ICANN
Transcription
GNSO New gTLD Subsequent Procedures PDP Sub Group B
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Michelle DeSmyter: Thank you so much. The recording has started. Welcome everyone. Good morning, good afternoon and good evening, and welcome to the new gTLD Subsequent Procedures Sub Group B call on Tuesday, the 19th of February, 2019. On the call today we currently have Anne Aikman-Scalese, Cheryl Langdon-Orr, Christa Taylor, Drew Wilson, Jeff Neuman, Jessica Hooper, Jim Prendergast and Rubens Kuhl. We do have apologies from Katrin Olhmer, Kristine Dorrain and Vanda Scartezini. From staff we have Julie Hedlund, Steve Chan and myself, Michelle DeSmyter. As a reminder, if would please state your name so it appears clearly on the transcription, and I turn the meeting back over to Julie Hedlund. Please begin.

Julie Hedlund: Thank you, Michelle. Christa, are you starting or was it Rubens? I'm sorry.

Christa Taylor: Rubens is starting. Thanks.

Julie Hedlund: Then Rubens it is. Over to you, Rubens. Rubens, if you're talking, we can't hear you.

Rubens Kuhl: Hello, everyone, can everybody hear me now?

Julie Hedlund: Yes, thanks.

Rubens Kuhl: Hi, all. Thanks for joining our call, Sub Group B today. We will be continuing the IDN section which we will start at line 31 of 2.7.5 which is the section on IDNs. The question we need to address now was a question from our initial report, number 2.7.5.c.5. This was an Implementation Guidance that we had general agreement to support IDNA2008 or its successor with applicable label generation rules which further resume, I'll call it, resume, label generation rules. And it would be -- which could be supported and avoid pre-delegation testing for groups that are well known in those label generation rules. We have 2 agreements with that proposal from the Registry Stakeholder Group and from the Brand Registry Group. We have a comment from ICANN Org which was not either an agreement or disagreement or diversion, that they noted IDNA2008 posed some constraints and it only suggested a baseline measure, so additional constraints could be posed by registries. And they mentioned some constraints are identified by the IDN Guidelines for the second level labels, although these are not relevant to our discussion of

subsequent procedures since we are discussing the top level. They also mention that pre-delegation testing covers different aspects of these constraints, but these only apply for second levels.

Also, besides ICANN, we have concerns and divergence from ALAC. They mention Pre-Delegation Testing covers the testing of different aspects that could potentially impact the stability and manageability of registry operations, such as DNS, WHOIS, EPP, IDN, Data Escrow and Documentation. IDN variants introduce added complexity to registry operations, even where compliant with IDNA2008 or LGRs. Consequently, ALAC believes it may be prudent to continue with PDT practices.

One comment here is that most of this answer was not mentioned about IDN which was the discussion point here. So we can note their comment specifically for IDN in this item was perhaps for the other items, something like education of registry service providers which is more in line with the topic of PDT, not specifically IDN. I see no questions here, so let's move on.

Line 36 is more of a section header of the report, mentions that Work Track discussed variants of IDN TLDs and is aware that the IDN effort which culminated in the IDN gTLD framework and the suggestion from the Work Group was that variants of this could be allowed provided the same, are to the same registry operator by force of written agreement, some policy of cross-variant bundling and defining which policy was this, and the applicable RZ-label generation rule was already available when the application was submitted. This was agreed by the Brand Registry Group and ALAC, although ALAC has one concern that the manageability and associated risks will depend on the nature and number of variants, and therefore a conservative approach might be appropriate, especially while deciding on the number of variants.

The Registry Stakeholder Group also agreed by proposing the new idea that the text should be clarified to state that variant IDN TLDs need to be operated by the same backend registry service provider, not only the same registry operator and not only at delegation/launch but including business transactions. Currently that's exactly what ended up being in the IDN variant TLD framework, but that's 3 lines below. So let's go another before that.

