ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 22 March 2022 at 16:00 UTC

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JULIE BISLAND: Good morning, good afternoon, good evening, everyone. Welcome to the Transfer Policy Review PDP working group call taking place on Tuesday the 22nd of March 2022. In the interest of time, there will be no roll call. Attendance will be taken by the Zoom Room. For today's call. We have apologies from Catherine Merdinger (RrSG) and Daniel Nanghaka (At-Large). They have formally assigned Jonathan Frakes (RrSG) and Raymond Mamattah, (At-Large) as their alternates for this call and for remaining days of absence. As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite emails.

All members and alternates will be promoted to panelists, observers will remain as an attendee and will have access to view chat only. As a reminder, please select everyone when using the chat feature in order for all participants to see your chat and so it's

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captured in the recording. Alternates not replacing a member should not engage in the chat or use any of the other Zoom Room functionalities.

Statements of Interest must be kept up to date. Does anyone have any updates to share? Please raise your hand or speak up now. If assistance is needed updating your statements of interest, please email the GNSO Secretariat. Please remember to state your name before speaking for the transcription. Recordings will be posted on the public wiki space shortly after the end of the call.

As a reminder, those who take part in the ICANN multi stakeholder process are to comply with the expected standards of behavior. Thank you. And over to our chair, Roger Carney. Please begin.

ROGER CARNEY: Thanks, Julie. Welcome, everyone. Hopefully everyone had a good break from at least this meeting last week since we haven't met since ICANN, so hopefully everybody's recovered from their ICANN experience week. And we can get into work here.

Before we jump into work, just want to open the floor up to any of the groups that want to bring forward any conversations they've had. Again, it's been a couple weeks since ICANN, but anything that any of the stakeholder groups have been talking about amongst themselves or outside this meeting that they'd like to bring forward. So I'll open this up. Steinar, please go ahead.

STEINAR GRØTTERØD: Hi. I distributed to the mailing list the result of some discussion in the Consolidated Policy Working Group for At-Large that we had last week. We had a discussion about the transfer locks, the transfer create and the lock for after successful transfer.

Based on that discussion, we also had a poll, and the result of that poll was kind of in favor of reducing the time, the present 60 days. But I have to say that in this working group, we have kind of consensus to stick to a 10-day period of locks. I added to the poll on alternative also for 30 days. And that was positively seen by the At-Large group.

I also added a question about keeping the same policy for all the legacy operators. And that was also seen as positive. So that was some sort of informal vote from the At-Large community. And it must be taken as informal. And it's not written in stone, but it was kind of feeling the temperature in the room. So that's my update for today. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Yeah, and I did see that email that you sent out a while ago. And that was great information. Really appreciate it. I wanted to see if anyone had any questions, especially for Steinar directly here on this. Sarah, please go ahead.

SARAH WYLD: Thank you. Good morning. Good afternoon. Hope everybody's well. Steinar, thank you so much for sending those results. It was very interesting. I noticed that in the time period, the post transfer

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lock, it's that almost exactly the same split between 10 days and 30 days in the poll. But for the initial post creation lock, there was support for a 30-day period, which I don't think we really discussed here in the team. And to myself, I don't really see why 30 days is better than 10 days. So I was wondering if there's any information as to how people made that decision and why people in ALAC preferred the 30-day period. Thank you.

STEINAR GRØTTERØD: Yeah, hi. I think one of the result of that poll was that in the discussion, I brought up also some sort of comments that were described in the documents about whether 10 days is enough for the UDRP proceedings. And so that was kind of an element that was taken not in favor of the 10 days but more keeping it into a bit higher number of days, but not as long as 60 days.

And for some reason, I don't know whether that is relevant, but for the post transfer look, it was a more positive to keep the number of days as low as possible. You see the result is 41% for the 10 days in the post transfer look. And it's only 31 for the post creation lock. But in essence, it was the UDRP argument that kind of flavored the discussion in that area. Thank you.

ROGER CARNEY: Thanks, Steinar. Thanks, Sara. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah, just in regards to the UDRP, Steinar. So when we receive kind of confirmation that a UDRP is taking place,

registrars have to put a lock on the domain, so it wouldn't make any difference whether essentially it was submitted prior to the 10 days, because it would have to remain at that registrar until we received either paragraph 4k or whether the kind of information had been dropped. So it's kind of a bit blurred as to why the At-Large were kind of worried about that. Maybe we can kind of give them a bit more information in regards to how the UDRP process works.

Just on another point, I thought the idea was to potentially standardize things across the board. That was my understanding from the previous prior weeks where we were looking at kind of having a set date for both the brand new creations and also for transfers as well. So yeah, maybe I missed it. But I thought that was something that we kind of agreed on to kind of standardize that across the whole process so that everyone within the community could kind of understand this a lot better, and there wasn't as much confusion as there is currently. Thank you.

ROGER CARNEY: Great. Thanks, Keiron. And I just to add to that. I think one of our goals was to make those time periods the same. But if we had logical reasons to not do that, then would that was still an option. But yeah, I mean, standardize on those just to eliminate another variable, I think was a goal. But it wasn't necessarily a hard fact. So Jim, please go ahead.

