

**Inter-Registrar Transfer Policy Part B PDP
Transcription
Tuesday 02 March 2010 at 15:00 UTC**

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<http://audio.icann.org/gnso/gnso-irtp-b-20100302.mp3>

On page:

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Participants on the Call:

Michele Neylon – RrSG – Chair

Berry Cobb – CBUC

Kevin Erdman – IPC

Mikey O’Connor - CBUC

James Bladel – RrSG

Chris Chaplow – CBUC

Michael Collins - Individual

Paul Diaz – RrSG

Matt Serlin – RrSG

Barbara Steele – RySG

Anil George – IPC

Baudoin Schombe – At-Large

Staff:

Marika Konings

Olof Nordling

Daivd Giza

Apologies:

Eric Brown – RY (all Tuesday calls)

Gisella Gruber-White

Glen de Saint Gery

Coordinator: The call is now being recorded. Please go ahead.

Michele Neylon: Thank you.

Marika Konings: Thank you very much. Good morning, good afternoon, good evening to everyone. This is the IRTP Part B Working Group Meeting of the 2nd of March.

On today's call we have Michele Neylon, Mike O'Connor, Michael Collins, James Bladel, Paul Diaz, Kevin Erdman, Berry Cobb, Barbara Steele, Anil George. And for staff we have David Giza, Olof Nordling and myself, Marika Konings. We have apologies from Eric Brown and Gisella Gruber-White. And over to you Michele.

Michele Neylon: All right. Thank you everybody good afternoon. You should all have got a copy of today's wonderfully exciting schedule. And let's have a look. Where's the schedule? It's like - it was sent around and I'm being terribly disorganized.

Okay roll call done. (Update) the sub-team - there's a small sub-team of myself, Mikey, Paul Diaz and James. And so Paul could you be so good as to give a very brief update on where things stand please.

Paul Diaz: Thanks for putting me on the spot bud.

Michele Neylon: Well you're welcome.

Paul Diaz: Where things stand.

((Crosstalk))

Michele Neylon: Any time.

Paul Diaz: Where things stand - this little team, we're in the processing of putting together some thoughts to address a gap that we've recognized in the course of the working group. The gap being trying to come up with a quick effective way to restore name that has been in some way improperly transferred.

We're still ironing out the details. So we ask the group, give us a little more time. We will have something to talk about, something to present to the group and talk about probably in the first call after the Nairobi meeting.

Michele Neylon: Okay thank you Paul. Does anybody have any questions about this or any queries or any other comments, thoughts? Don't all rush. No? Okay. Right then moving on. The - we're going - we're continuing to look at the constituency statements. And since I have the memory of a goldfish, I rely on Marika. Marika where were we at on this?

Marika Konings: I think we were on Page 5 Issue D comment Number 2.

Michele Neylon: Okay.

Marika Konings: Although I think the discussion covered to a certain extent already as well Comment 2 and 3 where I think on the one hand registry constituency was saying we don't need any standards and IBC and BC were saying well standards might be a good idea. And I think we started already discussing both sides of the argument, so.

Michele Neylon: Right. We were also - I think we were also looking a bit at this entire thing about EPP statuses and I think that's where we kind of got into a tangle because as somebody pointed out in one of the comments somewhere else, the document refers to a state - to a register lock status which doesn't actually exist.

I mean it did exist in the past, but it doesn't exist anymore. Is that - that's a correct summation or does somebody disagree? No thoughts? Okay fine.

Right. Okay then. I think we're going to come back a bit to some of the stuff with regards to the lock statuses in a meeting some time after Nairobi. I think we were going - I think we were looking at trying to talk to somebody about EPPs. Is that correct Marika?

Marika Konings: This is Marika. The suggestion I made in an email to Michele is that in the IRTTP Part A Working Group we had a presentation by I think a colleague from Barbara from VeriSign who actually wrote the protocol for EPP that gave us a bit of an explanation of how EPP works, what is and what isn't possible.

And one suggestion was to see whether he would be willing and available maybe to talk to us about this specific issue in relation to registrar lock, and as well the suggestion that has been whether, you know, status updates can be linked to the different lock statuses as having a more, you know, a clearer way of indicating to registrants what is going on. So, it was a suggestion and I see Barbara has raised her hand to I'm sure she'll be commenting to that.

Michele Neylon: Okay. James and then Barbara.

James Bladel: I'll defer to Barbara. She may cover my question.

Michele Neylon: Okay.

Barbara Steele: I was just going to say that it was Scott Hollenbeck who had joined the working group in the past to help explain some of these things. And I'm sure with appropriate advance notice he would be more than happy to make himself available to answer any additional questions that may - that we may have.

Michele Neylon: Barbara since he works for the same company as yourself, would you be able to Ping him on our behalf please?

