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JULIE BISLAND:

All right, for the transcript, this is Julie Bisland. Good morning, good afternoon, good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group call taking place on Tuesday, the 15th of October, 2024. For today's call, we have apologies from Rick Wilhelm, RySG, Prudence Malinky, RrSG, and Catherine Paletta, RrSG. Catherine, formerly assigned Essie Musailov, RrSG, as her alternate 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. Seeing none, 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 please note, all chat sessions are being archived.

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 with that, I will turn it over to Roger Carney. Please begin, Roger.

ROGER CARNEY:

Thanks, Julie. Well, welcome, everyone. I don't have a whole lot to share, just that I don't see Barry on, so I can say this really quick. But I can see the finish line, so I think a few weeks of good comment processing, and the group is going to be in good shape. But before we jump into our work today, I just wanted to mention that, as you noticed

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*Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.*

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when you were reviewing comments, that Leap of Faith Services, George Kirkos, had provided comments on a lot of them. The one thing I'll say is he mentions his proposal of the push transfer model that he introduced to us during public comment and the meeting after public comment closed.

Initial report of Group 1A, so I don't think that we need to cover that. We covered it when we did our comments process for Group 1A. I would encourage everyone to look at that again if they haven't looked at it. It's a novel idea, concept that George presented as a push versus the current poll, I would say, model of transfers. But we don't need to cover those specific comments from George this time because we've already covered them, and it's the same comments. But he did also provide other comments on a few of the recommendations, so we will take a look at those as we go through each of the recommendations. But we won't dive into any of the push model concepts as we've already talked about it and decided to move on from that.

The one thing I'll say on that is at ICANN81, during the Tech Ops session, I will be introducing the push concept to Tech Ops to see if there's an appetite for Tech Ops to examine that model and see if there is a viability in pursuing that model as a Tech Ops white paper. And if it does, then we'll work through the early part of next year, ICANN82 and the Contractor Party Summit to flush out a lot of those things.

I just recognized that the last transfer white paper from Tech Ops took a couple years to create, so I think that if it does even exist, it'll take a year to create for everyone to get input on to how something like that would work and the benefits and I guess the pros and cons on that. But again,

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we won't have to cover those comments from George. We'll just mark those as we marked them in our Group 1A comment process, but we will look at his new comments that he provided as we hit on those recommendations.

So, with that, I think we can go ahead and jump in to our agenda. And I think, Caitlin, are you going to take us through this?

CAITLIN TUBERGEN: Yes, Roger, certainly.

ROGER CARNEY: Thank you.

CAITLIN TUBERGEN: This is Caitlin Tubergen from staff. Christian is showing the schedule that staff presented last week and we had received a couple of comments about the assignment and maybe the homework was potentially too aggressive for some folks. And so, we noted that as an action item, if Working Group members could review the schedule and talk to your groups and ensure that this is doable.

We do know that we're moving at a fast pace. However, because of our project plan, we need to move at a fast pace to get through all of the comments. So, everyone had an action to review and ensure that this was okay and if there were any comments or concerns to bring them to this meeting. So, I'm just going to pause and see if anyone has any comments about the schedule.

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ROGER CARNEY:

Thanks, Caitlin. This is Roger. Yeah, and again, this isn't your only last time. If we get into something and it gets to be difficult, obviously we'll have to adjust. But we just wanted to make sure everybody was comfortable getting through this timeline. And I think today will help a lot as we go through it. We'll see how well our pace is. But we just wanted to make sure everybody had a voice here and the schedule wasn't crazy or, someone needed more time. So, yeah, I think that that's what we're looking for is anybody that is opposed to this schedule. And again, I think we'll, after today's session, we'll know a lot better. But I think this is a pretty good schedule.

CAITLIN TUBERGEN:

So, thanks, Roger. And as Roger just noted, the assignment is to read the comments. And so, we divided the comments into five groupings of like subject matter. So, for example, today we're going to go over all of the TAC-related recommendations. And so that you can review and cull all of the comments together so that we're not, there might be a comment on a related recommendation. We want to consider all of those together before potentially amending the recommendations.

There might be, as Roger noted, some recommendations that received quite a few comments where we will not be able to get through all of them in one meeting. So, this is really just reading material. Not, that doesn't mean we're going to close out on all recommendations. 1, 2, 4 through 11 today. It's just we hope that everyone read all of the

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comments for these so that we can have a detailed and fruitful discussion of how we'd like to treat those comments.

So, without further ado, we'll get started on assignment one. As noted on this assignment form or this page, the assignment was RECs 1, 2, and 4 through 11. Recommendation 3 is not included in this group because if you remember, the recommendations are in the order of how the transfer takes place. And recommendation 3 deals with a transfer restriction placed on the domain name after creation of the domain name. And because that deals with restriction of transfer, we're going to be discussing that recommendation with the other restrictions of transfer since they're all related.

So, we won't discuss recommendation 3 today, but if we would like to start with recommendation 1. And as you'll see from this table, there were no concerns with recommendation 1. All commenters either supported it or had no opinion on it. And that is simply the recommendation about updating the terminology used throughout the Transfer Policy with the term WHOIS and getting that up to speed with current terminology that's used, which is Registration Data or RDDS. So, I think we can move on to recommendation 2, which similarly believed to not receive any objections. Commenters either agreed or had no opinion on it. And this recommendation is also merely a terminology update. And that is about the use of Transfer Contact in the Transfer Policy.

Currently, it mentions an administrative contact. Because the new registration data policy no longer requires registrars to collect an administrative contact, the Transfer Policy will be updated to make note

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of that and remove administrative contact. So, moving on to recommendation 4, this recommendation is, again, a terminology update. It's updating the term off-info code, which is the current term used in the policy to transfer authorization code or TAC. It's a terminology update. We'll talk a little bit more about what that is.

We received one comment on that, and that was from Leap of Faith Financial Services. And Roger touched on this at the top of the call. But of course, we recommend that everybody read this proposal in depth. This is about a proposal to do away with the TAC system or formerly the off-info code system to a push-based method for approving transfers. As Roger noted, this will be discussed by the Tech Ops group at ICANN81. So, if you're interested in hearing more about that, we would encourage you to go to that session. But as Roger noted, the proposal is quite detailed, and this group did discuss the proposal during the last round of public comments.

That being said, please make sure you read through this. And if you do have any comments or reactions to it, by all means, please let the Working Group know. But we'll move on for now, unless anyone has anything to add on REC 4.

