
ICANN Transcription

Registration Data Accuracy Scoping Team

Thursday, 27 January 2022 at 14:00 UTC

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TERRI AGNEW:

Good morning, good afternoon, and good evening. Welcome to the Registration Data Accuracy Scoping Team taking place on Thursday the 27th of January 2022 at 14:00 UTC.

In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room. If you're only on the telephone, could you please identify yourselves now? Hearing no one, we have listed apologies from Alan Greenberg and Thomas Rickert.

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

All members will be promoted to panelists for today's call. Members, when using chat please select Everyone in order for all

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to see the chat. Observers will have View Only to chat access. All documentation and information can be found on the Wiki space. Recording will be posted on the public Wiki space shortly after the end of the call. Please remember to state your name before speaking.

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

With this, I'll turn it back over to our chair, Michael Palage. Please begin.

MICHAEL PALAGE:

Thank you, Terri. Good morning, good afternoon, good evening, everyone. Keeping with the theme that I started last week about wearing an old ICANN t-shirt, right now we are wearing ICANN58 which was Copenhagen. I am hopeful that this group will be able to meet in person, face to face, before we conclude our work. And with that, let's dive into the chair update and administrative statements.

One of the things that I discussed this week with our ICANN Org colleagues is to begin working on the write-up of Assignment 1 and Assignment 2. If you recall, it was originally our target date to have Assignment One and Assignment 2 completed by the end of January. Obviously, that did not happen. There was some slippage. So what we are doing is, we want to be mindful that we at least meet the stated delivery of having Assignments 1 and 2 to the Council before ICANN73.

With that in mind, I have asked ICANN Org to begin preparing a compilation of Assignment One. And hopefully, over the next couple of weeks as we wrap up the Gap Analysis, we will be able to meet and deliver on Assignment 2. Once this write-up ...

And again, we're being very careful. We're not calling it definitions or explanations. I am asking ICANN Org to synthesize the discussions that have taken place. I think we are close on Assignment One, but I do believe and am hopeful that we will also be able to make similar progress on Assignment 2 over the next coming weeks.

So with that, before we jump into the Gap Analysis, are there any questions/comments on that proposal there? Seeing none, I believe we will now hop on over to our Gap Analysis. And hopefully we'll be able to complete that today. And Marika, if you could remind me, where were we at with the Gap? Who do we have left?

MARIKA KONINGS:

Yeah. Thanks, Michael. The new information that we have on a new edition that is included—and you see on the screen here—is from the BC. I don't believe we have done a run through of that one yet. I think on our previous meeting or one before last, maybe, we also had some questions that were answered by the GAC Team. I don't know if there was any further follow up that they wanted to do or if there were any other questions that team members had. But the main, new information that was added since our last review of the Gap Analysis is the input provided by the Business Constituency.

MICHAEL PALAGE: Excellent. I do see that we have Susan on from the BC. Susan, are you prepared to walk through the Gap Analysis at this time?

SUSAN KAWAGUCHI: Sure.

MICHAEL PALAGE: Okay. You have the floor then, Susan.

SUSAN KAWAGUCHI: It's all in front of us, so I will not ... Maybe I'll just do a high-level review of it. But obviously, the WHOIS Accuracy Program Specification outlines all of this. Of the recurrent requirements, the BC is concerned that purposes are referenced and that even though we've been ... The purposes of the use of the registrant data has been discussed for years, we still do not have agreement on that in the community.

And the second paragraph there is a statement the BC has made in many documents, many comments. "The inability of Internet users to identify with whom they are doing business with online, and the increasingly pervasive inability of law enforcement, cybersecurity, and legal professionals to identify criminal actors online through their domain name registration data, severely undermines the security and stability of the Internet."

That is a statement that we've used in many comments, and we continue to be concerned. I think the current goal is to enforce the

existing policy. There's limited enforcement of the current accuracy requirements and it requires reporters instead of proactive enforcement. So I don't know if you want to stop and if there are questions on that.

MICHAEL PALAGE: I would think that would be a good time to stop. I seem Steve Crocker, you have your hand raised. I have also seen some comments in the chat from Sarah. So perhaps, Steve, you have the floor. Good morning.

STEVE CROCKER: Good morning. And thank you. Susan, thank you very much then the comments.

Two questions with respect to the point that you're raising here. Volker responds in the ... And sorry, Volker, for taking this on, but it all fits together into one composite point, in my view. Volker raises the point that rather than trying to get the information about who you're dealing with through the domain name registration system, rather it should be on the website.

I have a slightly different suggestion as well which is, given that this has been a difficult area for discussion for a long time, what would be your response to the idea of having a differentiation between those who make the information available and those who do not? That is, if you're trying to do business with somebody and you want to find out who they are and you ask, there are two possible answers.

One is that you either are told who they are and then they raise questions about, "What's the accuracy of that." Or you're told that that information is not available and therefore you should make your judgment about doing business with them based on the fact that they're not disclosing that.

If that aspect of the formalization of whether they made it available or not and the ability for individual registrants to choose to make it available, if that were included in the system would that change or adjust your posture at all?

SUSAN KAWAGUCHI:

If I'm understanding ... And it is little after 6:00 am in the morning here, so I please the time zone. But if someone has to proactively reach out before they make the decision on using a website that the registrant data isn't quick and easy to view—when a website is offering services that they would be taking your money, for example, or taking your information or collecting your information—I'm not sure that that would ...

Unfortunately, I think most people would just move on and go ahead and use the website. And we all know that a majority of the people do not check WHOIS information. But the registrant data information is critical for those that protect the Internet to understand. So I'm not sure exactly how that would work.

STEVE CROCKER:

With respect to the use of everyone's time here, I don't want to go too far into this, but I do think it's an interesting area and perhaps you and I can have some discussion to flesh this out. Because in

your answer, you were making a distinction, I think, between a consumer who's interacting with a website versus—the phrase I thought I heard was—“those who are protecting the Internet” which I assume you mean some different set of people who are trying to research who's behind a domain name and who's behind a website.

SUSAN KAWAGUCHI: Yeah, exactly. And, yeah, I would welcome the opportunity to do that. Maybe we could figure out a time to talk about that.

STEVE CROCKER: Thank you.

MICHAEL PALAGE: Okay, so what I want to do here is go back. Volker, your name was specifically cited. Do either yourself or Sarah want to respond to this dialogue?