Barbara Steele: Of course.

Michele Neylon: Thank you. That'd be very helpful. James.

James Bladel: Hi Michele. I just wanted to get something out on the record here. I am very respectful of EPP as the industry standard method of provisioning. And I think it's genius as how it is extensible. And I - but I understand that that's - even making a minor modification to it's no small undertaking.

But we said something earlier about what is possible and what is not possible under EPP. And I'd just like to get out there onto the record that EPP is a tool for implementing the policies that are decided in this group and other ICANN groups.

And if the tool needs to bend or change or modify to fit the policy then so be it. We shouldn't be bending policy around tools. And I just wanted to get that on the record.

Michele Neylon: Am I going to put myself in the queue? Does anybody else have any thoughts on it? Chair hat off, my own hat as registrar on. I would agree 110% with James. EPP is extensible. It's part of the bloody acronyms definition. So if we need to extend it so that it suits the pol - so it works with the policy then so be it. I'm sick of all these sacred cows. Anybody else have any other thoughts on that? No? Okay.

James Bladel: I - Michele, just - look you got to give us a little bit of time for the mute button there.

Michele Neylon: Sorry.

James Bladel: I said just give me one more second for mute button before you move on. I just wanted to say I agree and, you know, I think that we need to be cognizant that it is sometimes that there are time, costs and development resources involved if we want to make and/or recommend any changes that would affect EPP but it shouldn't be a showstopper, so.

Michele Neylon: I'll put myself back in on this. But who was that that was just speaking? Was that Paul or James?

James Bladel: That was - that was James.

Michele Neylon: Sorry James. Okay. One thing that is coming back James is that just being this and Barbara please don't be offended. The registries have a charming habit of informing the registrars when they make it a technical change. But we don't really have any option about implementing it. So, you know, it's a two way street.

Okay moving on, Issue E. Whether and if so how to best clarify denial Reason Number 7, a domain with already lock status provided that the registrar provides a (rethropy) - sorry this is a real mouthful - a regularly accessible and reasonable means for the registered name holder to remove the lock status.

And the registry go, it is recommended that to provide a consistent user experience, registrars use the EPP statuses to lock domains. I don't actually understand that comment because that seems to be self-evident or does - is that - or does that mean that it's not clear in WHOIS? Barbara please go ahead.

Barbara Steele: Hi. It's basically just that, you know, that the I believe it's client prohibited statuses are used to lock the various types of transactions whether it be client update, client delete, client transfer prohibited statuses. So I don't know if there are other mechanisms available by which registrars are using I guess the locked domain names. But it's basically that we would want them to be consistent and everybody using the EPP statuses versus I guess in-house versions to lock domain names if that's possible even.

Michele Neylon: Okay. James? Thoughts?

James Bladel: Yes. The thoughts would be that as a registrar, and I'm not sure if this is universal or just true of ourselves is that we tend to not through our control interfaces break down the lock function into those individual client prohibited statuses. Rather we just have a single lock on/off type of a switch and that is kind of a mask to all client statuses are then locked from that.

I think that Barbara you're correct. There's also probably that (maida) lock that, you know, it's a flag that exists only at the registrar level and does not - is not submitted to or set at the registry and that that would then cause the registrar to automatically knock any transfer request if that flag is set. So, you know, I'd be interested in hearing if they're willing to discuss how other registrars implement this locking function and whether it's something that's, and here comes the nasty word uniform again, but I just want to understand it if they're doing something similar.

Michele Neylon: Okay. Matt go ahead.

Matt Serlin: Thanks Michele. Yes James just to sort of pick up on what you said, I don't know how uniform the user experience is per se but I - from my experience I would say that you're correct and that most registrars, including ourselves, have a simple lock or unlock. We don't necessarily break it down to the client delete, client transfer, client renew, client update prohibited level.

And based on my experience dealing with most of the other registrars that I have I would say that that's pretty consistent across the industry is that it's either locked or unlocked. And now the user experience may be different, you know, from Go Daddy to MarkMonitor to Network Solutions and how you go about locking or unlocking, but my experience is that it's just sort of that one singular notion of locked or unlocked.

Michele Neylon: Okay. One thing I would say here is that this could also have an impact on say for example a registrar that has locked the domain on their own - on their back end but they're not actually putting it in the WHOIS that it is locked

because we've run into that issue several times in the past and it's very, very annoying.

In other words, any request to transfer the domain will get denied by the losing registrar but WHOIS shows that the domain is not locked. And so it's not very clear to anybody that there is a problem with the transfer. Barbara then James.