ROGER CARNEY:

Thanks, Caitlin. This is Roger, really quick. Just to respond to Steiner's question in chat, since we hit on this, George's note here, I don't expect, there's no way if Tech Ops takes this up, it changes anything from this group. The amount of time it'll take Tech Ops to get through that and to get to anything, I think that the Tech Ops work would lead to the next

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review of the Transfer Policy. It is not about this policy at all. We'll go through with this. We'll get this approved. We'll get it into IRT, and we'll get it implemented. And sometime after that, the Tech Ops white paper will inform the next group. It won't be for us, just to be clear. So, thanks.

CAITLIN TUBERGEN:

Thanks, Roger. If no one has any additional comments on REC 4, we'll move on to REC 5. So, as a reminder, Recommendation 5 is the working group's proposal of the TAC definition. It explains what the TAC is meant to do. And ultimately, the TAC is that token that's required in order to transfer a domain name from one registrar to another. We did receive some comments on this, ultimately supporting the recommendation but with some wording changes.

The comments here came from Tucows, the Registrar Stakeholder Group, and Namecheap. These are all in a similar vein. Essentially, the concern here is that when you look at the definition of the TAC and the recommendation text itself, it seems to imply that the TAC can be issued whenever and wherever. And there are ultimately times where even if a TAC could be issued, the domain name may be restricted from an inter-registrar transfer for another reason. So, some of the examples communicated in the comment is that a domain name might be locked due to a pending UDRP proceeding. And if the registrant were to request a TAC while that name is subject to an active UDRP proceeding, a transfer would still be denied.

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So, these three comments touch on that concern. Both the Registrar Stakeholder Group and Namecheap provided a couple of options of how to potentially reword the current text to accommodate that concern or to address that concern rather. So, noting that there might be ineligible domain names or the Working Group could potentially consider adding text along the lines of eligible domain name and communicating what that means to the reader since some names are not eligible for transfer because of an external circumstance like a UDRP or something else articulated in the Transfer Policy.

So, before we move to the proposed updated text based on what the commenters provided, I just wanted to pause quickly to see if anyone wanted to provide any additional context on these comments or if anyone had any concerns with the comments that were provided here. Okay, I'm not seeing any hands raised.

So, with that, Christian, if we could show the markup. And for those of you who may not have been here at the last call, what we are proposing to do, if we can go to recommendation five. You'll see three boxes that correspond to each recommendation. And in the public comment review tool, there's a hyperlink that'll bring you right to the correct recommendation or place in the document. But in short, you'll see that the red box shows the current recommendation text.

The yellow box, which is the Under Construction box, has some proposed edits that were either proposed directly from commenters or some text that support staff put together based on comments provided by commenters. And I'll give a very large disclaimer here. The Under Construction box is really a visual guide or a visual aid to Working Group



members to see what proposed text could look like. This is not any agreed upon language. This is not near final language. This is really Under Construction as it says.

You'll notice in future recommendations, for example, there might be conflicting edits proposed to recommendations. But support staff went ahead and included those so that the Working Group could see what it potentially looks like and discuss in general if they agree with the heart of the edit. And in the final box, the green box, that'll be ultimately what the Working Group agrees to, to be included in the final report. Again, you'll see that there's nothing there yet and we're not close to that yet. But Under Construction box is just to see, address some of the concerns from the Registrar Stakeholder Group, Tucows and Namecheap. And the concern there was again that there are some names that are ineligible for transfer.

The text that's highlighted in bolded is the proposed addition to the recommendation to address that concern. So, I will pause and hand it back over to Roger to see if anyone has any questions. I guess before I do that, what I would say is, we can certainly talk about that on the call and welcome any concerns with the proposed language. But as usual, we know that editing by committee gets a little bit dicey and some Working Group members or perhaps most Working Group members might prefer to digest edits outside of a Working Group call and provide comments, which is why we do have this Google Docs so that folks are able to do that. But if there's any initial reactions or concerns or observations, by all means, please feel free to bring those forward now for the Working Group to consider.

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

KENNETH HERMAN: Yes. Thanks, Roger. Thanks, Caitlin. This is Ken Herman, NCSG for the record. My preference would be for the recommendation to align closely with the option one. I appreciate RySG's comment on that and the others, the registrar comments. In fact, I prefer not to have an EG for example, since that opens the door to questions about what exactly might be included and simply have it referred to the relevant recommendations, which I think are 22 and 23, where we say that there are transfers that are ineligible for these specific conditions. Thank you.

ROGER CARNEY: Great. Thanks, Ken. Thoughts from anyone else on this highlight and what Ken discussed as well? Just a little input from me. This is a good call out, as Ken mentioned, I think that by everyone that called it out. I wonder if adding text is the right thing or if removing text works as well, and that it appears that the issue that the commenters identified was the authorized part. Is there a need for the recommendation that says, when presented authorizes the transfer, or can we just remove that and do we still set at the same spot? Again, just looking at not trying to overcomplicate or overword anything, but not opposed to adding the wording. I just don't know if shortening it helps as well. Thoughts from anyone? Jody, please go ahead.

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JODY KOLKER: Thanks, Roger. This is Jody. Would it be, just another option, I guess, would it be possible to put where it says, "For a domain name to be transferred one Registrar to another Registrar, and when presented may authorize the transfer", instead of removing it or adding the additional? Thanks.

ROGER CARNEY: Thanks. Jim, please go ahead.

JIM GALVIN: Yeah, Roger. Jim Galvin, Identity Digital, for the record. I actually like where you were going and, put a period after Registrar in that sentence. So, you delete the end when presented afterwards. And what if instead we did the TAC is required to be presented for a domain name to be transferred? Doesn't say anything about the status of having presented it, just that it must be there in order for it to be transferred.

ROGER CARNEY: Okay, great. I think we're improving things. And again, I think any of the commenters, if that, again, I want to make sure we're addressing the specific concern by the commenters. So, to me, it reads like the authorized was the issue and I think Jody and Jim's both work, but the extra wording works. And I think as well, but I just don't know again, if extra words help or hurt. So, that's my thought on it. Comments? Ken, please go ahead.

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KENNETH HERMAN: Yeah. Thanks. Thanks, Roger. This is Ken Herman. I see your point of where you're going, but I think this is the only recommendation that actually describes what the TAC does. None of the other recommendations indicate the purpose behind the TAC. So, I think you have to have it in the recommendation somewhere. But I liked Jim's comment about being clear about just that it authorizes a transfer.

ROGER CARNEY: That it's required, not necessarily that it actually will happen.

KENNETH HERMAN: Exactly. It's the word 'authorized' that I think we run into trouble because it implies that just presenting a TAC authorizes the transfer when that is not the case in it. And the TAC is not always prepared. And I think we have a further recommendation later on where it talks about how you get the TAC. And I think we addressed some of the similar issues there, but just I think James was on the right track.