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JIM GALVIN: Thanks, Roger. Steinar, thanks very much for publishing and presenting the poll results. I was actually there and present and part of the discussion, I wonder if you could just add a little more color for the group here and expand on the last question about registry operators. Should registry operators all have the same policy? Could you say a little more about what the policy was that they were voting on should be the same for all registry operators, and any other interesting bits about that for this group here? Thanks.

ROGER CARNEY: Great, thanks, Jim.

STEINAR GRØTTERØD: Yeah, well, I must admit that it was me putting the wording into this question. And that is mainly based on my experience that I do feel that it is more user friendly for all registry operator to have the same policy regarding the transfer locks.

I think the At-Large group in the CPWG call do have various experience of performing a transfer or the background and the challenges with transfers. But the way I read the discussion and the way I felt the discussion and also kind of concluded into the poll question is that it will be more user differently if post is the same number of days for all registry operators, and also for all registrars. And I must admit to the previous [inaudible] that I do agree that it makes also more sense to have the same number of days locking for post creation and post transfer lock. So hopefully you have the same memory as me, Jim. Thank you.

ROGER CARNEY: Thanks, Steinar. Jim, your hands still up, but you still have a follow up?

JAMES GALVIN: Yeah, it's a new hand. Thanks. So thank you, Steinar, for adding that. I just want to bring forward some discussion that we've had here. I appreciate that this has not been a decision yet in the group. It's currently a topic for discussion exactly where we're going to end up on these things.

But speaking on behalf of registries at this point, I know that there are some registries who currently do do interesting things with post transfer locks and post creation locks. But not all registries do. But the fact that some do it, it's important to understand that there are more registries who would prefer not to have any activities here in this space. So I just want to leave open that question that this is interesting input. I like the idea that we should all have the same policy. But we still have a discussion to be had about whether there's actually a requirement on registry operators, versus this being wholly a registrar responsibility. I just want to draw that distinction and make sure that was still known to be an open question in this group. Thanks.

ROGER CARNEY: Great. Thanks, Jim. Yeah, and I would say a lot of the flexibility in today's transfer policy is more on the registrar side. I mean, obviously, there are some auth code makeup and things like that in today's world that the registry gets to decide. But standardizing

across the Board, it's quite confusing. And I would say it's more on the registrar side, again, about timelines and things like that of when locks or when you can transfer and things. So yeah, I think there are still a few. And again, the main one that pops up in my head right now is just the old auth info, the new TAC being more standardized. That's probably on the registry side that I can think of just off the top of my head.

Okay, thanks, Steinar. Might get asked about how many—Steinar says around 40 people took the poll. So great, again, very appreciated, Steinar. [inaudible] for sharing, and it does align quite well with this group's idea that 60 days seemed like it was definitely too long of a period. And getting to that right day. As Sarah mentioned, what triggers that 10 to 60. The 10 was based on some factual things about grace periods and things. It can't get much shorter than the 10. But what's that next logical—is there a logical reason for expanding beyond that? Steinar, please go ahead.

STEINAR GRØTTERØD: I'm just wondering, and I will love to hear whether 10 days is the real showstopper for the UDRP process and so on, or is it feasible to make a policy for the 10 days look and still complete in good manner UDRP procedure. Thank you.

ROGER CARNEY: Great, thanks. Anyone have thoughts on that? Keiron, please go ahead.

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KEIRON TOBIN: Thank you. Yeah, I think 10 days for new registrations and 10 days after transfer is right across the board. And I believe by that point, chargebacks are usually massively dropped off the cliff, usually, a lot of chargebacks come within before 10 days. And also in terms of kind of for other parties as well. If that was standardized across the Board, I think it would massively reduce customer support, people being like, "Why can't I transfer this out?" We usually get quite a lot of people asking instantly why it can't be transferred away and things like that. So yeah. And it also reduces it as well in terms of the 60-day lock for new registrations, which I think we've all agreed is far too long. But that's just my opinion. I'm happy to kind of take any other concerns into acceptance. Thank you.

ROGER CARNEY: Thanks, Keiron. And again, getting back to Steinar's—I suppose the biggest question that Steinars bringing forward is, is 10 days enough time to initiate or to put in place a UDRP? And is there any issues of stepping on toes once that happens? And it doesn't seem like it to me, but anybody with more experience on UDRP and the whole process, if they want to speak, that'd be great. Owen, please go ahead.

OWEN SMIGELSKI: Are we asking the question, is 10 days from the creation quick enough to file a UDRP? I just want some clarification on that.

ROGER CARNEY: Steinar.

STEINAR GRØTTERØD: My question was more if we stay on 10 days, will that be sufficient timing for complete the UDRP process, as it is intended to be? Both in the post create and the post transfer. Thank you.

OWEN SMIGELSKI: Thanks, Steinar. Yes, I do have some feedback. And I know that there is actually a report out that ICANN staff put out there. It's a public comment right now about the status of the UDRP. Going through that last night, and I don't think that one of the data points they looked at was how quickly are UDRPs filed after create date of a domain name. That was something I don't remember sticking out.

So the way that you would really find out about this would be through some sort of domain name watch report, that would really be the only way to find out about the domain name within a quick period of time. But from what I've seen—it's been a little while since I've been practicing this—I don't think a lot of UDRPs are necessarily filed within 10 days of the creation date. But that's just my own experience. Thanks.