VOLKER GREIMANN: I think it's interesting how, basically, the argument shifted in this brief amount of time and I think there is some value in having data for research. But basically, that ship has sailed with the GDPR, and it's not really a question of accuracy of the data because I think you can glean the same kind of information from inaccurate data that that you can from accurate data. And let's face it, those people that you are trying to research are usually not the kind of people who are giving their actual personal information out when

they register a domain name. And no matter how many roadblocks and how many barriers we put up, they will always find a way to go around those.

So the accuracy of the data, I think, is the question that we are being tasked with, and I'm not sure whether the question of the availability in the first place is actually even part of our scope or mandate. Thank you.

MICHAEL PALAGE: Sarah, do you have anything to add to that before I go to Marc Anderson? No? Okay. Marc Anderson, you have the floor.

MARC ANDERSON: Thanks, Michael. I guess I'm going to echo a little bit what Volker said. And apologies for the duplication. This seems to be a little a little off track. As Volker said, this seems to be focused on access to data and not the accuracy of the data. So I'm wondering if this is ... And I don't want to suggest that Susan's concerns are not valid. I'm not saying that at all. I'm just not sure this is on target for what our tasks are, looking at the accuracy of the data.

And this is maybe still off course, but it seems to me that, as Steve brought up, per the EPDP Phase 1 report, registrants have the option to publish their data. And for those looking to build trust and provide a mechanism for people to be able to see who's behind this in WHOIS, they have the ability to do that. That's an option under the EPDP Phase 1 report.

And something that comes up from time to time about doing business and being able to trust who you do business with, this comes up quite often and when people ask me about that, I direct them to SSL certs which is much more appropriate and targeted at being able to have a level of trust and comfort with who you're doing business with. That's much more in line with the purpose of SSL certs than WHOIS data. So I maybe want to make that point here in regard to trust with who you're doing business with online.

MICHAEL PALAGE:

Thanks, Marc. So what I am going to attempt as chair here is to try to thread together what I've heard. So, what I have heard here is, while I'm initially concerned about the scope of the BC's comments and whether that was within or outside the scope of our charter, I think I've always said that if I think there is a legitimate basis for that, I will tend to err on being overly inclusive, particularly since we are just a scoping group. We are in the information gathering stage.

So here is my attempt to thread the needle. And perhaps those people that have spoken or have commented in the chat, perhaps we could use that as a platform for additional discussion. I think what I heard from Susan was, she was talking about business and being able to know who you're dealing with. And Marc, you're correct. SSL certificates are one of those mechanisms. I am reminded, however, of a discussion I recently had with Lori Schulman about the original green paper in the white paper, and this idea of contactability.

Now again, contactability is not necessarily the same as accuracy. But one could see, I would respectfully submit, a correlation. If you don't have accurate data, it's almost impossible to contact that person. With regard to Susan's comment about doing business, Becky noted that, yes, the GDPR was a transformational change in the landscape.

However, I think back to that original Board resolution that talked about making as minimal change as possible. And as we all have acknowledged, the GDPR only applies to individuals not businesses. But unfortunately, a large swath of this information has been made inaccessible or has gone dark, frustrating some of the participants and their respective stakeholder groups within this group. So I think that's something we also need to look at.

And again, trying to thread this needle—my “Hail Mary” pass here of trying to tie this all together here—is the concept of which is going to be one of the discussions at the upcoming ICANN73 which talks about the difference between malicious domain names versus compromised domain names. And in both of those scenarios, I think the accuracy of that underlying registrant data would be important, specifically in the area of ... If someone has been compromised, you want accurate data to notify them so that they can take appropriate steps either with their registrar or with their hosting company to correct that problem.

Conversely, if it was a maliciously registered domain name, knowing what that bad or inaccurate data is or whether it was actually a stolen identity could help. So that is my attempt. Again, as chair, I was initially inclined to state that I believe that the BC comment was going to be out of scope. But for the totality of what

I've just said, I would be inclined to say that I believe this is a valid contribution on behalf of the BC.

That is my opinion. I obviously would like to hear from the group as a whole. Did I get it right or have I swung and missed? So with that, I will start with those people that have their hands up. Steve and then Volker.

STEVE CROCKER: Apologies, old hand.

MICHAEL PALAGE: Okay. Volker, you are up.

VOLKER GREIMANN: Yes, I think you missed it a bit because, essentially, this is a question of access, not of accuracy. I think we first need to ask the question and gather evidence whether there is really an issue with inaccurate data that is so huge that it needs policy work. I think if we look at the ARS results over the past years, while they were still available, we have seen a very clear trend towards more accurate data.

And now that the data is no longer visible in WHOIS, thanks to GDPR, I think accuracy has improved even more because more people feel confident in the ability to provide their actual data knowing that it won't be blasted out to spammers over the Internet for whatever uses they put to it.

I think we need to focus on the question of accuracy, not the purposes of WHOIS. I think the purposes of WHOIS are one thing. The purposes of even more accuracy, first we need to have the question answered, “Why? What are we trying to achieve with increasing the requirements for accuracy? Is there even a problem with accuracy? And unless we answer that question, I don't think we are going to get anywhere. And muddling up access with accuracy, I think, will just lead to a quagmire that we will never find out again.

MICHAEL PALAGE:

Thank you, Volker. If I could comment on that. I believe that—and this is one of the points that I specifically asked Jonathan from ICANN Org last week—prior to the GDPR, the number one complaint of ICANN compliance was accuracy. And I think that is one of the nuts that we're trying to crack. Prior to WHOIS going dark or largely inaccessible ... Marc, I know that's a term you have issues with, so I will try to refrain from using that.

But prior to WHOIS becoming less accessible—that non-public registrant data—it was the number one complaint. And now it is not the number one complaint. And I think that is one of the questions we need to discuss. That is why I believe I am hearing from certain participants within this group that want it addressed as part of this Gap Analysis so that when we as a group go to Assignments 3 and 4, they can perhaps look at what studies, or what work or remediation, or what can be done to further look at it.

That is what I am seeing and what I am hearing. And I understand that participants in this group may not be aligned. Again, my job is

chair is to make sure that all voices are heard and that we properly document that.

Volker, to your comment about “not so huge,” of the things I would like this group to do is to prevent some of the, I would say, oversight in the current ODP and ODA where ICANN now is going to be in a position to make a cost-benefit analysis on what is in the public good or not in the public good. If we, in fact, can document this sooner as opposed to later ...

When the GNSO considers this as a potential policy, if there are recommendations, and if ICANN Org needs to do implementation work, I think we would be doing our best service to the community by documenting and doing as much fact gathering sooner as opposed to later.