ROGER CARNEY: Rich, please go ahead.

RICHARD BROWN: Yes, hi. Rich Brown for the record. And of course, I switched windows to get here. So, maybe we could update it. I'm kind of going along with what Jim said here earlier. The TAC is required for a domain name to be transferred from one registrar to another registrar. And when presented, authorizes an eligible transfer. And we have documents

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everywhere that says what's a valid, what's invalid for transfers. UDRPs and everything all state when a transfer can't be done. So, simply stating it's an eligible transfer might just resolve it. So, we're still describing and we're getting away from over explaining, which can cause more debate anyway.

ROGER CARNEY:

Great. Thanks, Rich. And I think that was a couple of commenters mentioned that fairly close to that as well, Rich. So, I think that's definitely another option. I think we've got several and I think it sounds like everyone's kind of agreeing that the fewer words, the better. And authorize is the thing we need to address here and how we address that. I think we've got a couple options.

So, I think that that's good. And I think we can move forward with those couple options as Jim presented. And just as Rich mentioned there, that a couple of the commenters suggested as well on eligible. So, I think if we pose those two, we can get to a good conclusion on which one we should use. So, okay. Any other comments on this? I think we've got a good way forward to address the comments and the issue here. Okay, great. Caitlin, I think we can move on to the next one.

CAITLIN TUBERGEN:

Thanks, Roger. So, if we could show the comments from recommendation six. Thank you, Christian. And also, for those of you who may not have been on the call last week, another shout out to Christian for creating this very, at least from our side, user-friendly document that allows you to toggle between all the relevant comments

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and our Working Drafts of the updated comments. So, this was the example that we actually went through last week, but we'll go through it again. This is about the service level agreement or SLA for TAC provision.

As a reminder, the Working Group is essentially agreeing to the status quo, which is five days after a request for a TAC comes through, that the registrar needs to provide it within five days. There were four comments supporting the language of the, or the intent of the recommendation, but with a wording change. And then there was a comment from Leap of Faith, a similar comment about the push-based method of approving transfers to be considered. But again, that's going to be a discussion we've taken elsewhere.

I did want to note, however, that I believe in this comment, particularly Leap of Faith also noted that any recommendation that provides timing in hours or days and hours should be converted only to hours. And the reasoning was communicated in recommendation three in more detail, but since we're not discussing that, I'll just quickly note that the concern was that, even if it says five calendar days, that might not line up exactly registrar to registrar, some may round up.

And so, hours are a more precise calculation that the Working Group should consider just having hours and not days and hours, because there might be an inconsistency there. If we can scroll back up, we went over this last week, but essentially the overarching concern or proposed wording change here is that the recommendation is called the Service Level Agreement or the SLA. And the commenters are noting that that term is not precise nor correct. And rather than using the term SLA, the

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recommendation could be called required timing for TAC provision or maximum time for TAC provision or mandatory timing for TAC provision. There were a couple of examples there.

Is there any questions or concerns or further detail that anyone would like to provide regarding any of the comments received before we look at the proposed or the Marked-Up Version? Okay, Christian, if we could go to the Marked-Up Version, please. This will look familiar for those who were here last week. But as you'll see that the issue, the two issues we just discussed were essentially the title of the recommendation with SLA being a concern or a bit of a misnomer. And then also that the five calendar days turn of one of the commenters as well.

So, in the marked-up version, you'll see that we've replaced SLA with required timing, which was one of the suggestions from the commenters. And then also in the marked-up version, we've removed references to calendar days and change that only to hours based on another commenter's concern. So, I will pause and hand it back over to Roger to see if there's any reactions to the marked-up version of the comment or the recommendation, excuse me.

ROGER CARNEY:

Great, thanks Caitlin. And as Caitlin mentioned, we did touch on this as our example last week, but yeah, I'll open it up for comments. I think that it's interesting that we added the hours in trying to be more precise. And the comments obviously show that that was a good idea, but it's still, the way we left it may have left some confusion. So, I think it's great that we're going that way. And I'm sure if Barry was on, he

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would be cheering about this because he likes that precision as well. So, I think it's a good point and we'll look at it throughout all recommendations and any comments that come up, but the precision is good, I think for everyone.

The recommendation name, I don't know if that means a whole lot, but it does sound better, not SLA, but required timing or anything related to that. So, I don't know if anybody has comments or other suggestions or concerns. Thanks, Jody. Thanks, Steinar. Okay, good. As Caitlin said a while ago, obviously this document is out there for everyone. And if you think of something, please jump in and do it, add some comments so that we know. But I think we're good with this and we can move on to our next one, Caitlin.

CAITLIN TUBERGEN:

Thank you, Roger. And thanks everyone. So, next is REC 7. This is the TAC composition recommendation. And if we scroll down, you'll notice that there is a comment, again, from Leap of Faith. This is related to the push-based method. So, we aren't talking about that now, but just wanted to flag that this comment is there. And if we scroll back up, the Register Stakeholder Group supports the recommendation as written, but did notice that there was a missing comma, so spotted a grammatical error. So, if we can go to the marked-up version, you'll see a very small highlight after modifications and there is a comma added there, which again was a grammatical nit that the Register Stakeholder Group had pointed out. I'll pause in case anyone objects to the addition of that comma or had anything else about Recommendation 7 to share with the group.



ROGER CARNEY: Great. Thanks, Caitlin. Yeah, and I'm just going to make a wild guess here that probably Sarah caught that, but good catch. Makes it cleaner. Yeah. And anyone have any issues with this? I think it's simple enough. Okay, great. I think we can move on.

CAITLIN TUBERGEN: Thank you, Roger. And thank you to likely Sarah for catching that grammatical error. Recommendation 8 is verification of TAC composition. And if we scroll down, we see that, again, the only comment provided on this recommendation was the similar comment from Leap of Faith about the push-based method. And so, there were no proposed direct edits to the text of the recommendation. And I believe this, again, is going to be discussed at ICANN81. So, if anyone wants to learn more about this proposal, we would invite you to go to the Tech Ops session at ICANN81.

ROGER CARNEY: Thanks, Caitlin. And I'll just jump in here and maybe I'll see if Jim has any thoughts on this. George points out how do you test for the randomness. And I think that to his point about a little bit of a concern about you could just use a static one. I think that's exactly what we were looking to avoid. And I think this recommendation does that. But I'll ask Jim to see if he has any input. Jim, please go ahead.

