
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 14 February 2023 at 16:00 UTC

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JULIE BISLAND:

Good morning, good afternoon, and good evening. Welcome to the Transfer Policy Review PDP Working Group call taking place on Tuesday, the 14th of February 2023.

We actually have no apologies for today's call. As a reminder, an alternate assignment must be formalized by way of a Google Assignment form. The link is available in all meeting invite e-mails. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only. Alternates not replacing a member should not engage in the chat or use any of the other Zoom Room functionalities. If you have not already done so, please change your chat selection from host and panelist to everyone in order for all participants to see your chat and so it's captured in the recording.

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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. Steinar, go ahead.

STEINAR GRØTTERØD: Hi. I have a very, very minor update to my SOI. I have ended my period with Thomsen Trampedach, a DNS Swiss registrar. I'm now working only for one company, IQ. So that's the update.

JULIE BISLAND: Thank you, Steinar. I'm seeing no other hands.

Please remember to state your name before speaking for the transcription. Recordings will be posted to the public wiki space shortly after the end of the call. As a reminder, those who take part in the ICANN multistakeholder process are to comply with the Expected Standards of Behavior. Thank you. Over to our chair, Roger Carney. Please begin, Roger.

ROGER CARNEY: Thanks, Julie. Welcome, everyone. Just a few updates before we jump into our agenda. I think everybody's expecting we're going to start into our Phase 2 discussions this week and continue those, and then circle back around to our Phase 1B discussions that we started that we reviewed last week.

I think we're down to, not counting this, three meetings before ICANN76. So I think that's just a little more than three weeks away. Hopefully, everybody's getting prepared. As we move into

Phase 2, as we did in Phase 1A, we're looking to send out a communication for early input on the Phase 2 charter questions or send that to all the SOs, ACs, SGs, everyone, to see if we can get some early input on those questions in the charter. That communication should be coming to the working group shortly for a review so we can get sent out and get responses back in so that we can hopefully get some good input and help us move discussions along.

I think that's about it for any updates before we jump into agenda. I'll just open up the floor, as we do weekly, to any of the working group members that maybe had some discussions with their stakeholder groups, they want to bring anything forward that they've been talking about to introduce to the group or maybe have the group think about and discuss. Steinar, please go ahead.

STEINAR GRØTTERØD: Hi. I distributed to the Consolidated Policy Working Group the proposal from Rick regarding Recommendation 13.1, making an opening for the registry to have a shorter TTL than the standard 14 days TTL. The discussion was quite lively but we didn't reach some sort of consensus. I think I would like to say that it all depends on what the total outcome of the working group's discussion that will most likely fall into that because there was no real objection. There were pros and cons, etc. But we had a very nice discussion and feedback. That was my feedback from this discussion. Thank you.

ROGER CARNEY: Thanks, Steinar. Thanks for taking that to the group and good to hear. Okay, anyone else before we jump into the agenda here? I think we'll jump into agenda item three here and do a review of our dispute mechanisms and our topics here that we're going to be covering shortly. Okay. We'll turn this over to Caitlin if she's on.

CAITLIN TUBERGEN: Thank you, Roger.

ROGER CARNEY: Thanks, Caitlin.

CAITLIN TUBERGEN: As Roger noted, we're just going to go over a high-level overview of the dispute mechanisms that currently exist, as well as the history of the Expedited Domain Reversal Procedure, which was something that was floated in IRTP Working Group Part B. It's similar to this clawback or fast undo process that various working group members have alluded to. We thought it'd be helpful to share what the previous model of that looked like and the reasons the community ultimately rejected that model as a primer for the conversation of what the group will ultimately talk through in Phase 2 if we want to resurrect that or why things are different now, why something may be accepted now that wasn't back then. So if we can just jump in.

We're going to start with the Transfer Emergency Action Contact or the TEAC as it's commonly referred to. So on this slide, we have some of the high-level points that are pulled right out of

Transfer Policy Section 1.4.6. The point of the TEAC is to resolve urgent communications relating to transfers. So, all registrars are required to have a TEAC. It can be a phone number or some other real-time communication channel. But whatever the registrar chooses to use that communication channel, it needs to generate a non-automated response by a human representative of the gaining registrar, and that response needs to be provided within four hours. However, the policy does note that the matter may not be resolved within four hours but a response needs to be received within four hours and the registrar needs to start working on that. The only entities that are allowed to speak with the TEAC or use that communication channel are contracted parties and ICANN Org. So this isn't a communication channel for registrants, for example. Additionally, all records of communications that are sent through this channel must be retained and documentation needs to be shared with ICANN and registries upon request. Next slide, please.

So the original objectives of the TEAC, which for anyone who's really curious, this was something that came out of the IRTP Working Group B, is that there needs to be a channel that is available 24x7 to access registrar technical support for any sort of emergencies related to transfers. There needs to be ability to quickly reverse instances of domain name hijacking or any sort of transfer error. The registrar needs to ensure that the representative or whoever is behind the TEAC communication channel is empowered to take action on a request. And importantly, in the event that a registrar does not comply with the TEAC provisions in the Transfer Policy, that would be a policy

violation and therefore action can be taken for non-responsive registrars. Next slide, please.

We thought it would be helpful just to remind everyone at the specific charter questions related to the TEAC that this group will ultimately be answering as it goes through its deliberations on the TEAC. The first being, is there any additional data that the group would like to request or that it needs to effectively do its work? Secondly, some of the concerns that were received in response to the Transfer Policy Status Report survey were that the TEAC is disproportionately impacted certain types of registrars, namely those that fall out of the Americas and Europe. So APAC registrars, for example. Small or medium registrars which may not be able to sufficiently cover that 24x7 timeframe and that four-hour response time, and also registrars in countries where English is not the primary language. So the group will be looking at, with these concerns in mind, does that four-hour response timeframe need to be revisited? Next is additional guidance needed to define a reasonable period of time after which registrars should be expected to use a standard dispute resolution process and it goes out of the TEAC. Next slide, please.

Next is do telephone communications provide a sufficient paper trail? And then the last two questions involve registry operators and that those questions: are several factors make a registry operator's obligation to undo a transfer challenging? Are updates needed? And to what extent are changes to the policy needed to address these concerns? Are there other pain points for registry operators that need to be considered as the group reviews the TEAC? Next slide, please.

