouldn't be able to enforce maze. So just a bit of caution when thinking about some of these optional type conditions. Thank you.

ROGER CARNEY: Great. Thanks, Berry. Always good to be reminded there. Theo, please go ahead.

THEO GEURTS: Yeah. I'm still a little bit puzzled about the entire NACK discussion on the losing FOA. I mean, we didn't eliminate that. We just moved that somewhat earlier into the process. I mean, as soon

as you create a TACK, you got a notifications where you can nullify it. If you go, like, okay, I didn't create this. Let me know if right now you can do that. At least, that's the process that I envision when I would implement this on a registrar level, like the same way that DNS Belgium does this.

I mean, it dawned on me yesterday that while this idea of the TACK creation sounds very new for most of us, especially for people who are not aware of our work. But DNS Belgium has this TACK system for years now. In fact, the TTL of their TACK is 5 days instead of the proposed 14 that they have.

And the moment you create a TACK, the registrant is going to get this option, is going to present a bit of options to either nullify it or just move on with the trends because it was a legit request to transmit. So there's still an option to NACK it, if you want to call it, if you feel that the request was not legit. So I think we are a semantic discussion here. Thanks.

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

JAMES GALVIN: Thanks, Roger. Jim Galvin, for the record. Let me try to come at this just a little bit differently. So the first time that I spoke here in this meeting, the first thing that I said was to ask ourselves what problem we're trying to solve.

And I want to put that question back out there again because I want to offer an alternate point of view about Jody's excellent

example about how bad things can get if a transfer was not supposed to happen. I think that we really do have to ask ourselves, are we trying to solve the transfer problem, or are we trying to solve the operational consequences to a registrant if they get it wrong? And so now the question is, what is it they could possibly have gotten wrong?

I mean, Jody is exactly right. I mean, the DNS is obviously, an obvious part of all this. And if I transfer and all of that is allowed to happen because I have allowed my registrar account to be hijacked, okay, and even if you do all of this five-day grace period, if this account is hijacked, and that was the deliberate act, you have to believe they're going to change all the contact information. So all of this extra stuff here is just not going to matter. You know, I mean, all bets are off here. And there's nothing that you can do that you can fix this with.

But I observed that in some ways, if you take an airline and whether or not it's a result hijacking or some other accidental thing, it goes away. I ask, is this a problem that transfer has to solve? The fact that they suddenly have a website that went down and now they have millions of customers that have been impacted.

Because maybe if your website and your domain name means that much to you, you should have all kinds of extra security features apply to your particular registration domain name. You should have a registrar who offers extra services and two factor authentication about everything. And maybe all of those kinds of things are manual services. I mean, that's not the business that most registrars are in.

So, sure, these kinds of things can happen, but I would simply argue that person doesn't understand the value of the domain name they have, and they should be at a different registrar who offers them the kinds of services they need. I mean, I hate to use the pejorative phrase of, you get what you pay for, but you get what you pay for. So I do want to come back and observe that I really do stand relatively firm on the idea that that 30 day lockdown period after the transfer is as good as it gets.

And we can provide some discussion and explanation that that combined with the other cornerstone things that we need really is a replacement for the losing FOA. It doesn't make things any worse than it already is, and it streamlines things, and that's a good thing. And registrants in general should like that. Bottom line, registrants with high value domain names buyer beware people. Get yourself a registrar with services that meet your needs. I mean, is the transfer process supposed to solve that problem? Thanks.

ROGER CARNEY:

Thanks, Jim. And couple of points, I think. You know, Jim brings up, we've touched on throughout our discussions over the past year or so, but the different kind of attack vectors. And I wonder if it's useful for us. And maybe it's a small team that just gets together and brainstorm's the different attack vectors that we've seen because we've seen most of them already in our lives here. But you know, even the possible ones that could come up. Is it useful to document those and say, to Jim's point, are we trying to solve that one, or are we not trying to solve it? Are we trying to solve this one?

But it doesn't make sense to list out the attack vectors we see and try to say, okay, but that's really not in our remit. We're not going to try to solve registrars being compromised or whatever. But we are trying to resolve if this or that. Does that make sense? Should we document those different attack vectors and show that they just need to be solved here or they need to be solved over there, over there, or wherever. Just a thought on that. So, Jody, please go ahead.

