
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 19 April 2022 at 16:00 UTC

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DEVAN REED:

Good morning, good afternoon, good evening. Welcome to the Transfer Policy Review EPDP working group call taking place on Tuesday 19 April 2022 at 16:00 UTC. In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room.

For today's call, we have apologies from Crystal Ondo (RrSG) and Daniel Nanghaka (At-Large). They have formally assigned to Jothan Frakes (RrSG) as their alternates for this call and for remaining days of absence. Joining a little later during this call is James Galvin.

As a reminder, 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 have will be promoted to panelists. Observers will remain as an attendee and will have view only chat access.

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Statements of interest must be kept up to date. Does anyone have any updates to share? Please raise your hand or speak up now. If assistance is needed updating your statements of interest, please email the GNSO Secretariat.

Please remember to state your name before speaking for the transcription. Recordings will be posted on the public wiki space shortly after the end of the call. 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 CARNEY:

Thank you. Welcome, everyone. Before we jump into our agenda here, I just wanted to cover a few things. As you know, there's a small team working through the NACK open items, and really just cleaning up some of the language, some of the questions that we had, making sure that they're in the right three buckets of the NACKing, reasons of denial.

They made great progress last week. And I think it looks like they'll finish up this week. So we'll hear from them maybe next week or shortly soon after that. So I just want to give an update on that. They're making great progress. And we'll see that work soon.

So other than that, again, I want to reinforce that we're into that phase now of probably not detailed discussions anymore, unless we need pointed ones here and there to get to a resolution. But really, we're going to focus on getting into solidifying what we've discussed, and what we've agreed to and get into our initial report so that we can get this document and move from there.

And again, I'm sure there'll be some pointed discussions that we had to get a pretty low level on. But we're going to try to make those very specific and focus on just moving forward with the initial report and getting an agreement there.

So, other things? I did see that the poll for attendees looked great. It looked like there was quite a few people at least today expecting to travel to I ICANN 74. So that's excellent. So we'll have a good split, I think, of people face to face with a good number of people virtually as well.

So again, I don't see that the running of the meetings going to be any much different than this one, just that a few of us will be in one location. So again, there was a good number of people planning to go so that's great. And there was more than a dozen I think that we're planning on going, so that's great.

And lastly, I think we completed—staff did updates from our discussions on the locking or the transfer window discussions that

we've had, and that doc's updated. So please take a look at that working document and add any comments in. Again, any comments coming in on that, well, we'll touch back on in probably a couple of weeks to when we get to those specific recommendations after going back to our initial discussions on TAC and gaining and losing and all those other discussions.

So take a look at that document, make sure that it makes sense to you and it covered what you thought we were covering so that we will be ready when we talk about that in a few weeks.

So other than that, I think that's all the updates I had, except I will call out for any of the stakeholder groups that want to come forward and talk about any discussions they've had, any comments from their stakeholder groups over the last week or so that they want to bring forward or have questions that we could maybe try to answer, at least get documented so we can get an answer for them. But I'll open up the floor to any stakeholder groups that have anything they want to bring forward.

No, okay. Again, we'll try to touch on that on every meeting. So if you think of anything, we can bring it forward next week or hit the mailing list with it as well.

Okay, I think we'll go ahead and jump into our agenda then. And I think Caitlin is going to take us through the next couple of documents for us. Caitlin, please take over.

CAITLIN TUBERGEN: Thank you, Roger. So, Emily's circulated this updated document last week. And this topic may look familiar. We discussed it

several meetings ago. So I'll provide a quick refresher. But essentially, the group had a charter question, specifically charter question H2, that relates to UDRP locking and decision implementation.

This charter question was added in response to a comment that we received from the World Intellectual Property Organization, in response to the transfer policy Status Report, and WIPO noted several concerns that it had that are tangentially related to the transfer policy. So for that reason, we included this charter question.

There are two main topics under the charter question, specifically the locking of domain names and the implementation of UDRP decisions. So we'll take that one by one. I'll give the disclaimer that the group did discuss this and staff tried to incorporate the feedback that we received from the group. But of course, if we missed anything, maybe misinterpreted anything, or something needs to be added or subtracted, and that's why we plopped it into the Google Docs so that any of the working group members can go ahead and add comments.

So the first topic of domain name locking, as most of you know, and as we've discussed in relation to the NACKing or denial of transfers topic, the UDRP or the rules, specifically rule 4B, requires that registrars lock a domain name within two business days of receiving a UDRP complaint from a provider. And that lock needs to be maintained throughout the UDRP proceeding.

And in short, that's because once a complaint has been filed, the name needs to be locked so that the respondent or the domain

name holder and the registrar stay the same through that proceeding. That has implications on both the complaint being accurate, so if anything were to change, the complainant would be asked to amend the complaint, and also, if the registrar or the respondent were to change, there are some mutual jurisdiction implications as well to the UDRP complaint.

But in short, there is that UDRP rule about locking the domain name within two business days of receiving a complaint and keeping that lock in place. And it's tangentially related to the transfer policy because there is a NACKing reason or specifically section 1A 3.8.1 of the transfer policy provides that the registrar of record must deny a transfer request in the following circumstances. And one of those circumstances is a pending UDRP proceeding that the registrar has been notified of in accordance with the UDRP rules.

While the reasons for NACKing are still being discussed by the small team on NACKing, I did want to note that when the group discussed this as a whole, there was a slight refinement proposed by the text. And that was what I believe the language used to say, a proceeding that the registrar has been informed of. That has been updated, at least tentatively, to has been notified of by the provider, because a few of the members of this group had noted that notified is a bit ambiguous and it doesn't say who needs to notify. So it might be that a complainant or a complainant's representative will let a registrar know that they're intending on filing a UDRP complaint.

For purposes of the transfer policy and for the locking of a domain name, that wouldn't be the critical date. The critical date is when

the registrar receives a notice of UDRP complaint from an accredited UDRP provider. So that slight refinement is hoping to clean up that potential ambiguity.

Also, in WIPO's complaint, they noted that there seems to be some ambiguity with what locking means. In response to that, I wanted to note that footnote three which I'm highlighting here, provides the definition of what lock means. That's defined in UDRP rule one, and as I noted earlier, it essentially means that the respondent and the registrar stay the same through the UDRP proceeding. But it doesn't mean that the resolution or the renewal of the domain name are affected, but the registrar and the registrant need to be locked. So the registrant wouldn't be able to update that information or transfer the name to another registrar once the name is locked.