At next line 40 we have the comment from ICANN Org with a new idea that ICANN Org would like to make the PDP aware of the IDN Variant TLDs framework which is something that we can also add to the Work Group and that's what line 42 below. But before that, we had one comment here from the IPC that IDN TLDs which are variants of registered trademarks should be subject to Legal Rights Objections. This was discussed or perhaps not in Work Track 3 and we could refer it to Subgroup C if Subgroup C hasn't already ended their discussion. So we need to refer it to the full work group to consider the comment and then if they say the comment needs to be further analyzed by the Work Group, then take it as an item. But this is somewhat out of scope for this Subgroup although definitely in scope for this PDP.

We had one of the comments, one of the recommendations from the IDN Variant gTLD framework that was published, and portions of that were out, so these are not direct responses to the comment period, but it's clear that they already take into account much of our discussions and they suggest that IDN Variant gTLDs must be allocated to the same entity and same registry service provider. So we agree they should be allocated to same entity and the idea of restricting to the same registry service provider which is also an idea that was presented by the Registry Stakeholder Group. So we can refer both of them with the single idea to the full Working Group. Any questions, hands? None so far.

Then go to 2.7.5.d.1 which asks, if cross variant gTLDS should be handled by the PDP by the implementation of the policy that would be in the output of the PDP or defined by each individual registry operator. We had ALAC supporting the idea, both ALAC and Registry Stakeholder Group supporting the idea of each registry defining its cross variance of policy which is totally different from what ended up appearing in the ICANN Variant TLD framework which explicitly prescribed one specific policy to be adopted by all registries. So we recorded this as disagreement and new idea.

Seeing no hands, let's move to 2.7.5.e.1, for the recommendation regarding 1-character gTLDs. Can the more general ideograph or ideogram be made more precise and predictable by identifying specific scripts? So this wasn't a yes or no question, but how it could be improved in predictability. The ALAC said that most of this should focus on what are now CJK scripts (Chinese-Japanese-Korean), but they suggest that further work could be made by specific language communities. And the Registry Stakeholder Group was more prescriptive in suggesting scripts of the ISO standard, when a single character represented an idea, and make sure specifically 4 of those scripts, Hangul, Han, Simplified Han and Traditional Han as being allowed, or a single character where single property is Hangul or Han. Pretty prescriptive in saying these could be the focus of 1-character TLDs. Steve is typing, but while he types we can move forward and then go back to our review.

In 2.7.5.e.2, the question was whether the bundling across variant TLDs should be unified for all future new gTLDs or should it be TLD-specific? The Registry Stakeholder Group suggesting letting those specific policies to each registry operator. The ALAC also mentioned this but also mentioned the policy process for the IDN Variant gTLD limitation. Which as we know, ended up suggesting that for gTLDs also. So this is something that ALAC might want to take into account because when they responded the idea in gTLD was not published and now that comment is somewhat contradictory. So it will be interesting for ALAC to reconsider that position and say what they prefer in that regard.

Next comment from Lemarit is a new idea once a domain name is allocated, all variants should be blocked, the activation of the variants should be up to the registrants. This leads to more consumer protection and limited confusion. I believe that is exactly what is in ICANN Variant gTLD framework, but let's move on.

SSAC mentioned a good number of concerns in this. They mention that the problem of synchronization of TLDs has been studied previously and it is clear that there are no generally applicable technical approaches to this. They also mention the goal should be bundling is the same in all of the contexts in which they occur. They mentioned the RSTEP which studied .NGO and .ONG proposal which was one of the proposals that the Work Group already also looked into. So SSAC mentioned that the work group should look at the findings of the Registry Services Technical Evaluation Panel.

We have what's published in the IDN Variant gTLD report that the same label under ICANN Variant should be used to the same entity. The divergence here is that the framework does not -- this would be up to registry operators to be fixed and would be this way. So we call that both divergence and new idea.

2.7.5.e.3 asks if there are there known specific scripts that would require manual validation or invalidation of a proposed IDN TLD. The ALAC mentioned that under the current IDN regime, this manual validation/invalidation is unlikely to occur and the Registry Stakeholder Group mentioned passages of RFCs of some script/language that would be likely candidate for manual analysis. So it wasn't an answer to the question, but

more of a question of providing possible solution with automatic valuation/invalidation of TLDs.