Barbara Steele: I guess the question I was going to ask is it almost sounds as though Go Daddy, while they have one flag if you will that they flip, but that flag actually does map to the EPP statuses. I was just wondering if what Matt was describing also in essence maps to the EPP statuses or if it's more like what you're describing Michele where there's really no indication in the WHOIS to show that it is in a locked status.

Michele Neylon: Okay. James then Paul then Matt. So James?

James Bladel: I want to answer Barbara's question but I'm not sure I understood what specifically she was asking. So can you repeat that Barbara?

Barbara Steele: Basically it sounded like you have a flag that you set. But I think that I heard that you had indicated that that flag actually does end up mapping to the client prohibited statuses to lock the name down for EPP?

James Bladel: That's correct.

Barbara Steele: Okay. So that's, you know, what I was trying to confirm was whether or not, you know, the mechanism that Matt also described is that same situation or if it's more like what Michele was describing where there's some way that they're able to lock it at the registrar level but there's no indication anywhere and so there's confusion as to why the transfer's not going through because nobody can really see that it's locked in any of the WHOIS records or data.

Michele Neylon: James?

James Bladel: I would have to let Matt answer that - if that is also his experience. I understood his statement to mean that it was but I don't want to speak for him.

Matt Serlin: Yes I can - Michele, if you're okay with that I can just jump in...

Michele Neylon: Yes we're fine.

Matt Serlin: ...and pick up on Barbara's. Yes so Barbara for us, our lock statuses do map directly to the registry. So if a - to us we - the lock - if a name is locked in our system, it's client delete prohibited, client transfer prohibited and client update prohibited. So there is no notion of, at least in our system, that someone locks a name and it doesn't actually push out three EPP to the registry.

But I think an interesting point to note is that different registrars have different meanings of locks. So I may lock a name at a different registrar and they may not put on those three statuses. They may just put client transfer prohibited.

Barbara Steele: Sure.

Matt Serlin: And so that is where I don't think there's really any standardization. But yes, for us we don't have any notion of a lock that doesn't actually get pushed out to the registry.

Barbara Steele: Okay thanks.

Michele Neylon: James?

James Bladel: Well I had a thought on another subject. And before going off on that, if you don't mind, I'd like to turn it over to Paul and see if he's on this same subject or...

Michele Neylon: Okay. Paul.

Paul Diaz: Yes thanks James. Exactly. I just wanted to weigh in. Just like Matt and James, our organization everything does map. And wanted to follow up on what others have said that we experience the frustration that there are registrars out there that have some form of internal procedure they call a lock. It does not appear in EPP. It does not appear in the WHOIS.

It is a major source of frustration and confusion. And it's something that, you know, we feel is a good thing for this working group to be looking at. It seems most of the major players, you know, have a straight forward, easy to understand, easy to verify process they use in instituting using the lock, using the existing protocol and, you know, for these folks that are operating sort of on the side with a one off mechanism that is not - there's no way to see it in advance and therefore creates all the confusion and customer frustration.

You know, we feel that it's appropriate for the working group to look at those practices and to think about - think long and hard whether that's an appropriate thing to allow.

((Crosstalk))

Michele Neylon: Okay.

James Bladel: If I could take my real turn now Michele.

Michele Neylon: Maybe. Maybe I'm think - I'm thinking about it. I might let Mikey go first so but that'll make you wait for ten minutes. But go on, I'll let you off this time.

((Crosstalk))

James Bladel: Okay well I just wanted to...

Michele Neylon: Well I...

James Bladel: ...mention that this is about to get a little bit - possibly a little bit more complicated with the implementation of - through our set of allowing registrars to activate or deactivate server side locks as well.

And I don't want to get too far ahead of ourselves, but if we're detecting that there's some inconsistency now that Paul - as Paul mentioned that's disrupting transfer operations, there's a possibility that that could become even a little more confusing for registrants. As registrars build products around registry locks, service side locks and as more and more registries adopt that through RCEP.

Michele Neylon: Okay. Mikey?

Mike O'Connor: Ten minutes. Hmm.

Michele Neylon: Okay.

Mike O'Connor: I resemble that remark.

Michele Neylon: Okay you do really resemble it. Oh sorry. Did I say that out loud?

Mike O'Connor: God.

Michele Neylon: Damn, sorry.

Mike O'Connor: People. My observation is that we have really sort of two topics here I think. All right. I think that this last discussion is great and I hope that we can capture the sentiment and I'm on board with all of it.

But the Issue E is really about, or at least when the last time we looked at it long ago was really about the consistency of the mechanism for the registered name holder to remove the lock. And so we may want to fork this discussion and capture the sort of technical consistency issues that we've been talking about.

But also not lose sight of the need for essentially a user facing a registrant facing consistent way to remove the lock as well. And that's less than ten dang minutes.