In terms of updating a definition of lock, the group discussed that briefly and noted that the definition of lock is part of the UDRP rules and really isn't in scope for this group to change. However, they would flag the comment from WIPO to the RPMs phase two working group, which will be looking specifically at the UDRP. And if that group was to determine that a clarification would be needed to the definition of lock that would be within their remit to do so. But this group didn't feel like that was really related to the transfer policy. That's more UDRP issue.

And lastly, in WIPO's comment with respect to locking, WIPO had noted that there are issues with registrars transferring names even after they've been notified and after that two-business-day window. The group did discuss this and noted that that seems to be a clear violation of the UDRP rules. So if WIPO or another

accredited UDRP provider were to notify the registrar that a UDRP complaint has been filed, and the registrar doesn't lock the name within those two business days and instead transfers the domain name, that would be a compliance issue, not an issue with an ambiguity in the transfer policy.

So that's what's stated in the last paragraph. Just that, again, if that is an issue, that's unfortunate, but that could be referred to ICANN Compliance and the registrar would have to respond to that.

So the next topic—and if anyone has any questions about the first topic, please feel free to interrupt me. But the next issue that WIPO was having, or noted in its comment to the transfer policy status report, is the inconsistency and the implementation of UDRP panel decisions.

So as a quick refresher, when a complainant or when an individual files a UDRP complaint, and is noting that they believe there is an infringing domain name, they can request one of two remedies. They can request that if they're successful in proving that there is infringement, that the name could be transferred to the complainant, or canceled or deleted essentially.

Generally speaking, most complainants would opt to choose transfer as the remedy because if the name is deleted, that doesn't prevent someone else from reregistering the name immediately. However, some complainants don't want to manage a portfolio of domain names, so they choose to cancel the domain name.

But what's relevant for this topic is the transfer of the domain name. So in paragraph 4.1 and 4K, we note the relevant language about what the remedies are, and that if an administrative panel decides that the complainant is successful, the registrar will implement the decision after 10 business days to cancel or transfer the name. The respondent Of course, does have an opportunity to challenge that decision in a court. And if they show official documentation to the registrar, the registrar would not go ahead and implement that decision.

But we talked about this briefly in this group. And you might remember that registrars noted different ways of transferring a domain name. Some of them will provide the complainant with the auth code and allow the complainant to transfer the name out immediately. Other set up an account and have the complainant enter their information at that registrar and then wait to transfer the name.

But essentially, as long as the registrar is effecting a transfer, in other words, giving that name from the respondent to the complainant, there are multiple ways to do that. And in terms of making that more clear, the group noted that they were hesitant to prescribe more specific rules around that since that's again, part of the UDRP not the transfer policy, where the transfer policy is implicated as the registrar is being asked to transfer the name and is to allow that in some way. But how it allows it is really up to the registrar. And if it is indeed an issue and it's confusing, that that could again be referred to the RPMs phase two working group.

And lastly, similar to the locking of the domain name, the last paragraph of this response notes that if a registrar is refusing to

implement a decision, and offering any way for the complainant to receive the name, that would be a violation of the UDRP procedure. And accordingly, the complainant or the provider should file a complaint with ICANN Compliance to investigate the issue.

But the group thought it's outside its scope to be requesting changes or recommending changes to the procedure or the rules of the UDRP. That's really for the specific working group on that policy to opine on and make recommendations.

So that is a high level of what the response to this specific charter question. This is the question that support staff got together and tried to put the working group's thoughts into a semi coherent response. But feel free to suggest changes or note if there's any sort of inaccuracy in here. So that's the summary of this response. i will pass it back over to Roger, because I see Theo has a question, and others may as well.

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

THEO GEURTS: Yeah, thanks. So I think it is within scope to do this. And I don't have any questions about the language, etc., etc. I do have a question, what happens if somehow the UDRP or the RPM— Yeah, the UDRP policy changes, does that automatically open up the transfer policy or is staff just going to do whatever is the outcome of a new UDRP policy, just going to be replacing some stuff of this if it is affected? Basically the question is, what if a new

UDRP policy comes out, has completely different procedures, two days become 10 days? I'm just making this stuff up on the fly. What will be the process to change the transfer policy text? Thanks.

ROGER CARNEY:

Great, thanks. Yeah, and I think that that's something important to think about. Obviously, any subsequent PDP can provide updates to existing PDP or existing policies. So I think if it came to that, that UDRP, if there was a PDP to make any changes that obviously, they could make changes to this, it would be good if we note that that dependency here and try to refer to the UDRP more than refer to specific things in the UDRP. Obviously, that would be good, if we make reference to the UDRP in instances and if we can get by with that, specifically pointing to or pulling out text to the UDRP, I should say, pointing to it makes sense, because then you're still locked there without those dependencies. But if we need something, obviously, we should put it in here. And then they would have to make a conscious decision to change it. Does that make sense?

THEO GEURTS:

Yeah, that makes sense. And I think your reasoning is correct. I'm just trying to make sure that we are not doing something unintended. And I do want to note that you now have to keep up maintaining two policies in case one changes or the other changes. Thanks.

ROGER CARNEY: Great. Thanks. And I think that's the important part of trying to limit as much duplication if we can just refer to the UDRP where we need to, great. If we specifically want to make sure that if a change—if we see the possibility of a future change in something, that may be important for us to pull down specifically, that text, so that there has to be a methodical approach when it does change that they actually have to come over here and make that change as well.

So I think obviously, the easy, the preferred method is just to refer to it, as you said, we don't want to keep two things going at the same time saying the same thing. So if we can just refer to it as much as we can. But again, to safeguard on those specific points, if we have any, would be good as well. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you very much, Roger. I have to say, as someone who's practiced UDRP disputes for 23 years, that was incredibly coherent, and well thought out description of these issues. So thank you for that. Caitlin.

My question is something related to WIPO concerns? If a complainant wins a UDRP and obtains the transfer order, and the domain name is to be transferred to the complainant after that 10-day period elapses, just like a normal win situation, what happens if there's another lock at play that prevents that transfer to the complainant, such as a lock that arose from a change of registrant or change of registrar, etc.? Does the transfer policy contemplate overriding that lock that might be at play? Or is the procedure here

then if another lock is at play for the registrar to effect a push rather than a transfer? Thank you.

ROGER CARNEY:

Yeah, thanks, Zac. And I don't think we cover that here. Yeah, that's a good question. I don't know if we should get into it or if the UDRP should. And again, Zak, I agree. I think there could be possible other locks, maybe a registry lock or whatever that's done on it. That may prevent that. So again, I don't think we should cover that here. But the group can make that decision. Owen, please go ahead.