JODY KOLKER:

Thanks, Roger. Yeah, I agree with Jim almost wholeheartedly. It's up to the registrant to take care of themselves here. And even if we put three different X and X on this or four or five, once the registrar or the registrant has their email hacked, and if we say we can only contact people through an email, or really it doesn't matter how we contact them, if the registrant has lost the ability or their accounts have been compromised at their email or other social media accounts or however the registrar is trying to get a hold of them, that domain is gone. I mean, it doesn't matter how many X or X we have on them.

And I don't know how we make that apparent to George or anyone else who's saying that this is going away, the ache or nag that, hey you've got to lock this down with additional security items that the registrar or registry may have or additional security items that you have on your email, or whatever social accounts that you're using for the registrar to contact you. I mean, in essence, a hacker's going to find a way around just about everything that we put in place. And eventually, the registrants going to have to look in the mirror and see that, oh, I should have done something to

better control my email password, or my Twitter password, or whatever is being used to contact them. Thanks.

ROGER CARNEY:

Great. Thanks, Jody. So I propose, and again, leaning off of what Jim and Jody were talking about there. Because I think Jim's right what he put in chat. I think that if we document these attack vectors and again so many of them are known to us already because most of us fight them throughout the days.

But I think if we can get four or five people together and brainstorm and just list out the different attack vectors and show where they are in play. And if this group is responsible for any of them, that's great. But let's market and say, this is how we solve this by email compromise. It's like that's nothing this group is going to solve, but it's a huge attack vector.

You know, as we've said in chat, email compromises happen all the time. But it is one of those that it is something we can't solve, but we know it that exists. And I think I've got two volunteers or maybe they didn't volunteer. But Jim and Jody sounded like they were interested in starting that list for us.

And, again, to me it's a fairly simple list to start anywhere. Yes, if I'm told, yeah, probably Jim. Just list the vector in and if we're responsible or not. And if we think we're may be responsible, what are we doing with it? Because, hopefully, we already solved it and we're good with it. But if not it's going to be good to list it and show.

And as Jim pointed out in chat, I think that it provides that rationale that we've looked at these, and maybe it gets down to we can affect it slightly and not, we can't solve it, but we can affect it. But at least we can show people that we're working at that. So I think that'd be good.

So if anybody wants to join Jody or Jim, drop in chat, and staff can put together a meeting or two or if you guys can do it on list or whatever. However, that works. But I think going through those attack vectors and getting them listed would be great. And we can provide that in our rationale, as Jim mentioned. Thanks, Rick. Okay.

So gain back. And again, maybe Rick can jump in on if he wants to. I think Rich had put it in chat, and he said it a couple times, keenness, losing FOA concept, and again, maybe we can drop the losing FOA and just say the registrant functionality of denying a transfer. I think Theo, maybe it was Theo, or someone said it. In our new world that we proposed, registrants can still deny the transfer. At any point they can tell they're sponsoring registrar, "Hey, I don't want to do this." But the issue of our proposal to today's Staff is the transfer is possibly more immediate in what we're suggesting than it is today. Sorry, I had to get a drink there.

So I think that yes, I think that our solution still provides registrants the ability to deny it. We actually talked about that. I remember talking about it, but it doesn't provide a period of time or more [01:21:18 –inaudible], however you want to say it, that is the registrants. Because if a TACK is created, it theoretically could be transferred within a minute or so in what we're proposing. So the registrant still has that ability, obviously, but it's going to be a

variable amount of time. And I think that maybe the suggestion is coming in, or maybe there's a window that should be allocated toward that. So just my thoughts. Rich, please go ahead.

RICHARD BROWN:

Yeah. Rich, for the record. I just want to say I totally agree that we cannot prevent, we cannot secure registrants in their personal information, including their emails or their passwords or what have you. That's always been the case, and I've been dealing with transfer disputes long enough to know that one. And as far as we go as a group that decision that that's where we should stop, I'm in agreement there, but I believe early in the discussion, we made an assumption that just sending the TACK and the security to log in to the account, the requested TACK is enough.

And I agree with that assumption, but we missed the point where the registrants are still out there trying to feel like they're part of the process. Our new process is fast, quick, done, out the door, get your transfer done. And if there was a mistake, don't worry. It's held for 30 days. So it can be resolved. The problem is we all know the domain is already transferred the minute that TACK goes out, because the minute the TACK is live, that transfer goes through. No ifs, ands, or buts.