So now we'll talk about the TDRP or the Transfer Dispute Resolution Policy at a high level. The TDRP is designed for cases of invalid inter-registrar transfers, and these are instances where registrars are unable to resolve the issue amongst themselves that may have been through a TEAC channel or otherwise. Registrars are known to typically resolve these things in the event of emergencies.

The statute of limitations for a TDRP is 12 months from the date of that invalid transfer. The entities that can file a TDRP are the gaining registrar or the losing registrar in a transfer dispute. So again, it's important to note that the registrant cannot use this channel. It has to be filed by the registrar.

The TDRP is decided by an independent panelist appointed by the TDRP provider. The complainant or the filing party must pay a fee to file the TDRP. In the event that the complainant is successful and if the complaint is found in favor of the complainant, then that fee would be transferred to the respondent. The complainant is required to show documentation of the improper transfer. And in terms of the documentation that's required, you can find more details of that in Section 3.1 and 3.2 of the TDRP. Next slide, please.

Then the charter questions that the group will be analyzing in reference to the TDRP are similar to the TEAC. Is there enough information available? Is there additional data needed for the group to effectively determine if this mechanism continues to be effective?

The second question came from Outreach to TDRP providers. The ADNDRC are one of the TDRP providers, in other words, reported to the IRTP Working Group Part D, that in some cases, the complainants and respondents failed to provide sufficient information to support arbitration. Is this something that needs to be examined further?

If the group determines that the TDRP is insufficient, are additional mechanisms needed to supplement the TDRP? Or should the general approach to the TDRP be reconsidered? Next slide.

The next few questions deal with data protection law. Are the requirements for processing of registration data, as specified in the TDRP? Are the data elements that need to be shared with the provider by the gaining or losing registrar, depending on who is submitting the complaint? Are those compliant with data protection law? And lastly, is the TDRP in its current form appropriate based on principles of privacy by design and data processing minimization? Next slide, please.

As I noted at the beginning of this presentation, we thought it might be helpful to go over the Expedited Transfer Reversal Procedure, the ETRP. As a reminder, this was something that the Working Group Part B discussed as a proposal. It was put out for public comment and the community had some pretty strong feedback about why it was untenable. So we thought it would be helpful to show what the proposal originally was and also the main feedback that was received from that proposal so that the group can begin discussing what's different now or how it could be reconfigured.

So at a high level, the IRTP Working Group B was looking for a timely cost effective reversal of a inter-registrar transfer that would restore the name to its pre-transfer state. The ETRP was looking to augment rather than replace the TDRP and the TEAC. It was intended to address the need for urgent return mechanism. In terms of the timeframe, the proposed statute of limitations was that the ETRP needed to be initiated within 60 days of the inter-registrar transfer completion or within 60 days of the registrar becoming aware of that transfer, but that time was not to exceed six months. The proposal noted that the registrar and registry are indemnified by the registrant who's claiming that there was an improper transfer. Next slide, please.

When the registry received valid documentation from the losing registrar, the registry would be required to restore the name to the pre-transfer state within 48 hours of receiving that documentation. Then within 48 hours of that reversal, the post-transfer registrant would be notified. This was intended to correct fraudulent or erroneous transfers, not to address any sort of disputes arising over domain control or use. Of course, there were instances where the ETRP could not be invoked, for example, a transfer to do a UDRP, a litigation, or a bulk transfer. The working group ultimately couldn't come to agreement on any mechanism to challenge ETRP. Next slide, please.

So with those main tenets in place, the bulk of the feedback or the criticism of the ETRP was that this creates a lot of uncertainty for the acquiring party and is extremely disruptive to the secondary domain marketplace, detriment of both sellers and purchasers. Because there would be this potentially six-month gap where that

transfer or sale could be challenged and the domain could return to the pre-transfer state without any ability for that purchaser to challenge it. Because there was no effective sanction or no way to challenge, this was subject to substantial abuse. One of the commenters noted that if there was a purchase that went through and the seller received an offer later on for a substantially larger amount of money, they could have challenged that transfer and abused that policy.

Another criticism was that that six-month window was way too long and that if there was some sort of mistake that needed to be unwound quickly, a domain name holder would realize that the name moved or was improperly transferred much sooner than six months. So someone had suggested that 30 days would be a better timeframe for that. As I noted, the group couldn't agree on a challenge mechanism so that wasn't included. And that brought a lot of scrutiny from the community because if this was going to exist, there needed to be an effective challenge mechanism. Next slide, please.

Another concern was that a lot of hijacking involves the hijacker gaining control of the domain name holder's e-mail and/or registrar account. So rather than having this mechanism, this commenter noted that security efforts should be aimed at this problem rather than creating a whole new dispute mechanism.

Another commenter noted that before introducing another policy, there should be more data from registrars needed to scope if there's actually a problem with hijacking. This commenter noted that the data could be gathered anonymously by a third party, but

currently there was a lot of comments about hijacking but no concrete data that would inform the group moving forward.

Someone else mentioned that the proposed solution is worse than the problem it's trying to solve. Also, there was a concern that the procedure would require registrars or registries to judge the merits of a hijacking claim by the losing registrant and essentially turn them into panelists or make them responsible for high speed dispute resolution and that the process could be open to gaming.

So those were the large concerns with the ETRP as it was proposed. As we were discussing in Phase 1, there was a lot of mention of a fast undo or a clawback procedure. Before we got into talking about that, we thought it would be helpful to at least show what was proposed in the past to see what was fundamentally wrong with that or what could be changed if the group were to propose something again since the community, again, did not take well to the previous proposal and how that could be different in today's world.

So at this point, I will turn it back over to Roger. I'm happy to answer any questions. Apologies for the scratchy voice. Hopefully, it was still comprehensible.

ROGER CARNEY:

Thanks, Caitlin. Thanks for going through that with your scratchy voice. It was very clear so I think there was no issue there, but hopefully it gets better.

Okay, any questions or comments on this part before we actually move into starting to talk about the quick reversal of the rollback or

however we want to call that? Okay. I think that obviously a rollback has been a thought somewhere for many years this coming out, Berry could probably tell me, early teams I'm sure the concept came out maybe even before the teams. So I think that not necessarily a new concept. I think when we look at it, okay, if we talk about it, especially now that we've reviewed this, is there anything new that would make us think, and again, not the environment or whatever, or maybe even just a different view on what the rollback is, but what's new now that we're not going to end up in the same spot six months from now when we talk about it and look for input? Is there something different now that makes us think, "Oh well, actually, it is worthwhile to discuss." Obviously, it's been 10 years plus this discussion originated. But is there enough that's changed in our environment or even in the thought of the rollback maybe a little different than what it was thought of then? I think that's the important thing. Let's not try to recover or discuss things that's already been discussed and talked about. But let's see what can we do to use what was discussed but look at what's new or different that will progress even further. Sarah, please go ahead.