OWEN SMIGELSKI:

Thanks, Roger. So Zak, to answer your question, the change of registrant lock which is commonly cited in there, as one of the reasons you will not be able to do that, does not apply to UDRP, implementation of UDRP decisions. That's further on down in our work. So we don't have to worry about that.

In theory, there could be some sort of server lock. But that would have to probably be considered and contemplated elsewhere outside because it's not really something that's part of the transfer policy. There could be, I don't know, a government order to lock a domain name or the other limited case of we saw—and this is, again, an outlier at Compliance, would be the UDRP lock requires that a domain continue to resolve. But sometimes what would happen is a domain name is registered and there may be another locked suspended domain name such as an abuse complaint, prior or during the UDRP or there was an RAA verification that

failed that required suspension. So sometimes those scenarios did pop up. And just kind of that would have forced that, but those are very limited and did not result in the inability to transfer to a prevailing complainant, at least that I recall. Thanks.

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

JOTHAN FRAKES: Thank you. Owen covered most of the ground I needed to raise. But I did want to just make sure that I understood Zak correctly. And I'll relinquish—you're talking about an intra registrar transfer within the registrar like a change of registrant or an account push between accounts within a registrar and not inter registrar transfer where there would be registry involvement, correct?

ZAK MUSCOVITCH: Yes. Thanks, Jothan. Yeah, I'm also contemplating that there could be a 30-day lock, perhaps, because it's a newly created domain name, and that could prevent the transfer of the domain name except perhaps by intra registrar transfer, aka push. Thanks.

ROGER CARNEY: Okay, Zak, was there anything else? I noticed your hand was up.

ZAK MUSCOVITCH: Thank you, Roger. I do think it's worth pointing out. And you know, I do defer greatly, Roger, for you and the group saying, listen, let's not deal with this here or this is not an issue. But I do feel it's incumbent on me to point out that some complainants and their counsel feel very uncomfortable having to—if they win a UDRP complaint, having to take that domain name at that domain name's current registrar, they would rather have it moved out to their current registrar of choice immediately.

And so if there were a post creation lock that was in place when a transfer is otherwise supposed to occur and so the registrar's only choice for complying with the requirements to transfer the domain name after successful UDRP was an intra registrar push, then that would put some complainants in a position they don't want to be in because they don't want to do business with that registrar, maybe it's because of its location. Or maybe it's for a practical reason that they'd like to consolidate their domain names in one particular register. And that would mean they'd have to wait out that post creation lock, for example. And if it's 30 days, it's probably not the end of the world. But it doesn't appear to be consistent with the requirement that the domain name be transferred after 10 days.

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

BERRY COBB: Thank you. And just building on the use case that Zak was bringing up. So I think if I understand it correctly, from WIPO, and obviously not speaking for them, but this was the original use case

for the source of their concern that they raised through the input on the survey or the comment period.

So in today's world, we recognize that there is an inconsistently applied 60-day post creation lock. And I think we understood that one of those is the .com TLD. So given the registration monitoring solutions that exist out there, it is viable or theoretically viable that a future complainant or a brand owner would be notified within five to 10 days of that registration. They do that evaluation. They make a determination to file a complaint at a provider.

As noted, I think by Jothan, as little as 21 days, sometimes 30 to 45 days to complete a case depending on the complexity and those kinds of things, but I understood WIPO's concern is that in those instances where it is a newly created domain name, the complainant can be found in favor of the complaint before the 60 day lock expires. And that's what is the source of their input.

Now that the group is considering 30 days or maybe a little bit less, that is likely to be lightened. Or depending on how big of an issue it is, it's likely to be reduced by reducing that lock period. And so I think that that's a positive sign to try to help address that particular use case.

Now, it kind of varies a little bit different for a URS, because those are more expedited type of complaint that's being utilized. But still, those typically take somewhere in the realm of 14 days or so.

In today's world and based on the group's discussions today I don't believe that would be in this group's scope to try to trump—if the lock is applied, even if we assumed that it was supposed to go

for 30 days, and whether it's a UDRP or URS gets resolved and found in favor of the complainant in 21 days, the complainant would still have to wait the nine days to have that lock lifted, so they can transfer it to their registrar of choice.

And a remedy for that perhaps could be that if in that scenario, that the creation walk could be undone, but I believe that would be more in scope for a future review of the UDRP to make that determination and not necessarily here. But again, the point standardizing to a lower timeframe may help mitigate most of that use case. Hope that was clear. Thanks.

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

VOLKER GREIMANN: Yes, thank you, I mean, we have always understood the word transfer after UDRP not to refer to an inter registrar transfer but rather to a registrant transfer. So transfer ownership and control over the domain name and therefore, it is affected when we push it to the account of the of the complainant.

That said, the timeframes for the eventual transfer, now the inter registrar transfer that usually occurs after winning a UDRP is elongated because of the notification period and the implementation period that also exists, because the registrar is notified of the decision and 10 days after that notification occurs, which usually is 12 days after the decision has been rendered, only then may we implement because the respondent always has the option to file in court to contest the decision, obviously.

Therefore, a lot of these time periods that we're looking at are longer than the time it takes for the UDRP decision to be rendered. So that should also be taken into account.

But all that said, I'm very amenable and very convinced that these locks should be liftable in case UDRP decision has been rendered. So the creation lock, the transfer lock, all the other locks that might exist, all the change locks, even though I think it's highly unlikely that they still apply, they could be overridden by the desire of the respondent to transfer a domain name. And I think if we want to put that in the policy, then that's okay, as well. Thank you.

ROGER CARNEY:

Great. Thanks, Volker. Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Roger. Those preceding points were all excellent. I think what I'm hearing collectively from the points made is that if this working group were to go with a 30-day post-creation lock, for example, that would really alleviate most, if not all of the concern that WIPO and others might have, that the UDRP transfer order couldn't be implemented because the UDRP procedure, plus the 10-day waiting period for the transfer would eat up whatever was left of that 30-day lock period. So that might be one reason for that shorter lock.

But I also took from what Volker was saying and from what Berry's saying, that UDRP is on the mind right now because the comment period on the UDRP status report, the deadline is today. So it's on a lot of people's mind, in my mind, in particular. And I do think that

it is conceivable that, maybe not likely, but it is conceivable that if phase two is commenced that there could be some proposals that might even reach consensus for some kind of abbreviated or shorter or expedited UDRP that is similar to the URS but actually has a transfer remedy, as opposed to just the suspension remedy at the registry level.