Michele Neylon: I'm very impressed with you Mikey. You're restraining yourself. Does anybody else have any thoughts on that? Okay. Let's have a look - move along - oh wait a second, we have movement. Paul?

Paul Diaz: Yes thanks Michele. I was just going to ask, and David's here, this Issue E, wouldn't this (ultimately) become a compliance issue in that, you know, the policy very clearly states that the readily accessible and reasonable means to remove the lock status if a registrant feels that their registrar is not providing that reasonable means, then there's an escalation path to ICANN compliance, right?

David Giza: Correct. There is. And typically that...

Michele Neylon: David Giza speaking, just so - state who you're speaking please for transcription.

David Giza: Yes. Yes, Dave Giza speaking. The answer is yes, that's correct. And usually the escalation path starts either through the consumer complaint system or it comes to us directly through an email or some other form of contact by an aggrieved registrant.

Michele Neylon: Okay. Marika?

Marika Konings: This is Marika. Did I have a question and like Dave how do you then interpret that it'd be acceptable and reasonable? I guess that's the key question relating to this charter question. Where do you draw the line if - because I understand there's no definition in the policy that defines what should be considered acceptable and reasonable?

So how do you go about that and is that something you would like to have more clarity around those concepts? And maybe that's something, you know, you would like this group to provide some more guidance on or, or you have a very clear approach into what you consider yes you're right in your complaint and no this is not, you know, you don't have any right to complain basically.

David Giza: This is Dave again. Unfortunately, you know, the investigative work we do is case by case. And so there is not a clear standard on, you know, what constitutes readily accessible and reasonable. And so if this group were to take it upon itself to try and define that term that would provide some guidance for, you know, for our compliance team as we investigate, you know, these instances.

But right now it's really fact based and it largely depends on, you know, how much information we get from the complainant and - before we can begin to assess if there's a legitimate, you know, basis for that complaint or not.

So I can't - I can't give you a, you know, kind of a cut and dry answer because there really is no definition around those terms today. It's really a question of judgment.

Michele Neylon: Mikey?

Mike O'Connor: This is just to amplify David's point. I think that's the reason that this issue's on our list is how to best clarify that. And that's the only thing I was trying to bring up is that I think that we may want to fork this discussion into a

discussion about that and another discussion about the technical issues that we were, you know, the essentially operational issues we were talking about just before. I think both of them are very important.

Michele Neylon: Okay. Let's just - let's see what - okay with respect to the technical issues in terms of the EPP and everything else, Barbara's going to be asking her colleague if he can give us a bit of this time to go through some of this stuff with us.

So maybe it would be appropriate to look at this - to have a look at the - Barbara go ahead.

Barbara Steele: Well I was just - I'm sorry, this is Barbara. I was just going to ask if you all are going to be meeting next week in Nairobi or if in - if we would be taking next week off and when I should ask him to join us.

Michele Neylon: Oh sorry. I don't think we're planning on meeting next week are we, unless I've lost my mind and agreed to something in - does anybody want to meet next week desperately?

((Crosstalk))

Paul Diaz: Michele we can't because next Tuesday's constituency day, so.

Michele Neylon: Oh yes, there we go. Perfect, thank you. Perfect cop out. Thank you Paul. There. We have a cop out for this next Tuesday's constituency day so we're off the hook. Perfect. Thank you Paul. I owe you a beer.

Barbara Steele: So I think...

Michele Neylon: Um...

Barbara Steele: ...16th then?

Michele Neylon: Potentially yes if he was available.

Barbara Steele: Okay. Thank you.

Michele Neylon: I mean ultimately it's where - if - whenever he's available whichever Tuesday and then we can work from there.

The discuss - okay just going back to this thing about reasonable means for the registrar - registered name holder to remove the lock status. Does anybody have any thoughts on what would - what reasonable means is or isn't? Okay. I would appreciate if somebody like say - is Chris Chaplow on the call? He's not is he? He's not. Okay.

Marika Konings: No he's not.

Michele Neylon: Marika, go ahead.

Marika Konings: This is Marika. I was just actually going to point to the next two comments where I think some suggestions are being made as to what might be considered reasonable. I think the second comment from the registry suggests that terms and conditions should be included in the registration agreement and have also provided some specific language for denial. We just happen to reflect that. I'll post the actual new language in the chat so everyone can see it.

Michele Neylon: Yes please.

Marika Konings: Okay. So. I just wanted to...

((Crosstalk))

Michele Neylon: Yes. Thank you Marika. All right thank you Marika. James?

James Bladel: Hi Michele. This is James speaking, and just wanted to state that if we are going to define reasonable means, we should make sure that we are not impeding registrar's abilities to develop security products against unwarranted transfers. For example, pin numbers or call back systems or whatever else is out there.