Melina, you have the floor.

MELINA STRONGI: Yes. Thank you, Michael. You covered, already, some of the points that I wanted to make. Just some remarks. [inaudible].

MICHAEL PALAGE: Melina, did we lose you?

MELINA STROUNGI: [inaudible]. Do you hear me well?

MICHAEL PALAGE: I lost you there for about—

MELINA STROUNGI: Hello?

MICHAEL PALAGE: —15 seconds. I don't know if anybody else did. Or is that just me?

MELINA STROUNGI: Can you hear me now?

MICHAEL PALAGE: I can hear you now.

MELINA STROUNGI: Okay. Please let me know if I disappear again. So yes, I was saying that I don't believe that we can see accuracy as something distinct from the purposes as seems to be the suggestion I heard from Volker. You have to see this holistically. You have to take into account the purposes when assessing accuracy.

So for instance, as someone rightly pointed out, you have the context of contactability. You have to assess whether the data are accurate to serve this purpose. So you can't cut out from our discussion the whole discussion on purposes. I mean, this is precisely also covered in the GNSO Council instructions that, among others, we should take into account the PDP identified

purposes. So not limit our scoping efforts to these purposes, but take into account, among others, also those purposes.

So also, coming from an institution that has proposed the GDPR—and this my personal view—I feel it's really, how to say, unfair and not accurate to blame the GDPR for the lack of flexibility. I mean the GDPR is a regulation that was set to put into force certain safeguards with regard to data processing. So it is not there to prohibit data processing. And it only relates to natural persons. The majority of data, as part of my knowledge and based on reports that I have read, concern data of businesses. So really, I fully understand that the GDPR has certainly brought some changes in the structures and there are safeguards that need to be taken into account, but we should really stop bringing this argument because it doesn't really help advance our conversations. And also, it's not accurate.

And also, in relation to arguments like, “Hey, is there any evidence showing that there is an accuracy problem?” I mean, there are plenty reports. We also, in our Gap Analysis, have referred to one of them that indicates that there are high rates of inaccuracy reported. So we don't make this up. There are complaints that we receive, so it's the reality.

But because we hear this often ... And also, again, I don't think it's quite constructive. I mean, we're also happy to see any evidence from the other side showing and proving that there is not a problem because we don't have access to this data. And this relates to the point where access and accuracy are also kind of linked. So you cannot see the one without looking at the other.

So I will stop here because I made a lot of points. Thanks.

MICHAEL PALAGE: Thank you, Melina. Marc Anderson, you were next in the queue.

MARC ANDERSON: Thanks, Michael. Sort of a lot to unwrap there. I raised my hand to respond to the first bit from Michael. So apologies if this a little bit of an old hand at this point. But I was part of the EPDP Phase 1 Working Group involved in establishing the purposes. And the purpose on contactability was a key purpose and an important one. And that's been established. Right? And to Melina's point, that is something that is part of our work and shouldn't be separated. I don't want to speak for Volker, but I don't think he was suggesting that we should separate that out. But again, there's a huge risk in me trying to speak for Volker.

But I do think it is part of our work and part of our considerations. And going back to Michael's point, if inaccurate data is hindering contactability, I would see that as a problem and I would see that as in scope of our work. On the other, reopening the discussions on contactability and access to the data, I would see that as outside of our scope. That work has already been done. Right? From Phase 1 there's an obligation for registrars to provide a mechanism to contact the domain owner, the registrant. They have an option. That can be a web form or an e-mail link. So that is an important policy decision that's already been made. So revisiting that, I think, is outside of our work. But like I said, if

there's inaccurate data that is preventing that contactability, that is a concern.

So Michael, to your previous question about threading the needle, I hope that helps with where my view is on that and what I think is and is not in scope.

I'll also point out ... And thanks for recognizing my distaste for the term " WHOIS has gone dark." I'll remind everybody that there's quite a bit of data that still exists in WHOIS, including this contactability mechanism and having an abuse contact. There's a requirement for all registrations to have an abuse contact posted as well.

MICHAEL PALAGE: Excellent. With that, hopefully, Susan ... Answer #1 actually stimulated a good discussion. Hopefully, you've been able to get your tea or coffee, and you now have the floor to continue summarizing points 2, 3, and 4.

Melina, is that an old hand, before I proceed?

MELINA STROUNGI: Yes, sorry.

MICHAEL PALAGE: No problem, Susan, you have the floor.

SUSAN KAWAGUCHI: Yeah. I just want to make one point on the contactability. We're working on the Temp Spec. Right? That's what we're working on [inaudible]. Right? EPDP is not an implemented policy. I'm on that IRT. So the contactability that might occur in the future is [inaudible], maybe. But right now all you have is, for the most part, probably 40 to 50% of the registrations that I look at—the WHOIS records, the redacted data—you send it to the registrar.

If you want to contact the registrant, you're contacting the registrar and you're just hoping and praying that they actually forward that. And there's no mechanism in place right now to have any sort of idea of whether it makes it to the registrant. Sometimes, if a registrar feels nice, they will tell you, "We forwarded this." Other times you know it's gone through because it hasn't bounced back. But other than that, it's a black hole. Which could be true if you had an e-mail, too, for that specific registrant.

But right now, as of today, there is no ... The contactability is in a dire situation, in my opinion. Maybe we'll have a EPDP implemented in several years. Maybe not. But in the meantime, we're going to have, my guestimate is seven years of very limited contactability before this policy is in place. So that's my personal viewpoint on that, too.

MICHAEL PALAGE: Susan, I have a question for you. Over-under, Elon Musk lands humans on Mars or we implement the Temp Spec?

SUSAN KAWAGUCHI: EPDP, you mean? Implement [inaudible].

MICHAEL PALAGE: Yeah. Which one's going to get done first?

SUSAN KAWAGUCHI: I have faith that the ICANN community will implement first.

MICHAEL PALAGE: There you go. I guess I'm betting on Elon. Beth, you have the floor.

SUSAN KAWAGUCHI: And Sarah, I didn't acknowledge that. If you want to have that discussion about a web form, we can have that discussion. But don't put words in my mouth, please.

Okay, let's go to 2.

MICHAEL PALAGE: Wait. If I can, Susan. I see Beth with her hand up and she usually puts it up and takes it down. So I want to call on her before she takes it down. Beth, you have the floor.