And so if that's the case, what I was hearing from Berry, I think, if I'm not mistaken, and also seemed to be echoed by Volker, that it's possible that rather than to address a condensed contingency within this working group, that perhaps the UDRP working group would be able to enact some kind of policy that overrides a lock in the event of a UDRP transfer order.

And so if that's the case, we would be able to just leave it to the UDRP working group, rather than to try to address it here. If we thought that the UDRP Working Group wouldn't be empowered to do something that overrides the transfer policy, then maybe that this is something that one aspect that ought to be deferred, before a final decision is made until the UDRP working group resolves it, or that there's some provision included here as Volker was kind of mentioning that invalidates or relieves the locking requirement in the event of UDRP transfer order. Thanks.

ROGER CARNEY:

Great. Thanks, Zak. Yeah, and again, I think that obviously again, a later PDP, if it fits into their charter and the GNSO let them look at it, can make any changes that they wanted to to this transfer policy, so I think that's a potential. And, obviously, it's one of those where when policies cross over, that does create

interdependencies that they have to be particular about when they look at those and make sure that they're treating them correctly in looking at why that other policy is the way it is. So I think that if there's a UDRP PDP, they'll definitely get into that.

Okay, any other thoughts, comments? Yeah, and I'll second Zak's earlier comment that this is a great write up on this. So it's great work done here and documenting the discussion was great.

Okay. Again, please take a look at this, reread this as many times as you need, throw comments in here. We'll review this again, this is not done. So this is a good write up of this. But if anybody has comments or questions, please take a look at the document and put those comments, questions in it. And then we'll review those as well so that we can get that into the initial report.

Okay, and I think Caitlin's going to do our recommendation 27 wave one report items as well. Caitlin, please go ahead.

CAITLIN TUBERGEN:

Thanks, Roger. That's correct. Emily asked if I could present this since I was part of the support staff team for the EPDP phase one. Also, we're lucky enough to have Berry Cobb who also helps support so he can correct any errors of mine, or add to the discussion.

I thought it might be helpful to first show what recommendation 27 is. Some of you may have heard us talk about recommendation 27 or heard about it in other fora. But in short when the EPDP team looked at registration data as a whole and looked at how the requirements need to be updated to allow for new data protection

laws, including the GDPR among others, the group did a wholesale review of the WHOIS requirements or rather the RDDS requirements and what data that contracted parties are required to process. So in other words, collect, transfer, retain, etc. But noting that some of the previously required data elements are going to change because of requirements, or policy recommendations from the EPDP phase one team.

So noting that, the team recommended that as part of the implementation of EPDP phase one, that updates may need to be made to other ICANN consensus policies to ensure consistency between the EPDP recommendations and those consensus policies. Some examples are included in recommendation 27. And as you can see, the fifth bullet is the transfer policy.

So the internal ICANN Org team that went through the Rec 27, and went through the EPDP recommendations, vis-à-vis the transfer policy among other policies came up with what's called the wave one report. And that was the report that included those policies and the bullets I believe, one of which is the transfer policy.

And what they did was they identified what they called key analysis points, which are points where they went through the current language of the consensus policies and noted where there may be a conflict. In some instances, the report suggests how those should be handled, it might just be a simple terminology update, for example, changing who is to RDDS since WHOIS is going to be a retired term, or, for example, eliminating the term administrative contact, since that contact is also no longer

required to be collected by registrars and therefore shouldn't be referred to in policies as a requirement.

In the case of the transfer policy, the ICANN Org team that went through these key analysis points noted that there is or was going to be soon a transfer policy review working group that could look at the proposed changes and either agree with them and or propose something else.

And so as part of the charter questions, the group is being asked to look at those key analysis points, particularly the ones that are relevant for phase 1A, and note if there is any disagreement with the proposal.

So what the support staff team did similar to the UDRP document that we just went over, is we put everything in one spot so the key analysis points appear on the left, there are 10 of them. Not all of them are relevant for phase 1A, we'll just quickly touch on the ones that are.

The middle column is a potential response to the ICANN Org proposal. And then the additional notes discussion column is for working group members to note disagreements, suggestions, etc. And I believe there's already been at least one suggestion or question and we'll touch on that quickly when I go through this.

But the first key analysis point is one of those terminology updates that I mentioned. So the ICANN Org team notes that in section 1A 1.1, the term administrative contact is included. And we noted in a potential response that the recommendations are obviously in a tentative state right now, but in the recommendations that the

group has discussed so far, rather than use the term transfer contact, the group is using registered name holder so that there's no confusion, and there's no more reference to administrative contact because that term is obsolete. So that's number one, is just noting that administrative contact will be removed throughout the document or throughout the language of the transfer policy.

Similarly, section two notes the transfer contract and as those of us who are familiar with the transfer policy note, there is a reference to a transfer contact, which is either the registrant or the admin contact. Again, because the admin contact is a field that is no longer going to be required for registrars to process, that needs to be updated or the definition of transfer contact needs to be updated.

So here, we note that this group and its recommendations to date has been using the term registered name holder consistently to make clear that it's the registered name holder that would approve a transfer or request to transfer, etc.

So similarly, point three, you're noticing a pattern here, there's another mention of administrative contact. And again, as I said before, thus far, the group is not recommending any use of the term administrative contact going forward in any of its recommendations as that's no longer a required field to be collected.

Item four talks about the Transfer Emergency Action Contact, which is the TEAC, this language is italicized, because that is not a topic for phase 1A. So we note here that that will be deferred to phase two, we just want to make sure we have all of the items in

one place so that the group can refer back to the items that it needs to discuss at the appropriate time.

Item five is one that we should all be quite familiar with at this stage, because it deals with the issue that was noted in the temporary specification, that it might not be possible for the gaining registrar to send a gaining form of authorization to the registered name holder because it may not have access to that information in the publicly available registration database.

So in lieu of that, we note here that the working group is recommending, at least as of right now, the elimination of the gaining FOA. And we noted also that as of right now—and again, the group is going to go over their recommendations again, that the group is recommending elimination of the losing FOA as well. But in lieu of that losing FOA, the group is proposing to introduce some new required notifications and also some additional security around what used to be the AuthInfo code is now the transfer authorization code.