In 2.7.5.e.4, we also don't have a set prescription, but more of an open-ended question, for IDN variant TLDs, how should the Work Track take into account the Board requested and at this point yet to be developed IDN Variant Management Framework? ALAC suggested with work track should consider its recommendations as inputs which is exactly what we are doing, incorporating their recommendations here. SSAC also believes the same that the Work Group would take this into account, so we can cross this done. And the Registry Stakeholder Group said that while they support the concept of a harmonized framework, they believe that IDN studies are already enough to base policy development. So they suggested not take this framework that was developed into account. And obviously the ICANN TLD Variant framework also proposed that we just follow it and it says that by saying that existing policies and associated procedures, a TLD must be up updated to accommodate the recommendations for IDN variant TLDs. All remaining existing TLD policies must apply to IDN variant TLDs, unless otherwise identified. So, let's give people some time to think, because this will end 2.7.5 IDN section. Any comments? Questions? Complaints? Nope? Then that's it and we now move to 2.7.6 with Christa. Thank you.

Christa Taylor: Thanks, Rubens. As Rubens mentioned, looking to the next tab on Security and Stability on 2.7.6, there is some initial, a few little comments there. The first one is from the CCT-RT Report mentioning Recommendation 14 to negotiate amendments to existing Registry Agreements, with subsequent rounds of new gTLDs to include provisions in the agreements to provide incentives, including financial incentives for registries, especially open registries, to adopt proactive anti-abuse measures.

We then have another one related to the CCT-RT Report, Recommendation 16, to study the relationship between specific registry operators, registrars and technical DNS abuse by commissioning ongoing data collection, and that this should be published ideally quarterly and no less than annually, and to identify registries and registrars that need to undergo greater scrutiny and investigation. Also to identify abuse phenomena where ICANN should put in place an action plan to respond to such studies, remediate problems identified, and define future ongoing data collection.

We have a comment from the ALAC making suggestion that processes should defer to the SSAC for further recommendations in a number of areas including dotless domains and name collisions. And they note that there is no cause for urgency surrounding the further introduction of gTLDs due to time and due time should be given to the SSAC to explore the security and stability implications of various proposals before a new round begins.

And then we have the SSAC with a comment that further research is needed to understand the scale of domain name abuse that is attributable to the introduction of new gTLDs in the 2012 round. They also have a concern that there are no questions or preliminary recommendations in the Initial Report on the subject of domain name abuse and that further research is needed to understand the scale of the abuse and go on to say the SSAC is highly likely to study this issue further in the near future.

So I guess we can maybe come back to those. We want to take those items specifically to the full working group maybe at the end of this one so we get through this section. So I'm just going to jump into the first question which is on line 7 saying, in the 2012 round, some applicants ended up applying for reserved or otherwise ineligible streams causing them to later withdraw or be rejected. The Work Track suggests the following as Implementation Guidance: that the application submission system do an all feasible

algorithmic checking of TLDs to better ensure that only valid ASCII and IDN TLDs can be submitted. And then a proposed TLD that doesn't fit all the conditions for automatic checking, a manual review should occur to validate or invalidate the TLD. We have the Brand Registry Group, Neustar, the BC and the Registry Stakeholder Group all agreeing with this. The BC adds in the new idea that define timelines for the manual review process to enable the applicant to make plans accordingly should be under, should be provided. And the Registry Stakeholder Group has the idea that the RZ-LGR, while it is evolving and adding new scripts periodically will only be able to process certain scripts for checking. And therefore, the ideal algorithmic tool to validate applied for TLDs, ICANN will need to provide alternative methods to validate applied for labels using other scripts not supported by the RZ-LGR.

We also have a comment or idea from ICANN Org that the system to check applied-for gTLDs against specific lists, such as the Reserved Names list, the ISO-3166 list, and the Root Zone LGR could be automated and that it would determine -- the RZ-LGR defined for the scripts of these labels would determine the complexity of the implementation of the algorithmic checks. Any comments to that section 2.7.6.d.1? Rubens got a comment, I believe it is on another section and I believe it is more of an alert than a request. This couldn't -- sorry, this couldn't be known at the time when they responded was going to be contradictory now. Sorry, that's regarding IDNs in the prior section.

