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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 5th of November, 2024. For today's call, we have apologies from Zak Muscovitch (BC), Owen Smigelski (RrSG), John Woodworth (ISPCP), Jim Galvin (RySG). They formally assigned Arinola Akinyemi (BC), Essie Musailov (RrSG) as their alternates for today's call and for remaining days of absence. As a reminder, the alternate assignment form link can be found in all meeting invite emails. Statements of interest must be kept up to date. Does anyone have any updates to share? If so, please raise your hand or speak up. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only. Please remember to state your name before speaking for the transcription. And as a reminder, participation in ICANN, including this session, is governed by the ICANN expected standards of behavior and the ICANN community anti-harassment policy. Thank you. And over to our chair, Roger Carney. Please begin, Roger.

ROGER CARNEY:

Great. Thanks, Julie. Welcome, everyone. I don't have too much to say. Just a couple comments as we're getting ready for ICANN 81. Going into 81, our goal for that face-to-face is to discuss any of the more complex or open items that we have on these public comments. So between now and then, take a look at what we've talked about and the proposed edits and everything. And if there's something specific that anyone wants to talk about at the face-to-face, just let us know on the list and

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we'll make sure to hit those on Saturday, our session on Saturday. So again, I know we've touched on a few updates that we wanted to come back to, so we'll do that. But anything that you guys notice or that you want to talk about, please just hit the list with it and we'll make sure we get it covered on Saturday.

Okay. Jumping into our work today, there's quite a few comments on the few recommendations that we're going to cover here. Again, just a reminder that we're looking for new information or new thoughts. So if we run into something that we've talked about already, we'll probably brush by that and just point the commenters to our discussions that we've already had. But anything new, we do want to take a look at. And on these recs, the change of registrant data recs, there were quite a few comments, so we'll go through those today and hopefully make it through all those. But again, we're looking for new stuff that we can act upon. But with that, I think I will turn this over to Christian to walk us through our starting on recommendations to 25. Christian, please go ahead.

CHRISTIAN WHEELER:

Thank you, Roger. Yes, so we're going to pop right into the final report recommendation drafting guide. I know on the agenda, it says the PCRT tool. So you can always look through there to see kind of summaries of some of the discussions that we've had and some of the draft responses. I might recommend that looking at some of these draft responses, you'll see some of them are blank. So those might be good ones to kind of take a look at as far as potential ones to kind of revisit, because it just means the group hasn't really finished those discussions

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or wanted to circle back to those. So I'm sure we have some a list of ones like 18.3, for instance. So I'm sure we can kind of look at those to see what kind of things are still pending as well. Just an additional food for thought. Now, going back into recommendation 25. So this is kind of where we left off with the tail end of last session, last call. So there was one comment on recommendation 25 with regard to the privacy proxy providers. The commenter had noted that privacy and proxy service providers are different, that a change to a proxy provider would entail a change of registered name holder. So it shouldn't be grouped in with privacy providers. And so a proposed change would be just getting rid of the mention of proxy in here within the text of 25.3. So I'll leave it there for the working group to continue its discussion on what it thinks of what it should do about this comment. Roger, back to you.

ROGER CARNEY:

Great. Thanks, Christian. Yeah. And again, 25 just had the one comment here. And that does sort of make sense. I think I don't remember who brought it up, but it does make sense since the proxy is technically the registrant there. So I think it makes sense to remove that. But I'll open it up to the floor to anyone that wants to make any comments about this, support or concerns about it. So anyone? No one? Thanks, Jothan. Yeah. Okay. I think this is pretty good. I think a pretty easy change and a smart one to call out. So I think that's great. So I think we can move forward, Christian.

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CHRISTIAN WHEELER:

Great. All right. And moving to recommendation 26. So I'm going to just kind of briefly go through some of the comments. I'm not going to read all of the stuff here. Yeah. And everyone should kind of be familiar with these comments already. But essentially, there was a comment with regard to creating a standalone policy, just kind of as a reminder that the inter registrar transfer policy was changed to the transfer policy in consideration of adding in the change of registrant piece of it, the other kind of other half of it, because there was some dependencies or kind of an intertwined relationship, namely being that lock, that 60 day lock that is triggered, which is why it was kind of included within the transfer policy, because those are kind of wrapped up together. And so there was just kind of a concern of separating them if there is that kind of relationship.

Another comment was with regard to the designated agent. There were concerns that removing the definition of designated agent doesn't really solve the problem and that registrars would still probably put in their registration agreements since the policy doesn't prohibit them from approving change of registrant data on behalf of the registrant. And so the recommendation was if the intention is to restrict it to exclusively the registrant, then that should be explicitly stated alongside why the designated agent is proposed to be removed or else provide an updated definition for designated agent.

There was a comment, a few comments on 26.2, which was about the removal of section 2B, the availability of change of registrant. And just as a refresher, this is it right here. 2B, the reasons why they can deny a cord or when it would not apply. So the commenters had basically said that this gets rid of a really important clause that's really important to

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registrants, namely this right here, that registrants must be permitted to update their data and transfer the registration rights to other registrants freely, saying that this is a really kind of key piece of information that shouldn't be removed. There were also some comments with regard to that it's the even though it was classified as the impact is being low for removing this, that it suggested that it would actually not be a low impact, it would have a high impact. And so they listed some reasons here as to why it's important to keep those reasons for denying it, namely being like things that keep things clear, so that registrants know when they can be denied. So registrars know, so it prevents abusive denials and keeps that language that they can transfer their main rights to other registrants freely. So there's just concerns about not having those being explicitly stated. And there was also a question with regard to the removal of just a point that if a domain was in the middle of a dispute, like ownership concerns or UDRP, it could still be updated to a new registrant data. And the question was, was this the desire of the working group? So just some additional food for thought there if that's something the group wants to clarify. Another comment on this suggested removing, eliminating from and replacing it with retaining in, which essentially reverses the comment. So instead of getting rid of the confirmation aspect of the court policy, it would be keeping it. And then the confirmation. This was just another comment that was basically saying that having the confirmation of from the prior registrant and the new registrant is an important security check that's in place. And that one email notification isn't enough as it can be missed, potentially.