This is a value added security feature and it shouldn't be construed that adding different identity checks and things like that would be considered unreasonable. So I just would want to make sure that we have any kind of a definition that we would put into this term to help compliance that we would ensure that we were leaving sufficient leeway for those types of services.

Michele Neylon: Okay. David as this concerns you directly, do you have any comment to make on that?

David Giza: None other than the fact that I think if there was a laundry list of items in an effort to define, you know, different options or variables that collectively represent a, you know, this definition of reasonableness that that would give contractual compliance flexibility to work with registrars and registrants to, you know, to determine if, you know, if we've got a legitimate basis here for a complaint or not.

So I'm really open to the suggestions of the group. And I really wouldn't want to preempt any of the groups' thinking, you know, by suggesting, you know, a very narrow definition. But I'd - I would much more favor a broad definition with some examples, again that provides a, you know, a bit of flexibility but also, you know, begins to reign in, you know, sort of the either ends of the spectrum where, you know, judgment can go awry, you know, due to some very unusual fact pattern.

So I'm really curious to hear what the other registrars on the call have to say about this.

Michele Neylon: Okay thank you. Michael then Matt.

Michael Collins: Yes this is Michael. I'm also interested in what the other registrars have to say. I think to define this without having it be somewhat subjective, but I think that generally it should not be harder to remove the registrar lock than it is to make a, you know, change to the registrant or maybe changes to DNS settings.

I mean I think that it shouldn't be - it should be similarly a program so that it's not that - so that it's not any harder than other typical changes to a registration, or maybe even as simple as registering a domain name.

And - but I'm also concerned, I don't know if this is the right time to mention it. I was just reading the text in the chat and it says that registrar must facilitate removing the lock within five calendar days of receiving a request. That seems like an unreasonably long period of time to me. That's my personal thoughts on that. Thank you.

Michele Neylon: Matt?

Matt Serlin: Thanks. So just to pick up on what Michael was saying and then just sort of go back around to actually what James started off by saying is that, you know, I'm a little hesitant to say that unlocking a name should be as simple or as straight forward as anything else, frankly. Because it's making an assumption that every registrar treats all of those actions the same.

And again to circle back around to James' point, that's not necessarily the case. And, you know, security features are definite market differentiators in this industry. And so I think, you know, James makes a good point. And certainly representing a registrar that likes to pride itself as, you know, differentiating based on security we also have a different client base than a lot of the registrars out there that I'd be really hesitant to say across the

board, you know, a lock should be as simple as registering a name or should be as simple as updating registrants because that to me isn't necessarily the measure.

Registrars should be able to have different levels of security based on their clients' preferences and choices. And so I think we need to be really careful about any recommendations that we would make that limit a registrar's ability to do that.

Michele Neylon: Thank you. I would - I put myself in the queue. To be perfectly honest, this thing about unlocking a domain is something which people should not enter into lightly. It's - it opens up a domain to all sorts of issues and problems at multiple levels including the domain being hijacked, somebody doing something nasty with the domain.

And I would strongly disagree that it should be as easy as changing name servers. I'd agree - I agree in broad terms with what Matt was saying. I mean I think the registrants should have the ability to unlock the domain name but if they need - if an extra degree of validation and everything else needs to be taken, then it has to be taken.

I'll give you one clear concrete example why unlocking a domain easily is a bad idea, DROA - Domain Registry of America. I'm sure some of you have come across them. What is that beeping? Mikey?

Mike O'Connor: This is Mikey. I agree. I think that we're all sort of in the same place. The reason for this particular issue is mostly to overcome the problem of an unresponsive registrar making it hard for a registrant to unlock the name. But...

((Crosstalk))

Michele Neylon: So Mikey how would you dequal - how would you classify unresponsive? I mean what...

Mike O'Connor: Well I don't know.

Michele Neylon: What cons...

Mike O'Connor: I have...

Michele Neylon: What constitutes unresponsive?

Mike O'Connor: All right. I leave that to folks like Michael Collins who does this a lot more than me to describe. You know, I don't have a quantitative hurdle. But I think that the real point of this issue is not to flatten the, or make all the registrars uniform in terms of how they handle security, but rather to address registrars that are just holding back the names.

And that if we can come up with a definition that accomplishes that, but leaves security choices up to registrars that we're in good shape.

Michele Neylon: Okay. Anybody have any thoughts on that? (Bud Washoom) has joined the call. Does anybody have any other thoughts on this? I mean, okay, what - just a question to all of you. You've all had problems with what is being termed often as unresponsive registrars. What - how - what do you consider to be unresponsive? I mean is it one day, two days, three days, five days, a week, two weeks? At what point do you consider the registrar to be unresponsive?
Paul Diaz?