I'm just going to continue on. I'll let the chat go in the meantime because I'm skipping back. Thanks, Justine. It relates to one of the questions that arose up in the other section regarding the ALAC comment. Jumping to line 13, the question on 2.7.6.c.2, for root zone scaling, the Work Track generally supports raising the delegation limit, but also agrees that ICANN should further develop root zone monitoring functionality and early warning systems as recommended by the SSAC, the RSSAC and the technical community. And we have the Brand Registry Group and Neustar agreeing with this. We have ICANN Org with the new idea from the ICANN Office of the CTO that the design of our early warning system that could monitor several aspects of the root server system could be implemented to monitor possible signs of stress on various aspects of the root server system that could result from increased size of the root zone. It would also remind the PDP Working Group of our comments on this topic on the January 24th letter from Akram and David Conrad to the Chairs of the PDP Working Group. I haven't referred back to the letter to see what it actually says, so I'll let that to an action item.

The next comment from the Registry Stakeholder Group notes the SSAC recommendations and there are 4 of them. The first one is, The SSAC Recommendations are one, ICANN should (1) continue developing monitoring an early warning capability with respect to root zone scaling. Secondly, focus on the rate of change for the root zone, rather than total number of delegated strings for a given calendar year. Three, structure its obligations to new gTLD registries so that it can delay their addition to the root zone in case of DNS service instability. And finally, fourth, investigate and catalog the long-term obligations of maintaining a larger root zone.

We also have a new comment or a new idea from Alexander Schubert. It's mostly around pricing rather than security and the pricing was addressed in the financial section, so they are saying that the increased volume might result in -- or increased price might result in a more manageable application stack with less speculative registrations and increase of speed for applications. And they surmise that increasing the price would reduce the volume and I guess would also decrease any issues on the root zone.

The next comment is from the ALAC suggesting that any cap should be based on what the root-zone system can handle technically and it should initially be determined -- well that's pretty much it. And then finally, we have a comment from the SSAC, it's a bit of a

long one here, with a bunch of factors to take into account and reiterates advice from SAC100. Pretty much that we lower the barriers to making applications by reducing the price. And that by doing so, item 2.5.1.e.6 becomes important based on how many more TLDs will be introduced and whether ICANN can scale its operations to handle that many TLDs which poses several security and stability issues. Not so much whether the root zone can accommodate additional entries, but whether the ICANN Org's operations can scale. And they gave a couple of excerpts. Recommendation 4), ICANN should investigate and catalog the long-term obligations of maintaining a larger root zone. And investigate how increasing the size of the root zone will impact activities such as the DNSSEC Key Signing Key rollover, IANA root zone change requests, transfers, contract negotiations, etc. And that recommendations should include an acceptable rate of change to the root zone instead of a yearly delegation limit, and that the obligations to new gTLD registries should be structured so that their addition to the root zone can be delayed in case of any DNS service instabilities. Any comments to that section?

Seeing no hands, but there's some comments. Anne asks, I see that Alexander Schubert's comment is marked take to larger group for discussion. Did we mark the comments in 2.7.6 at line 36, insecurity and stability, to take to the full working group for discussion? I believe it was done in the prior section on costing. And maybe if somebody would help me to make sure that we did actually note that as something to bring to the full working group, that would be great.

And then Steve brings up a question, are we acknowledging and accepting of ICANN being a so-called registry of registries? i.e., does the community envision ICANN approving a few thousand, hundreds of thousands, millions of gTLDs to be applied to the root? And should there be a cap? So I'll let that conversation continue while I jump to the next section since it's a nice short one.

So line 21, the question 2.7.6.e.1, to what extent will discussions about the Continuous Data-Driven Analysis of Root Stability Report, and the analysis on delegation rates, impact the Working Group discussions on this topic? How about the input sought and received from the SSAC, the RSSAC, and ICANN Org discussed below in section (f), under the heading Root Zone Scaling? And it's the exact same comment that I just read out from the SSAC. And Steve mentions that the prior comment was mentioned, was providing a reference to the question mentioned in the SSAC question.