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26.4. Those recommend a comment that the lock should not be eliminated, but reduced to 30 days. Similar to, you know, for the same kind of reasons to remove that restriction as in recommendation 18, which was about the removal of the or the lock after a registrar transfer. So I believe this was At-Large saying that they recommended keeping the lock but reducing it to 30 days. And then this last comment was about—sorry, just checking it out. Yes, there's just more concerns that it would be, it's opening up to more potential risks of hijacking if these restrictions are removed for CORD. So those were the comments in a nutshell. We got a lot of comments so I'll just leave it up to there if I'm forgetting anything or mischaracterizing anything. So I'll just kind of pause there before going into some of these proposed edits based on these comments.

ROGER CARNEY:

Great. Thanks, Christian. Yeah, and I think you got all of them that I can remember on all the comments covered. So I think that's good. Again, the under construction piece of this is just taking the comments as they are in looking at how that would look. It's not anything from the IRT standpoint yet or the working group standpoint yet. It's just what the comments would be if they were impacted. So that's the goal, is to go through those comments and see if we agree with them or not. And again, I think, as we go through these think about, is this new, or have we already discussed these things and decided, and then we can point those commoners to those discussions. But Rich, please go ahead.

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RICH BROWN: Good morning. Good evening, everybody. Rich Brown for the record. I just want to say, I am totally against sending any sort of confirmation emails on this. We had long conversations about this. Confirmation of registrant information changes is a function of the actual RDDS system. It is not a process of the transfer system, which we are working on. Yes, we agree that registrant information is a valuable part of the transfer process, which is why we kept the notification when a change is made, hey, you get a notice saying a change was made. It doesn't invalidate any other WHOIS verifications or other WHOIS requirements. Again, I'm against the re adding of the confirmation email to this process after we removed it after long debate and for various reasons. So I'm just reasserting that. Thank you.

ROGER CARNEY: Great. Thanks for that Rich. Steinar, please go ahead.

STEINAR GROTTROD: Just a short comment on At-Large input here is that we had quite a lengthy discussion about this in the Consolidated Policy Working Group. And what I understand from that discussion is that the primary goal for At-Large is that this change of registered data must be established as a separate policy and not included in the transfer policy. In that discussion, there was concern about and the majority of those who spoke were in favor of putting a 30 days lock after material change when it is defined as material change. We did not discuss the verification stuff. Actually I advocated that this is something that I sincerely hope the registrars will take care of in a professional and

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best way, but it's more or less must be tailored down into the standalone policy. Okay, so the essence here is that the key thing we are in favor of a standalone policy, but we want to have 30 days lock when there is a material change. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Okay, any other comments. Ken, please go ahead.

KENNETH HERMAN: Thanks, Roger. And I just want to comment a bit on this notion of confirmation. What emerged in discussions with the stakeholder group was a realization that for many of the stakeholders that we represent, these are individuals that are generally small organizations and they have depended in the past on both the administration and the technical contacts in order to keep track of what is happening with their domain names. So we realized that those contacts, administration is no longer there, technical is by choice of the registrar. And therefore, it's pretty easy to miss a notification of this nature if you're really not prepared for it, if you're really not really know what to do about it. I think I'm happy to discuss where some of the other confirmations might come from, as Rich has mentioned, and ensure that there's a clear path to ensuring that in the cases where an account may be compromised or there may be other malicious attempt to mess with a particular domain name that these kinds of communications get through. So the main point really has to do with the fact that there is now principally just the registered name holder. And in the past, that's been more eyes on the on the domain



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names. That's kind of where we're coming from here. So happy to talk about it some more and learn more about where these controls can be maintained. That's kind of my position. Thanks so much.

ROGER CARNEY:

Great. Thanks for that, Ken. And that's good to have, that thought process. I think Rich hit on something that was important that we spent some time on when we discussed this, was the change of data here is important, but it's not transfer related. And I think that's why, and it seems like everyone still agrees why that needs to probably just be on its own policy. So I think that that's a good thing. And again, what that policy looks like, I think, is important. But again, it's not a transfer related thing. So it is our recommendation here on what that policy should look like. So all important things.

One of the comments, and just wanted to make sure it was aware, you know, the confirmation, and then one of the commenters said, you know, it was the first line of defense here. Well, actually, it's not the first line of defense. It's the second or third or whatever it is. But, you know, to get in here and make a registrant change, you have to log into that person's account to make that change. There's at least one or two steps prior to any kind of confirmation to begin with. So I wouldn't say that it's that front line, I would say it's still a post kind of thing. So just want to make sure everybody saw the picture fully that that that's not a first line of defense there. But great comments. I think what we'll do is we'll step through the under construction and see which ones we like, which ones make sense. So I think there's some things we can pull out of here and do. And some of it, again, we've talked about, we don't

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think that there's a need for it. And we've already discussed it. So we don't have to go through those. But under construction here, this is all the changes that were suggested in the comments. So I think we need to walk through each one of these and see if that's something we want to do. So, Christian, do you want to take us through these updates?

CHRISTIAN WHEELER:

Sure thing. Yeah, so the first change you'll see here is adding in that this was from the commenter about the designated agent removing it doesn't really solve the problem. And so if it if it's the intention that it should be done by the registrant, then only then that should be clear. So this is a proposed edit. So the group recommends that a change of registrant data must be confirmed by the registered name holder. Therefore, the role and definition of designated no longer fit for purpose. So that's just one thing. And I would say that this is kind of a reflective of in the current transfer policy. I believe it says the registration. Oh yes, part of the process. So it's kind of from here, this this kind of first sentence that can confirm from the registrant or designated agent of the new registrant. So it'd be kind of getting rid of this piece here.

ROGER CARNEY:

Yeah, and I think that it's interesting because I'm not sure what confirmed means. And I don't have a problem with this wording. I just trying to think operationalizing confirmed. Is that confirmed because they logged into their control panel and did it, or is that saying that they had to proactively do something? Just a comment there. so thoughts on

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this. Again, I'm not opposed to the wording at all but again, the confirmed part is interesting. Rich, please go ahead.