And I don't want to read through all of this and bore everyone, but I encourage you all to read this text and see if you're okay with the proposed answers to these questions. Items six and seven are italicized. Those are for phase 1B that deals with the change of registrant. So we don't need to discuss that now.

Item eight deals with again outdated terminology. There are some references to WHOIS. WHOIS is now an outdated term, as most of us know. And the suggestion is to replace current references to who is to RDDS. So that is the proposal here.

In item nine, it's similar. It goes through more terminology updates. There are some terms using the transfer policy, WHOIS data, WHOIS details and publicly accessible WHOIS. The proposal from the ICANN Org team was to change those terms to registration data and RDDS.

I note to the right you'll see a comment from Sarah about where these terms come from. RDDS and registration data are terms that are currently defined in the registrar accreditation agreement, so that it would be consistent with how that is applied in that agreement. That's the idea here.

That said, the actual definition may change slightly because that's part of an ongoing negotiation. But the idea there would be just remove references to WHOIS and make the terms consistent with what's in the registrars' agreement. And I highlighted that in orange as that is a question of does the group want to recommend those changes?

And item 10 was just a note that back in June, prior to when this working group began meeting, there was a proposal at least from—I believe it was the technical ops group that rather than going through specific terminology changes and specific requested changes from the transfer policy status report, that perhaps the working group could just do a wholesale review of the transfer policy and start from scratch and blow the old one up.

We noted here that the approach the group has taken has been a bit flexible in that in some cases, there are simple updates that can be made. And in those cases, those would be suggested directly. In other cases, a whole new approach is taken. But either

way, the group has been methodically reviewing its charter questions and proposing answers as it sees fit and recommendations as it sees fit.

So that is the document at a high level. Again, I encourage everyone to read through it and ensure they are okay with the proposed potential responses, which is the middle column right here. And then if you're not, or you have some concerns or questions, feel free to add them as comments or into the additional notes discussion section of the document. So I see there's at least one hand raised and I will turn it back over to Roger. Thanks, Roger.

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

THEO GEURTS: Yes. First, I think I'm agreeing with everything here, looks pretty good. Thanks for staff pulling this together. Seems that we are on track on the EPDP recommendations.

On section five however, that language with respect to the losing FOA, it's the working group observed that it is still possible for the losing registrar to send a losing FOA. I'm not so sure if we can say it as it is drafted now.

I mean, I personally do not agree with it. I mean, for me, it's most likely in violation of articles [40 to 44] of the GDPR. But regardless of what I'm thinking, I think if we put this language, if we keep this language, that it might turn into a red herring, and during the

comment session, people will try to sort of bring back the losing FOA. And I don't think that this group should be spending any more time on it. So I'm just flagging that as a potential issue. Thanks.

ROGER CARNEY:

Great, thanks. Okay, I see a lot of comments in chat about how great this document is now concur with that this is well put together, easy to read, easy to follow. And it does create a nice little checklist for us as we go through our work to see that we are touching on all of the items out of Rec 27, specifically the wave one report.

But does anyone have any questions or comments? Similar to Theo's, he brought up this [inaudible] here. Does anybody else have anything immediate? Again, as Caitlin said, I think everybody should take some time and read through this and agree to it. And if they don't agree to it, throw some comments in about what isn't quite right, or questions that you have, before we actually post these to the responses to these specific items. Jothan, please go ahead.

JOTHAN FRAKES:

Thank you. So I wanted to clarify, I think that the CPH TechOps, I'm the co-chair of that group so I want to just clarify, I think we're talking about the letter that was kind of born into the temp spec where we were identifying how FOA needed to be changed in order to overcome the sweeping impact of the GDPR

consequences causing widespread redaction and dealing with articles 40 through 44 of GDPR, etc.

I just wanted to clarify that that we're talking about when we say CPH TechOps said start over or start anew or just start from scratch, was that in reference to the FOA temps spec letter and dealing with the losing FOA, or was that in reference to some other context? Thank you.

ROGER CARNEY:

Great. Thanks, Jothan. I don't know if Caitlin has that detail on exactly what that was referring to. I honestly can't remember, Jothan, if that was exactly that spot. It's been a while since I read the TechOps paper. Caitlin, do you have any further on that?

CAITLIN TUBERGEN:

Thanks, Roger. Thanks, Jothan. I think that there were some comments that were received in various fora that—and not everyone was of the same opinion, obviously. There were even some responses in reference to the registrar survey that went out part of the transfer policy status report that there were some registrars advocating for, “Can we just completely start over? We hate the transfer policy.”

And so when we were putting together the charter questions, in response to the feedback that we had received, we had allowed for that, that the group could look at the TechOps proposal, but they could also propose, let's just look at what's broken and start over rather than trying to piecemeal the existing policy.

But I think ultimately, the direction of the group has been to look at the existing language but not foreclose the opportunity to make sweeping changes to it if the group deemed that valid.

So I don't know that we need to spend more time on point 10. That was just what the group had heard back in 2019. And the situation has changed since then. So again, I don't know if it's one specific reference. I think it may have been in reference to some of the comments that we received in response to this survey. But of course, those were comments from individual registrars and didn't represent the stakeholder group as a whole or the TechOps group as a whole.

ROGER CARNEY: Great, thanks, Caitlin. Jothan, did that help?

JOTHAN FRAKES: Oh, yes, absolutely. And as I mentioned in the chat, I'm not really triggered about this. I just want to make sure if we're citing that TechOps said this, I just want to make sure that we had an opportunity to vet that and what we're referencing—just as co-chair.

ROGER CARNEY: Okay, great. Thanks. Any other comments, questions on this initially? Again, I encourage everybody to take a look at this and specifically read down that middle column to make sure you agree or disagree. Like Theo pointed out, maybe some wording difference would help with that. If Theo has any thoughts on that,

he can drop those in on the section five as well. Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. Hi, everyone. So we were just back channeling a little bit on the staff side. And to Theo's concern about the losing FOA language, what we can do is go back to the draft recommendations on losing FOA and just make sure that the language referenced here parallels language in the recommendations itself. And then we'll have another opportunity coming up pretty soon to look at those losing FOA recommendations again and make sure that they are indeed what everyone thinks they are. So rather than going into detail and revisiting the intent in this section, we'll just make the text clean and consistent and make the recommendations themselves sort of the master copy. Thanks.

ROGER CARNEY:

Great. Thanks, Emily. Sarah, please go ahead.

SARAH WYLD:

Thank you. On that topic of making this text on screen more clear. Because I do see Theo's concern, perhaps where it says that the group is proposing to eliminate a losing FOA, that could instead say to replace it with the following messaging. So just a word idea to think about. Thank you.