BETH BACON: Thanks. So, Susan, I don't want to say that ... I'm not saying that the contactability as you described it couldn't be an issue, but I think that it's not an accuracy issue. It's an access issue. And as you say, the discussion of a web form or whatever ... It's a

separate discussion. This is about accuracy. I just don't think that ...

And while I'm not denying the connection between them, seeing that in order to e-mail someone, you need a name e-mail. But again, I think that description is of different problem, not accuracy which is what is in scope for what we're talking about.

So I don't think that anyone here is saying that it's not a problem or that it's not an issue or that we we're not and haven't tried a lot of things to fix that and we couldn't try more. But it's an access and disclosure issue and not an accuracy one. So I just wanted to draw that that particular connection. And very much appreciate everyone's input.

SUSAN KAWAGUCHI:

Thanks, Beth. And unfortunately, I just cannot disconnect the inaccuracy issues that we have and way you would need accurate information, which goes back to that statement from the BC. Yes, we're talking about in accuracy. But the reason we're talking about any accuracy is because there is a dire need to be able to use that information and know who you're dealing with on the Internet. And unfortunately, that is the BC stance. I mean, this was approved by the BC. I can't walk away from that. And I fully believe it.

So let's move on to 2. Accuracy should be measured by ICANN Org. We think resuming the ARS would be a good start. People are constantly asking for data. Well, the last study that was done was over a decade old, the NORC studies. And it would be very helpful to initiate another study.

As a member of the RDS Review Team, I pulled out a comment from that report. And you could go read the analysis in that report. I put the subsection in. Even with the ARS, there was still between a 30 to 40% inaccuracy rate. That came out of ICANN. That was their numbers, the data that we analyzed in the RDS.

And because there still isn't a decision on which entity or entities is a controller of the data, the BC thinks that this has impacted any actions of review for accuracy.

It also is very ... And this is a side comment and not in scope. But because we don't have that agreement, we can't even implement the first report for EPDP.

MICHAEL PALAGE: If I can just ask one qualifying question there about the, I believe it was [NORC], the group from Chicago. I believe they did a report well over a decade ago, but I do believe the ARS was being done twice a year. And I believe it was following the recommendation from [NORC]. So just from a factual standpoint, I believe the ARS was being done twice a year up until, I guess, 2018. And if there is someone from ICANN Org, or Volker, if you can confirm that.

SUSAN KAWAGUCHI: Yeah. I can confirm that. Yes.

MICHAEL PALAGE: Okay, good. I just wanted to make sure that ICANN was doing stuff, the ARS, twice a year up until 2018. And that "decade" thing

just kind of piqued my interest. So I just want to make sure the record is accurate on that.

Are there any comments or questions from the group in connection with Susan's #2 statement? If not ... I see no hands, Susan. You are free to move forward with point #3.

SUSAN KAWAGUCHI:

Okay, the goals that have been overlooked. So in reading the GAC responses, the BC is very aligned with their goals. And so I sort of cheated here and copied their goals in. But I want to make sure everybody understands that 1, 2, 3, and 4 are all from the GAC response.

"The BC believe that for each disclosure, the registrar should be responsible for validating the registrar information immediately before disclosing, along with providing the dates of when the data was previously validated in the history of the registration."

And to be honest, I don't know how practical that is, but I do know that we had this discussion in previous calls about providing the dates of when it was validated. And maybe we're off track here, to be honest, because maybe this is done much more frequently than it appears.

Also, "Privacy Proxy registrant data should adhere to WAPS. Some registrars have been known to provide the disclosure of the registrant data with the caveat that the registrant data from a proxy registration is delivered with a disclaimer that the information may not be verified." It may not be accurate.

So as you can understand, that could be a frustrating situation that in requesting the data—and here we are back to disclosure and display—it gets back to that the data that they've collected and restored and relied upon, they're stating that it may not be verified and accurate.

MICHAEL PALAGE: If I could there, real quick. Before you move on to 4, I do Sarah. Sarah, I see your hand up. You have the floor.

SARAH WYLD: Thank you. I have a question. Just a question. I think what I heard from Susan was a suggestion that data should be validated immediately before disclosure. So I'm just thinking practically so that I can try to understand, I guess, the goal or intent here. And I'm kind of wondering if the intent there was validation, like the data in the fields are formatted correctly, or if the intent there was verification that the data is accurate.

And if that's the case, I wonder if that would delay the disclosure process because the registrar needs to go do something else to reverify or revalidate the data before completing the disclosure. Is that a thing that has been considered? Is that a thing that the BC would be interested in? Or would it be better to prioritize the turnaround times on those disclosure requests over building in a delay to revalidated? Because, especially if we're thinking about verification where the domain owner does have a 15-day period to respond, it seems like that might be unnecessarily delaying the disclosure.

So, of course I know we're Scoping Team. We are not setting policy here. But I just wonder what the thinking is around that kind of question. Thank you.

Oh, yeah. And that's a really interesting point in the chat, that that would perhaps call attention to that. Yeah, thank you.

SUSAN KAWAGUCHI: As I spoke to that point, that was something that sort of came up with other discussions from other review of other members' Gap Analysis. So that is not a ... I admit that would not be completely thought out on the BC's part.

But right now, I think the policy will say you have 30 days to respond. So in 30 days, it seems like you could, at minimal, go, "Hey, yes, we validated this, verified this X date that's been within the last year, so we know" or "Go out and check it. Do that. Check again." Because 30 days is a long time.

But that this a good point that it may draw attention to the domain and the registrant. And cybersecurity might not agree with that, so it would be something that we could discuss.

MICHAEL PALAGE: Okay. With that, Susan, if you want to address #4. And then we'll be done.

SUSAN KAWAGUCHI: "In support of the GAC's overlooked goal, #2, the BC highlights the development of NIS 2, here EU lawmakers are seeking to

address gaps in accuracy requirements. NIS2 directs EU member states to ensure that registrars, registries, and privacy/proxy services have publicly available accuracy policies and procedures in place. Recent versions of the legislation also propose standards for accuracy verification processes, including a 'best efforts' approach."

And before anybody really starts to discuss this, I'm going to make the admission that I have not been following NIS 2 that well. I have some talking points given to me by Drew Bennett, but this is something that others in the BC found very important. So questions I may not be able to follow. If you have questions or concerns about that, I may have to get acknowledge to you on those.

MICHAEL PALAGE:

So with regard to that, again, I do think tracking that perhaps is a Gap Analysis and whether we have ... Also, DSA was a rather close vote. I think 308/309 to 22. There were requirements in DSA as well, in addition to NIS 2.