Seeing no comments on 6.e.1, for the last section which is 2.7.6.e.2, with the question, the SSAC strongly discourages allowing emoji in domain names at any level and the Work Track is supportive of this position. Do you have any views on this issue? And the RrSG, Lemarit, the IPC, the SSAC and the Registry Stakeholder Group all agree with this and the Registry Stakeholder Group provides the additional idea that although not interfering with already registered emoji SLDs in gTLDs and that we would support reviewing this decision if/when the IETF IDNAs standards allow them, if that ever happens. So that is all of Section 2.7.6 on Security and Stability. Any comments?

I see a couple of people are typing. I'm going to give it a few seconds here in case something pops up. Steve makes a comment regarding taking it to the full group and notes that albeit in a summarized fashion emphasizing new ideas as it relates to agreements, new ideas, concerns, divergence will be sent to the full Working Group.

So in the meantime, we'll prep for Section 2.7.7. It's a bit of a long one, so we're hoping we can make some progress on this today to see how far we can get to save us a little bit of time for the next call. So the first one is just some general comments. We're going to see notes in the first lines. The first one is Marques, and this entire section is pretty much based on fees in the prior section which we already discussed, but there is one other item

I guess related. It's mostly related to the process regarding brands and the fees related to it. So I think we're bringing this up here not because of the fees, but for process purposes and how they should be dealt with. So for Marques, they have the new idea that there should be a fee for Single Applicant/Closed Brand Registry, where the evaluators do not need to review a business plan and therefore it should be a lower processing cost than for an Open Registry. We have a divergence from INTA that believes the application fee should be relatively high to dissuade frivolous applications. And that there should be a reduced application fee for Brand owners who wish to apply for a gTLD that fully incorporates their trademark.

We have a comment from Vanda that suggests ongoing evaluation of the application fee be monitored by the community. To the extent that the whole external support as independent panels, shall be registered as a list of persons open to join in different panels, any time for a specific task, they are experts. For each application when needed, a reduced panel of 3 will be selected for a working day to analyze the application.

And finally, one from Marques that is the same idea, single applicant, closed brands should have a lower fee because they don't need a business plan review. So that's that section.

Reading the comments, Justine has a comment on the prior section, on 2.7.6.e.2. I just saw today a VICE News report about an American domain investor reselling emojis under the .ws ccTLD. Out of scope for us but interesting to note in context of SSAC's position on emojis. Yes, but they also note that the ones in prior should not -- well at least the Registry Stakeholder Group noted that we shouldn't interfere with already existing emoji SLDs and gTLDs. I'm not sure that helps, but just mentioning it.

Moving along to the SSAC comments that has notes that publicly traded companies must not be exempt from the financial evaluation. They go on to say the barrier to be publicly traded is very low in some jurisdictions, such as penny stocks in the US, and such companies do not undergo extensive screening. They also go onto say no applicant should be allowed to self-certify that has the financial means to support its proposed business model, that self-certification does not provide surety and there is great variance in requirements from jurisdiction to jurisdiction. They also for Technical and Operational Evaluations say a full IT/Operations security policy from applicants must be required. And then they mention the goal of the evaluation is for the applicant to demonstrate its expertise and assure the security and stability of the operations of the registry.

We then jump into the first question which is 2.7.7.c.1. For all evaluations, in pursuit of transparency, published during the procedure and any Clarifying Questions and CQ responses for public questions to the extent possible. And we have agreement from the Brand Registry Group. We have a longer comment from ICANN Org that says they request what is meant by during the procedure as well as possible consequences. And the implications that the PDP Working Group might want to consider, discuss and consider, prior to finalizing the recommendations. They go onto say this may no longer be a consideration, I'm sorry, they are referring to the 2012 round in the financial evaluation. And then the preliminary recommendation 2.7.7.c.13 suggests that the responses to the revised financial questions be publicly posted. However, the PDP Working Group alter preliminary recommendation c.13 based on community input, that they may want to consider the potential implication. Sorry I'm making a bit of a mess of it here, but an additional implication to consider is that doing so would provide applicants with larger priority numbers with an advantage of having the answers available to them, making the evaluation less meaningful. This would then create a disadvantage for applicants that have smaller priority numbers who would be putting in the initial efforts to formulate a response to the clarifying question that could then be leveraged by others. So I guess the

question is, during a procedure, does that mean kind of real time during the application, so those answers could be used by other members in their own responses? So perhaps we should take that to the full working group to respond to?