ROGER CARNEY: Replace, or update or enhance something. Great idea, Sarah. Okay. All right. Any other comments or questions on this? Again, we're not done with this. So please take a look at it. Make your comments, suggestions in it. We'll get it cleaned up and everything.

Okay. All right. So let's go ahead and move on to our next topic here. These first two were great work products that the staff produced. And again, that needs to be reviewed and everybody needs to comment if they have any concerns or anything with it, or questions or improvements. So we look forward to anybody updating those in working drafts themselves.

But I think Emily is going to take us through some actual work items that we need to take a look at. She'll work through this document real quick with us. Or not real quick. However she wants to do that. But these will actually be work things that we have to get done. And a nice little punch list for us to get through some of this. So I will turn this over to Emily.

EMILY BARABAS: Thanks, Roger. Hi, everyone. So there's sort of two documents that we're going to toggle back and forth between. The first is the one I just put into chat, which is the spreadsheet. As Roger said, it's sort of a punch list of items that are outstanding at this point on the topic of AuthInfo codes.

There's two elements to the spreadsheet. The first one is items that the group agreed it would return to after talking about some

other topics. So for example, locks. And we've just sort of consolidated those so that it's easier to run through them.

And then the second set of stuff in this document, the spreadsheet is some early input from some of our ICANN Org subject matter experts, for example, from the compliance department.

The idea here is something we're sort of piloting in this PDP is to try to get input from some of our experts who will be doing the implementation side of things and the operational side of things as early as possible so that the working group can at least take that into account and think about it early on, and so we have some input already on the TAC draft recommendations, the losing and gaining FOA draft recommendations as well.

So we'll run through those, some of these don't require any action, they're just items of feedback, and some of them are a bit more detailed, and maybe raise some things that the working group might want to consider.

So again, this is a little bit of a balancing act. We've seen with some PDPs in the past that if you wait until the very end of the process to get feedback from the Org SMEs, that things come up that are harder to adjust or account for. What is the exact right point to start getting input? That's something we're sort of experimenting with, and of course your input is appreciated on that as well as we find the sweet spot.

So I think what I'll do is just start running through these items one by one, and we'll see how far we get today. Caitlin, if it's okay, I'll sort of briefly summarize the items. And then if we can pop into

the draft recommendations, folks can reference those as well. But if that's too complicated, just leave this up and folks come up on their own screens at the working document.

So if you are bringing up the TAC working document, which is here, the draft recommendations, and responses to charter questions begin on page 15. And hopefully, this text is familiar, although we haven't revisited it in a while.

Okay, so the first item is in reference to the response to charter question B1 about whether the AuthInfo code is still a secure method of inter registrar transfers. This was a piece of feedback in row four from ICANN Compliance department.

And basically, they're agreeing that the term "identifiers" is not the right term to be using in the definition of the TAC, but that they want to make sure that indeed, not only is the definition changed, but that that's reflected as well in the language of the applicable sections of the transfer policy.

So there's a fairly easy fix there. And I think it's just that we can add a sentence to Recommendation 2 where we define the TAC and simply say that relevant policy language must be updated to be consistent with this definition, which, rereading the language I realize isn't explicitly called out.

So I don't know if there are any objections to that. I think it's just housekeeping. But if there are, please drop a note in the document or feel free to raise your hand.

The next one is also regarding the response to charter question B1 and this is just stating that there's support for additional

security measures. Another SME also provided support for that. So there's no action required there. The second one was about Recommendation 1 and supporting the use of the term TAC, again, no action required.

Okay, next item is regarding Recommendation 2. This is about the definition of the TAC. And there was some concern raised by Compliance about the fact that the term designated representative is not defined. Also, there was a suggestion that perhaps the recommendations should include something that says that in the event of a dispute the RNH's authority supersedes that of the representative.

So recalling the working group had previously discussed that it didn't feel that the term designated representative needed to be defined. I don't know if that's something the working group wants to revisit at this point or if it wants to provide perhaps a rationale for why it's not necessary for the designated representative to be a defined term. Thoughts on this? And actually, maybe I'll turn it over to Roger, if he wants to do the facilitation part of this.

ROGER CARNEY:

Great Emily. Thank you. Theo, please go ahead.

THEO GEURTS:

If you start to set up definitions, you might not scope them correctly. Because we don't know exactly who all these designated representatives are. For also registrar, it becomes even more complex I suspect. So I wouldn't go there. Because I am afraid that we can be spending a lot of time on it. And even if

we do have a definition which could be very specific, does that really help us? I think it's going to be counterproductive. Thanks.

ROGER CARNEY: Great. Thanks. And I think Sarah kind of supports that as well. Theo, just something to think about. And Sarah jumped in and chat as well. And that I had not thought about prior to this either. The RNH supersede others, whoever, whatever it is, it seems like that seems logical. But people think about that, and, again, I never thought about that prior to this, but it does make sense to me.

THEO GEURTS: That is also a problem, Roger. We have no idea. Let's assume that the registrant entered into some form of contract with a designated representative, which he actually gave rights away. Then this policy would turn that around, and that would turn it into a legal mess. So I'm not sure if it should be in there. It sounds logical, correct. But I'm not 100% sure if that is the result we want. Thanks.

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

HOLIDA YANIK: The reason the Compliance is suggesting inclusion of the definition is for the reasons of implementation of this policy. When we would be investigating the cases with the registrars, we would prefer something—a language stating that the designated agent is

the party or person who is explicitly authorized by the registrant to receive the TAC in order to complete the inter registrar transfer, the similar language that is prescribed in the COR portion of the transfer policy. A designated agent is a party who is authorized to approve and complete the COR. So otherwise, for Compliance, it would be difficult to investigate and address with registrars.

ROGER CARNEY: Great, thanks, Holida. And thanks for that specific call out. Jim, please go ahead.

JIM GALVIN: Thanks, Roger. Thank you for calling out this phrase here and asking a question about it. I remember thinking about this when we were having quite some discussions about the TAC and security and principles and such in these early recommendations. And I kind of let all this go thinking that I wanted to see where everything else went in our discussions here, because even then, I wasn't sure what designated representative was.

So let me come at this from a security principles point of view and offer the following for consideration. I think that our recommendations here should focus on what we can control and our security posture has to be about what we can control and what it means in all of that.