Paul Diaz: Thanks Michele. It looked - from the perspective of a registrar, if we're working on behalf of a registrant for us unresponsive is so simple. They don't answer an email and they don't pick up the phone. Unfortunately that happens and we do then have to escalate it up to ICANN.

It's very frustrating to have to drag ICANN into something as what should be as straight forward as that initial level of contact.

Michele Neylon: Well the question is this. You're saying that the registrar does not answer the emails. Now but how long are you allowing before you consider that the email is unanswered and is not going to be answered is what I'm asking.

Paul Diaz: Oh in some cases Michele I'm talking about bounced emails and no working phone number.

Michele Neylon: Okay so...

Paul Diaz: We deal with those extremes and unfortunately it's not uncommon.

Michele Neylon: Okay. Fair enough. And Chris, Matt and I'll probably let James in as well. He hasn't put his hand up but he's making noises by putting ticks and things. I'll have - I'll expect something. Chris go ahead.

Chris Chaplow: Yes. I think there's probably different levels isn't it just from a natural point of view. No response at all, you know, certainly by 24 or 48 working day hours to me. And then the second would be some sort of response but no action at all isn't it. You know, yes we'll look into it, yes we'll look into it.

And at some point when that goes on for a period of time I imagine that would then reach the point at which the registrant feels they're just not getting anywhere. So maybe we're looking at two levels on this. Thanks.

Michele Neylon: Okay. Perfect. Matt?

Matt Serlin: Yes. Just to pick up on what Paul said and I don't want to spend a whole lot of time on it. But, you know, we certainly do run into situations where, you know, we - where an unresponsive registrar - and again, it's not the folks that are participating in this process, the folks that are on this call. It's the outliers

out there and that, you know, the pulse point, emails bounce, there's no phone number or the email just goes unanswered, you know, for days if not weeks if not longer.

And so I agree with - and I apologize I forget whose comment it was earlier, but, you know, if we can come up with some sort of standard that helps to address that while not, you know, tying the hands of registrars that want to have, you know, enhanced security then I'm in support of stuff like that.

Michele Neylon: Okay. Michael Collins.

Michael Collins: I would - I certainly have listened and accept that there's a need for increased security especially with extremely valuable domain names. And I would appreciate - if I had that type of domain name like at one time I did that I had a means at my registrar to provide extra security for it.

So I think that there is a need for both. But I would suggest that these extra security optional measures should be clearly entered into. They should not be just buried into a user agreement or a registrant contract that ini - so such that you're allowing registrars to automatically add security features that a registrant might not understand.

I think if they were optional and they were opted in, I would be all for it. I'd be excited about it. Thank you.

Michele Neylon: Okay. Chris Chaplow or is that from earlier.

Chris Chaplow: So yes. It was up from before. Sorry.

Michele Neylon: That's okay. David Giza then James Bladel.

David Giza: Um-hmm. Yes, I just wanted to make sure the group was aware that contractual compliance is actually now taking a different enforcement approach around the - around removing the lock within five calendar days.

And so for those registrars that are the outliers, the ones who we've received a more significant number of complaints, we've developed a breach letter that we've sent now to about half a dozen registrars in an effort to get them to comply with the policy.

And I'd say three out of six registrars have responded affirmatively and have resolved the situation. The other three were - are still in limbo at the moment. But we're attempting to enforce the policy here, you know, around the five calendar day requirement.

And then we're going to collect that data and see what success we have and, you know, I'll be happy to, you know, provide the group with more information as we get a little further into this enforcement exercise.

Michele Neylon: Okay thank you. James?

James Bladel: Hi Michele. This is James speaking. And I wanted to just real quickly address Michael's point about any additional security being an opt in. I believe it was Michael that raised the question. And I agree completely. It should be very conspicuous and require action on the part of the, if not agreements but some sort of action on the part of the registrant to activate those security features otherwise 1, how would they be a visible differentiator and 2, how would the registrar successfully up sell those services, those value added services.

So assuming that that was part of their business model which wouldn't necessarily be the case, but I do agree that, you know, there's a way to do this in such a way that addresses the needs of both ends of the spectrum.

We talk about registrars not being uniformed, well registrants are also not uniform. Some would have trouble removing even the simplest of lock features. And others require as many layers or different depth of security features as possible to protect valuable names.

And I think that we, you know, we shouldn't say that, you know, group, you know, the groups from Column A are having trouble understanding it so we should remove the security features that are demanded by those from Column B. And I think that we need to just be mindful of that.

Michele Neylon: Okay. Anybody else have anything to say on this before I throw another one of my two cents in there? No? Okay.