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JAMES GALVIN:

So, yeah, Jim, Calvin, for the record. Thanks, Roger. This recommendation, in fact, explicitly does not obligate a registry to confirm randomness for exactly the reasons that George lays out in his message, which is that there is no way to test randomness after the fact. Well, there is, but not in a transactional kind of way as what's going on here. The recommendation explicitly just says, syntax requirements. So, he's right. I mean, a registrar could just send in the same value all the time each time it wanted to do it. There's nothing that says that you can't do that. I think if anyone were to do an audit, they would see that and find it to be inappropriate because that in and of itself does not meet the 9154 requirements, I would argue. But that's also up for debate. So, anyway, yeah, I mean, I think we're fine. There's nothing to do here. George is both right and wrong in what he said. Sorry.

ROGER CARNEY:

Great. Thanks, Jim. Yeah, and that's the big thing to me was, the recommendation wasn't specifically about randomness. It was about the syntax. And to your point, we do require registrars to follow 9154, which would technically be the randomness part of that. So, if they're not, then that, as you said, could be a compliance issue at some point. Any other comments or questions on this one? Again, I want to make sure that every question or every comment gets addressed. And this was slightly different than George's push model concept. He did have a specific thing. So, I wanted to make sure we addressed it there. Okay, good. Caitlin, I think we can move on.

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CAITLIN TUBERGEN:

Thank you, Roger. And thank you all. So, moving on to our next recommendation, which is recommendation nine. This is the recommendation about the TTL for the TAC. There were several comments received on this. So, we'll provide an overview of the comments and then ask if anyone has anything additional to add. And as we just observed, there might be something that I miss in the overview. So, thank you, Roger, for adding in.

So, the first grouping of comments is, supports the recommendation's intent, but with some proposed wording changes. There were comments by the register stakeholder group Namecheap and Tucows, noting that when it comes to the TTL, the way that the recommendation is currently worded, the registrar can NULL the TAC upon agreement between the registrar and the registered name holder. But these commenters have pointed out that there may be cases where the registrar needs to be able to null the TAC immediately and accordingly cannot wait for the registered name holder's approval. And the examples that they use deal with the security of the domain name and preventing an invalid transfer when it's obvious to the registrar that there's some sort of fraud going on or security breach. So, that was the first comment about the language.

The next group of commenters, or I guess a related concern, was through INTA and through ICA. And this comment is about allowing the registered name holder to waive that 14-day TTL on the TAC. And the comment in particular notes that there might be some domain names where there's multi-layer approvals, whether there's an attorney or some sort of agent involved. And the approval process might take more than 14 days from the time that that TAC is received until the time that

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the transfer is initiated. And accordingly, to allow for that kind of situation, those groups are recommending that the Working Group allow some sort of carve-out to waive that 14-day limitation.

Also, I believe ICA recommends not having a TTL or has some significant concerns with the 14-day TTL, noting that there was no sufficient evidence provided in the recommendation or the accompanying text of the recommendation, showing that there's a security risk with unexpired tax or off-info codes, as the case may be. And noting that, adding in a TTL could be harmful, particularly to the aftermarket, because based on this comment, the aftermarket often uses pre-stored tax. And so, that commenter is recommending either removing the TTL or, similar to the other commenters, allowing some sort of opting out of that TTL for purposes of the aftermarket or customers who might have a unique situation that needs more than 14 days.

And then, similarly to some of the previous comments, Belief of Faith rejects the TAC entirely in favor of a push-based method. And also, similar to what we discussed with Recommendation 6, Belief of Faith is noting that any time there is a reference to both days and hours, days should be removed in favor of hours for precision reasons. I believe that is a pretty high-level overview of what you've read through this week, but I'll pause in case anyone has anything to add to those comments or reactions to the comments. And I see Jim has his hand raised, so I will cede the floor to Jim, and then, Roger, if anyone else has anything to say, I'll let you manage that queue. Thank you. Jim, please go ahead.

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JAMES GALVIN:

Okay, thanks. Jim Galvin, for the record. I was just going to respond to the INTA and ICA comments. The other wording change business, I think, is more appropriate for registrars to respond to and react to. On the INTA thing, I guess, it's not clear to me, well, the way that I would do this, as I understand what INTA is talking about here, what this says to me is that they should have a better relationship with their losing registrar. It occurs to me that they don't have to start the 14-day timer until it's appropriate to need the 14-day timer.

It occurs to me, I don't know why registrars or anyone else should have to accommodate, the various business interests of all of the corporations and other registrants out there. We have a window, and it's their job to stick that 14-day window wherever it needs to be in their processes. So, I really don't see a need for offering an extension of 14 days. We've decided that that's the right amount for the system to work, and they should just slot that into their processes, rather than offering the opportunity to waive all of that.

And then, similarly, well, a little bit differently here with the ICA business. They don't like it because there's no serious risk with unexpired tax. Well, I'm sorry. Maybe, I mean, I forget now. Maybe there's no words anymore in the beginning, in an introduction, but isn't the whole point here of doing this because there were situations where, in the old Auth Info system, Auth Info codes were set once upon creation and left forever. And, there were some sets of problems in all of that. And we're trying to standardize this and make a uniform security model here.

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So, I think their opening comment there strikes me as the whole reason why we're here. And so, I don't know what to do with the rest of what they say there, because it doesn't seem applicable to me if their basis for doing it is their first half of the second sentence. So, that's my quick reactions. Thanks.

ROGER CARNEY:

Thanks, Jim. Jody, please go ahead.

JODY KOLKER:

Thanks, Roger. This is Jody from GoDaddy. So, I want to echo what Jim has said. I agree with everything that he has stated. As far as the RrSG comments, I'm fine with those being changed. As far as the INTA and the 14 days to commence, I agree with Jim that the losing registrar doesn't need to know that you're transferring it until all the approvals are done. So, that would get the 14-day limitation down to, well, it shouldn't matter. You could transfer this within 10 minutes, transfer domains within 10 minutes if you want to. At least some registrars are allowing you to be able to do that. So, I agree, get all the approvals ready, and then start your transfer.

Also, I do want to make one note here. GoDaddy has had a 14-day or 14 or 15-day limit on their Auth codes, so that when you request an auth code at GoDaddy, you have 14 days to use that. And if you don't use it within those 14 days, that auth code is updated, and then the auth code is no longer good anymore. We haven't had any complaints on that, and that process has been out there for four or five years now. So, four or five years of thousands of transfers away, and we don't have any issues

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with customers saying that they weren't able to transfer the domain in enough time.

As far as the ICA goes, in the fast transfer API that I'm familiar with, the Auth code isn't stored anywhere. In fact, when a transfer or domain sale has gone through, the fast API system actually calls out to the losing registrar and says, update your Auth code to be this. So, the Auth code isn't stored anywhere in the fast transfer system that I'm familiar with, and maybe that's what other fast transfer systems should start leaning towards. I think that maybe these fast transfer systems should work on securing an Auth code a little bit better than what they have, than storing it for multiple decades. Thanks.