So I think the reality is we control what's inside registrar systems and inside registry systems. And to some extent, you have a handoff that you give to a registered name holder, and the

registrant, and that is a party or an element of the system that sits right on the edge of its perimeter.

And I think in point of fact, we've proposed here in all of this, in this discussion, a lot of principles around—now the TAC is what we're calling it, because we are trying to adopt a more secure posture overall in the system. But I think the reality is the last element of this that you actually control and can have any kind of check on is the registrant. The TAC itself, once it's been handed to the registrant has been put at the perimeter of the security wall that you have and what you can control, they can do what they want with it.

The only thing that you're saying to the registrant, right, the principle overall is this TAC allows the transfer. So what you do with it, now that I've given it to you, is completely on you. And I have no control over that, and I'm not going to check anything, I don't know anything, you're going to take this TAC outside of our little wall here, our security perimeter, and at some point in the future, you're going to walk it back into the wall, you're going to bring it back in the wall on the other side. And what happens between that ingress and egress is just out of our control and something that we don't have.

With all of that in mind, from a security point of view, and from a principles point of view about focusing on what you know, what you don't know and what you control, I think that you should just remove that phrase. The right thing to do would be “or the designated representative” doesn't need to be there, your only obligation here is to give the TAC to the registered name holder, and then all bets are off. And you shouldn't try to bring anything

into the system that you really have no way to reach out to and have anything to comment on. So that's my suggestion. Thanks.

ROGER CARNEY: Great. Thanks, Jim. Other thoughts on that? Volker, please go ahead.

VOLKER GREIMANN: Yes, I mean, if we remove the designated representative from the parties that may request or receive the TAC, then we are removing a lot of currently established practices. And I'm not sure if that's 100% desirable in each and every case.

If we remove that, then that code may only be provided to the registered name holder himself. And in many cases, they have agencies, law firms, resellers, third parties that manage the domain names for them, and that provide 360-degree full-service experience for those customers.

And those providers or service providers are usually considered as designated representatives of the RNH and are authorized to act on behalf of the RNH with everything that concerns management of the domain name.

If we are now excluding transfers to that and forcing registrants to request themselves and then hand over that code to their representative, their service provider, then we've complicating it unnecessarily without adding too much security. I think I feel that we need to keep this addition in there. Thank you.

ROGER CARNEY: Great, thanks, Volker. Okay, if we keep this in here, what are the thoughts on Holidia's pointer to the designated agent part of COR? Is there something there that we can borrow from that that would help here? Can we use some of that language? Sarah, please go ahead.

SARAH WYLD: Thank you. I tried making a definition of designated representative based on what Emily helpfully provided as the designated agent definition. So maybe this is a starting point for us. Designated representative means an individual or entity that the registered name holder explicitly authorizes to obtain the TAC on their behalf. That's my suggestion. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Thinking about that, and whatever we come up with, is that just a simple footnote on the designated agent that we throw into the bottom here, thoughts on where that goes? Sarah, please go ahead.

SARAH WYLD: Thank you. Two questions. One question. Just remind me, will there be a definitions section? Are there usually definitions in the recommendations? Or does that just not happen until the policy part? I think maybe the latter.

And then my second question was going back to the order of who supersedes whom? Maybe that goes in the definition also, so that that sentence could be like in cases of conflict or when questions, the RMH has authority, something like that. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Okay. Yeah, and maybe staff can answer that. Obviously, we're defining TAC and everything right here. But I don't think we have a specific section for at least initial report anyway, on any definitions outside of defining TAC. Emily, please go ahead.

EMILY BARABAS: Sorry, Roger, I was just going to put it in the chat. That's correct. At this stage, we don't have a full list of definitions. And to the extent that we're creating definitions, we can do that in line in the recommendations for now. Thank you.

ROGER CARNEY: Thank you. So Emily, I think, yes, we want to work on something here. And maybe we can borrow from the COR—from what Sarah threw in chat here, and at least start there. And then we can see how that works out. But I will turn this back over to you, Emily. So you can continue.

EMILY BARABAS: Thanks, Roger. And it sounded like perhaps that we would not necessarily put in text about the RNH's authority superseding that

of a representative. Or should we put some draft text in there as well for folks to consider?

ROGER CARNEY: Thanks, Emily. I think let's hold off on doing that, because I think we had some pushback, and we'll see what comes out as.

EMILY BARABAS: Sure thing. So the next item, there's also in reference to recommendation two. And one are the SMEs suggested that recommendation specifically referenced who is using the TAC. And I think based on this discussion, also the previous discussions that we've had, the working group explicitly decided not to specify in this recommendation who was using the TAC but rather to specify what the TAC does as a token. So I don't know if anyone wants to revisit that or feels that it's necessary to discuss further, but that was an item that was flagged. Thanks.

ROGER CARNEY: Great, thanks, Emily. Thoughts on that? I think that we had pretty good reasons why we didn't want to call out—we wanted the—the basis that the TAC was that one key and that one key was all that was needed. So thoughts on that? Again, I think we have good reasons behind that. But obviously, with our colleagues bringing it up, any thoughts from the group on that? Sarah, please go ahead.

SARAH WYLD: Thanks, Roger. I think this one is good as is. Thank you.

ROGER CARNEY: Great. Thanks. Any other comments on this? Otherwise, I will go back to Emily, and she can continue. Jothan, please go ahead.

JOTHAN FRAKES: Thank you. So putting in the TAC does in fact create an approval for lack of better term, but there is still the five-day waiting period and the acknowledgment so you can manually acknowledge, and that really is what I think totally approves the transfer.

ROGER CARNEY: Great. Thanks, Jothan. Okay. Emily, I will turn this back over to you.

EMILY BARABAS: Thanks, Roger. So the next one is probably a pretty meaty one. This is on Recommendations 3, which the group agreed to revisit after going through some of the other topics and this is about security requirements for the composition of the TAC.

So for example, example length, syntax, entropy value and so forth. The current text of the recommendation notes that ICANN Org should establish those requirements based on current applicable technical security standards. And as you'll recall, the working group had previously discussed whether a specific RFC referenced here, that's RFC 9154, should be referenced.

And I think that the Registries Stakeholder Group representatives had an action item to bring that back as well and see if there might

be some alternative text that might be appropriate for this recommendation.

There was also some feedback, of course, on how those requirements have changed over time. And then there's been subsequent discussion about whether the concept of a randomly generated value should be referenced. In general the RFC has covered quite a lot of ground. So sort of figuring out the balance between what's captured in the text of the recommendation, versus the standard itself and sort of referencing alone is something for the group to discuss a bit more.