SARAH WYLD:

Thank you. Hi. There's some construction happening in my apartment building so apologies if there is suddenly a lot of background noise. I do think overall it is useful to discuss some kind of reversal process, partly because the existing TDRP is difficult, it has some problems. Maybe we can improve it, maybe we will decide that the only change we want to make is to address those gaps or improve the TDRP. Maybe we will decide that we

want to have something broader, something quicker or different. So I do think that this is an important part of our work as a working group. If I were approaching this by myself, probably what I would do is look at the existing two things that you showed us plus the feedback on the ETRP and figure out what are the components of a policy that we could have for reversal, and then how would each of those components work? And then look at the feedback on the ETRP and why people didn't like it to see how to accommodate or change or address that feedback in the proposal. I'm sure you have a plan. I wonder how our plans might be similar. Thank you.

ROGER CARNEY:

Thanks, Sarah. I think that was a good thought there, a good comment that you made on. People think that there's some changes that can be made. Obviously, that's why it's in the TEAC and everything. Are there changes to those policies? Sarah mentions the idea of a rollback seems good but where does it go? I don't think that we can get to that point, but is there a big encompassing transfer dispute process that incorporates something that's quick, something that takes a process, something that takes a bit longer time, something that's immediate. As one of the parts of this complaint is you can't wait 60 days to do an instant reversal. You should know sooner than that. Is there different timelines for different dispute mechanisms? But they're all piece of a dispute mechanism. So think about it. As Sarah was leading to there, where's the gaps in the current process that we're looking to fill? Theo, please go ahead.

THEO GEURTSL

Thanks, Roger. I'm supportive of what Sarah just said and what you just said. I think it is worth looking back at the TEAC. It's not a perfect process. There's some issues with it. The dispute process back then I always felt it was sort of unfinished back in my day when I was on the IRT. Maybe that's one of the reasons to circle back to it, to give it a little bit more time and discussion. Regarding the quick undo or whatever you want to call that feature, I think that's going nowhere. I mean, we couldn't solve it then, we won't solve it now. Thanks.

ROGER CARNEY:

Thanks, Theo. I wonder taking a look at that, as Sarah mentioned, tying all of them together, is there a preferred—I mean, I don't want to jump into talking about rollback if people want to solve the issues of TEAC or solve any issues of TDRP. Is there a logical step? Hey, let's look at TDRP and get it working, fix those six things that are broken or whatever it is. And then let's look at the TEAC and get those. Then we can talk about this. Or is it the reverse? Does anybody have thoughts on the appropriate, I guess, project line here that says, "Hey, let's talk about this one. I think that leads to this one and which leads to this one"? Any thoughts on a process to get through the different mechanisms? Theo, please go ahead.

THEO GEURTS:

In my mind—and I could be very wrong and I have been before—to me, it sounds logical to look at the TEAC process first and see what changes are going to be required there or whatever the outcome is, and then move on to the dispute process, see if we

can revamp that, make that even better. I think there's still room there for improvement. And then basically, you will end up with a couple of solutions that are being perfected, in my mind, and then you come to the undo feature. Based on what the previous work, you either sort of move ahead with it in terms of like, "Okay, we won't sell the undo feature. We are not going to create that feature due to old kind of limitations." But based on your previous work, you might come in a position that you have a better background on explaining why the process has been improved on several fronts, except not on the quick undo feature. Then you have more sort of meat on the bones to explain why the group didn't go or get-go to whatever the group ends up with. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. That just seemed the logical. It actually updated if the TDRP is updated. Maybe it addresses any of the concerns or needs for a quick root. As you point out, maybe it doesn't, it maybe it highlights those so that it is a valid discussion that continues.

Any other thoughts? I mean, I think that that seems reasonable. Look at the quick-hitting TEAC. Again, I know there's been quite a bit of noise about it and how it could be improved and be more to its goals more fit for purpose, I guess. So any thoughts? I think that that makes sense to jump into TEAC discussion and then roll into TDRP. Again, through those changes, does that solve any of the concerns that people are looking at a reason for a rollback? Or does it highlight the need to continue that discussion? I think that's a good path. Hit the TEAC and then TDRP and then see where we are. Sarah, please go ahead.

SARAH WYLD:

Thank you. I agree. I do agree. I think it might be useful as we go through this work to clearly document why we have both a TEAC and a TDRP. They're different things, right? One of them is an emergency contact but that contact person can do certain things. Then the other one is a whole policy but it's not really for emergency. Does one feed into the other? Are they supposed to be separate? If one does feed into the other, maybe it all ends up becoming one policy with a bunch of different components and requirements. But just as we're going through it, I think we're going to want to consider like emergency fast action things, slightly slower things. But we need to be clear about what they are and why they're different. Thank you.

ROGER CARNEY:

Great. Thanks, Sarah. I think you're right. I think you think about, okay, what is the purpose of a dispute mechanism? I think that when you look at it, I think TEAC and the TDRP are there for the same reason, it's just a different urgency level or whatever it is, something, but it's for the same reasons. It's an invalid transfer. The transfer wasn't supposed to occur. Those same reasons kind of lead there but it's a different mechanism based on the urgency out of it. So I think that it's a good way to look at it, Sarah. Okay, what's the purpose of the dispute mechanisms? And then drill into the actionable items of it. Theo, please go ahead.

THEO GEURTS: The only thing that I'm not very comfortable with but that is an issue, apparently, the previous working group was struggling with it also, that we still not have any data on how big the problem is. Maybe that's a personal view that I'm venting here but I don't like to come up with policies without a problem scope. That is my only problem with this. Thanks.

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

SARAH WYLD: Thanks. I have two thoughts. First one, I agree with Theo. Of course, it is difficult to create a policy to solve a problem when we don't know the scope of the problem. That way, it makes it difficult to know that we are solving the correct problem. I kind of imagine that there's maybe not so many hijacks because we have a good Transfer Policy in place. Since we're going to continue to have a good Transfer Policy, I don't know, but I do think we do need some kind of undo process for cases of actual dispute.