I think, like other chairs have done, I will take note of this. I believe both DSA and NIS should be going to trilogue later this year. I don't want to use a lot of time at that right now. I'm noting that it is possible that will have greater clarity in the next couple of months, and then that would be more appropriate in Assignments 3 and 4.

So that is how I'm going to try to thread the needle, be fair, accurate, and follow the precedent of other chairs in dealing with perspective legislation. Is that a fair comment, Susan?

SUSAN KAWAGUCHI: Yeah. I'm find with that.

MICHAEL PALAGE: Okay. I just want to make sure. So with that, we now have completed the BC Gap Analysis. Thank you again.

I just want to go back. And Melina, I know you'd had to leave early the one day. Do you believe that you have been able to answer all of the questions? Is there anything outstanding that you feel that you need to state regarding the GAC Gap Analysis? If not, if you feel that you're done, that's fine and we can move on to our other homework with the ARS.

MELINA STROUNGI: Thank you, Michael. I believe we didn't have ... And please correct me if I'm wrong of if I was not present at the meeting... But I believe that we did not have the opportunity as GAC to really present our input and it was just discussed in a meeting where we were absent. But please correct me, again, if [inaudible].

MICHAEL PALAGE: Well, yes.

MELINA STROUNGI: Yeah. So this is my understanding. And then ...

MICHAEL PALAGE:: Yeah, so what—

MELINA STROUNGI: Sorry, go ahead.

MICHAEL PALAGE: Yes. If I could answer that. Yes, what happened dis, I believe, one of the alternates from NTIA—I believe it was Kenneth—did sit there and did his best to present. I facilitated in reading. So, yes, that did take place. I believe it was right before the Christmas break. I believe you were already on holiday. There were some questions, and I believe you were addressing some of those questions.

I just want to make sure before we conclude this portion of our Gap Analysis that you feel that GAC has been able to respond to all questions/concerns.

MELINA STROUNGI: I believe not. Last time I think we had started responding to some questions received in relation to Question . If someone can scroll, maybe, to show the GAC text.

MICHAEL PALAGE: And Marika, I do believe Terri perhaps memorialized some of those questions that were raised. Is it possible if we could pull that up from out notes from that meeting? I believe one of the last meetings of December.

And just a note to everybody, just a reminder of what great work our ICANN Org colleagues do in documenting everything and how this could all be easily accessible via the Wiki which I, myself, do not ... I read most stuff ... There we go. There are the questions. If you could, Melina, if you'd like to address them.

MELINA STROUNGI:

I have my own notes in front of me so please just interrupt me if I miss to address something.

So I believe where we were left last time, it was in Question 2. "How and by whom is it or can it be measured whether these goals are met?"

We received a comment from the Registry group questioning the relevance of the SSAC [inaudible] study, given the fact of the most recent RRA of 2013. So it's basically just a very short reply that [inaudible]. I mean, it is true [inaudible] this predated [inaudible] 2010, super recent. But we don't think it's invalid and we don't know why it would not be relevant. And it was around the date that the ARS [inaudible] came into life and all this discussion about having data accuracy assessed on three layers [inaudible] identity. But then the discussion on identify kind of were put [onto] ice.

So really, just in the context of our fact-finding exercise, we just wanted to go over everything that is there so we have a complete overview of what it was, how it started ...

Then we received another question on evidence. So basically, if there is evidence that the requirements are not being met and that

we have to prove that these are not met. In the beginning of my earlier comment, I kind of addresses, already, this comment.

So basically, from our side we have been trying our best to find data and evidence and reports corroborating our arguments, including the RDS Final Report that we referred to in Question 4 about the high inaccuracy rates. And we have also, in the past, referenced [inaudible] studies and other studies. But we do our best to really try and bring all the evidence and data that we have [in our position], but then [these] are questioned on grounds that they are not impartial or that it's not, I don't know, the greatest study.

So really I think we're really not—how to say ... We were hoping to really have constructive discussion in this group and just openly exchange what we have. We are also open to receive any evidence or data or statistics from the others pointing to the contrary, that what we say is not right. So we're open to a more constructive dialogue.

Then on Question 3, I have noted a comment that there is a contradiction between the GAC's overall goal for a more holistic interpretation then the RRA and it's specific concern with respect to certain relevant RAA requirements that may cover accuracy.

We refer to this input on Section 3.7.2 of the 2013 RAA that states that the "Registrar shall abide by applicable laws and governmental regulations." So I think this specific example was perceived by some groups, some people [that] believe that this is contrary. It's just an example of the question [inaudible] have been overlooked [inaudible] taking into account ICANN's mission, taking

into account various laws. And not just GDPR, but taking into account everything including this 3.7.2 section, we have to see this thing holistically.

So I don't think these are in contradiction. It was merely one of the many examples that should be taken into account.

Then on Question 4. Again, a similar argument that there is a lot of conjecture based on old data [and flagged the need] for new data to substantiate GAC's claims. Again, here we refer to the report of 2019, if I'm not mistake, which points to—as also Susan explained earlier—to the 30-40% in accuracy rate. So I think it's quite recent. But again, happy to be pointed to data pointing to the contrary.

And then, what other comment do we have? A comment that the statistic from the Interisle Consulting Group is inaccurate. I don't know why is that. I'm happy to listen to shy this study is inaccurate. I didn't draft it. Yes.

And then I think we also received a comment from ALAC noting that in many cases, the contracted parties [inaudible] which is an interesting insight.

I don't know if I have ... Sorry, because I was not looking at the screen that you have in front of me. I don't if it was easy for everyone to follow my question and answer kind of thing.

MICHAEL PALAGE: Yeah. Put it this way. I was able to follow. We did have some intermittent audio, but it was intermittent so I think myself and others were able to follow along.

I do see two hands. And I just want to do a quick time check here, everyone. I believe after we close out the GAC Gap Analysis, we will now be turning to ARS. And we do, today, have Jared from ICANN Org here. And I know a lot of the questions that we've been discussing as part of the Gap Analysis have referred to the ARS, so I think it would be good if we could begin to touch on that, particularly given the ICANN Org memo that has been provided to the group.

So with that, I will turn it over. Sarah, you have the floor.

SARAH WYLD: Thank you very much. I have, not a question, but a suggestion, an idea as to how the group as a whole might be able to proceed effectively.