RICH BROWN:

Well, if we want to go back to the current wording or previous wording or however you want to say it, basically not what we're writing what current policy is on the designated agent. You're supposed to send to the old and the new email address and get confirmation from both, even if the older email address no longer works. So, that right there already shows a break in the current process that needs fixing. And to add to this further. As I said previously, when you make a change to your WHOIS data—and I think this is getting confused with transfer policy and this comment really should be a complaint to the WHOIS management policy, or however you want to put that. The bottom line is one, to make such a change, the account is already compromised if this is being done by a bad actor, because we already stated bad actor needs that access first and foremost before they can submit such a change. So, the bad actor argument, slash compromise, I'm not buying that. As far as making a change to the WHOIS, well, there are many instances that when you update your WHOIS information, the registrar must confirm or validate that data. That is part of the RDS policy, not the transfer policy. So, us having to do another confirmation that is already theoretically happening as part of policy in a different area that is applicable to this, or we send yet another notification almost duplicating the effort. And there has been a lot of complaints about overuse of notifications. But once again, in my opinion, us removing the confirmation necessity of this requirement and just turning it into a pure notice, that's what fixed it to begin with. And once again, I still

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stand against changing back to a confirmation for the reasons already listed. But, yeah, if we need to break more things down, let me know.

ROGER CARNEY:

Great. Thanks, Rich. And again, I think we're clear that the change of registrant data is not really a transfer thing. So, I think we're all in agreement there and it needs to be, but I think the important thing is, is 26 is saying it needs to be moved. And someone correct me, I may be wrong, but I think what we're talking about is the IRT is going to do that. It's not going to be another PDP, the IRT is going to actually create another policy that handles these things. So, if we're telling the IRT in this section what to put in that other policy, it's not transfer, it's a change of registrant data policy, then we need to be as clear on that as possible. And I think that's what these comments are trying to say is, okay, none of this is transfer related. Okay, right. So 26 says get rid of it out of the transfer policy because it's not transfer related, then it needs to go and the IRT needs instructions on what to put into that policy. So I think that that just trying to be clear here. So, but, Ken, please go ahead.

KEN HERMAN:

Yeah, thanks. Thanks, Roger. And thanks, Rich, for that explanation. This is Ken Herman for the record. So, do we need to then change 26.3 from saying, from even mentioning the term registrant? I mean, we're not changing registrants in the CORD policy, we're changing the registrant data. So, unless I'm reading that incorrectly, I'm sorry, the writing on the screen is a little bit small. So 26.3 obtained confirmation from both the

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prior registrant and the new registrant prior to processing a change. So, we're not changing registrant is what I'm kind of getting here. And I'm trying, you know, my recollection of the previous discussions some months ago is a little vague. And we did simply didn't register at the time. But the confirmation from both the prior and new information or something, just by referring to the term prior registrant to new registrant implies to me that we're changing registrants here. When, if I understand Rich correctly, we're not. We're just changing the data that's associated with a particular registrant. And that registrant would still remain the same within the RDDS, within the WHOIS database. So that's what I'm getting here. And it would be great if you could tell me if I'm sort of on the wrong track. Thanks.

ROGER CARNEY:

Yeah, I think you're heading down the right track. And I think that was one of the things that we talked about, and it was the hard part of trying to pull this apart. We purposely in our discussions tried to not get into ownership or, you know, whatever anybody wants to call it. We're not talking about changing of registrants. We're talking just about changing a registrant data. And as you pointed out, Ken, that's two different things. We're not talking about a change of registrant. That's not in this. And we're not trying to do anything about that. We're talking about change of registrant data. So it's a good call out there. So, but Theo, please go ahead.

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THEO GEURTS:

Yeah, thanks. Apologies for being late. Back to back meetings. Always fun. But yes, that was the whole argument that I made maybe a year ago. I don't know. Time flies when you're having fun. That's basically the entire gist of the discussion. This is the problem that we faced back then when we introduced this change of registrant policy. Then we realized like, oh, wait a minute. Is there a change of ownership? Is there a new one? We don't actually know. We can't tell from the data, unless you manually inspect like a million domain name updates a day, which is impossible to do that manually. And even with AI, it's going to be really hard. So that's why I've always been pushing. We are talking about an update of the registered data. We don't know if the domain name owner is being changed or the domain name is being sold. And that is the impossibility of the former policy that we had. And that's why the working group eventually came up with eliminating that this entire concept of changing of registrants, because it's sheer impossible to do. It only created friction, as we have discussed this throughout the deliberations backed up with ICANN compliance, how many confusions it created within the registrant sphere and there were tons of complaints there. People didn't know what to do anymore and basically it was preventing, which is something the ICANN community really wants to have, is accuracy of data. Well, this policy made that impossible in the sense like it put in more barriers to make sure that data became more accurate because registrants go like okay, I thought I already changed the data but oh, did I miss an email? And basically that issue of missing emails, missing this, forgetting a step within a portal of a registrant, you know, all these barriers make data less accurate and that's why we sort of came up to the conclusion like we need to get rid of this.

ROGER CARNEY: Great, thanks Theo. Yeah and again, it's something that, you know, obviously we had this discussion and we had it multiple times as we were walking through this and the public commenters didn't get to obviously be part of that so that it's one of the things that we need to make clear is we're not talking about change of registrant, we're talking about change of registrant data and the registrant is not changing here so it's important to know because that is a big difference. But getting back to 26.1, does anybody have any issues with the wording? Again, the confirmed, it seems, I'm not sure what that means. Does that mean that they logged into an account so we're confirming that that's the registered name holder so that's done? Or do we feel that this extra wording here is not needed to explain why we're getting rid of the designated agent? Just thoughts on that.

CHRISTIAN WHEELER: What about initiated? Does that clarify things or does that add in more wrenches?

ROGER CARNEY: Interesting. You said something along that line. Maybe that's better, Christian. That's a good thought. I don't know if it's initiated or processed, whatever it is. Maybe that word can be improved. But the wording there doesn't seem to bother me. It's just that confirmed. And again, maybe we can come up with something there. I think we can work with that. But Theo, please go ahead.

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THEO GEURTS:                    Yeah, since I missed most of the discussion, 26.4.

ROGER CARNEY:                We're just talking about 26.1 right now.

THEO GEURTS:                    Yeah, okay. That doesn't bother me also.

ROGER CARNEY:                Okay. I think let's go ahead and work on a word there. I agree. I confirmed just doesn't seem right but let's work on a word. And I think that, you know, try to get the intent there. But I'll come back to Theo. Are you done on 26.1? Maybe I'll come back to you when we get down to 26.4.

THEO GEURTS:                    I'll wait till we end up at 26.4.

ROGER CARNEY:                Sarah, please go ahead.