The next comment is from Neustar. That they are in agreement and that only responses that relate to the public portions of the application should be disclosed. Same with FairWinds Partners and the Registry Stakeholder Group. They also note that no confidential information should be published. Then we have a new idea from the BC that mentions that ICANN will not provide -- mentions that the ICANN will not provide financial models or tools, why not make these options available? That might make the evaluation process simpler and make it easier to prepare an application. And for some applicants, it is best to create a single purpose vehicle/coalition/entity to apply. In this case, we will need the system to be able to measure the viability of this new entity that may not have full multi-year financials. I'm going to pause there for any comments on 2.7.7.d.1.

Justine notes, why is ICANN Org to clarify what is meant by during the procedure as an agreement even though tagged as clarification also? Julie says, it is marked as agreement because the comment says it is feasible from a program operations perspective, it is feasible to publish CQs and responses to public questions of the applications. So it doesn't seem to disagree, but asks for clarification. I see no hands, so I'm just going to continue while that conversation develops.

Line 17, question on 2.7.7.c.2, for all evaluations, restrict scoring to a pass/fail scale, 0-1 points only. The Brand Registry Group, Neustar, Registry Stakeholder Group and Valideus all agree with this recommendation. Any comments on that section? I see Justine typing. I'm just going to jump to the next one in the meantime. So the question is going back on ICANN Org's question to clarify and whether that is changed to a new idea. And Steve mentions yes.

So I'm going to jump to the next section which is 2.7.7.c.3. The question is, for all evaluations, an analysis of CQs, guidance to the Applicant Guidebook, Knowledge Articles, Supplemental Notes, etc. from the 2012 round need to be sufficiently analyzed with the goal of improving the clarity of all questions asked of applicants such that the need for the issuance of CQs is lessened. We have the Brand Registry Group, Neustar, FairWinds, the Registry Stakeholder Group, and Valideus all agreeing with this. And the Registry Stakeholder Group also cautions against making substantive changes to the questions that would make subsequent procedures incompatible with the 2012 round. Any comments to Section 2.7.7.c.3? Still making sure that the prior comment is flagged to go to the full working group, and I believe it has.

In the meantime, I'm jumping to line 28, 2.7.7.c.4, with the question for Technical and Operational Evaluation. If an RSP pre-approval program is established, a new technical evaluation will not be required for applicants that have either selected a pre-approved RSP in its application submission or if it commits to only using a pre-approved RSP during their transition to delegation phase. The Brand Registry Group, Neustar, the Registry Stakeholder Group and Valideus all agree with this and the Registry Stakeholder Group also notes that all other applications used in the RSP can rely on that technical evaluation and if a registry operator uses different business rules for different TLDs, then all different functions and variations of those different functions should be tested and approved. Any questions to Second 2.7.7.c.4? Seeing no hands, no comments, that section it looks like we have now concluded the entire section and we're all good with that.

Jumping to line 33, 2.7.7.c.5, for the question for Technical and Operational Evaluation: Consolidate the technical evaluation across applications as much as feasible, even when not used using a pre-approved RSP. For example, if there are multiple applications using the same non-pre-approved RSP, that RSP should not -- sorry, that RSP would only have to be evaluated once as opposed to being evaluated for each individual application. The Brand Registry Group, Neustar Registry Stakeholder Group and Valideus all agree. And the Registry Stakeholder adds to the extent that the underlying technical evaluations are the same. Any comments to that section?