ROGER CARNEY: Thanks, Owen. And I'll just note what Sarah said in chat. Once a UDRP is notified, the 10 day kind of goes out the window, because then it's locked until the UDRP is settled. So the 10 days becomes an unknown set of dates. So. Berry, please.

BERRY COBB:	Thank you, Roger. In the group's original discussions around the reasons for the creation lock, or post registration lock I don't think it was originally discussed that it had anything to do with UDRP. As Keiron noted earlier, the moment the registrar's notified of a UDRP, they have to apply a lock that is different than what is probably a post registration creation lock, which is, I believe, there's a SLA of two business days upon notification from a provider. And the duration of any kind of creation lock, again, shouldn't have necessarily any bearing on how long a UDRP may take to complete its proceeding.

So I think it'll be important for the group to kind of consider those mutually exclusive when trying to nail down what the right duration might be for a creation lock, and I'm reminded of the input we received from WIPO. And if I understood some of their comments back from the public comment on the policy status report that got into this is they couldn't put a number on it, but there were issues uncovered that for some registries that offered a 60-day lock.

To Owens point, the use case here is there are brand protection monitoring services that immediately recognize when a potentially infringing domain is registered, they are pretty quick—and I don't have stats to back this up, but fairly quick to file UDRP. Typically, if they are found in favor of that complaint, or they prevail in that complaint anywhere from 14 to 21 days, then the creation lock is still applied when that domain could be transferred to the complainant, which in some cases can wrap up before that 60 days. But again, I think that these things are mutually exclusive. And I do have a comment with regards to Jim's intervention from

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the registries, but I'll come back to that, just to not disrupt this thread.

ROGER CARNEY: Okay, thanks, Berry. And I'll just mention there's a lot in chat going on. I think Steinar tried to clarify he wasn't saying that the UDRP would be completed or anything. And maybe he can jump in here. But his point was, does the 10 days gives the registrar enough time to do what they need to do if a UDRP is put in during that time?

And I think there's a two business day window that a registrar has to take action. In my experience, that happens quite a bit quicker. But so I think that that falls within that line. And just a couple other notes in chat, there was discussion about the UDRP, does it have to be what the registrar it was, and the UDRP doesn't care. It travels with the domain no matter where it goes. So if it did get transferred, that UDRP would be enforced by the new registrar anyway. So Zac, please go ahead.

ZAC MUSCOVITCH: Thank you, Roger. So although this isn't responsive to Steinar's question, it is related to some of the discussions and chat that we've just been discussing. As I mentioned, I guess it's a few weeks ago, some of the feedback from the brand protection interests within the BC identified why they wanted a longer post creation lock. The reason was that if they commence the UDRP within the 10 days, well, then, once the 10-day lock, for example,

expires, the UDRP lock still carries on as others have pointed out in this group.

Nevertheless, if they commence the UDRP, let's say 12 days after the creation, there's no lock. And there will be a lock once they file the UDRP. But they may have the practical problem of having to redo parts of the UDRP to reflect that there's been a new registrar for the domain name, just in the interim period of them preparing the UDRP complaint. So they prepared it and identified GoDaddy as the registrar. But then by the time they actually filed it, it's Tucows, and so then they'd have to go back and redo it. So it was a practical problem that they identified for what it's worth. Thank you.

ROGER CARNEY: Great. Thanks, Zac. And Berry just jumped in chat and said basically, the WIPO mentioned the same kind of thing. And I think maybe talking about that, maybe if we do go to a 10-day or whatever we get to really, whatever day it is, maybe we do forward on to the RPM phase two working group at least a notice, hey, look at this, we've changed this, does something need to change in the process of the UDRP that will allow for a quicker response or something to that effect? Keiron, please go ahead.

KEIRON TOBIN: Thank you. Just in regards to the point. Even if it was a 60-day lock, you can argue that what happens if they submit it like on day 58. Essentially, the way I think we were looking at it was that if a 10 day minimum kind of new creation was put on, even if they

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were to change the registrar, then another brand new lock because it's been transferred would be on there for another 10 days. So essentially, it would stop kind of if you were worrying about the fact that it's going to jump from registrar to registrar, that would be impossible under our new rules, because that would have prevented it from going for another 10 days. So that was plenty enough time to change that.

So hope that helps clarify kind of some of the situations as to why [inaudible]. And in regards to—I used to work very, very—I was head of UDRPs. And in regards to ones that were created within less than, I'd say, 40 or 50 days, I don't even think I could put a 0.0 percent on that. It was extremely small. And yeah, again, like we actioned things well before two days, it was usually probably within that day. Thank you.

ROGER CARNEY: Great. Thanks, Keiron. Berry, please go ahead.

BERRY COBB: Thank you. And I do recognize that this wasn't part of the original agenda, but just so that it's kind of on our radars or in the back of our minds. So Jim's intervention earlier from the registry perspective that again, we're not concluding any agreements yet, but I think staff probably did need a clarification. And, Jim, correct me if I'm wrong on this, but you were basically saying that there probably wasn't broad support in the registries for a creation lock. Based on the discussions that we've had to date, it was staff's understanding that it would be a registry imposed lock post

registration date. And so I guess this is maybe really a question for us to consider the next time we circle around on this topic. Is it the group's intent that if we were to standardize a post registration creation lock, would it be a lock that is enabled by the registrar to prevent the transfer, or was the group intending that this would be a registry imposed lock that would automatically lift in either case whenever X number of days was passed?