SARAH WYLD:                    Thank you. This is Sarah. I know I'm in alt. It's just so hard. I'm sorry. So two thoughts on this. Number one, adding in a concept of who is going to initiate or confirm or do something to trigger this change of



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registrant data, that is a totally separate thought from whether or not the designated agent should continue to exist. So if that's happening, I think it should be in a separate point. And then point number two is just to support what the other registrars have already said in this meeting. We did a lot of work to get to this point of sending a notification but not requiring confirmation from either new or old owner. And I don't think we should go back to that previous plan. And sorry, just back to thought number one for a second in terms of suggesting that it should be initiated by the registered name holder. Even that I think is just really unclear because there could be a process where the registered name holder calls the account holder or a reseller, very different relationships. And that person is the one who actually types it into the system. So from the registrar's perspective, they don't really know who initiated it. And it's very difficult to monitor and police that. Thank you.

ROGER CARNEY:

Great. Thanks, Sarah. Okay. Yeah. And thanks for the interruption there because I think that was important. Those are kind of separate items. But okay, I think we're good here. I think we can move on to our next one, which is I think 26.2. I can cover that one, Christian, I think. Just basically, we suggest eliminating the whole section. And commenters are like, well, no, that's a bad idea. And I think that's right. I think there's a couple pieces of that section that are important to be maintained. Some of it I think we purposely thought it wasn't needed. But I think like, Christian, can you flip to that section in the current policy? Thank you. I don't remember who actually put it. But number one, I think is an important thing. And I think that should be maintained in a new policy. You know, it's what most of the new privacy laws are based on anyway.

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So I think that, you know, there are pieces here that we probably wanted to keep. And we just kind of did a big broad stroke on it. But I think there's other pieces here that we didn't want to carry on. So I think we need to be maybe more refined in our removal here. I think we wanted to keep one. I think that makes sense and should be somewhere. Not in the transfer policy, because again, it's about updating data. So it should be in the standalone policy. But I think we need to probably look at this and see and be maybe a more refined deletion mode. Number two, I don't know that the discussion about UDRP and URS, I believe, are already in those policies. So I don't know that the new policy needs to talk about what's in our policy already. But Theo, please go ahead.

THEO GEURTS:

Yeah, you said it yourself. I mean, that is already covered either through other policies or within the transfer policy.

ROGER CARNEY:

Yeah. That's what I was thinking too. So right. Yep, exactly. Thanks, Eric. So I think we can refine our recommendation in saying that, you know, what we were talking about is we don't want to be two and to be three, whatever ones we decide. But I think, you know, to be one, it makes sense. The first bullet makes sense to keep. The other ones, like number two, I think can go. And again, I think number three can go. But I think we need to look at that and make it more refined. I think if we can flip back to our edits there, Christian, I think we want to keep this. We just

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want to be more precise in 26.2. So just my thoughts. Anyone else have thoughts on that?

Okay. And we can take a look at that. Again, I think we may have missed that, you know, that one for sure. But I think we can clear that up. So with no other comments there, I think Christian, you can take us on to 26.3.

CHRISTIAN WHEELER:

Yes, 26.3, I think is pretty self-explanatory and the group has been talking about this, wanting to keep the recommendation as it was. So this was an edit to say instead of eliminate the confirmation aspect of the CORD policy to instead keep it. But from what I'm hearing from the working group doesn't sound like this is an edit that the working wants to kind of pursue. But I'm happy to hear otherwise, so leave it up to you guys.

ROGER CARNEY:

Great. Thanks, Christian. Yeah. And again, yeah, I think we did kind of touch on this. And again, I think the big explanation to me, and when I read it, I wasn't thinking of it, but as we talk through it now is the fact that this is about data, not about registrants changing. So it's just data changes. And that's why we think that this can be eliminated. So, but open it up for comments from anyone that want to talk about it. And again, I think to be clear, we're going to stay with what we originally recommended is the current process thought. So Ken, please go ahead.

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KEN HERMAN: Yeah. Thanks, Roger. It's Ken Herman for the record. No, thanks for the explanation. I'll take this back to the stakeholder group, try to emphasize what I've heard here today and reiterate that this is about the registration data. I think what's confused me and I think a lot of the people that are not that familiar with this is that it's a reference to the prior document, the policy. And it's not that we're eliminating any kind of confirmation or we are eliminating confirmation only because we can't confirm. So I'll take that back. I think there should be some better understanding about it and we'll take it up again if we need to.

ROGER CARNEY: Great. Great, Ken. I appreciate that. That's great. Thank you. Okay. I think we can move on to 26.4 now, Christian.

CHRISTIAN WHEELER: Yes. This would be to keep the lock after a change of registrant data but reduce it from 60 days down to 30 days, which consistent with the other locks and kind of the revised language changing to 720 hours rather than expressing calendar days because they could be different. So this new text would be, the working group recommends that the registrar must restrict the RNH from transferring a domain name to a new registrar for 720 hours following completion of a change of registrant data. The registrar may remove the 30-day inter-registrar transfer restriction early only if all the conditions provided in recommendation 18 are met. So this was something that the commenter had suggested in keeping the consistency with recommendation 18, which I'll just quickly just scroll up so you can remember kind of what that was. This I

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think was one that the group had kind of put a pin in to think about, but this was recommendation 18. 18.3 was about the reasons that they could remove the restriction. Originally it was kind of a reasonable basis and then there was some adjusted language, you know, that's kind of pulled from the rationale as far as what those bases could be. So this is kind of a callback to recommendation 18. So let's scroll back down here and I'll leave it back to you, Roger.

ROGER CARNEY:

Great. Thanks, Christian. Yeah, and I think we've talked about this and again, I think we touched on it and that we want to keep our original language and again, mostly on the basis of the fact of we're talking about data changes, not registrant changes. But Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. So I understand people commenting on this and, you know, on the surface, they might seem like good suggestion and definitely these people who make these comments, they try to improve things, make things better in the world. That's the reasoning behind the comments. And sometimes you get even novel ideas from them. But when we are talking about a comment like this and the text on the screen here, if you think that a little bit through, you know, basically what it says here, anytime there is an update on the data, the domain name will be locked for 30 days or 720 hours. What does that do at the registrar? Well, I'm going to tell you, you're going to expand your support team by 10 times. I mean, the amounts of complaints and questions you're going to get from this is just beyond. I mean, you

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change the data. I mean, you're a registrant. You want to move the data. You go like, oh, that data is actually, oh, the house number is incorrect. Let me correct that. I moved down the street a couple of years ago. You make that tiny little adjustment there. And you know, you want to transfer and the transfer is denied. And then you go to the registrar. Why is it denied? Well, and then somebody goes to look in the logs and go like, yeah, you made an update to the street address. And that is immediate reason to put in a restriction on the domain name transfer. And that's going to create a lot of support at registrars there. And it's not going to improve the lives of the registrants, nor it's going to improve the people, my colleagues at the support desk, because these people are going to need some help there. Thanks.