And then there were two feedback items from ICANN Org on this particular recommendation. The first one was from Compliance and Compliance noted that it wasn't immediately clear to them who would establish those requirements within Org and how those requirements and any changes would be communicated to contracted parties, which again, was something that the working group had discussed as well. Compliance noted that they don't have the technical knowledge to establish those requirements or determine whether they're appropriate, and that in order to enforce them, the policy would need to be clear about what the requirements were.

And then one of the other SMEs mentioned that perhaps one of the sets of requirements that are listed as examples should include security requirements for data at rest. So that's another suggestion of something that could be included in the text of the recommendation. So Roger, I'll leave it to you. I think this is one that may need some discussion from the group. Thanks.

ROGER CARNEY: Great. Thanks, Emily. Yeah, and again, as Emily pointed out, we kind of left this, we tweaked the language a couple of times here and there but we knew we would have to come back to this. And I am not sure that we spent a whole lot of time coming back to it. So here we are.

So yeah, I think that we need to make sure that this wording works. I think it says what we wanted to say, but are we being precise and clear enough for moving forward? And as ICANN Org has kind of shared with us, it could be improved, and we knew what we wanted to take a look at it.

And Emily mentioned that our registry members [inaudible] on this that they wanted to do. Yeah, thanks, Sarah. And I think Sarah's comment in chat was what we've heard when we talked about it, ICANN Org setting this and they themselves saying that that's kind of a stretch for them to do, maybe be a little more explicit. And Jim throwing in another RFC, which I'm not sure what 4086 is. Jim, please go ahead.

JIM GALVIN: Yeah, thanks, Roger. So yeah, I'll take ownership of not having closed with registries on the technical details about the TAC.

ROGER CARNEY: I was going to blame Rick since he was the new guy.

JIM GALVIN:

Well we could, you're right. I like making IoT Rick's fault. That works for me, I'll just duck. But, yeah, in the document that Rick had given, the previous RFC, that is already flagged here by staff and had been collected, and I just gave another one. The difference between the two is the document that Rick had put out there was a discussion of how to handle a better TAC using EPP.

So it's a proposal for how a registrar and registry could communicate a better TAC because the current EPP element doesn't accommodate the things that we'd like to do. So that's what's in there.

The document that I gave there is a long running document. It's been updated a couple of times, it's the best current practice on how to create a random number. And it's really important and really useful.

So it's also something to capture because it feeds into when you go in to create your TGAC, we had talked before about the fact that you need a randomly generated value which meets certain characteristics.

And that document there gives the source of how to get randomness when you're in software. And then you have the EPP document, the other one for how to transfer them.

I will take it on with Rick so that he can share half the blame in the future, I'll just volunteer him to make sure that we close the loop with the registries on the issue of the syntax and how to transfer and exchange the TAC. That was the open question from earlier. So we'll come back with that so this group can deal with that. And

then also the security requirements for storage, which is all part of that, too. So on the registry side, and we'll get consensus there. Thanks.

ROGER CARNEY: Great. Thanks, Jim. And I think Sarah was kind of saying the same thing but on the registrar side, but I'll let her talk. Sarah, please go ahead.

SARAH WYLD: Thank you. Yes, basically the same thing. I apologize. I had intended to have some discussions with some of the more techie folks at my own organization on this topic. And I forgot, I'm very sorry. So I want to take this back to my internal team. And also, hopefully, we can get this on the schedule of a Registries Stakeholder Group meeting, although as I'm saying that, Jothan, we have a TechOps meeting tomorrow. And I wonder if this is a TechOps topic, because this is about sort of more technical security standards. So that's it.

But anyways, Roger, I think if it's okay, more time to think about how to solve all this would be good. It was very helpful to hear that ICANN Org is not super comfortable with how they could take this on. Because I think that might also be my next question, would be, is there a team within ICANN that sets technical security standards? But I kind of think the answer to that is no, that's what we have all this IETF stuff for. So thank you.

ROGER CARNEY: Great. Thanks, Sarah. And I appreciate Sarah calling out Jothan, because I was going to do that next. So Jothan, please go ahead.

JOTHAN FRAKES: Well, I picked the right date to be here. So as far as TechOps goes, I think we could certainly add this. I definitely know it would come up in the context of the transfer team review. And I think it would come up in the course of the discussion around reg ops.

I would not have set the expectation with this group, though, that the TechOps—it is CPH TechOps so it's combined registry, registrar TechOps. So if we were having something that you wanted to have an official “registrars say this” stamp on it, that would need to get circulated with the registrars as a dialogue in our next Registrar Stakeholder Group meeting, which is in two weeks at the soonest.

So I'd want to make sure that we either combine or compose a small team that can address this, but I think it's a good place to start circulating this. So could we not make a formal decision on this? Or at least leave room for that discussion to have transpired inside of the registrars, as well as in TechOps, would be my ask here. And absolutely, we'll cover it tomorrow in the TechOps meeting. I think we have the OCTO coming in to talk about what the SIFT program is. So we have about a half size typical meeting, but it should be in well attendance. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. Thanks, Catherine. Yes, Jothan, and I think the issue is here we're running into a little bit of time as well.

I mean, obviously, I think that the formal stance here is yes, we have to update this. And how we get that done through TechOps, through stakeholder group, we have to be fairly [expeditious] so that we get it done in a time where we can get it document and then everybody else can review it so we can get it put out.

So if we're taking a couple of weeks [inaudible] a good solution here, that's great. We can't really take another month on this, though, to get it answered.

So let's take the next couple of weeks and let's see where we stand. And hopefully, everyone here, Jothan, Jim, Sarah comes back and says, "Yay, we've got the solution and it's perfect. Here it is." But yeah, I definitely support taking it back. Those are the perfect groups to do it. And Jothan actually mentioned the reg ops, which is going to be a sad timing problem for us, at least here initially, but something to discuss for sure there and providing maybe comments to the public comment period. Thank you. Jim, please go ahead.

JIM GALVIN: You forgot to include Rick Wilhelm.

ROGER CARNEY: Oh, yes, everything's on Rick's back. Okay, I'm sorry, I did let time slip there. We're a couple minutes past. But I appreciate the conversation. Thank you. And we will start back up here next week. And again, we'll skip this, we'll get to starting on the next one. And hopefully even by next week, maybe we'll have some updates from that group. So thank you, everyone. Bye.

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 great rest of your day.

[END OF TRANSCRIPTION]