ROGER CARNEY: Great. Thanks, Berry. And Sarah, I think it applies to both. So I think we're kind of talking about post create and post transfer. Again, maybe someone can correct me, but I was thinking that the lock was enforced at the registrar level, and maybe others can correct me, but that's how I thought our discussions were going. So Keiron, please go ahead.

KEIRON TOBIN: All UDRP locks are done at the registry level on a registry hold. I don't think there would be any reason as to why the registry would be brought into those proceedings. The only way registry is usually brought into the proceedings is if a court case, it goes to essentially a legal matter, but a more formal legal matter. But yeah, usually, it's all done at the registrar level. Thank you.

ROGER CARNEY: Great. Thanks, Keiron. Berry, please go ahead.

BERRY COBB:	Thank you. And so to what Jim is posting in the chat, then I think maybe staff misunderstood this. So hypothetically, if this group were to agree to this, the general recommendation would be something that after a domain is newly registered, there are no registry level locks to be applied. And any post registration lock would be managed by the registrars or the sponsoring registrar. Is that a fair statement then?
ROGER CARNEY:	Great. Thanks, Berry. And that's how I understood it. Please, anyone else that wasn't thinking that same line, please jump in. But that was my thought. And again, I think on both sides of this, the post creation and the post transfer, I thought that the registrar was going to handle that window, whatever that window is that we agreed to, that the registrar would handle the locking of that domain during that period. Jim, please go ahead.
JIM GALVIN:	Thanks, Roger. and not to confuse things, but as long as we're talking about this topic, let me add a related question, but not directly this one. There is also still an open question and just want to confirm this, I guess, as to how registry lock is handled during the transfer process. My reading of all of the recorded documents is that—and we had quite some discussion about this before—when is a registry lock removed or put back on? What's the relationship there between the gaining and losing registrar with that?

And I just want to be careful to carve that out as a separate topic. These lock things. Yeah, there's a lot of stuff going on here. And sometimes things get conflated. And I wanted to make sure that we do remember that there is a relationship about a potential action with registries in this lock business, just not this one that we're talking about. Hope that wasn't too confusing and it was clear. Thank you.

ROGER CARNEY: Thank you. That seemed clear to me. And I think that where our discussions led was registry lock as a service or product, whatever it's going to be called at the registry level, I don't think we were going to get into it in this transfer policy, that's outside of this policy. Obviously affects a transfer, or it could affect a transfer. And actually, in Berry's swim lane, he actually had I think a mention of it in there, or at least the potential in there. But I think that that registry lock is outside of the transfer policy. I think that losing registrars versus the sponsoring registrar may interact with that on their side when a request is made. But I think that that's outside this policy. So Jim, please go ahead.

JIM GALVIN: Yeah, I could be completely wrong here and that's fine. Just I want to make sure to clarify a point here. While I agree that the registry lock service is out of scope for what's going on here, there is an interaction. And I thought it was still an open question that this group would address. And that is, when is the fact that the registry lock is present, dealt with, is it dealt with on the losing registrar side, for example, when TAC is provisioned? Or is it done on the

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gaining registrar side when the TAC is offered to initiate the transfer? I don't remember a resolution on that key point. And it seems to me that that point is in scope for this group. Thanks.

ROGER CARNEY: Thanks, Jim. And again, I think that being a separate product outside of this, I think that the flexibility there is I think it has to be allowed on both ends. Again, the losing or sponsoring registrar should or could, I should say, I don't know if they should or not, could account for that during the TAC request and let the registrar know, hey, there's a lock here, do you want to go through the process to have that removed? Which is different than what we're talking about, a different lock. So again, it's a service on the other side. But if that doesn't occur, obviously, the registrar is going to deny that request from the gaining registrar. The registry will deny that request, because there's still a lock. So again, maybe I have that wrong, but that's how I saw it. So Jim, please.

JIM GALVIN: yeah, so I guess we're having a little discussion about this. Might as well dig in here on this too. Actually, on this particular issue, I don't have a vested position on behalf of registry. So I probably want to, once we get around any finality here, want to make sure that that I go back and ask, but just speaking about this generally on principle. At least I don't know that there's any reason to prefer one over the other. But what I would think here for this group from a transfer policy perspective, in the large, is it seems to me that it would be good to have a stated policy about this.

Even if the policy could say that it could be up to the registry to decide, the policy could say that it's not going to speak to this issue, which then essentially makes it a registry policy, just indirectly, not directly. But I would think the definiteness about this is really what we would want in this group from a transfer point of view. I would think that right registrars would want to know both on the gaining and losing side what their responsibilities are and what they have to do. So it's either registered policy or it's not. if it's registry policy, then there's complete variability. Or we could decide here which way you want it to be on the provisioning side, or the initiation side. And so, yeah, I think I'd like for this group to state where they want it. It's up to the registry is one of the possibilities for where they want it. So it's not open ended. Thank you.