Seeing no hands, line 38, question 2.7.7.c.6, the question for Technical and Operational Evaluation: For applications that outsource technical or operational services to third parties, applicants should specify which services are being performed by them and which are being performed by third parties when answering questions. Brand Registry Group, Neustar and the Registry Stakeholder Group along with Valideus all agree with this and the Registry Stakeholder Group adds that, suggests components that could be separated into categories. And they provide a number of examples such as SRS, EPP, RDDS and Publishing to Data Escrow along with a Data Escrow Provider, DNS provider, an abuse monitoring/handling and RDAP could all be areas that are different components that could be separated out. Any questions to 2.7.7.c.6?

Cheryl notes she has to leave. Thanks, Cheryl. And hopefully we can do one more section here on line 43, 2.7.7.c.7 with a question for Technical and Operational Evaluation: Do not require a full IT/Operations security policy from applicants. We have the Brand Registry Group, ICANN Org and Neustar along with the Registry Stakeholder Group that all agree with this. And then we have -- just scrolling down, ICANN also adds that they encourage the working group to consider this recommendation in the context of ICANN's mission to "ensure the stable and secure operation of the internet's unique identifying systems". And we have the RSP has a divergent point of view that the tech and operational evaluations are still needed, especially for applicants that are using RSP to support dozens of TLDs. And we have also a divergent point of view from the GAC that believes the applicants' evaluation and RSP preapproval process should include consideration of potential security threats and that tools such as ICANN's DAAR to identify any potential security risks associated with an application.

Jeff notes that I don't see those as necessarily divergent and these things can be assessed without the full plan. Any other comments to Section 2.7.7.c.7? Anne brings up the very great point of what is DAAR? And I'm hoping somebody else can answer that because I have no idea. I see Jeff is typing.

In the meantime, I'm just going to do maybe one or two more sections here if I can. Section 2.7.7.c.8 for Technical and Operational Evaluation: Retain the same questions except 30b, the security policy. The Brand Registry Group, Neustar and the Registry Stakeholder Group all agree with this. The Registry Stakeholder Group also notes, except for possible clarifications as much as they were in 2012 for fairness and comparable results. Any comments to that section?

Anne has noted that there is a link with what the DAAR is and it's noted the Domain Abuse Activity Report.

Jumping to Section 2.7.7.c.9 with a question for Technical and Operational Evaluation: Applicants must be able to demonstrate their technical and operational capability to run a registry operation for the purpose that the applicant sets out, either by submitting it to evaluation at application time or agreeing to use a previously approved technical infrastructure. We have the Brand Registry Group, Neustar, Registry Stakeholder Group and Valideus all agreeing with this and the Registry Stakeholder Group said if a Registry

operator selects or switches any preapproved RSP will have to satisfy the technical requirements. And that if they use different business rules for different TLDs, then all different functions and variations of those functions should be tested and approved.

Anne asks Jeff, how would the DAAR apply in the application phase?

I'm going to do one last section, I'm going to call it. So Section 2.7.7.c.10 with a question for Tech and Operational Evaluation, it may be aggregated and/or consolidated to the maximum extent possible that generates process efficiencies, including instances both where multiple applications are submitted by the same applicant and multiple applications from different applicants share a common technical infrastructure. The Brand Registry Group, Neustar and Valideus all agree with this.

So I'm going to stop there for this call and then jump to the next item on the agenda for any other business. And there is some comment still going on regarding the DAAR. So we have 2 more minutes. We're perhaps suggesting in the interest of before we reach Kobe to be able to finish this section, so we were discussing perhaps extending the next call to ensure that we can finish this section. I don't think we're going to need the extra time, so I think we should be fine. But maybe we should note in case we don't manage to get to it, that we might just maybe spend an extra 10 minutes at the end of that call just in case. But I don't really see the need for that.

Any other business? There's some comment still going on about the DAAR. In the meantime, I'd like to note, everyone, that our next call is on February 26th at 20:00 UTC and if there is any other questions or comments, otherwise I'll end, come to a close on this call. As always, I'd like to thank everyone for attending and hope to see you on our next call.

I see multiple people are typing. Maybe we'll bring up the comments where we revert back to the DAAR on the next call, just to make sure that we properly addressed all the questions there. We'll circle back. So thanks, everyone, for your time, and we'll see you next week.

Michelle DeSmyter: Thanks, Christa. Meeting has been adjourned.