ROGER CARNEY:

All right. Thanks, Jody. Good comments. I kind of thought we would get into it when we see the markups, but excellent comments, and it fits into the reasoning and logic that, obviously, that some of the commenters may have not had in the logic that the Working Group went down for. But let me have Caitlin run through these, and then I'll get back to the queue, just so that we get through this, the markups so everybody has it all. And then we'll talk about the reasons why each of the comments. So, if I can put Ken and Zak on hold for just a minute, so Caitlin can go through this, and then I'll jump back to them. Thanks.

CAITLIN TUBERGEN:

Thanks, Roger. Caitlin Tubergen from ICANN Org, for the record. So, as you can see in the yellow box, we have some proposed edits based on these comments that we've been talking about. The first is probably the

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most straightforward, which is 9.1, the removal of 14 calendar days in favor of 336 hours, because of the precision issue that was flagged.

Secondly, in 9.1, there is some bracketed text, noting that the registry may waive the 336-hour limitation in lieu of when the registry is informed by the registrar that the registrar received an explicit instruction requesting an extension. And then in 9.2, there is the request or the concern from the Registrar Stakeholder Group, Namecheap and Tucows, related to the fact that there may be instances where the registrar of record, by its own accord, believes it needs to NULL attack for security reasons. So, there's some proposed language here.

Again, the language in both 9.1 and 9.2 is based off of the comments. It has not been agreed to by anyone, and any edits or additional concerns and thoughts is most welcome. So, with that, I will turn it back over to Roger.

ROGER CARNEY:

Great. Thanks, Caitlin. And again, as Caitlin mentioned, this markup, it's just plainly from what the comments are suggesting. It's not anything that's agreed upon or anything. This is just an interpretation of what the comments are suggesting and how it would look. Obviously, Jody and Jim did not agree with the markup at the end of 9.1. So, again, we can discuss those things and how they work out. It sounded like Jody was okay with the 9.2 Update. So, it was again, this is just a plain comment into what it may look like, not anything that's agreed to. So, let me go to Ken, and Ken, please go ahead.



KEN HERMAN:

Thanks, Roger. Ken Herman for the record. My concern is with the markups in 9.2. I am appreciative of efforts by registrars to look after the interests of registered name holders. I am concerned about the ability to reset the TAC to NULL for any reason without explanation to the RNH. I can foresee a situation where an RNH might request a transfer and just have it be denied and having difficulty to get some explanation. So, if the account has been compromised, one would assume that the registrar would notify, but either we have some explicit indications there that these are the conditions under which the registrar may invalidate the TAC for these reasons or, and or, in any event, a required explanation to the registered name holder. Thanks.

ROGER CARNEY:

Thanks, Ken. And thanks for that. When I read the comments, I was thinking, well, how I perceived it when we talked about it originally was, well, that could go into terms and conditions and the registrar would have the registrant's agreement, not individually, but have their agreement that just for protection, they could do it. But to your point, and it's something that I think the group should think about is, given that registrars feel like they need this ability, does Ken's idea really hold water in that, okay, but then send a notice saying, okay, we stop or we know this out, probably not know because no registrar will probably know what that means, but, that we stop this transfer request because of X, Y, Z, whatever it is.

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If a registrar is going to know it, should they notify the registrant when and why they know it? So, it's a great suggestion, I think. And again, it's something I appreciate that the different views everybody takes out of this group, because it's like, I didn't perceive that or didn't even think about it and I'm sure others didn't. So, it's great. But Zak, I am assuming you're going to talk about 9.1. So, go ahead.

ZAK MUSCOVITCH:

Yeah, I just, thank you very much, Roger. I think that one of the things that's made this Working Group effective is there's so many people, so many perspectives and practical experience that it's a brain trust. And I think that when we seek public comments, it's very important to be respectful and welcoming of them. And I just want to say that I was about to let this go because I was having a rather good day up until now. But in fairness, I thought, Jim, that you could probably improve a little bit upon your delivery and how you treated the ICA's recommendation.

I'm not here representing the ICA, but the ICA is a member of the BC. And just for clarification's sake, Jim, you said that the ICA doesn't think that there's any risk with TACs. If you read the comment, it's there in black and white. It was a reference to insufficient evidence of that, which isn't a denial of the existence. So, I want to clarify that, rather not have had to have made this intervention. Now, getting to Jody's comment, I think there's a good comment, Jody, about the fast transfer system you're aware of. And that's interesting to me because in my discussions with other secondary market participants, they said this was a genuine concern. But I'll take that feedback back to them and see if I get any further information on it. Thank you very much.

ROGER CARNEY:

Great. Thanks, Zak. No, and please raise your hand, even if you're having a good day, because I think it helps us all when we do that. The one thing I thought about and Jim kind of alluded to was, obviously, one of the big things we went into this was taking a look at security and seeing if security updates needed to happen. And I think as we went through it, everyone kind of agreed with needing additional security. And as you said, Zak, the ICA said, is there proof of it? And I think even then, as registrars, we know that this happened. We don't have any numbers that say, hey, somebody used this Auth code that was issued four years ago. Someone's email got hacked two months ago, and now the auth code is getting used.

We don't have the numbers of that. We know what happens. So, I think that it was one of those security mechanisms that made sense, even without hard numbers on it. Into your fast transfer, I think that would be interesting to hear, Zak, if you can find out any information on those. And again, one other thing I was thinking about was, if someone needs longer than 14 days, all they do is generate another TAC. So, it's not like it's an onerous process. They just go in and create another TAC, and it's going to be a new TAC, but it'll extend it however long they want to do it. It's not like people stop you from creating TACs. So, if it gets to day 15, you just issue another one and use it. So, but I'm going to be quiet, which is probably good for most of you, but Jim, please go ahead.

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JAMES GALVIN:

Au contraire, Roger. I'd love to listen to you expound on what's going on here in all seriousness. I may try to be taking on board Zak's comment. Let me try to be a little more constructive in my response to the ICA comment. I do think that I don't recall, and I was trying to say this before, but I don't recall that we explicitly lay out some of the reasons why we have migrated to this kind of uniform system. So, as you just said, Roger, we don't necessarily have data, factual data or evidence, if you will, to offer. But it seems to me that somewhere in our introduction, coming out of our charter, there has to be some references as to why we're doing this and some of the bad experiences that have been there.

We should confirm that all of that is there. And that's in reference to the unexpired tax. Maybe we make reference to bad practices we're trying to approach. I mean, I'm not sure, but that's where, that's really how I would respond to the ICA thing is make sure that our introduction properly captures the context in which we're working. And that might just be making sure we draw out of our charter some appropriate references. That's what I think. Thanks.