ROGER CARNEY: Great. Thanks, Jim. And as you describe that now, you're making me think about one more step and, and Berry and Sarah kind of helped me get to that next step as well. The way I described it is how it would function. But to your point, I think, no matter where in Berry's swim lane, no matter where it gets caught at, I think that this group had decided that, yes, it's the sponsoring registrar's responsibility to work with the registrar and the registry to remove that, because that's how it was put in place to begin with. And that's my thoughts.

Again, now, is the sponsoring registrars doing that pre-TAC? I would hope so, I think that would be best. But if they miss that, obviously, the registry is going to respond just like they respond today and not allow the transfer because the lock is still there. And

then it would have to feed back to the sponsoring registrar. So. Okay, Steinar, please go ahead.

STEINAR GRØTTERØD: If I recall correctly from my days as a registry operator, we actually applied for the registry lock service. And it [was an RSEP.]. But when it was approved, it was some agreement between us as a registry operator and the sponsoring registrar for certain domain name on behalf of the registered name holder.

So for me, the intention here was to lock the domain name preventing all possible mechanism for domain theft, securing the domain name, etc.

So in my opinion, this is not something that is—this regularly lock service is not something that should be included in the transfer policy. But on the practical side, I think it's more logic is that if the registrant want to transfer a domain name from one registrar to another registrar, and do have a directory lock service with the losing registrar, this service has to be terminated in front of the initial transfer. Because here you have an agreement where the registry is responsible for certain activities, etc. The registrar has also responsibilities.

And the way it has been is that it's been server transfer locks and client transfer locks. And these have to be removed on both sides and is a special process to do updates to a domain name with that kind of service, is also a certain process to terminate that agreement. That's my memory if my memory serves me right. Thank you.

ROGER CARNEY:	Thank you, Steinar. I think everybody's following that same path as well. So Berry, please go ahead.

BERRY COBB:	Thank you. Picking up on Jim's point, which I think Roger, you had it pretty much correct and I believe Sarah seems on board on this, and it sounds here in the near future. It'll be time again for another swim lane review session. It's been a while since we've done the last one, have made updates from our last time that we did review it.

In addition, I haven't released the next version because I'm kind of waiting for the NACK of transfers to get a little bit more stable because it's going to force the swim lane to look a little bit different. BUT in relation to who does what when with respect to locks—and I'm always reminded by Jim's very early intervention, what is the timing of all of this? And when we're trying to look at this in a swim lane type of activity, things are practically occurring in milliseconds, if not seconds.

But in general, the moment the TAC is provisioned—it's all going to be automated, right? The RNH requests the TAC. The TAC is created and provisioned and hashed at the registry. But then according to the swim lane, there's a primary decision gate here. If there are any locks at the sponsoring registrar determines that would prevent this domain from being transferred, they shouldn't be technically provisioning the TAC back to the RNH.

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But assuming that they get all of the locks in order, whether it's a registry lock service, or there's some other kind of particular lock that would prevent the transfer, they're supposed to cure them at the sponsoring or losing registrar, then provision the TAC, which is the green light that gives the RNH to complete or initiate the transfer at the gaining registrar.

But if for any reason in that process, all the locks are not cured, there is this final bailout aspect after the gaining registrar has submitted the TAC to complete the transfer, that if the registry for any reason did discover that there was still a lock in place that would prevent them from transferring it, then it kicks it back to the losing registrar. So again, it seems that most of this is always going to be cured at the sponsoring or losing registrar. And again, taking note that these things are happening very quickly and not over hours or days.

ROGER CARNEY: Yeah, and actually, I add on to Berry's description there because I think that's accurate. I think that another example of that, where I think that that last catch has to always be there, is maybe not for this right, whatever it is, but Berry likes to think of this as happening very quickly. But we know that registrants sat with the code for days sometimes without doing the transfer. And maybe they do it three days later, just because they had time and it was the weekend or whatever.

But there could be a URS that comes in on Saturday and it gets posted or whatever. And they already have the TAC. And then they go to the gain registrar and then the registry still has to

validate that there's no lock on it. So I think that catch at the end is always there. And as Berry mentioned, and as I said, I think the sponsoring registrar should do this due diligence upfront because it just makes a better customer experience. But I think that obviously, system wise, the registry has to do that final check that says yes, there's no lock. Okay, is the TAC valid and move on from there. So just my thoughts, Rick, please go ahead.

RICK WILHELM: Thanks, Roger. So yes and to all the comments that are being made there, especially some great comments by Steinar and Berry, and to yours also, Roger, the one thing I would just generally offer is that when we're talking about these things, the locks that we're talking about are expressed in terms of EPP statuses being set. And so while Jim was speaking earlier of registry lock, there kind of, in a formal sense, really is no such defined thing.

Registry lock, while it's a little bit, it's out there in the market, it means different things in different spots. But it generally refers to a service that sets a group of EPP serverside statuses and has some things. And it behaves in different ways with being able to turn it on and turn it off and things like that. And so while it has some elements of common implementation, it doesn't always behave the same way.

And so I'd just encourage us to talk about it in terms of the server statuses which Steinar, I think you posted into the chat there, as opposed to talking generically about locking. I think that would help make the conversation a little bit more precise. Thanks.