I wonder if perhaps we will decide that we don't need a fast undo process, we just need a normal dispute process. Because the fast undo I think was really tied to the concept of getting rid of the losing FOA, and that if a transfer can go through instantaneously, then it needs to also potentially be reversed instantaneously, that option needs to be there. And now, because there is the FOA, whatever we're going to call it, maybe we don't need an instant reversal. Thank you.

ROGER CARNEY:

Great. Thanks, Sarah. On the urgency thing, you call out one reason why I think it was brought up. But I think when you look at it in use, the domain gets transferred—and maybe that’s a problem and it should get transferred back—but maybe that domain is not even being used or doesn’t get used much or however it is. But that impact isn’t real high. So it doesn’t need to come back instantly. But if a domain accidentally gets transferred and a company is running their whole business on it, to me, that urgency level is different. As you said, maybe it’s the same process, it just has a path that takes a different way. But I think that the urgency factor is still a factor even if it still has the losing FOA.

Okay. I think that we’re on a good path here. I think maybe we kind of spin this and jump into some discussions and kind of maybe more of an open forum here of TEAC pain points, what doesn’t seem to work. I think if we take a global idea here, the purpose of the dispute mechanism is for some reason there was an invalid transfer. Again, I think Theo pointed out the problem is we still don’t know. With data, we don’t know how big a problem this is.

I think obviously discussions of what happened with the [IP] days, noting specifically in some of the comments that we just saw, hijacking is mostly done when account is compromised and that can be looked at. I think through our discussions over the last year and a half, we’ve actually identified the fact that those issues have been looked at and not addressed by policy but addressed by contracted parties, and that account hijacking is a lot harder to do now with two-factor authentication that a lot of contracted parties

have and other various things. So I think that some of those comments, obviously, have been addressed over the time. As Sarah mentioned, there still needs to be a process because it's going to happen and it does happen to dispute a transfer and a way to get that transfer to the right spot. Owen, please go ahead.

OWEN SMIGELSKI:

Thank you, Roger. So I guess I'll kind of do a little freeform stuff here. I want to go back. For TEAC, I want to agree that while data is certainly a good thing, I think it'd be very difficult to find data on this. There may be complaints with ICANN Contractual Compliance, but I imagine that represents a small subset of the actual TEAC issues that go on or communication. I may be speaking from my experience at ICANN Compliance, as well as my experience at a registrar. Take what you want from these observations I'm coming up with, but not everybody knows about the TEAC obligations. So they may not necessarily be aware of that avenue to use that.

Another thing is communications of use in part can be through an ICANN mechanism. Right now ICANN is using Salesforce, the Naming Services portal or NSp. I'm not sure how many people use NSp for TEAC communications. I know the previous system that NSp replaced was called RADAR, and there was also a communication thing through there for that, but I don't know how much that was being used. It can be done via e-mail, it'll be done via phone, so trying to gather some data. I mean, there can be some data that there is. But I think it might just be difficult to get something that is comprehensive and anything that we can draw some conclusions from. So I'm not saying not to try to get it but I

just think that it be might be limited. I see some people saying they haven't seen or rare or whenever in 15 years. I've seen a couple because I'm on the TEAC list here at Namecheap. So that's one thing.

The other thing I'm concerned about is TEAC is very easy to gain. So it's 24x7, etc. If you don't respond within four hours, then that is a 100% reason for a registry to reverse the transfer. So if you respond in three hours, 58 minutes, that's okay. But if you respond in four hours, two minutes, then sorry. There's a very good chance that the registry operator will reverse the transfer because that was not timely enough. So what this has led to is some gaming.

But then also, interestingly enough, it appears that some of the bad actors are aware of this. So unauthorized transfers occur over, say, the Christmas holiday, when some registrars may shut down, or it happens during the Chinese New Year when a lot of them shut down. So they may not necessarily have people who can respond to that four-hour timeline. Is it really necessary to get somebody out of bed in the middle of the night? Just say, "Hey, sure, we're working on this," if the request comes in at 2:00 in the morning. There's some significant concerns there on that. Interesting of note, that four-hour response is just to respond. So you can say, non-automated response, "Hey, we've got your TEAC responsible follow-up," and then the registrar doesn't do anything for three weeks. Kind of an interesting dichotomy there, which I think is a little bit of a concern because you need that initial quick response, but then nothing to resolve it, the actual issue underlying quickly. So that's just my feedback. I will step away from the mic now. Thanks.

ROGER CARNEY: Great. Thanks, Owen. Keep thinking about those because I think that's important to pull those pieces out. Obviously, everyone that worked on this many years ago thought, "Hey, this is going to work out well." I think that it's important that we learn and can adjust to that. Obviously, they felt there was a need and it sounds like there's a need for something. But yeah, it's how that gets implemented and I think it's important for us to go through. Rick, please go ahead.

RICK WILHELM: Thanks, Roger. Rick Wilhelm, Registries. Plus one everything that Owen said. They're all very good input. I'd also offer that since the TEAC contacts are via phone, it can be difficult for registry operators to document a timeline on those things to capture policy violations that might be there to support the registry operator undo, just because capturing timelines when you're down to the minute is very difficult. It's better for the registry operators if they use the TEAC e-mail rather than the phone thing. But of course, that's all within bounds, given the way that the current situation is developed. Of course, something we might consider if we're going to change this. So that's something to consider.

One other point that I'd like to make is that although it probably doesn't happen related to the registrars within earshot, one of the things that I've had experience with is TEAC contacts becoming stale where the registry reaches out to the TEAC contact that they have on file and the registrar has not updated that TEAC contact for whatever reason. And so while the registries frequently get

primary contact updates from ICANN, ICANN does not supply the other contacts that get updated to the registry. So that's a way that if this mechanism is going to be maintained, ICANN could help this situation by providing that TEAC as the list of the authoritative contacts and passing that TEAC update change to the registries when those notifications go out. Because the registry sometimes contact the TEAC that they think they have and then it goes into the dead letterbox, etc., whereas the registrar did have a TEAC contact, the registry just didn't know what it is. That's all. Thank you very much.