ROGER CARNEY:

Great. Thanks, Jim. And it's something I don't know that we all agreed to or agreed on, but, as we were, especially early on going through and looking at things, it kept coming back to me as standardization is one thing that was a problem area for the current spec. Security was one. And being mindful of registrar experience, those three things were big fundamental things to me when we were looking at things. And it seemed like we kept pulling those things together.

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So, it's just one of those things. And again, as you said, Jim, I don't know if we agreed to those things or not. It's just one of those things that was always in the back of my mind as we were going through things. Okay. Any other comments or suggestions on this? And I'm going to ask staff if they have anything that they need or want as well before we move on from this. Just one more comment for me is 9.2 also has a 14-day calendar thing we should highlight and move to 336. Okay. Caitlin, anything? Christian, anything that we need to move on from this one?

CAITLIN TUBERGEN:

Thanks, Roger. I don't think so. We will take note of the discussion. And I probably should have mentioned this earlier, but if we could just go back to the Public Comment Review tool, you'll notice that there is a column for the working groups discussion and notes. And this is for the benefit of all of the folks that took time to send in a Public Comment and are wondering how the Working Group handled the comment or if anything was adjusted based on that comment.

So, I'm going to go back to the public comment review tool. And I'm going to go back to what support staff will do is go through and make note of what the groups spoke about. And of course, because this is a Google document that all Working Group members have access to. If anything, you believe is mischaracterized or we may have missed something, then Working Group members can provide comments. And as I had mentioned earlier, with all of the marked-up versions of the recommendations, please go back and if you have further edits or concerns or questions about the proposed edits in that document, you also have commenting rights as a Working Group member on that.

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And so, we will take note of any additional comments here. But I think we took a note that when it comes to the security of the TAC or the proposed TTL, to provide a little bit extra context of why the Working Group is suggesting this. So, that when the readers of the final report see the recommendation, there's a little bit more context since there was a concern that there was no evidence or rationale as to why this is being suggested.

ROGER CARNEY:

Great. Thanks for that, Caitlin. Thanks for calling those two columns out.

CAITLIN TUBERGEN:

So, with that, I think we can move to recommendation 10. And as you can see from recommendation 10, this is about the Generation Storage and Provision of the TAC. Most commenters supported the recommendation as written, similar to the other recommendations. The Leap of Faith is, again, noting that the fundamental flaws with the TAC system and proposing the push-based system. So, unless anyone has any specific comments on the push-based system or this particular comment, we could probably move to recommendation 11. But I'll pause just in case there are additional comments for recommendation 10.

ROGER CARNEY:

Thanks, Caitlin. And if anyone has any specific comments on 10, again, I think Leap of Faith in George's comments go back to our group 1A public

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comment process. So, I think we can move on from there. So, I think we can jump to REC 11, Caitlin.

CAITLIN TUBERGEN:

Thank you, Roger. Thanks, everyone. This is our last recommendation for the day, or at least from homework assignment 1. As a reminder, this is a recommendation about the notification of TAC issuance. So, the text in this recommendation, as a reminder, the Working Group is noting that due to the purpose of the TAC or the utility of the TAC or the power of the TAC might be the right term here. The Working Group is noting that once that TAC has been issued, the registrar of record is required to send a notification to the registered name holder, notifying the registered name holder that the TAC has been issued and also an explanation as to what that actually means, because most registered name holders would just receive that email and have no clue what it means and gloss right by it.

So, with that in mind, if we can scroll down, there were some concerns with the recommendation and also some requested edits. So, the first proposed wording change was from Tucows. Tucows ultimately supports the recommendation, but noted that the language of the recommendation currently provides in 11.1 that the notification must be provided in English and in the language of the registration agreement. As you'll see in that comment, Tucows is proposing a parenthetical after agreement that says if different. So, in other words, maybe it just needs to be provided in English if the registration agreement is in English. So, that was a small update from Tucows.

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Then there were a few commenters that had significant change required, and I will try to summarize these concerns, noting that all of you have read this. The first concerns were from the ICA and BC. The comment was similar. The concern is that the notification of TAC issuance is provided within 10 minutes, and it could be very well provided after the TAC has already been used, so thereby preventing any sort of security measure or inability or ability to invalidate the TAC in a timely manner.

So, the question or the suggestion from these two groups is perhaps there should be a recommendation or text around delaying the effectiveness of the TAC to prevent this situation where that notification goes out after the TAC has already been sent, or alternatively, is it possible to require registrars to ensure that registrants have confirmed that, yes, they meant to authorize the TAC before it's provided? INTA provided a similar concern about the timing between the TAC and noting that there's a concern here that it may have been sent. Additionally, INTA noted that in cases there should be a carveout for privacy proxy services.

So, to be clear in the recommendation that the notification of TAC issuance should be sent to both the registrant and the underlying customer to ensure that the customer has the notice in case there's a lag between when that Privacy Proxy Provider sends the notification to the customer. So, there was a proposed addition there. And similar to the ICA and BC concerns about being able to invalidate the TAC before it's used might be impossible with the current wording. And then lastly, because this is a TAC-related recommendation, we did include Leap of



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Faith's concerns, which are related to the TAC more generally in favor of a push-based system.

Lastly, ICANN Org provided a comment. And I believe this is in reference to some of the specific text in the recommendation, particularly the footnote, which provides that the notification of TAC issuance could be sent via email, SMS, and that it could be sent via the same method that the TAC is sent. And so, ICANN Org is noting a concern related to RFC 9151 about best practices and that this should be sent via an encrypted method. Currently, the way that the recommendation is worded allows a registrar to send the authorization information via email, which is generally unencrypted, unauthenticated, and goes against RFC 9151.

So, I believe ICANN Org is noting that perhaps the Working Group might want to consider a reword there to prevent some sort of security issue. And so, Roger, I will turn it over to you to manage the queue, but obviously invite others or invite Working Group members to react to some of these comments before we show the marked-up version.

ROGER CARNEY:

Great. Thanks, Caitlin. Excuse me. Jim, please go ahead.

JAMES GALVIN:

Yeah. The ICANN Org comment, that's 9154 is what he means there, whoever on the team said that. They don't mean RFC 9151. I was trying to look back and see if it's a copy-and-paste error or a comment that's wrong in the thing. But just to be clear, that should be corrected for the record, that they meant 9154. Thanks. That's what that quote appears.

ROGER CARNEY:

Thanks, Jim. Even when I read it, it processed in my head as 9154, so I didn't even notice. But thanks for that. Okay. Any other general comments on these? Otherwise, I can have Caitlin run us through the conceptual markup. Okay. Go ahead, Caitlin.