ROGER CARNEY:

Thanks, Theo. Yeah. And just to add on to that, this was one of the data points that we actually had data from ICANN compliance on. And this is, you know, their number one complaint issue is when someone goes in and changes data and they can't do things then. And again, I think that, you know, it was a sore point for registrants that this does occur. And I think that was one of the big impetuses of removing it was, you know, we actually had data that registrants are really feeling the pain on this. So that's why we suggested the removal. So any other comments, questions, concerns, again, about staying with what we said and not the updated text or the suggested updated text? Okay, Steinar, please go ahead.

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STEINAR GROTTROD: If we stay with the initial text, do we really want to keep the 60 days lock or is that to be changed into something else as recommended 30 days?

ROGER CARNEY: No, our language was to eliminate that completely anyway, no lock or anything when data changes. And again, I think that's important to stress to people is this is when data is changing, not registrants changing. So it is just when somebody goes in and edits their email address, whatever it is, their postal address, and then they're locked out for 30 suggested days, 60 today. And that's the biggest frustration of complaints getting to ICANN on transfers. So I think to be clear, what we recommended was eliminating any locks when data changes. And I think that's where we're going back to or staying with.

STEINAR GROTTROD: Yeah, I misread it. Okay, thank you very much.

ROGER CARNEY: Thanks, Steinar. Okay, I think we have good direction on that and we can move on, Christian.

CHRISTIAN WHEELER: Right. Okay, recommendation 27. All right, so we got obviously a lot of comments. There was a comment, just concerns about domain hijacking that by the time that the notification is sent, it's already been hijacked. And just a note for the group to consider 26 and 27 together. There was

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a concern kind of about this undue delay as a suggestion that there'd be an immediate automatic notification to the registrant. There was a comment suggesting that there'd be more specificity around the taking action part, like specifying the time period in which the registrant has to take action, as well as suggesting that the CORD policy include the actions, the required actions that a registrar has to take and when when being notified of a potentially unauthorized change of registrant data, such as locking the domain, denying a transfer request, that sort of thing. I believe this was from compliance, just to try and get some more details that they could hold on to and request when actually enforcing the policy.

There was a recommendation that everything be properly documented, retained, made available to ICANN compliance. There's another suggestion for 27.3 that instead of this being an Or, so the registrar must send the notification via email, SMS, or another secure messaging system, that there would be an immediate automatic notification to the registrant. That this actually be and, so that the registrar uses all potential methods of communication to ensure that the registrant note is notified. So if like an email is missed, that they can catch a text, that sort of thing. There was a recommendation in 27.4 that this may turn into a must, as a suggestion that even if there is no malicious intent, getting a confirmation email at the new email is clarifying for the registrant to make sure that everything went through, and would potentially inform the legitimate owner of a change.

27.5, there was a flag essentially that material change and the current definition also includes that any change to the registered name holder's name or organization that that is accompanied by a change of address

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or phone number. So that's something that the working group said, CORD is a material change. A material change remains fit for purpose and this is just a flag that these other pieces of information, the phone number and address, if it's accompanied by a change of a name or organization, that is still considered a material change. So, I'm not sure if the group and group already knew this, you know, probably, but it was just a flag by the commenter. The may consolidate piece, the comment was about suggesting that the registrar should not be able to consolidate if they're not able to include all domain names affected within that notification. That notification should list all the domain names that are affected by the change of registrant data and if the method that they're using, like a text message has a character limit, doesn't allow them to put all those domain names, then they shouldn't be allowed to consolidate. It would have to be something that the registered name holder should know all the domain names that are affected. So kind of a niche part of it, but something to consider. Finally, there was a comment in 27.7 to clarify what kind of optional change of registrant data notification is being referred to here. I believe optional was meant to refer to just the fact that if the red if they don't have to change if they don't, if they don't send the change of region data notification if it was opted out. That's why it would be optional but I guess it was unclear to one of the commenters I'm going to leave it there in case anyone caught anything that that we missed, or, you know, me just kind of flying through the comments and summarizing it if you know missing anything. Please feel free to speak up and then we can go through the under construction text.

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ROGER CARNEY: Great thanks Christian. Yeah, I think that covered all the comments. I don't know if anyone has anything to add. As Christian read those off before we get into younger construction stuff. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. So, when you're talking about comment periods. So, it's always good as a working group to take account the stuff we never discussed the new ideas, the angles that we haven't explored. And it goes for a lot of these sections to keep that all in mind. But this section. I sort of predicted this was going to be a rehearsal of our own work. People come in with these comments like if the register does this and this and this, then it will be more secure. Sure. It will always be more secure if you put in more barriers, right up to the point that you can argue, well, let's stop the transferring domain names and we don't have a problem at all. You don't want to get hacked, unplug your computer from the internet, power it off all completely never do any work on it anymore. But, you know, it's that balance that we seek within this working group, where we have operational clarity on how the transfer process is going to be, there needs to be predictability, but it also needs to be usable for the registrant. The registrant must have a predictable path, and not too many barriers all at once. We're going to go into the details there. I heard something about sending notifications through email and SMS. Sure, a great idea, but there are some repercussions to that. And some of them are not feasible, but we go there in detail in a bit. But, you know, just in general, this is how this process works when it comes to comments, new insights and I didn't expect new insights here. And that's exactly what happened. But we as a group must remember we have discussed this in detail over and over and over. We've been at

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this for three and a half years, so we are sort of experts. Maybe that's too big of a qualification, but we definitely talked this one through.

ROGER CARNEY:

Great, thanks Theo. Yeah, and again, yeah, I started the conversation this morning out that way. Make sure that we're looking for new. I want to be able to answer every comment. That's fine. But, you know, pointing them to our discussions that we've already had would be enough if they're not providing anything new. But we are looking for those new novel ideas or things that we missed, whatever it is. So that's the purpose as Theo mentioned. So, Rich, please go ahead.