So now that all the homework has been completed in this Gap Analysis ... Although, I guess we don't all have the next piece of homework of how can it be measured ... But now that we've all done the gaps, would it be possible for the staff team to go through that Gap Analysis and pull out the specific data and evidence or references to reports that the different teams have provided that specifically relate to this problem with accuracy?

So that's my suggestion, that staff could provide that for us all to review. I want to specifically acknowledge that in the GAC input, there is data. Data that I think we should really dig into as a team.

So for example, in the GAC input #4 it mentions a problem with an accuracy data—sorry—a problem that data and accuracy issues are largely under-reported. That is an interesting topic to discuss, and it is evidence.

It also references “confirmed data inaccuracy rate across sampled domains is still high (30-40%). I think that may be referring to ARS. It's not what I see in the report that just came from ICANN about ARS. Right?

So if we have data that we don't agree on, the way to deal with that is to put the data in front of everybody and talk about it. And we haven't done that yet, and I think we can. So my suggestion that I would be interested to hear what other people think is for the staff team to help us by consolidating the data, pulling the hard facts out of the Gap Analysis, to make it easier for us all to review. Thank you.

MICHAEL PALAGE:

So I am all for facts there, Sarah, and getting all the facts on the table. I don't want to sit down there and chair, off the top of my head, and commit to that. But that does sound very consistent with what I have been advocating since the start. And I do believe that type of factual analysis is actually what is required or what is expected from us, from the Council, as part of Assignments 3 and 4.

Marc Anderson, you have the floor.

MARC ANDERSON: Thanks, Michael. Before I get to my comment, I would say I think what Sarah suggests makes sense. I think she's suggesting that we ask staff to gather all the data points we do have on levels of accuracy and sort of level set with that. I think that makes sense.

And Michael, you mentioned Tasks 3 and 4, but I think that would also be helpful for Task 2. I think understanding what data does exist and what has been done in the past will also be informative for Task 2 as well. So, just a long way of saying plus one to Sarah's suggestion.

Getting back to the reason I raised my hand, though, I'm cognizant of time and I do want to get to staff's update on the ARS memo. So maybe this is something to follow up on later. But I think the question for Melina on better understanding their comment on a more holistic interpretation of the RAA ... I think that one came from me and I think I am still scratching my head a little bit on that one. I guess where I'm unsure ...

And just to be clear. I'm not arguing against it. I just want to better understand the comment and better understand what the results of that more holistic interpretation should be. And Melina did a good job explaining, at a high level, the other things that should be considered. But what I don't think I understand is what the outputs of that more holistic interpretation should be.

And that may be a larger conversation than we have time for today, but I think I would like to understand that better. And I think that would be worth having a follow-up conversation on. So I'll leave it at that. And I see Melina has her hand up.

MICHAEL PALAGE: Melina, you have what I think will be the last word on this before we turn this over to Jared. You have the floor.

MELINA STROUNGI: Yes, sorry. I'll try to be as brief as possible. And of course, Marc, I would be happy to follow up this discussion, if you would like. But, yes, it's not our intention, in any case, to dictate a certain outcome. So it's not that something is expected should happen from the holistic approach. It's rather like really taking an open approach and really making sure that we have the whole picture.

For instance, there are certain provisions such as this particular one, since you raised it, that the "Registrar shall abide by applicable laws and governmental regulations." So for instance, there are so many countries, so many different laws, it could be, for instance, that certainly laws have—I don't know—specific additional national accuracy requirements in place. Things like that. And how this is monitored? How does it work? These are issues that we are just trying to understand, and this is why we noted this down.

I don't know if this help a bit to clarify, but that was the intention behind it.

MICHAEL PALAGE: Thank you, Melina. And with that, I would now like to turn over to Jared from ICANN Org. I'm sorry, Brian. I see your hand up. Well, what I will do, Brian, is I will turn it over to you and I will allow

ICANN Org to walk through the ARS memo and take it over. So with that, I turn it over to you, Brian.

BRIAN GUTTERMAN: Thanks, Michael. And hi, everybody. I just wanted to tee up my colleague, Jared, who is here to over, once again, the supplemental ARS memo that I sent through last week, and hopefully at least some of you have had a chance to go over prior to this meeting and sort of switch gears. I think that was a really good discussion with respect to the Gap Analysis. And as we wind that down ...

And obviously we touched upon the ARS, so hopefully, everybody find this additional information that we're providing here useful. So I think what Jared is going to do is just go over it briefly and then field questions with the time remaining that we have here.

So with that, here's my colleague, Jared. Jared, thanks for joining.

JARED ERWIN: Thanks, Brian. And thank you, everyone, for having me. My name is Jared Erwin, for the record. I also work in Global Domains and Strategy Function, GDS Function, under Karen Lentz who many of you probably know.

If you wouldn't mind projecting the memo. I was just going to walk through a couple highlights, kind of key takeaways, and then hopefully answer any questions that you might have. And if not able to answer it now, then I will certainly take those back and

review and consult with colleagues as needed and follow up with responses.

So to start here, in the Executive Summary on page 3, you'll see a couple questions that were kind of the impetus for this memo which, as I understand, were a couple questions that were being discussed in the initial conversations within this team. And those are:

1. Were there any specific ideas behind the suggestion for a study, as mentioned in the ICANN or briefing of accuracy requirements from a year ago?
2. Were there any alternatives explored to data sources for the ARS before the program was put on hold?

The very brief answer to both of those questions is no. So there wasn't necessarily a specific idea for what an addition study on accuracy or a study of how to measure accuracy would look like.

In the briefing from last year, ICANN Org suggested working together with the GNSO Council to develop a framework for that study. But in this memo—and you can see the hyperlink there to that section—we have provided some potential objectives that might be used for a future study on accuracy.

And in response to the second question again, the brief answer is no. No alternative data sources were considered. There were high-level discussions and conversations about using, potentially, escrow data or bulk registration data access. Those were not thoroughly investigated. No specific actions were taken to look at that more closely to see if those would be viable alternatives.

And so a key point here in connection with that, and that kind of theme of the memo, if you will, is that GDPR has limited access to registration data for all parties, including ICANN Org. So it's not clear that ICANN can access the non-public data to check accuracy.

And so ICANN Org, again, tries to make it clear here in this memo that any study of accuracy, whether it's through the ARS or a new kind of study, would require substantial review to ensure that that study is consistent within ICANN Org agreements and policies—or ICANN policies agreements—and any applicable laws or regulations. So those are kind of the high-level takeaways.