Just my own perspective, as to both the registrar and the registrant, we're getting some interesting thoughts and feedback here. I still - I think maybe what Chris was saying that we might need to have a look at splitting this into, you know, no response, in other words that's it, boom. You know, the emails are bouncing, everything else. We've no way of contacting the registrar. So they're considered completely unresponsive.

In terms of the ones who are actually going to respond, it would be easier probably if we had - we could kind of decide on some parameters there. I would have a problem, for example, with the idea of two working days for the simple reason that they might be two of your working days, they might not be my two working days because of, you know, bank holidays aren't the same internationally, so that - I could see that as being a problem.

And in terms of the differentiator, I'd agree 100% with everybody else on that one. In terms of the security measures which people may not be aware of, the problem there is where do you draw the line? We've had raging arguments with clients who refuse to carry out even basic validation because they think it's "too much hassle," yet I know for a fact that the same clients

would have huge issues if their domains were transferred elsewhere without their permission.

So what - where do you actually put the bar? I mean do you want it to be so easy that, you know, we as registrars don't do anything to protect your domain names at all. We don't do anything to protect your accounts. Or will you accept that we need to do something otherwise we're going to spend our entire lives being sued? Does anybody have any thoughts on that? No. James?

James Bladel: Yes Michele. You've just - you hit it right on the head. This is a classic convenience versus security issue. We can make something easier, more convenient, more streamlined, but then it opens up vulnerabilities. And we've addressed this in the other IRTP group as well as this one. And I think that we just need to be mindful of that balance, of that tradeoff and adjust our - any recommendations accordingly respectful to both needs.

Michele Neylon: Okay. Thank you. Mikey?

Mike O'Connor: Yes. I'm with James on that. And also think that we've probably run into another fork in the discussion because we've had a pretty extensive discussion about the unresponsive registrar which I think is a great discussion, but I think it's a registrar to registrar unresponsive discussion and useful for our report.

But on this particular issue, what we're really talking about is registrar to registrant and the visibility of the mechanism for the registrant to unlock a domain name. So I'm just highlighting another fork there. But I agree with you and James on the notion that, you know, it's a dilemma. It's a tradeoff.

You just have to pick a place and say this is a decree to which we will not go beyond making it easy for registrants to unlock domains because we don't want to let them hurt themselves. And we'll have to draw a line somewhere.

Michele Neylon: Okay. Good thank you. So the - so in some ways you're talk - what we're talking about here Mikey is that you have unresponsive registrar in terms of their relationship with the registrant and unresponsive registrar in terms of registrar to registrar. Is that correct? Mikey? He's probably left.

Mike O'Connor: Sorry. It was a magnificent speech to the mute button. Sorry. I agree. This is the fork. Registrar to registrar is one side and that's not really addressed by Issue E. It's an important discussion and we need to capture it and find a place to address it. But it's really the registrar to registrant relationship that's addressed in Issue E.

Michele Neylon: Okay. Matt?

Matt Serlin: Yes. Just to pick up on what Mikey was saying, I mean I don't know about the other registrars on the line but generally when we're contacting a registrar it's on behalf of the registrant and we're doing so after the registrant had been unsuccessful in doing so directly. And so they come to us assuming well you're both ICANN accredited registrars so surely you must have a better way to be able to contact them and get information for us.

So I don't necessarily know that it requires we sort of fork this off. I just think it's an understanding of the fact that the registrars that are contacting other registrars specific to these issues are doing so on behalf of the registrants and also asking frankly that the registrar contact the registrant in order to resolve whatever the issue is.

Michele Neylon: Okay perfect. Mikey?

Mike O'Connor: Well, I don't disagree much, but I just want to highlight that I think the intent behind this issue when it was written was essentially to provide the almost technical guidance to a registrar that says dear registrar you need to provide

a gizmo for your registrants to be able to toggle this status. And that, you know, that's sort of one layer of the discussion.

And if you don't provide it in a high, you know, difficult to define but important readily accessible and reasonable means, then blah, blah, blah.

And then there's the second half which is when this doesn't work, either when it's not available or the registrant can't make it work, then the second half is the registrar to registrar conversation and that, you know, we need to just understand that distinction. And we may have different approaches to solving those two parts of the problem.

Michele Neylon: Okay. I put myself in the queue as a registrar. I have to echo what Matt was saying. I mean I've got one of my staff now who's probably got - who I'm going to be hounding for the next week as she tries to sort out the transfer of a domain for a client, and basically because the registrant has tried to resolve the issue with the registrar and has hit a brick wall, so now we're trying to do it for them because it's - even though, you know, it's not really our problem, in some respects it is our problem because we're the only ones who are going to be able to solve this in the long run. So I'd agree with Matt. I mean we can't really split the two off.