So even if I got the email as a registrant and I am 10 seconds late, it's gone. I can't NACK it, but and mind you, here this has a registrant who has yet to hear our ideas for claw back or anything. There's none of that's out there. All they hear is oh, yeah, well, your domain's gone, but you can argue it. There's a process for that. Oh, really? Yeah. Yeah. Yeah. We'll get back to you next

year. By the way, if you read the current transfer dispute process, which is all they have for reference, it's a very scary area to deal with.

So mind you, like I said, as far as consensus goes, I agree that we shouldn't have to change what we've already written. We shouldn't have to move forward. But I think that as a group, we did lose a little bit of sight or agency on behalf of the registrant. And I think we have an easy way to put a little bit of ease of mind back into it. And that's just by sending. Instead of just immediately sending the TACK to send a, hey, we got a request for it, is this valid? That's it.

And by the way, even if their account was compromised, and the hacker logs in request to TACK, response back saying, yes, I request in, the domain is transferred. By the way, the agency that registrants and everybody are saying they're losing it's still now in the process. It's now a lot easier for a registrar to go like, well, yeah, you logged in with a password.

We sent you an email to verify, and you said it was okay and there we go. Now you still want us to dispute this weekend and we can go, but it can take 30 days. It's easier to tell registrant that we did all this stuff upfront than to say, like, well, that was all on you. Yeah, we'll do something. We'll get back to you in 30 days or 10 days or whatever it takes.

And so my point here, I'm not trying to rewrite or create a huge response to George, but I think maybe we should just look at that one part of the TACK request on how it's responded to. And I know there was an assumption that registrars might do that on

their own. I think maybe we just overstepped assuming that and just maybe we can throw that in, maybe not.

But I think I personally would just like to actually hear debate on just this one point. Not changing technical specs on how we get things, or that the losing registrar and gaining registrar, the losing registrar needs to create the TACK. The gaining registrar now has to get their own TACK.

I agree. All of those extra steps, not part of the process, but I think we need to address this "loss" that registrants are feeling. And by the way, I think really is why we're getting a lot of feedback regardless of what George or whatnot says. Others have said they don't like not having this anymore as well. Thank you.

ROGER CARNEY:

Great. Thanks, Rich. And just two points off of what Rick said, and we're running out of time here. We only have a couple minutes left. The first thing and as Rich went through the description of, okay, maybe somebody requested it and changed the email, he went in and changed the registrant email and then request to transfer, and now the email gone to the person that is going to approve it anyway.

But I also think when a registrar has that five-day window, I'm not going to say, should, they have the opportunity to check to see if those things were changed, and that could change their resolution on providing TACK or not.

If someone came in and changed the email address, and 30 seconds later changed or requested to transfer, to me, a registrar

doing due diligence would question that. Maybe not stop it, but question it and maybe verify it another way. But, anyway, I think, again, that due diligence is important up there. And I think there's many points to look at.

But to get it back to what Rich was saying, and I'm going to throw maybe some words in his mouth here, just to get something on paper, is I think the proposal is let's require a transfer request notification so that's when a transfer or TACK is requested, a notification has to be sent to the registrant.

And as Rick mentioned, should it be mandatory or not? The proposal is, let's make it mandatory x number of days. Like, how many days? I don't know if that has to be five days, if it has to be three days. However, that is, I think, let's throw that on paper and see what people's thoughts are on it of, okay, a transfer request has to have a notification to the registrant.

And, again, that doesn't have to be emailed. We went past all this. But there has to be a notification to the registrant. And they have the opportunity to deny or accept that within x number of days, less than five, obviously, because that's the period of the beginning.

So I'm not sure that out there and we're overtime now by a minute because I talk too much. But let's put that on paper and see what people's thoughts are. And let's move forward on there. And we'll continue this discussion next week. And I think that's it. Anything else from Staff before we cut out? Okay. Thanks, everyone. Great to see everybody again after a few weeks off. We'll talk to everybody in a week. Thanks. Bye.

JULIE BISLAND: Thank you, Roger. Thanks everyone for joining. This meeting is adjourned. Have a good rest of your day.

[END OF TRANSCRIPTION]