ROGER CARNEY:

Great. Thanks, Rick. That's good information to have. Actually, you start thinking about it and it's like, "Okay, maybe that's something that could get added to that policy." Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. This is Emily from staff. So I wanted to just echo something that Owen mentioned, where he was talking a little bit about that the data would be helpful but it seems like it's challenging to find. Indeed, on the staff side, we realized that that would probably be a question that comes up in the group. So looking to Org to see if there were other sources of data that might not have been in the Policy Status Report, we found that it's not really something that Org can or does track at this time through the Naming Services portal, for example, when the TEAC is being used, so that does make it a bit challenging to provide additional data from the Org side. The one thing that the Policy Status

Report does have is responses to survey questions, which is not data about instances, but is self reporting for registrars and registrants about any experiences they've had. So we do encourage everyone to look at the Policy Status Report and also the final Issue Report which has a summary of all the inputs there that we do have, and hopefully that that does provide some value to the discussion. Thanks.

ROGER CARNEY:

Great. Thanks, Emily. Again, I think we've hit on the data issues several times in our discussions and it's something that, yes, we have a lack of data here. But is it something that we can include in the next version of the policy that that data starts to be collected, or it's somewhere that maybe whoever reviews our review can actually use some useful data coming out of that. So something to keep in the back of the head, too. Jim, please go ahead.

JIM GALVIN:

Thanks, Roger. Jim Galvin, Registries. I want to ask a question, bring sort of a different perspective into this discussion, as I've been listening to it and reflecting on it. Question that occurs to me is what is the purpose of the hijacking? Is it about committing abuse so what we really have here is a just a very particular type of abuse problem? Or is somebody trying to and in a targeted way trying to get at your domain and wants to own your domain for some reason? Or is there something else? I'm just wondering why is hijacking being called out as something special here? What is the problem that we're trying to get at here? Someone really wants ownership of your name? And how often does that really

occur that you get targeted to somebody to steal your name? Or is this more of an accidental, “Oh goodie, I can get a domain name. Let me go get that.” And then what? If I’m not trying to get ownership of that, it must be for abuse, right? Just trying to understand. Thanks.

ROGER CARNEY:

Thanks, Jim. I think that gets back to maybe Sarah’s question early on of what’s the purpose and where are we going? Generally, again, I think when you look at the dispute mechanisms, you’re trying to correct something that occurred erroneously for whatever reason. As you mentioned, Jim, maybe that’s hijacking and it gets called out specific for some reason. But maybe it’s just I meant to transfer a different domain or I didn’t mean to do that yet or whatever it is. The purpose of a transfer dispute is to undo something that occurred. Again, maybe there are specific paths based on why that occurred. Maybe it’s different if it’s hijacked and maybe it’s different if it was a sale that went wrong or whatever it is. Someone sold somebody else’s name. How did that happen? But I think that you got to look at it—I think that what we’re trying to solve or what we’re trying to do is create a mechanism for a transfer that occurred erroneously for whatever reason. Owen, please go ahead.

OWEN SMIGELSKI:

Thanks, Roger. I want to respond to Jim’s question there some types of TEAC requests that I have seen since I’ve been at Namecheap. These are generally high profile, high value domain names that, for whatever reason, are transferred from one

registrar to another. It really can run the gauntlet of it. It's not a kind of, "Hey, we're going to take this domain name and start doing fraud or abuse or something like that," or it's not the registrant says, "Oops, I accidentally transferred it from Namecheap to GoDaddy, I want to bring it back." It is somebody obtaining access to the registrar accounts, hacked it, got an exploit through an e-mail or something like that, and then stole the domain name. I've seen several times where there are fake court orders that are provided, and then the transfer happens. And then it's realized after the fact that the court order transfer was 100% bogus. I've actually seen that several times. There's a number of things in there in those scenarios. Because this is generally a high value, high profile domain, name website, etc., you need to get them back quicker, as opposed to a normal process to get something back. So that's why I think we still do need to have this because it does happen every now and then. And it's when it does happen, it's certainly a big concern issue for the person who did absolutely nothing wrong and lost their domain name. Thanks.

ROGER CARNEY:

Thanks, Owen. I think you had to think about it. I mean, obviously, some of them aren't as catastrophic or whatever, but some of them can be. And it's not just the registrant that's having a problem or they're not making money or whatever. That's bad enough as it is but it's affecting the customers of their customers and however far down that line goes. Obviously, if something happens with an e-commerce site versus the auto industry or something else that could impact safety as well, obviously there's concerns there that could escalate much higher than "We just

noticed this nine months after it happened.” Obviously, it isn’t going to be as big a concern as, “Hey, 10 seconds ago, this happened. Now our customers can’t board planes or whatever it is.” So, I think it’s important. Obviously, there’s multiple paths to resolution because there would be a different urgency level.

Okay, good. I love this open forum. Let’s talk about the issues that we know. I think next week we can get into specifically tying these ideas, these issues, to specific charter questions. We can delve into specific charter questions in our discussions, but it’s good to see what everybody’s seen and what everybody’s feeling in the pain points and things like that. Again, we keep talking about the problems here, but are there things that really make sense? I think what we’ve come to, urgency makes sense. There’s different level of impact. So I think that urgency is one of the things we’re identifying as being something that’s important to keep. Whatever we wrap around those is yet to be determined but it’s still an idea of importance.

So any other comments on TEAC kind of issues that they’ve run into or anything that they think that can even be improved on the TEAC? Thanks, Jim, for your comment. I think you said hijack is a simple one. I think it’s easy to identify and go that way. But I think, again, it’s broader than hijacking. It’s more important of just something that happened in a transfer. It shouldn’t have went through. So I think that’s the important thing. Maybe there’s different paths based on how or why that happened, I don’t know. But I think yes, I think hijacks called out just because it’s something to point to. To me, the dispute mechanism is broader than that and it’s about any transfer that shouldn’t have occurred.

Okay, comments on TEAC? Anything else we want to bring up? Again, next week we'll get into some discussions of that. I saw some comments in chat, Sarah and Zak. I didn't read them as they went by either because I was talking too much or I just can't read fast enough. But if you guys want to talk about anything that you put in chat, please come forward. Sarah, please go ahead.

SARAH WYLD:

Thanks, Roger. The chat with Zak is about the approach that we take—I hope I'm understanding Zak correctly—to a reversal process of any sort. I think what Zak is suggesting, as I understood it, is that we should start by looking at the concerns that came in from the public comment period. Because if we cannot fix or address those concerns appropriately, then we're not going to be successful in any kind of process that we come up with. So maybe that's an approach. Contrary that what I was suggesting, which is to first list out all the components of what the process would look like, and then fill them all in. Maybe first we start with what were the problems that we couldn't solve last time around.