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

THEO GEURTS: Yeah, thanks. So I'm A little bit lost in the discussion. I know we had this discussion before. And the situation of the so-called registry locks, or the server transfer prohibited lock. I mean, that's already there, here now. Nothing is going to change. If somebody initiates a transfer with that transfer lock on it, it's going to bounce back as an error. And then you have to go to the losing registrar and clear up the issue. And if it's a commercial surface for anti domain theft, yeah, then the registrant has to go through a procedure which is being set between the registrar and the registrant or the owner or owners of the domain name, because the procedure can be completely different for any given domain name.

So I don't see what the change is when a TAC is being issued on such a domain in which such a lock, because the process are going to be the exact same as it is now. So I don't think—we don't need to spend more time on this. Thanks.

ROGER CARNEY: Thanks, Theo., Jim, please go ahead.

JIM GALVIN: Thanks, Roger. Launching off of what Rick said. Let me try to frame this discussion from a security perspective. As Rick said,

we should be careful to distinguish a registry lock service, which is kind of an application level thing, from the technical details of the fact that we're talking about the status on a domain name. And there are statuses that a registrar can hit, and statuses that a registry can hit.

And as Steinar put in the chat room, there are some specific statuses that registry can hit. A registry will set a transfer prohibited and the rest of these and delete and update prohibited as part of a registry lock service. And so the registry is offering that as something in order to protect registrants and their domain names.

In a broad sense, they're helping the registrar and they're providing a security service where they mitigating hijacking potential. That's what's going on. And all of that is true. In the spirit of in this whole process, part of what we're after here is improving security in general about all of this process. There are a number of things that registrars are agreeing to here to change this process to make things better both for themselves but on behalf of registrants, and better in terms of process and also better from a security perspective.

I think that this is one of them. I think that there is an interaction here with these registry lock statuses, domain statuses, that's important to understand where it intersects with transfers.

In particular, if the goal here is to ensure the greatest protection throughout the greatest part of a domain's lifecycle, then here's a scenario that I would actually think could play out. I could imagine a registry creating a lock service dependent on the following

technical details that intersect right here with us. And that is that a registered name holder could ask for a transfer, registrar has to handle all of those statuses that belong to them, the client version of those statuses, and they have to cure those, and then they provisioned TAC. And they provision it in the registry.

The registry, however, has its own set of those statuses and they stay in place. So now what happens is the registrant takes their TAC to the gaining registrar, and they initiate it, and then the request comes up. And the registry looks at that. And now what the registry would want to do is now they've got a transfer request, and how do they distinguish that from a potential hijack? How do they distinguish that from TAC that got lost somewhere along the way between a losing and gaining registrar?

So now they have to go through the process of initiating the request to take off the registry status that's there on the domain name, and that would cause a message to go to the registrar of record, which then has to interact with the registrant, and then they have to do whatever their overall process is for confirming and doing that validation and bringing that lock off allowing the transfer to complete and then putting the lock back on. Because the presumption is that's what they want to do.

What I'm thinking here is from a security point of view, you don't want to just take that lock off just because TAC was provision, because that leaves you a window of vulnerability. Until that thing actually transfer and that registry lock is back on, anything could happen to that domain name. And the reason for having it is to avoid those kinds of things.

So that's where I'm going with this, I really do think that there's a spot for us to speak to this issue in what we think we want in transfers. And this is right now just me speaking from a security point of view about how I could imagine my own registry wanting to do this in detail and looking at this kind of thing. If you're looking for an overall registry perspective, I'll certainly take that as a question to bring back to the registries at large and get a group decision about it. But I offer that to registrars to think about in terms of your desire to want to offer the best security services that you can do a registrant. Thank you.

ROGER CARNEY: Thanks, Jim. Theo, please go ahead.

THEO GEURTS: So I understand where Jim is coming from. Good points. However, I like the situation that we have as it is now. And let me explain it, how we do it with such services as a registry lock. When we place a registry lock on behalf of the domain owner or owners, we create a list of people who are authorized to make changes or are able to transfer. That is being documented and we know exactly what passphrases, who can do what and who is allowed.

So if suddenly, a transfer code is being generated, we do not always know who is doing that, we can't see that on some levels even though we have an extensive user role model, we can always see who is generating what on a reseller level. So there's that problem there. Authentication, we need to be sure who is doing what.

So if somebody wants to transfer a domain name out with—let's call it registry lock to prevent domain name theft, then that registrant has to come up through an authentication, verification and validation procedure. And only if all the requirements are met and everybody has supplied their passphrases, passcode and God knows what, then we proceed to the next level, then we go to the registry, and then we go through their procedure to get the lock removed. And that is easier.

Because if you are doing it at the gaining registrar level and bring it back to the registry, the registry has no idea who we authorized for that domain name to move to transfer, the registry doesn't know that. So you go into a process with maybe potentially the wrong people and talking to the wrong persons.

So I think our process as we have it now, I think it's more straightforward. You can build in as many layers of security as you want. And you're not dependent on your registry. So I think it works better. Thanks.

ROGER CARNEY: Thanks, Theo. All right, Rick, please go ahead. We're gonna finish this discussion.