The other thing I just wanted to briefly mention again ... I'll shorten this a little bit in the interest of time so we can get to your questions. But I did want to go over the issues that ICANN Org has noted with regard to restarting or continuing the ARS. And that's on page 6, I believe. There's also background which most of you have probably seen already in the briefing from last year. But if you do have questions about how it works, I can try to answer those as well.

But, yeah, maybe one more page down. Sorry. Thank you. Yeah, right there.

So we have here some different categories of issues that ICANN Org wanted to call attention to with what it sees as potential complexities with restarting the WHOIS ARS, or continuing with the ARS as it's currently envisioned. The first one being that the contracts for all the vendors have all expired. So this is important

because the ARS isn't really a system in the sense that you can just flip a switch to turn it back on.

The work is based on a team of vendors that conduct the tests. So we would first have to recontract or find new vendors who would do the test. And that would require time to do that contracting process. And in addition to that, there would have to be considerable development time for developing the tests and assessing what kinds of changes are required because of the GDPR—the kind of data that we have access to or would be using.

So it could be a considerable amount of time to get that back up and running. And also, the expense is fairly high. Based on previous cycles, \$300,000-500,000 USD annually.

Along with that, the data ... So again, I mentioned the changes that might be required. Another issue that ICANN Org sees with continuing the ARS as it has currently envisioned is that simply the data that we have access to has changed or is not there. And because of that, and using ...

Because the ARS relies on publicly available registration data, ICANN Org has expressed some concerns—before in letters and in the ICANN Org briefing from last year—that using the publicly available data may simply not be useful or provide the kind of results that the community is looking for, as they could be biased simply to those who are choosing to publish data or registrants who consent to publication.

Okay. Switching, I think, to the next one. The legal environment has also changed, of course, so ICANN Org doesn't have the contractual ability to require contracted parties to provide access to non-public data. So we couldn't simply restart and ask them to do that.

And secondly, the Purpose 2 from the EPDP Phase 2 Team doesn't necessarily ... Which you may or may not be familiar with. And sorry, I'm glossing over fairly quickly, but you can read more closely there. But that Purpose 2 doesn't necessarily make the ARS, or wouldn't necessarily make the ARS GDPR-compliant. There would have to be considerable analysis there to ensure that the interest is balanced with the subject's interest and fundamental rights and freedoms, and that the processing of the data is GDPR-compliant.

And then moving on to the next issue here, just generally, ICANN Org wanted to call attention to the higher-level discussions on accuracy which I think have been discussed a little bit today already. I'm sure you've discussed it before, but ICANN Org wants to call attention to the fact that accuracy and how accuracy should be measured should be looked at in context of other conversations around data protection, including different kinds of legislation—the GDPR, the NIS 2.

And there are a few different conversations that—letters that Göran has sent to the GAC or to the European Commission. And there's a blog from 2020. Those are not hyperlinked here, unfortunately, but they are linked in the briefing from last year.

And then another kind of high-level question about the ARS and its focus, if you will ... “The ARS is focused on a static moment of accuracy of registration data ...” It looks at the accuracy of data in a point in time, but it doesn’t necessarily provide ways to improve it. So that’s something to consider.

Yes, the ARS was created with the intent of providing those inaccuracies that are found through its data collection to Compliance for review. But again, the overall focus of the ARS is measuring accuracy in a moment of time.

And then finally, Compliance—that Compliance piece—some more practical considerations on how the ARS worked. And again, something that would need to be considered if it should be restarted is that many of the accuracy tests created false positives. And this had a lot to do with the postal addressing and the standards for format of postal addresses, often based on the formulates used by the vendor, the UPU, the Universal Postal Union.

It could cite something as inaccurate when, actually, it is accurate per the country’s format. So Compliance would get a ticket that they would have to investigate and find out that that’s actually accurate. So the false positive created work that didn’t necessarily need to be done.

And again, tying to this piece of looking at data in a moment of time, Compliance would often receive tickets that were already obsolete because the ARS would take data usually at the beginning of a cycle and it took a few months before the data was processed and analyzed and created and handed over to

Compliance to create tickets. And so sometimes they would receive data referring to already obsolete issues or inaccuracies that had already been fixed or corrected.

So you can see there, for the ARS report in June 2018, over 1,000 tickets were closed before the first noticed because the data was already outdated from the time of sampling.

So those are the kinds of issues that ICANN Org wanted to call attention to. I think, yeah, it's best we move to questions if you have them. But you can see that next section. That's where you would find some of the potential objectives of a study on accuracy. But I think I won't read through those.

Michael.

MICHAEL PALAGE: Thank you, Jared, for going through that. I'd like to open up the queue. Questions/comments from team members? Is this a sign we did not do our homework?

Marc, you have the floor.

MARC ANDERSON: Thanks, Michael. It's not a question, but a comment. And first, Jared, thanks for the overview. And thank you, staff, for the memo. I did find it useful and interesting.

I think one thing Jared was talking about a little bit, and something that jumped out at me, is that there are different layers to this. There's understanding a snapshot of accuracy of the data, and

then understanding what are the measures to put in place to improve and/or ensure that registration data is accurate.

And it seems to me that those are both important aspects of our task on the Scoping Team—understanding what are the levels of accuracy currently? What’s the current situation when it comes to accuracy? Understanding what are the current requirements and goals around the Accuracy Program? Are those goals being met? And are there things that can be done to improve on that?

I know that’s not really an answer or a solution, but I think that’s a good point and something that we need to keep in mind—that there are separate aspects of our tasks. What are the current accuracy levels? What are we currently looking at today? And are there things we should be doing to change and improve on that?

Again, just a comment. That really jumped out at me, and I thought that was an important consideration for us to keep in mind as we go about our work.

MICHAEL PALAGE:

Thank you, Marc. Are there any other questions or comments for Jared? I have some. So again, I want to make sure that ... Are there any members? Okay.

So what I’m going to do is, much like Marc, I just have some initial comments in reading through this. And again, I have not had the ability to actually do a detailed write-up or analysis.

So Jared, on your point about the cost. Yes, I believe Xavier, when I was speaking with him ... I believe each of these individual

costs, I believe, were average about \$200,000-250,000. So I believe that's where we get to the \$300,000-500,000 cost, annually. While that is not insignificant, I would submit that it's bargain-basement when you look at the recent SSAD ODP. Or if you look at ... I know the ICANN Board just recently approved two IT contracts which appear to be over \$500,000 each, based upon the requirement of needing Board approval.