Then the other thing in the chat is about the term hijack. So that's conversation with Jim, which I think we've come to agreement that it's all about, it doesn't matter why the transfer is being disputed. It's a problem for some reason and what we need to figure out is whether it's urgent or not urgent, and so I think I'm in agreement with Jim on that. Hopefully, that's helpful. Thank you very much.

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

ZAK MUSCOVITCH: Thank you, Roger. Sarah expressed pretty much what my thought was on this. The impetus for my thought is that having briefly reviewed the public comments on that quick reversal, whatever you want to call it, they're so damning that unless someone in this working group has some new bright ideas about how those can be addressed in broad form, without going into specifics, then it's almost not worthwhile going down that road. But if someone said, "Here are the main concerns from the feedback. And you know what, there's another approach that wasn't originally considered that like to float," then there's some faint hope or hope. At that point, I could see why it could be worthwhile looking into it further. Thank you.

ROGER CARNEY: Great. Thanks, Zak. On the quick reversal, rollback, whatever we've been calling it, I think we can set that on the backburner and get through the TEAC and TDRP. Looking at the overall, a bad transfer happened, how do we undo it? Maybe it's in similar form as it is today, maybe it's not. As Zak has mentioned, once we work through the TEAC and TDRP and, as Sarah mentioned, the whole idea of the process of getting it back, I think that, as I said earlier, we may eliminate the need for that rollback conversation to even occur. Or we may actually highlight, "Hey, there's a big hole here. What happens when the TEAC doesn't do this and the TDRP isn't hitting it either?" Maybe it identifies that and there is something to pull up. But I think if we work through those other

two, we'll start to identify that and either identified as not needed or needed. Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. I just wanted to reinforce what you've said here. Because I think one of the intentions of us introducing the proposal from IRT Part B and looking at the criticism is that so everyone can have that in the back of their minds and let it percolate as we have these additional discussions. Look at what was proposed, look at the criticisms, look at the concepts. Nothing stops members of this working group from thinking in the background about what can be different next time, what can be useful. But in the meantime, the hope is that in tweaking what already exists, potentially, and identifying any gaps that those existing mechanisms can't cover, when we come back to the ETRP, hopefully folks have had some time to think about that and think about both the sort of opportunities and the viability and that question of what's really changed since the previous discussions on this topic and is there something to pursue here. Obviously, if it's useful to clarify any of these points that have previously been raised or kind of brainstorm a little bit on understanding them better, that can certainly happen. But we're hoping that this is something that everyone can kind of hang out with in the background as we proceed with the other conversations, as Roger said, and then be ready for sort of a constructive and fruitful conversation when we do get back there. Thanks.

ROGER CARNEY: Great. Thanks, Emily. I think that we can look at the reasons why it didn't move forward. A lot of good comments came in and a lot of good concerns on it. But I think also look at the reasons it was even thought of as an idea. Can the goals of the prior ETRP, are those things that can get covered by the TEAC or by whatever we end up with, TEAC or TDRP replacement? Again, we're looking to improve both of those things. And maybe we improve them that encompass these things that are concerned and we can move forward. But as Emily mentioned, maybe there's a gap there that we're identifying and we could fix somehow. Emily, please go ahead.

EMILY BARABAS: Sorry, Roger, I'm talking a lot. But this is just one more point that I wanted to flag that is probably very much known to many of you, but just to those who might be less familiar with the history. So the TEAC came out of IRT Part B, and that's the same group that was considering the ETRP in the course of their deliberations. So to some extent, the ETRP was looking to solve some of the problems that the TEAC ultimately came in and became part of the final policy recommendations to solve. So thinking of those things as sort of part of a single process of the group trying to work through a set of solutions for undoing transfers might be helpful also in the context of putting the pieces together in our own deliberations. Thanks.

ROGER CARNEY: Great. Thanks, Emily. Okay. Any other comments on TEAC? Anyone have more experiences they want to share? I haven't

heard a lot of positive experiences, but if people have them, that'd be good to share as well. But anything that's a pain point, or if anything positive, that's great. Any other ones, anything people want to bring up? I know Owen will think of something tonight when his head hits his pillow. Oh yeah, I forgot to say this, but anything that we want to cover now?

Okay. How we approach this, again, I want to kind of slide that whole rollback or expedited, whatever you want to call it, to the side. Let's work through the TEAC and TDRP. If we find gaps, then we can pull that back up. If we don't find gaps and we've solved all the problems of the world by then, we will just move on.

Okay. I think if no one has anything they want to add, maybe we can jump into at least introducing the charter questions. If we don't want to discuss them, we can introduce them so everybody can get thinking. But let's go ahead and jump into the specific charter questions. Emily, do you want to take us through those?

EMILY BARABAS:

Hi, Roger. Sure. I think the first charter question is one that we've already touched on, and that's about whether additional data is needed to support the evaluation of the effectiveness of the TEAC mechanism? And if so, what data is needed? So I don't know if we need to dive into answering this question right at the moment but it might be helpful for people to start thinking about if there are data points that could be shared, that could be resourced. What are those? The answer might be that it's not possible to answer this question, but it does seem like there's already some momentum

around that the additional data would be helpful. So perhaps something to think about in the background.

The next charter question is one that might be something that people already have reactions to and we'd like to discuss. So this is about the timeframe for registrars to respond to communications via the TEAC channel. It's something that came up in the Scoping Team and also in survey responses associated with the Policy Status Report. As Caitlin mentioned, the fact that in practice having that 24x7 coverage to meet the requirement with the right language skills is particularly challenging, and specifically for those outside of the Americas and Europe, for smaller and medium-sized registrars, and also in those in countries where English is not the primary language which requires them to staff an English-speaking contact. So the first question was about that four-hour timeframe, and that might be something that folks already have thoughts or reactions to, whether it might be appropriate to either adjust that or other means for addressing that set of concerns. So that might be one that we can already dive into if folks have thoughts on it. Thanks.

ROGER CARNEY: Thanks, Emily. Owen, please go ahead.