RICK WILHELM: Very good. I'll try to be quick. Thanks, Roger. I think that is sort of—in the comments that Theo just made, I think we ought to really sort of not let other mechanisms or concerns about precedents that might or antecedents that might be before whether or not a name is ready for transfer. Like registry lock, as

we can see right now, might be just one of the things that either a registry or registrar might conceive of that could block a transfer from being able to be initiated.

You could imagine that different TLDs have varying levels of security. Dot bank, of course, I think is a good example, could come to mind that might have all sorts of other antecedent requirements before you could throw a name into getting it ready for transfer.

And so I don't think that we should, in the PDP treat, registry lock as anything special. And so we should just sort of say that when it's ready, it's ready. And but there are some things that would be within scope, which are those EPP statuses. And I think that that would be just as simple way to simplify it, if that's not too redundant. Thank you.

ROGER CARNEY: Great. Thanks, Rick. Yeah, and again, I think everybody's describing the same process. And again, I don't think anybody's actually suggesting a change to the way it works today. But Jim's just bringing up the security issue, which still exist today, that when a registry service lock is removed, there is exposure from that point as—again, today, with the auth info, tomorrow with TAC, if those are already issued and someone has them, as soon as that registry lock is removed, that is an issue.

[But I don't think we're adding or] removing any security issues here. And I think that the ones we have in place are working. So I think that again, I don't think anybody here suggested a change to

what happens today. And we just have to document. Again, I think the losing registrars' responsible for all of this work, no matter what kind of lock you're describing. It always goes back to the registrant and the sponsoring registrar. So they have to resolve those issues. And the registry is going to stop them until they do resolve them.

Okay, great discussion. I don't know how we got all the way to here from how Steinar started, but a great discussion. And again, from all the way from what Steinar brought up to this final discussion here—and it's not final. I'm sure we'll discuss it more. But I wanted to at least get into—yes, it's not your fault, Steinar. Or at least not all your fault, I will say that.

I just want to call on Holida real quick. She had some information from Compliance that she wanted to share. But I wanted to jump into the bulk discussion and at least get that introduced. So Holida, are you still on?

HOLIDA YANIK: Yes. Thanks, Roger. I just wanted to provide some clarification about Compliance's enforcement of section 3.9.3 in response to the question that was brought during our previous meeting. So I checked with my colleagues from Compliance to see in what scenarios we applied 3.9.3. And my team confirm that we refer registrars to this section in cases when transfer is not denied for reasons listed in [1.A.3.7 and 3.8,] but simply because the domain has a lock applied unless reasonable opportunity has been provided to the registrant.

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So real life example I was able to find for the case, where the reporter complained that he removed client transfer prohibited and had authinfo code but his domain was not going through. So registrar explained that implemented a new service that provided additional protection layer against unauthorized transfers. And this was kind of internal lock in addition to client transfer prohibited and served as an additional security preventing non registrants who have access to control panel to transfer or steal the domain name.

And the registrant simply had to follow some steps to request the registrar lock to be disabled and then could transfer out the domain name. And these steps were like sending a request from a specific registrar to the specific registrar email from the registrant email address. And so generally, the way Compliance understands 3.9.3 Is that the registrar cannot deny a transfer simply because the domain name has an internal lock applied, unless the reasonable opportunity to remove it has been provided. So while section 1.A.5 is a bit, I guess, more clear, which addresses specifically, the locks applied by applying EPP status client transfer prohibited.

So I guess it would be appropriate to have the language that also includes a clear provision concerning internal locks, not only the client transfer prohibited. I'm sorry if it was a bit long, and again, to confirm, this provision is applied only in cases when the registrar does not deny transfer for valid reasons enumerated in 3.7 and 3.8 of the policy. I hope this clarifies. Thank you.

ROGER CARNEY:	Great, thanks, Holida. Anyone have any questions for Holida? Okay, thanks for that update and clarification. All right. Sarah, please go ahead.

SARAH WYLD:	It sounds to me like in the situation that Halina just outlined, it was okay. Like the registrar didn't do anything wrong, because the domain owner did have a reasonable opportunity to lift that internal lock and had not yet done so. Am I right? Was that the evaluation or is that wrong?

HOLIDA YANIK:	Yes, Sarah. The explanation provided by the registrar that the registrant needed to email them from the specific registered e-mail, we found it reasonable. But also, if the policy provides more clarification, what could be considered as reasonable would be helpful.

SARAH WYLD:	For sure. Yeah, could definitely be more clear, but I'm really glad that I understood that one. Okay. Thank you very much.

ROGER CARNEY:	Thanks, Holida. Thanks, Sarah. Okay, any other questions for Holida? Okay, let's go ahead and jump into our discussion on bulk transfers. We have a whole charter section for the bulk transfers section here. And really the key one is charter question B5. Should the ability for registrars to request auth info codes—now

TACs—in bulk be streamlined and codified? If so, should additional security measures be considered?

And we've touched on this, I think several times in our TAC discussion, and we've had some discussion on it. But we purposely kept pushing off the main discussion until we got to this spot. So we've made quite a few recommendations for the new TAC. And I think the things we have to think about is, do those still work? Do those recommendations still work in a bulk scenario? Should they work in a bulk scenario? So are there maybe some changes that need to happen? Or maybe the bulk has to be slightly different and we have to account for it that way.