CAITLIN TUBERGEN:

Thank you, Roger. So, I guess the most straightforward update is 11.1. That was the Tucows edit, which is an edit that anytime there's a reference to in the language of the registration agreement, Tucows is suggesting a parenthetical of if different. I believe that language is actually consistent with what's in other policies at ICANN as well as the accreditation agreements, if I'm not mistaken. So, we've added that parenthetical there.

The second update is in the first paragraph. That was, I believe, the INTES proposed update, where the Working Group recommends that the notification of TAC be sent to the RNH. There's a draft parenthetical and underlying customer if the RNH is utilizing a Privacy or Proxy Service Provider. Privacy or Proxy Service Provider is capitalized here because that is a defined term. And then, if you see 11.3, this is language that gets at the concern from ICA. I believe it's the business constituency and INTA about that potential issue with a notification going out after the TAC has already been used. And so, if it was used fraudulently, fraudulently, then it might be too late.

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So, that's some proposed language to address that concern. But I see some hands are already raised, so I will turn it back over to Roger for reactions. Thank you.

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

JODY KOLKER: Thanks, Roger. This is Jody from GoDaddy again. I think it's on the-- and underlying customer if the RNH is utilizing a Privacy or Proxy Service Provider. It's not always very, what I want to say, obvious that the customer is using a Privacy or A Proxy Service Provider. Some registrars have their own Privacy Proxy Providers, and other people may be using a lawyer, et cetera, to do their proxying for them. So, I'm not very comfortable with this because the registrar doesn't know that it's a Privacy Or A Proxy Provider that's being used to register the domain name. Thanks.

ROGER CARNEY: Great. Thanks, Jody. Yeah, and I had the similar thought as the PPSAI. IRTs in the back of my head, and I'm thinking this was, one of the big issues that came up was registrars don't have that ability to know if it's a Privacy or Proxy or Agent, whatever it is. They just don't know that. So, when you make registrars, you just can't do it because they don't have the data potentially. So, it's one of those things where you have to send it to the RNH, which may be a Proxy or not. To the registrar, it doesn't really matter because they may not have any other data than that. So,

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that's one of the things I was thinking of as well, Jody. Thanks. Jim, please go ahead.

JAMES GALVIN:

Thanks, Roger. Two comments, two different comments. Let's deal with them separately. Let me first go at the 9154 comment and just observe what an excellent identification of a point that we kind of missed here. Yeah, there's an inconsistency there and that is something. I will say from a security point of view that, obviously, if one were to want to require compliance with 9154 in a very strict sense, then yeah, that basically means that you can't use email anymore for notifications. However, I do remember that in this Working Group, we had quite some discussions about all of these kinds of things. And I don't imagine that that option is going to fly with anybody.

And so, I'm not really sure what the right way to fix this is, but I'll make one suggestion that I think aligns with the preferences in the Working Group in spite of the fact that that's a valid vulnerability and threat vector to call out, if you will. Perhaps in the footnote, and this is kind of the problem. Maybe the footnote is not the right place to put it because now we get into the whole formality of it has to be in the recommendation somewhere. I don't know. But I think that somewhere, we do say even in the footnote 6 for 11 that it may be sent via email. Maybe we just need to -- I would offer to maintain consistency with where we've decided and what we like to do here.

And this is really, I guess, for the registrars to decide because you're the ones impacted by all of this. We put a phrase in there that

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acknowledges the 9154 requirements for an encrypted tunnel, but our current industry standard is email. And so, that's why it's a 'may'. It may be sent this way because that is our industry standard or industry best practice or industry practice. I don't know, something like that.

So, I'm trying to be helpful there with that one as a way to just be responsive. Let's at least not acknowledge the point being made, but I don't see us making any changes. That's my assessment of our discussions to date. Let me pause for a moment before I get to my other comment. I was going to speak to this timing issue in the other one. Roger?

ROGER CARNEY:

Thanks, Jim. And let me just add on just before if anyone else wants to. But I'll say, so email can be secure. Obviously, there are secure emails. Now, most people don't use it. And Jim, I like your idea of calling that out, especially because we need to recognize it. ICANN took the time to do that. And I think, as you said, obviously, it's the current practice. So, I don't think anyone in the group thought it was going to change as soon as this went out. So, I think that we can identify that and call that out. But anybody else have comments? Okay. I think that's a great idea, Jim, to add that in. So, I think we'll look to add that in. So, on your timing.

JAMES GALVIN:

Yeah. So, on the 10-minute issue, once again, that's a good identification of a vulnerability, if you will, a threat vector in the processes. My suggestion would be to find a place to indicate that, setting the TAC should actually happen coincident with sending the

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notification to the registered name holder. That's just one suggestion for how to deal with this. I mean, on the other hand, there's a part of me that thinks, as a practical matter, well, that's a valid comment. I don't know really what to do with that from a practical point of view.

You've got two things that have to happen. They basically have to happen coincident with each other. To expand on something that Jody was saying in his comment, I mean, even though you might send this notification in 10 minutes, the truth is you don't know who's receiving that notification. You don't know that they're going to do anything with it in 10 minutes. I mean, sending the notification out is, in my mind, not really a practical control part of this whole process. And that's the truth. It only allows you a reactive opportunity to do something.

So, from a security point of view, it's not an integral part of the control of this whole process. And with that in mind, I don't know that there's anything to do here. I mean, the best that I would suggest doing if you really wanted to be responsive, is to try to find a way to word this such that the setting of it has to happen coincident with sending out the notice, which means, if you get a request for an attack, if it's going to take you 10 minutes to get the notice out, you wait 10 minutes until you actually set it at the registry. But even that, again, it doesn't really get you anything because the notice is not part of the control structure of the security model. I hope that that makes sense. And I don't know how to explain that any better at the moment, but maybe if somebody has a question, we can deal with that. Thanks.

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ROGER CARNEY:

Great. Thanks, Jim. I think you actually said it perfect that it is a reactive measure. And the reactive measure may be before the TAC gets used or maybe after the TAC gets used, but it is reactive either way. The notification is a reactive measure. To issue the TAC is the actual control. So, they actually had to get into the control there or whatever to get it. So, that's where the control. This is just a passive second measure that we're using, reactive. I should say not passive, reactive. And that, to your point, Jim, and the timing, and I think INTA actually suggested something to update our words about being as quickly as possible, get it, as you're suggesting, Jim, is when you do those things, obviously, it has to happen in a certain order, but it should happen together, as you say.