RICH BROWN:

Yeah. Hi, Rich Brown again. I just want to point out, as we go further into this, we have established multiple, multiple, multiple, multiple times. Is that enough? I hope so. Anyway, that in cases of compromise. If they have already accessed your account, i.e. you've been compromised. Yes, sending these notifications might be too late. Putting a lock might be too late. A lot of these comments mentioned how in cases of compromise. This action, XYZ, name the action, is too late. And that's true. But remember, and that we discussed this at length in previous discussions, we can't tie everything to if a compromise occurs. Nor will every policy note we make fix every type of compromise. So we need to keep that in mind that a lot of these are edge cases that just aren't addressable as part of this. And really, in my opinion, wouldn't require an update. Thank you.

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ROGER CARNEY: Great. Thanks, Rich. Okay, I think, Christian, we can go into the under construction. Yep, perfect.

CHRISTIAN WHEELER: Well, the first proposed change suggested to add in immediately, rather than without undue delay, but keeping the no later than 24 hours just to have a time basis. It was also suggested of possibly making it automatically, just throwing that out there as well. But this was the first kind of change from the comments, so.

ROGER CARNEY: Great, thanks. Thanks, Christian. Yeah, and it's interesting, I know, and some of the other registrars know that without undue delay is fairly common in our policies and in our contract. And it does to most registrars that, you know, are, I would say, larger registrars that immediate is what without undue delay means to most larger registrars. Now, smaller registrars that maybe communicate differently. I don't know if that applies to them as much. You know, if they're very hands on, white gloves, kind of a registrar that reaches out, you know, that may not be immediate, that could be, you know, hey, I'm going to call them in the next hour, whenever their next available slot that I know is. So I think that the immediate to me is not needed. Without undue delay always means that to the larger registrars. So, but anyway, just my thoughts. Theo, please go ahead.

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THEO GEURTS:

Yeah, thanks. And you explained it very well there, Roger, and this too for the record. And undue delay, that is an important part, even for the not so large registrars. I mean, we talking about systems. I mean, if there are a ton of updates or whatever that's going on within these SRS systems, you know, we always talk about undue delay, because there could be some delay on a level that we that due to whatever what's going on at that system. Let me rephrase that. That could be a lot of stuff being queued up that still needs to be executed before you can go to the next task on such systems. So that's why we always talk about undue delay. If the queue is empty, great, it will be carried out immediately. And that will be now. But if we need to send like 1 million emails, yeah, we're gonna buffer that a little bit, because if we're gonna blast that out in one strike, well, then most of it will never be received by the recipients. So you need to sort of buffer that, throttle that to make sure the systems keep working as people expect to do. And that is what undue delay means in my world. You know, you can't control everything. Sometimes you have all these updates and the systems need to sort of make sure that it's all done in an orderly fashion. Still needs to be done within 24 hours, which is a reasonable time limit so far that I have seen. I don't work for a large registrar. But if they agree with the 24 hours, then it seems that those systems even at large registrars can keep up within that timeframe. So I agree. With undue delay is fine and covers it better than immediately, which implies now and you can't always do that.

ROGER CARNEY:

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

RICK WILHELM: Rick Wilhelm, PIR, speaking for the registries. This is obviously a registrar requirement, but as the registries, we would not be supportive of this because we would not be supportive of the introduction of immediately anywhere into the standard, into the transfer policy because it's an unmeetable standard. And so we wouldn't want this to be anywhere in the transfer policy because it would set a precedent that immediately is a valid and reasonable and valid standard that any contracted party could meet for anything in which we would offer that it isn't. Basically, for the reasons that Theo was saying that you can't have an SLA on doing something immediately because that it would imply by various standards, tenths of a second of an SLA. And so that's not a standard that should appear in a policy or something like that. So we would not be supportive of this use of immediately. Thank you.

ROGER CARNEY: Great. Thanks, Rick. Okay, I unless anyone else has anything else, I think we can move on. I think we'll stay with our recommended original language. But Christian, I think you can take us to the next one.

CHRISTIAN WHEELER: Thank you very much. Yes, next one is 27.2 which goes over the elements of the actual notification that sent. So you see as the domain names, the text which data fields were updated date and time that it was completed instructions how they can take action. And then there was a suggested edition of the time period within which the registrant

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must take action as just kind of part of that. You know, clarifying some of those instructions a little bit.

ROGER CARNEY:

Great. Thanks, Christian. When I read the comment I'm like, Okay, yeah, makes sense. But I don't know. When we wrote this. I don't think it was really bound to a time. Do that action at any time. So I don't know if, if adding a time period helps or actually detracts from what the registrant can do.

THEO GEURTS:

Yeah, I'm not going to make it any better because I'm struggling with a time period. You know, I think they already set up the most vital information within the notification. And I think the moment you're going to deal with time periods where a registrant must do something, you know, that might be messy. I haven't fought this one through. But my immediate response was in my mind like, yeah, time periods equals liability. When it comes to legal action. If we set up that time period wrong. Can we cover all the time periods in the world for all the registrars? I don't know, I haven't thought this one through. But that was something that came to mind, like, that could be liability issues there. That's my take on it for now. Thanks.

ROGER CARNEY:

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

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HOLIDA YANIK: This is Halida for the record. I just want to clarify this comment is coming from ICANN compliance, and we suggested inclusion of the time period. Because from our practice, we are seeing that unauthorized COR complaints are being filed after a long time following the completion of COR. You know, many people do not recognize and then do not understand that there was a change in the registrant after a few years and then they're coming to us when it's too late. And then even we don't have the authority to investigate such complaints because of because of the data maintenance restrictions as well. So this is why we just put in there about the timing. Thank you.

ROGER CARNEY: Great. Thanks, Holida. That's interesting. Yeah. Wow. Yeah. Yeah, that's a strange one but a real one so that's good to bring up. Rich, please go ahead.

RICH BROWN: Hi, Rich Brown again. I just kind of want to mention what I was saying in chat, where I agree struggling on the time period question at hand. But I want to state this is a notice we're sending. It's a call to action. If the recipient believes there is action necessary. Okay, so a time period for them to take action is open and variable and completely in their court. As far as compliance or enforcement would go, we're not enforcing a customer on how quickly they reply or not. It would simply be an enforcement of whether the registrar sent a notice with the required data without undue delay. If we add more, of course there's going to be



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more requirements of proof, etc. And I don't believe this is one area we really need to add to that equation. Thank you.

ROGER CARNEY:

Great. Thanks, Rich and maybe, maybe I'm starting to think a little like Sarah sometimes and I wonder if this point is not really part of this section to who lead his issue. Should there be another 27 point, whatever that states you can't complain about change of registrant data after a year or whatever, you know, whatever that is. I mean, maybe it's not part of the notification. Maybe it's just a stipulation of, hey, you know, if you're going to complain about this, you know, you got to do it within a reasonable amount of time, you know, maybe that is a year or whatever it is. But just trying to think outside. Theo, please go ahead.