Mike O'Connor: Oh I don't want to split them off. I certainly don't want to lose it. I just want to highlight the fact that it's really a different kind of problem. One is sort of a standard setting X, you know, the registrar to registrant one is really a standard setting sort of exercise that says here's the threshold of what everybody ought to provide their customers. And then the second half is here's the mechanism to address the situation that you and your staff person are in. And those are really quite different.

Michele Neylon: Okay. Does anybody else have anything - any other thoughts on that? No. Okay. And looking at the - where's the text? Marika provided the text on the chat and I'll just read it out. This is from the registry stakeholder group.

Proposed modification for denial reason seven. I'll read this. It's quite long. Prior to receipt of the transfer request, the domain name was locked pursuant to the registrar's published security policy or at the direction of the registered name holder provided that the registrar includes in his registration agreement the terms and conditions upon which it locks domains and further that the registrar provides a readily accessible and reasonable means for the registered name holder to remove the lock status.

If the registrar does not provide a means to allow a registered name holder to remove the lock status themselves, then registrar must facilitate removing the lock within five calendar days of receiving a request from the registered name holder.

It's all on the chat there for - I think most of you are on the Adobe thing. Does anybody have any comments on that suggested text? Mikey again. Hold on Mikey. Just hang tough for a second. Does anybody whose name is not Mikey have any comments to make on it? No? Mikey you have the floor.

Mike O'Connor: I just wanted to amplify Michael Collins' point which is I don't think this is too bad. I mean it's a pretty tortured sentence and maybe we could make the sentence clearer. But I think that five days is probably a little long given the pace of today's domain name world. That would be my only suggestion is clarify the sentence a bit and shorten the interval.

Michele Neylon: But doesn't that contradict what you were saying previously on previous calls about slowing down the entire transfer process?

Mike O'Connor: Yes but presumably this is a registrant initiated lock that we're talking about in this particular case.

Michele Neylon: No.

((Crosstalk))

Man: Not in this case.

Michele Neylon: No. That's not what was suggested in the text. The text was that there were two types of lock either that the lock was something that the registrar did but that they mentioned in their agreement or was a lock that was initiated by the registrant.

Mike O'Connor: Right you are. I stand corrected.

Michele Neylon: Okay. Anybody else apart from Mikey have any thoughts on that? Okay. Do you all - would you all - oh Michael Collins.

((Crosstalk))

Michael Collins: Sorry, I'm a little slow. Sorry I'm a little slow. This is Michael. I think reading that again I think readily available and - well I lost it now. Readily accessible and reasonable means seems adequate to me after I've looked at it again. That may be sufficient for Dave and his team. Thank you.

Michele Neylon: Okay. Any other thoughts on that? David Giza?

David Giza: Yes. Thanks Michele. So if we leave the - those terms undefined, then, you know, clearly, you know, compliance will exercise its judgment in terms of what reasonable and readily accessible means which I'm fine with, you know, provided that, you know, the community is okay with that as well.

But I will tell you at the moment we're probably relying more on the five day - five calendar day time period as setting a sort of hard and fast compliant date that gives us again the ability to issue a breach letter and basically threaten a non-compliant registrar into taking the appropriate action.

So, we're going to continue down that path. I would still recommend five calendar days just because of the complexities of communication as they exist today, globally as well as the fact that, you know, some registrars are just on the ball and, you know, they respond almost instantaneously and others we find, you know, we can't reach them no matter how hard we try.

And we - and that's one of the reasons why we're conducting a registrar contact information audit, you know, this fiscal year because we realize just how poor some aspects of registrar contact information or data is. But beyond that, if we don't define those terms, then, you know, they'll continue to have a bit of vagary and ambiguity. But again we can work within that context if that's what the working group, you know, you know, wants us to do.

Michele Neylon: Okay thank you. Anybody else have any other thoughts on this? Okay. Rather than trying to get into anything further because we're coming up to the hour, we've got about five minutes left, I would humbly propose that we call it a day. Do I have anything else on this? No. The next meeting - we're not meeting next week because next week is constituency day. So we are - we should be meeting the week after which is, if I understand it correctly, the 16th. Is that correct? Yes that looks right, 16th.

Does anybody have any other matters they wish to raise? Okay then. For those of you traveling to Nairobi, have a pleasant flight and hopefully your bags will arrive there at the same time as you do. For those of you traveling to (Renton) or whatever it is, enjoy getting up and the - staying up all night. For those of you in Europe, we'll get to sleep in our beds at normal times and enjoy it. And I'll speak to you all in two weeks. Good-bye.

Man: Thanks Michele. Bye.

Michele Neylon: Bye.

Barbara Steele: Thank you. Bye.

Paul Diaz: Thanks Michele.

James Bladel: Bye now.

Barbara Steele: Bye.

Michael Collins: Good-bye.

Man: Thank you. Bye.

END