The issue is when you're doing that communication, no matter if you've sent it the second afterwards, for the receiver to actually get it, is a different story. So, and you don't control that amount of time. So, yes, could you, and I think almost all registrars are going to, once the TAC is set, they send a notice. However, that notice is sent, it may be, in the control panel itself, so it's going to be almost instantaneous. But the closer to that, I think you're right, and I think, again, most registrars are going to do that, but trying to get too specific on that issue, I think ignores the fact that the receiving of the communication is uncontrollable, and if it is sent via email, I mean, it could bounce around for more than 10 minutes before the email recipient even gets it.

So, not that it wasn't sent right away, it just took longer to get through. And in any mechanism, if you send it SMS, I mean, sometimes SMS doesn't go through right away. So, I think that being aware, and I think, and to kind of hit on it, is, and I thought we had wording close to what,

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into suggesting what, because we say without undue delay, and they're suggesting as soon as feasible. I think something along that line, which to me is similar, but maybe it is better the other way. But I think that, the point is, I think most registrars are within seconds, not minutes, but it does allow that, and especially if it's a registrar that's their notice is a phone call or whatever, because they treat their customers differently, white glove, and you know, whatever it is, for whatever reason, it allows, it affords that. But Zak, please go ahead.

ZAK MUSCOVITCH:

Thanks, Roger. Thanks, Jim. So, I get it that this is a reactive notification, and I also appreciate that the security for the processes is found elsewhere. But what is the argument against, for example, the proposed revised language, and highlighted on our screen for the 24 hours after notification? What's the argument that it's not feasible or desirable to make the attack effective 24 hours later, or give a 24-hour window to invalidate it? Thank you.

ROGER CARNEY:

Thanks, Zak. And I think that's more of gets to a user experience than anything. But to your point on exactly 11.3, I guess I didn't read that the same way you read it, because to me, it reads that they get 24 hours to do it, not that nothing else can happen. They just have 24 hours. And when I read this, I thought, well, actually, they have 14 days, they have up to 14 days to invalidate this. As soon as it's created, they have up until, and even beyond it gets used, because they have a remediation



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process that the registrar will tell them, if this was not valid, then do this. But just my quick thoughts on that. So, Jody, please go ahead.

JODY KOLKER:

Thanks, Roger. This is Jody from GoDaddy again. I think there's a misunderstanding that we're having with Zak. I think what Zak is saying is that he'd like, and Zak, please tell me if I'm wrong. I think what you're asking for, or what the ICA is asking for, is for a notice to be sent to the RNH, and then the RNH has to approve it before the TAC is actually sent to the RNH.

ROGER CARNEY:

That was one, that was one suggestion. The other suggestion was, create a TAC and don't make it valid for 10 minutes or 24 hours. Create the TAC. It's at the registry, but it's not valid until 10 minutes from now or whatever. That, so there's two different suggestions.

JODY KOLKER:

Okay. And then this is a third suggestion that just states allow the RNH to invalidate it within 24 hours after it's been done. But again, to what you said, I would expect the RNH to be able to invalidate it during the whole lifespan of the TAC.

ROGER CARNEY:

Anyway. Yeah. And I think that the, to me, our current process is, the registered name can invalidate this at any point. So, to me, 11.3 is actually more restrictive than what we allowed today. But I think it goes

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back to, because I read this different than Zak read it. Again, we're going back to the fact of, is there a way to delay when a TAC can be used? Or as, as you led into, the other idea was, can it be a confirmation in between? So, but Zak, please go ahead.

ZAK MUSCOVITCH:

Thanks. Yeah. So, I think those are the, the three kinds of scenarios. The way I read the into comment is that, I'll just read the excerpt of it from the middle. Furthermore, it is unclear how long the RNH will have to invalidate the TAC upon receipt of notice of issuance. Therefore, the Working Group should recommend a standardized timeframe of no less than 24 hours. The way I read it at least is I thought what INTA was getting at was not so much that 14-day period to invalidate an unused TAC, but to invalidate a transfer essentially. That, I think that's what they're getting. That's more consistent with what the BC and ICA's comment was. Thank you.

ROGER CARNEY:

Great. Thanks. And recognize also that there's a five-day window at the end of use. So, I don't know, it's, it's one of those where I think that's covered because, we still have the transfer completion notice which allows a five-day window to acknowledge it. So, just, just thoughts on that. But Jim, please go ahead.

JAMES GALVIN:

Yeah, in the interest of time, let me just make a summary statement here. I want to be careful that we're not conflating at least three

different things. One is the actual controls that are in place. And it kind of goes to what you just said, Roger, which is that, I think everything is covered in total, in the large, maybe not in this one particular recommendation, but I think from the point of view of controls with respect to the security model and, and the transfer eligibility, we've got the issues covered.

The other thing is, the opportunity for reactivity. So, this just gets to the fact that the notice is not really part of the control system. It's really just part of making sure that you have the opportunity to come back and undo, which is already covered in other ways. And then the third thing, you made this comment, Roger, about user experience. And I think that's an important part of this too. Whether or not a registrar allows a registrant to terminate a transfer that they've started, on set the tack or something like that, that's a user interface kind of issue, user experience kind of issue. And we uniformly pretty much don't say too much about that here. So, anyway, thanks.

ROGER CARNEY:

Great. Thanks for that, Jim. That's, it's a good summary. And again, we are running out of time, but, and we obviously need to clean this up a little more, but I think as Jim pointed out, I think what's being asked is, and it may not be here, and maybe that's maybe a disconnect that we can tie together. But I think we've got the controls in place to allow this and beyond this actually. But I appreciate it. And it was a great discussion today and we are currently out of time, but we got a lot further than I had expected. So, thank you all for that. I'm going to turn

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this back to staff if there's anything we need to finish. Oh, yes. Next assignment.

CAITLIN TUBERGEN:

Thanks, Roger. And thank you, Christian, for highlighting assignment two. Thanks everyone for doing your homework on assignment one and for all of the discussions. We will take note of the discussions, as we showed when there's a comment, there's a cell next to it describing how the Working Group treated that comment or any observations from it. So, we'll also ask that you have a look at those as we're going through this process to ensure it is captured correctly. But please make sure you do your homework on assignment two. Staff will translate some of the comments that we had or heard today. Updates to the Under Construction Recommendations and if there's time, we will review those at the top of the next call. I think that's all from us, Roger. Unless I forgot anything staff.

ROGER CARNEY:

Great. Thanks, Caitlin. Thanks, Wheeler. I appreciate it. And sorry, we went a minute over. We'll talk to everybody next week. Thank you.

JULIE BISLAND:

Thank you, Roger. Thanks everyone for joining. This meeting has concluded.

**[END OF TRANSCRIPTION]**