THEO GEURTS:

Yeah, I wasn't going to take the Sarah route just yet. Usually a good thing to do. But with the input that we got from Holidia. I'm just wondering if we can actually solve the issue. Let me explain that one. Let's say we're going to include a time period, a time slot here. Let's say that real time register is going to send these notification, and we're going to put a note within the notification, you have 48 hours to respond, and then the message gets ignored. And then at some point, the registrant goes to ICANN compliance again, they will request the notification and there it says the register had 48 hours to comply. And now two years later, they filing a complaint with ICANN compliance. Is that going to take away the issue that compliance has? Is it going to lessen the burden? So, are we actually going to solve the problem when

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we are putting in a time slot? I don't think so, but I'm very open to other input. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Any other comments, suggestions here? Yeah, okay. Again, to me, putting a time period, to Theo's point there, it doesn't solve the issue. Again, they can come in and update it, but to compliance issue, I think maybe we pull this out of 27.2 as a separate compliance item. And we can discuss it as that, that, hey, you can't complain about this after X month time or whatever, however we come up with the language. But I don't think it's part of the notification. Again, that seems to be restraining the registrant from, as Theo said, solving the problem. So I think that let's pull it out of 27.2 and think about it as an independent thing with Holida's input there.

ROGER CARNEY:

Okay, I think we can move on, Christian.

CHRISTIAN WHEELER:

Thank you. All right, moving on to 27.3. There's a few comments kind of put into this one, but it was a suggestion of maybe replacing or with any other available secure messaging systems, sending it to all and to all contacts available, as suggested by the by the commenter. And then another comment was adding in, regardless of the means used, all notifications must be properly documented, retained and made available to ICANN compliance upon request. Yeah, maybe we don't

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need this, maybe we could just say all notifications must be sent. Some proposed language to meet with some of those comments.

ROGER CARNEY:

Right. Thanks, Christian. Yeah, and I know, Sarah had put out something in chat earlier, I saw it fly by that if you're sending a notification, you know, four or five different ways, that's a major overload. And people will be looking to get out of as many of that as possible. Our intent was to allow flexibility, and to allow it to expand into newer things. The end seems like it's going to a different intent. And I'm not sure about that. But that the last highlight here makes perfect sense to me that, all notifications must be documented and retained. So I think that's a good add, but just my thoughts on this. So Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. And I agree, Roger, we try to create flexibility when it comes to the business models. And I think that's very important. And reading this again, it sort of implies that notifications now must be sent via email, SMS, and/or other available secure messaging systems. And apparently, the commenter had something in mind like, well, it must be sent through email, and it must be sent through SMS. And that is something we need to make sure that those things are extremely separated. Because while a registrar who charges a lot of money for the domain name, who can probably do both, for me as a wholesale registrar, sending email and SMS, that is going to be problematic. I mean, if we make 10 cents on a domain name, and the SMS cost 25 cents, and in some countries, that's actually the price to send them SMS

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on a global scale, then we're going to lose money on it. So I want to make sure that we have that separation of all these communication systems. And yes, available secure messaging system makes sense. I mean, at some point, email will maybe be deemed as a non secure system. I think that's going to take quite a while, by the way, because you can actually secure email quite a bit to make it sure it's GDPR and security compliant. But yes, we need to make sure that if there are more available, secure messaging systems out there, well, registrars who have that flexible business model, that they are able to adopt it. And yes, if they want to use like, in Sarah's comment, flood a registrant with all kinds of messages. Well, I don't want to prohibit that in any way. I think it's annoying. But if a registrar thinks that's a good thing for the registrant, so be it. They may, in that case, they can send 10 messages over and over, over time span. But again, that separation of these processes is very important here. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Yeah. And as I was thinking about operationalizing it, it's one of those, you know, most likely, you know, there's an email because it's required. But the phone, I mean, it may not even allow SMS to the phone that they have on record. So not being sure that that's, you know, feasible to do in that scenario. But Ken, please go ahead.

KEN HERMAN:

Yeah, thanks, Roger. Appreciate the comments. The intent behind here was to ensure that the registered name holder actually did receive the communication. I think there's an understanding that there are various

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systems available and that many registrars make available a number of different ways to communicate with their registrants. So I don't think it's an obligation to send it by SMS if there's no SMS that's provided by the registrar in terms of communicating, if for anything having to do with their account or their registration, just that if it's there and it's being used, that it should be used. And this goes further to the comment earlier that there are no other people sort of watching what's happening with the registration information. So the administration is gone, the technical context may not be there. And it's only the person, only one email account where in the past it would be several that might have been contacted. And I'm just also reflecting on the comment that we received from ICANN compliance just a few minutes ago, that registrants, registered name holders are a bit uneasy and perhaps have complained that after a certain time they really were not aware that this kind of information had changed and by then it's been too late, et cetera, et cetera. So I think that the intent here was not to oblige registrars to use everything that's available except to say that, find some way to say if it's being used to communicate already with a registered name holder, then they shouldn't be just limited to, they should use that as a way to notify the RNH that a change has been made and they should be aware of it and not rely just on the one mechanism. That's kind of the background behind that. I hope that helps to clarify. Thanks so much.

ROGER CARNEY:

Great. Thanks, Ken. Yeah, and it does. And I wonder to that point if we add something here that registrar must send notification via preferred

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communication channel or something similar to that or something like that. But Theo, please go ahead.

THEO GEURTS:

Yeah, and thanks Ken for that additional info. Makes a lot of sense what you just said. I just want to make sure to, yeah. So SMS is always a little bit dodgy anyways to start with. Roger mentioned it. There are some technical issues there. But I know registrars who have the ability or the option where somebody can sort of put in their information about their WhatsApp handle or Signal handle or whatever means of communication that there is. And I think it's great if a registrar offers an option that the registrar can communicate additional notifications through Signal. It's great. Those who are doing that, kudos. I think that's a great option. But I think that should be all optional because it all boils down to the risk factor. How big is the risk threat? That's a better description there. It all makes more sense for those registrars who want to offer all these optional security mechanisms and all these secure messaging systems. And that could sort of be an additional point of sale. Might be a little bit too big of a word. But it could set you apart as a registrar from all the other registrars. Hey, look, what we are doing. We are now offering this additional notification communications through Signal. And a good registrar could go like, oh, that's great. I'm going to switch registrars. And that would be a good way to compete with each other. But I don't want to see that actually being required into the policy. So we need a little bit more work there. I think the intent is great, but it needs some more wording here to make it more solid. Thanks.