OWEN SMIGELSKI: Oh boy. Do I have thoughts on here? Roger, I don't have to go put my head on my pillow to come up with these. I've got them all ready to go. I've got quite a bit of experience with this from my time at ICANN as well as in Namecheap. I think the four-hour

thing right now is kind of a drop dead thing. If you miss that four-hour deadline, it is 100% reversible transfer by the registry. I don't want to go into further details about discussions I've had with other registries or registrars on this. Again, a registrar waits four hours, five minutes to respond to a TEAC communication, and then immediately undoes the transfer. That could be a rationale for reversing it. But a registrar that responds in two hours but then takes six weeks to reverse the transfer, that's not necessarily a way for the registry to do it because they've complied but they haven't done that. So I don't think that's very fair. I think that hard line for missing the deadline should not be a 100% reason for reversal.

That said, I think there should be something for a registrar that doesn't respond. I don't know how to quantify that in time because bad actors have shown that they are aware of what this time is and they exploit it so a transfer will happen at a time when it's either vacation or in the middle of the night for the gaining registrar but it might be business hours for the losing registrar and they're able to jump on it right away. I think we need to explore some guidance perhaps for responsiveness. Then maybe, really, a longer thing at that point would be considered too much time. But I'm not sure necessarily what that perfect solution is and how we can reconcile that without being exploited later on down the road. Thanks.

ROGER CARNEY:

Great. Thanks, Owen. I think that's something important to remember. I think we've said it prior on another discussion. Obviously, when you come up with the rules, those good actors

will follow those rules but the bad actors use them to their advantage as well. So it is something important. I think you're right, Owen. I think it's hard to think about that, I guess, lack of window, really, of when this could be done and something that should probably be bounded. If we're going to require such a quick response, it should be worked fairly efficiently as well. Theo, please go ahead.

THEO GEURTS:

Thanks, Roger. I agree with Owen. And I wasn't even aware of that. Bad actors actually could use that four-hour window to their advantage to create a lot of damage on the Internet because basically that is what it is. It is a giant loophole to do a lot of damage. I'm actually amazed that not more bad actors actually use this to disrupt some really critical services on the Internet. So I think we got lucky so far.

I don't know what the best timeframe should be. I don't have an idea on it. Four hours, obviously, is an issue. I mean, that is quite clear that we also have the discussion about small- and medium-sized registrars. I'm always glad that I never received one. So the problem seems to be somewhat contained but that doesn't mean it isn't contained over a year or so. This is, again, a pretty big loophole in my mind. Security risk, if you will. I think it would be useful to come up with some kind of solutions around this. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Owen, please go ahead.

OWEN SMIGELSKI: I just want to follow up with Theo said about not realizing that—I can't go into too much details here. But with my time at Compliance, I saw it at least twice where domain names were hijacked to coincide with the end-of-year shutdown that's common throughout North America and Europe. Then also one other time, I saw when it happened around the Chinese New Year. It was impressive because it was within 12 hours of those holiday shutdown time starting the [conflict] winner. It was in that period. It was very clearly targeted to take advantage of that so that there would not be the ability to either reverse or not reverse in there. It does really happen. Thanks.

ROGER CARNEY: Great. Thanks, Owen. Any other comments on the four-hour window? Any of the issues brought up here obviously are big issues—smaller registrars that don't have that capacity or maybe non-English-speaking areas. Thoughts on that? Maybe we don't have to get into the specific four-hour range because maybe the solution there is more based on urgency of the request. A domain that's hijacked is not being used, maybe response on that is less than a domain that is impacting infrastructure of some kind. Comments, thoughts or anything on this? We're covering this for the first time. We'll definitely hit on this again. Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. I'm actually responding to Steinar's comment in the chat. There will be "less problems" with a longer window. I've thought about that and I'm not sure—a typical lawyer response—because what's a longer response time but also keeping in mind the urgency of the issue, 12 hours, 24, five days. I'm not sure how to define that. The other concern is once we do have that maximum, then it's going to be out in the wild and it has that subject to being exploited by bad actors. That's something I've struggled with trying to figure out as I put my head down on my pillow and try and figure out what's going on here. So I'm not sure but certainly open to discussions. I think there should be something a bit longer, perhaps a little bit more flexible in terms of if you miss that deadline. So it's not a 100% transfer undo in that thing, but I still think we need to discuss it further.

ROGER CARNEY: Great. Thanks, Owen. I think you touched on something right there at the end that is important to think about as well. The degree of impact there doesn't have to be a complete reversal of ownership and registration life cycle and everything like that. Or if it's a quick hit, is it something as simple as DNS goes back to the way it was until something can be determined further? Whatever. I think there's degrees in between completely transferring it back and still making a function if it is something that's critical. I think that that's something to think about in the discussion of timelines as well. Okay. I think we've teased this out enough for today. Emily, do you want to take us through the next few?

EMILY BARABAS: Hi, Roger. Sure. The third charter question under this topic focuses on Section 1.A.4.6.2 of the Transfer Policy, which says that communications to a TEAC must be initiated in a timely manner within a reasonable period of time following the alleged unauthorized loss of the domain. The Transfer Policy Review Scoping Team noted that there were concerns that this is not a clearly defined time period and suggested that the working group look into and think about whether additional guidance is needed around that reasonable period of time. Shall I pause here and see if anyone has initial reactions to that?

ROGER CARNEY: Great. Thanks, Emily. Yes. When I read this, I'm not sure if we're trying to solve two different things. I'm trying to figure out if they're saying upon a transfer, does it need to be a certain window, a fairly short window? Or as Owen mentioned earlier, the four-hour is great but someone spends 16 days doing the rest of the work. It's still not a very urgent response. I think maybe there's two pieces here. Is there a reasonable timeline post transfer? Then also is there a reasonable timeline to actually action it? Theo, please go ahead.

THEO GEURTS: In my mind, there's a couple of scenarios that prioritize one reasonable period of time is. I mean, there will be some kind of transfer issues that are not high priority because the domain name is still functioning, the e-mail is still coming and going. So that defines how urgent something is versus the scenario that something is offline, causing a lot of damage, a company's going

bankrupt while we speak, so to speak, that defines what reasonable is. I mean, in the worst case scenario, an hour is maybe a reasonable period of time. The best case scenario could be maybe 10 days. That could be reasonable. It depends. Thanks.

ROGER CARNEY:

Thanks, Theo. When you think about it, again, whatever the timeline is, if someone doesn't recognize that their domain has been transferred 14 days ago, it doesn't seem like the TEAC is an appropriate mechanism to dispute it with. That timeline is maybe a little iffy but it seems like when that gets longer, the TEAC becomes less of the dispute mechanism that should be used, at least how I'm thinking about it. Owen, please go ahead.