So when you look at the totality of what ICANN spends, I would say that number is not exorbitantly prohibitive, particularly given that there are a number of people in this community that really did see value in ARS before it was discontinued. So that is, I guess, my one comment.

The other comment that I would make, which is fair, is that ICANN Org done need to obviously be cognizant and be in compliance with GDPR and work with its contracting parties to make sure that data can processed in a legal fashion.

That being said, I look at how ICANN Org, last year, worked with the Registries to amend their contract to be able to process data for purposes of DAAR to incorporate Registrars into that. Do I can does know how to negotiation with its contracting parties when it wants to expand the use and processing of that data. And as my Registry colleagues will note, as the owner and user of Palage.com, my personal PII is being transferred there [with] those zone files and other associated information.

So I just want to highlight the point that ICANN knows how to do this. And when it wants to do is, when it does want to achieve something, it can do that. So I just want to, again, highlight those

points. Those are some of the comments that I saw that were kind of top-of-mind. I do want to provide a more detailed analysis, and what I will do is follow up in an e-mail to the list and copy both you and Brian on those points.

So those were, I guess, the two high-level comments that I had. I again want to see if there are any other individuals that have questions or comments for Jared.

Lori Schulman, you have the floor.

LORI SCHULMAN:

Yeah. And I'm going to just disclose that I've not read the memo. So I'm going to apologize in advance for that. And I will read the memo in time for the next meeting.

But my question is just based on listening to the presentation and, Mike, your comments. So basically right now, we've suspended a check we've normally done because there are concerns about GDPR compliance. There's also a concern about, it seems like the cost. That this was an expensive process.

But my understanding is that, from a Compliance perspective, there is a duty to check. So right now, is it ICANN's position that because of GDPR, the duty has been suspended? That's what I'm trying to figure out.

And I'm going to preface what I'm saying with this. GDPR has affected a lot of businesses, globally. We know this. And I'm going to say not just GDPR. We know inside the United States, there's just a CCPA. We know Brazil has enacted laws. We know that

there are laws springing up all over the planet. We also know that there are negotiations underway, particularly with the EU and U.S. in terms of data flow and what we can do under new regimes now that certain privacy shields have been invalidated by courts. So we know there's a lot of flux.

Meanwhile, business are still doing business. And business are finding ways around these problems, either by having local servers, by having contractual agreements with standard clauses. There's a lot that can be done in the business world, and is being done so businesses can continue to operate under new privacy regimes.

And I'm just going to make a general statement because what confuses me about ICANN's position in the Temp Spec and all the way through is that hands have been thrown up rather than saying, "Let's get to work to find the workarounds and the contractual agreements and the infrastructure we need to put in place," understanding there are some pieces of this puzzle we may not have an answer to yet, specifically the US-EU data transfer questions I know are quite open.

But that's what I'm finding difficult to understand from a business perspective and from operating a business and consulting to business. So I'd like, Brian, if you can at least share with me some of the internal thinking about this, it would really be helpful, I think.

MICHAEL PALAGE:

I don't know, Jared. That may be a little outside of your wheelhouse. You may have to go back and consult. But if you

could, either Jared or Brian, try to address the comments of Lori. And if you do need to circle back to your ICANN colleagues and come back with that, I respect that as well.

Brian, you have the floor.

BRIAN GUTTERMAN: Yeah. Sure, Michael. And thanks, Michael, for your comments. And Lori, thanks for your comments, too. I wonder, again, I don't want to ... We want to engage in a dialogue here. I wonder if you can perhaps—and others too—maybe try and put the questions you have about the content in this memo and larger questions about ARS or the Org's position in writing. Perhaps we can maybe put together a Google Doc again, or you can pose a question on the list. And we can try and get back to you with some specifics because there was as a lot there.

But I appreciate the questions and comments. And if we could put them in writing, that would us talk to the right people internally to get you as complete an answer as we can.

LORI SCHULMAN: I really appreciate that. If you don't mind barging in just to follow up. Yes, I know there was a lot there and a lot to unpack. And I'm happy to write it up. But this is what I feel is stymieing the talks across the board—is this zero risk tolerance which is just not a feasible approach to business, in my view. And I think in most businesses' views. And unless we can have those very conversations, I know how any of this truly gets resolved.

BRIAN GUTTERMAN: Thanks, Lori.

MICHAEL PALAGE: All right. Marc Anderson, you have the floor.

MARC ANDERSON: Thanks, Michael. I kind of raised my hand to give Lori a plus one. I think there are a lot of good questions she had there, and some of those are questions I have, too. This has come up on this call and in previous calls, and so I know I'm at risk of just repeating the same refrain over and over again. But the lack of data processing terms and conditions between ICANN and contracted parties is frustrating, and it's a hindrance to our work.

Yeah. I'm looking at what Lori says n chat, and I think that's a frustration and a roadblock to a lot of us. So, yeah, I guess essentially I'm just plus oneing Lori. And hank her for the questions.

MICHAEL PALAGE: Okay. So we are not at the bottom of the hour. Again, Jaren, thank you for the presentation here today. I do believe there are some other members that still need to review this document. And we will get back to you. Or I would encourage them to get back to you with written questions. I think this is important, that we hold up our end of the bargain.

We asked you to prepare a document. We thank you for doing it. We need to follow up so that we could meet our deliverables for both Assignment One and Assignment 2 so that we can report to Council by ICANN73 that we are back on target with what we need to do.

Sarah, you have the last word.

SARAH WYLD:

Thank you. Sorry, my apologies if you said it and I just missed it. But are we going to ask staff to consolidate the evidence or problems from the Gap Analysis? Was that idea amenable to the team? Thank you.

MICHAEL PALAGE:

So here's my promise to you. Myself and Olga have a standing meeting on Tuesday where we discuss the proposed agenda. I believe the proposal you made is consistence, so before committing to that ... I do not want to make commitments on behalf of my ICANN Org colleagues. So I would like to consult with them. Usually, on Tuesday you see the agenda that is circulated after our admin meeting. So I will raise it there and I will try to give you an update or an answer to that question by Tuesday afternoon, if that's acceptable, Sarah. Okay, that sounds good.

And with that, I would like to thank everyone. Stay safe. I look forward to seeing everyone face to face, hopefully in 2022. And with that, we could end the meeting. Stay safe, everyone.

UNIDENTIFIED MALE: Thank you.

TERRI AGNEW: Thank you, everyone. I will stop the recording and disconnect all remaining lines. The meeting has been adjourned. Stay well.

[END OF TRANSCRIPTION]