ROGER CARNEY: Yeah. Yeah. Great. Thanks, Theo. Yeah. I think that's the path to take is staying with the or, but we can probably add in something. And again, better wordsmiths than me can do that. Something about preferred communication channel or something like that. I think we can handle that and get to Ken's point about really using the best method. So. Okay. And is there any comments on the last line? I think including, as Christian said, I think we can, you know, we don't need the regardless part, but, you know, all notifications sent must be properly documented and retained and made available. I think that's makes perfect sense to add, but any comments on that? Okay. I think we can move on to our next one, Christian.

CHRISTIAN WHEELER: Thank you. This is 27.4 proposed change from May to must where the registrar must send to the change registrant data to the RNH's new email address. So currently, this is a May saying that it must be sent to the prior email address before the change. This is a suggestion of making it mandatory to send it to the new one as well.

ROGER CARNEY: Okay, great. I honestly can't say I remember us discussing this, but we made the first one a must. So I'm assuming we purposely made this a May. But I open up comments because I can't remember us specifically talking about it, but since we made a must, I assume we went through each one of these and purposely did it, but Sarah, please go ahead.

SARAH WYLD: Thank you. This is Sarah. I'm sorry, I was actually intending to ask a question about 27.5, which I thought we were talking about a moment ago and then moved on from. I guess I just got confused. The yellow highlighted line at the end of 27.3 is the same as at the end of 27.5. I'm so sorry about that. Okay. Thank you.

ROGER CARNEY: Thank you, Sarah. Okay. Again, May or must. I mean, obviously it's an obligation that if we change it to must, then it has to be set. So again, I'm sure we had reasons why we said may, but Theo, please go ahead.

THEO GEURTS: Well, I'm not 100% recalling this one also, but following the logic here, you know, if there is a change to the registered name holder's email address, then it makes sense to notify him with a must that there has been a change to the prior email address. Sending a must to the new RNH email address, well, that is a redundant because either the registrant put that in there explicitly or be dealing with a criminal actor who changed the email address and then that notification doesn't make any sense again. So in both options of both scenarios, it doesn't make a lot of sense that it must become a must. There could be registrars out there and that's why we put it as a may that might want to do that on whatever mighty algorithm they've got running on their background that makes that decision that there must be that is going to send that notification to the new email address. But for the majority, this is not a big thing. That's my thinking.

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ROGER CARNEY: Yeah. Thanks, Theo. Yeah. And again, you know, if it's a completely new email address, the registrar is going to have to do a verification with it anyway. So yeah, maybe again, I think the may works. But Steinar, please go ahead.

STEINAR GROTTEROD: Yeah, hi, this is Steinar for the record. The way I read 27.4, is this connected to a scenario where the registrant has actually opt out for notification. So that's why it's a may, even though having a must when the registrant has actually opt out for having notification in this, I don't understand the must in that. If I'm correct reading this. Thank you.

ROGER CARNEY: Thanks, Steinar. I don't think this has to do with that the registrant opted out. I think that 27.4 is just saying subject to the opt out rules, basically meaning we wouldn't send if they did opt out, we wouldn't send these to begin with. And I think that's what the main text of 27.4 is stating. But open it up for anyone to opine on that. Rick, please go ahead.

RICK WILHELM: Thanks, Roger. Registries, but the registries don't really care. So I'm just commenting to try and move the ball down the pitch. We care, but we don't capital C care. On this one, I think this should just stay a may because the reason that the must is there is in 27.4A is that the registrar must send it to the prior so that the registrant is notified that, hey, your

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data change is going out. If you disagree, that notice would look like if this is a surprise to you, you need to contact support or something like that. The notion that the 27.4B, that that be changed to a must is a little bit odd because it's not really the notion of change of registrant notification. It's more like, hey, you're going to start getting notifications here. And so that to me being a must seems a little bit odd because that would be optional. And already, presumably, the registrar has validated and verified that someone is in control of that email already. So I don't understand the rationale to make that be a must. The delivery validation has already been established at that address. And so I don't understand why would there need to be a notification added to that.

ROGER CARNEY:

Great. Thanks, Rick. Okay, I'm noticing time. Maybe we can get 27.5 at least introduced, Christian.

CHRISTIAN WHEELER:

Sure. Yes, and this is text just with reference to that flag that in the definition of material change it includes a change of address or phone number that is accompanied by a change of name or organization. So this just kind of clarifies that saying that in instances where modifications to the address or phone number occurred in conjunction with the change of the RNH's name organization consistent with the definition of material change, registrar must send the notification to the RNH via email, SMS, or other secure messaging system. All sent notifications must be properly documented, retained, and made available to ICANN compliance upon request. So I'm not sure if this is

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needed or requires some further tweaking and such, but I leave that to you guys. And we have two minutes left.

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

SARAH WYLD: Thank you so much. This is Sarah. So the first sentence of the new A there seems to just be saying that if a material change happens then the registrar has to send the notifications. And it already says that up above. So it's not clear to me why that needs to be repeated. And then I noticed that we're adding in two different places that the notifications have to be documented and retained. And so I just wonder if that is a thing that's important to include in two different places of this language, like maybe it should actually get its own point rather than being squished into two other points.

ROGER CARNEY: Great. Yeah. Yeah. Great. Theo, please go ahead.

THEO GEURTS: Yeah. Plus one on all points that Sarah just mentioned. And just in case, and this is something to mull over next week. But basically, if you that registrar who wants to implement the most secure messaging system in the entire world with no logging, total sense of privacy there, then these requirements to have all these logs, that's going to prevent such adoption of such systems.

ROGER CARNEY:

Thanks. Great. Thanks, Theo. Okay. I think we are at our time here. So I think we'll stop here and we'll pick up next time on this spot and continue with that. Okay. I think a great discussion today. And I think we actually got further than I was expecting to get. We did come through and get some quite a few comments here. So I think it's good that we worked through these. So again, our next meeting is Saturday. I don't remember the time, but Saturday afternoon in Turkey time sometime. And so I'll see most of you then hopefully I'll see all of you there and online at least at our meeting. Thanks, everybody.

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