OWEN SMIGELSKI:

Thanks, Roger. I think it's difficult to put it nicely. I'm looking at the chat here, what is an emergency is being discussed in there and when would that be a TEAC trigger? I do think the policy needs to be changed to, instead of this reasonable time period following the alleged unauthorized loss, I think there needs to be some sort of notification to the registrar as the trigger for that. Because, I'll be honest here, Namecheap does not have a system that can 100% identify every time a domain name is unauthorized transfer away. Yes, there are some things in there that can determine suspicious activity, a login from an IP address that's not associated remotely with that person, etc. I mean, there are ways to do that. But there's also, for the most part, we're relying upon somebody to tell us, "Hey, my domain name is gone. I just realized that." I think that can be a good trigger. But I don't want to start putting in days

saying how long somebody must have to respond or notify registrar for that, because there's could be a number of reasons why somebody might take 1, 2, 5, 10, 30 days to discover this. They're on a safari and they're off the grid for 30 days. They may not know about it, it doesn't mean it's not unauthorized, it's not an emergency. But as soon as they find out about it, then they can contact the registrar and let them know. But I think making it here perhaps a little bit guidance about what might be an emergency and why they might need to do that could be one part. But also, I think the important part is the notification to the registrar. Once the registrar knows that it's an emergency, then they need to follow the timelines and guidance on this policy. Thanks.

ROGER CARNEY:

Great. Thanks, Owen. Okay. Any other comments on this item here? What I want to mention, not this past time but earlier, if it is an emergency, I think that not only defining what reasonable is here but also reasonable actionable time as well. Not just notification time but action post that I think is something that's important to think about as well. Okay. Let's go ahead and jump to the next one then, Emily.

EMILY BARABAS:

The next question focuses on the method of contact. The TEAC, as you heard earlier on this call, may be designated as a telephone number. That means that some TEAC communications are taking place by phone. The Scoping Team noted that this is something that the working group may want to consider further. Specifically, the question of whether communications by

telephone provide enough of a paper trail for registrars who might later want to request a transfer undo based on a failure of TEAC response. As a reminder, the requests for an undo have to require the registrar to provide evidence that a phone call was made and not answered or that a callback was not received within the specified timeframe of four hours. The question is in light of this paper trail requirement, should communication by phone be eliminated as an option and is an authoritative system of record for TEAC communication needed? If so, what would the requirements be for such a system? I'll pause for a moment. Thanks.

ROGER CARNEY:

Great. Thanks, Emily. I think that Rick and I touched on this a little bit earlier as well. The difficulty with setting timelines based on something that's not easily trackable. I think this is a good call out and something that we should look at. It seems like calling a phone number is quick. Maybe 12 years ago, whenever this was thought about, it seemed like the quickest way. Maybe it's not, maybe there's better ways or, as this points out, a better way specifically for audit trail or documentation. Thoughts on that? Should TEAC be a phone number? Does it need to be quantified? Does it have to be a specific thing? Can it be left to the registrar? Thoughts on that? Theo, please go ahead.

THEO GEURTS:

You pointed out a bunch of good reasons there yourself, Roger. We should take those into account. Speaking as a smaller registrar, keeping up those phone numbers in a reasonable way is

problematic. The times that we lost a fax number, I cannot even count them anymore. I need a calculator for that because it happened so much because barely anyone uses a fax anymore. We have the same issues with the telephone number and then we have the privacy issue. Because usually you want to have a provider phone number where you have a lot of staff, so somebody picks up the phone, that will be our support team. However, we do not monitor those calls due to GDPR reasons, etc., so there's no monitoring on it. I think any other solution, whatever that be, is going to be better than a telephone number. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Other thoughts on this? Again, I assume the telephone number seemed to make most sense because it's probably a quick response and, I don't know, maybe more of an affirmative response. If someone picks up, it's easier than, "Did they actually get the e-mail or text message?" or whatever it was. But again, I think that telephone may not be the quickest or most responsive as it once thought it would be. Thoughts on this? Flexibility here important? Okay. I don't think we need to spend much more time on that.

Emily, do you want to run us through this last one? I don't think we'll have much time to talk but at least we'll get it in everybody's head for next week.

EMILY BARABAS:

Sure. This last charter question is specifically about registry pain points around the obligation to undo a transfer under Section 6.4 of the Transfer Policy. One is that the registry operators don't have access to the designated TEACs for each registrar, making validation of an undo request very difficult. Second, that there's no way for registry operators to independently verify that a registrar didn't respond within the required timeframe or at all since they're not a party to the communications with the TEAC. That undo requests associated with the failure of a TEAC to respond are unilateral. So there's no validation required before the registry operator takes action, which can lead to a sort of "he said, she said" scenario where there's not clear evidence and different perspectives on the situation. Then if the policy were to be updated to allow some level of validation by the registry operator before they take action, the requirement that the undo needs to happen within five calendar days of receiving a TEAC undo request doesn't provide enough time to actually do that validation.

I did want to also mention these charter questions are fairly specific, following on to issues identified by the Scoping Team and also in the survey results. But as we talked about before, taking a broader view of what problems are we trying to solve with the TEAC and what problems are we not solving with the TEAC that could still need a solution, it's still within the scope of these charter topics. To the extent that some of the conversation doesn't fall specifically into one of these charter questions, I think the goal here is to find the pain points and the gaps, and to come back and look at the TEAC holistically to see if there's areas for improvement to address some of the concerns that have been

raised more generally about undoing transfers. Just to keep that in mind as well as we continue the conversations. Thanks.

ROGER CARNEY:

Great. Thanks, Emily. We've got a minute left here. Again, I didn't want to dive into this. I think we've talked about a little bit of this anyway. But I wanted to mostly just get introduced so people can think about it between now and next week. Next week we'll start diving into these specific questions and discussion and start discussing them and get them hopefully toward answering them so we can work through these charter questions and get to a good spot.

I want to thank everybody for their time today. It's been a good hour and a half today, introduction to our next set of work. Hopefully, we can get through this and make some good policies coming out. Thanks, everybody. We'll see everybody next week.

JULIE BISLAND:

Thank you, Roger. Thanks, everyone, for joining. This meeting is adjourned.

[END OF TRANSCRIPTION]