But I think we've got to look at that when we're talking about it and say, okay, are recommendations still applicable? Do they need to be updated? Or do we need something new for bulk altogether? So I think I will turn this over to Theo, he had sent me a few ideas on this, and I wanted him to talk through. And again, I think the big ideas here on this bulk that we're discussing, we're not talking about ICANN transfers here, we're talking about a large volume of domains moving but not everything moving. So I think the two big scenarios are investors that move hundreds or even thousands of domains from here to there. And the other big scenarios, when a reseller moves possibly between a registrar to another registrar, and they move their whole portfolio across. So I think those are probably the big two scenarios and I'm sure others can come up with a few others. But I think that those are the big ones that we're gonna try to address and I would like to call on Theo to at least explain how they work through there currently and how best we can see it moving forward. So Theo, please go ahead.

THEO GEURTS: Yeah, thanks, Roger. I've never been a real big fan of the current transfer policy. It works pretty well if you're a registered and you're unhappy with your registrar, whatever reason that might be. You have plenty of choice with other retail registrars, you can make a choice. And if you have like 10 domain names, that's okay. You will get through it. It may take you like 30 minutes, maybe an hour, but then you're done and you're gone to another registrar. So that works pretty well.

But it doesn't scale at all. And the problem in my opinion has gotten bigger and bigger and bigger as these hosting companies/resellers got more and more domain names, and they are now up to the point that if they need to transfer 100,000 domain names it has turned into an entire migration, I mean, it takes at least a year to transfer all the domain names from one registrar to another. There is so much operational barriers that are being created at those volumes that it's become impossible, it's become very expensive.

So most of the resellers/hosting companies, if they have to move such large amount of domain names, it's mostly they go like "No, forget it, it's going to cost so much, there's going to be so much liability. And there's too much interference from registrants not reading the newsletter and disrupting the transfer process due to FOAs being sent to the registrant." So a lot of these resellers are just stuck, even though they might be at a registrar that is just total crap. Excuse my language. But that is the reality that's out there.

So here in the Netherlands, on the ccTLD registry, it's not just the Netherlands, Belgium has a bulk transfer option on a registry level, EURid has one, probably a couple more. And they've been there for a very long time. And with good reason, because consolidation in the registrar market has been going on for quite a while. There are indeed domain investors who want to move a portfolio from one registrar to another and don't want to be bogged down with very complex transfer rules, which make a lot of sense.

So in the Netherlands, we have a partial bulk transfer and a full portfolio bulk transfer. And the process, I can explain the process. Roger, do you want me to explain it a little bit?

ROGER CARNEY: Yeah, please.

THEO GEURTS: Okay. If you're a hosting company and you want to transfer your portfolio from one registrar to another, it's pretty simple. You go to the gaining registrar, and you provide them with the list of the main names that you want to transfer to them. The registrar accepts that list, starts the procedure at the registry, fills in the forms, gets all the designated signatories that are required. And then the registry contacts losing registrar, the losing registrar goes, does its due diligence, it has to check if the domain names are really from that reseller. Again, there's a lot of paperwork involved. I'm not saying that this is the most ideal option ever, but let's stick with it for the example.

So the losing registrar fills in the paperwork, sends it back to the registry, then the registry sets a date and time when they make the database switch. There's not a real transfer, it is just a switch of databases, they just switch it from the registrar to another registrar.

As soon as it's executed, the losing registrar gets a ping from the registry that it's done. And then the losing registrar can remove the domain names in their database. The gaining registrar gets a heads up from the registry and starts what we call a sync command. We're going to sync all the domain names with the registry and making sure that we get all the information in our database so that the reseller has the domain invisible in their account.

Depending on how large it is, if you do under 100,000 domain names, it's gonna cost two hours and then you've done. This saves the reseller a lot of headache. You don't have to worry about the expiry dates, nothing will go out of sync. There's no change to the expiry date. So the invoice systems, the billing systems all remain the same. There is no human error present in these transfers as opposed to a regular transfer.

So of course, before a bulk transfer starts, there is of course always the communication to the registrant. They need to know that okay, the reseller, the hosting company is going to switch to a different registrar back end.

That can be the losing registrar but often, all cases, I would say, the reseller will send out communications to the registrant, "beware, are we going to change backends, because ..." and then

they have a list of reasons to do that, better DNSSEC support, whatever, better security, there's millions of reasons out there to change to different registrar, it's not always just about price. A feature rich API might be a very good reason to switch.

So that is how it's done. And that is how domain name investors can also change on a pretty easy way and cost effective way to change registrars without too much interference from anyone.

The Dutch registry charges 50 euro for such a database switch. So that is pretty inexpensive. Of course, the Dutch registry operates at a not-for profit basis. So they just only want to have cost recovery. The entire process, of course, they already made sure that they can execute a database switch from one registrar to another in just a few hours. I mean, they've already got the scripts ready. It's just a very fluid process.

And we do have other registries throughout Europe also. And that makes sure that large transfers can be done without too much hassle. And that actually ensures that registrars in the Netherlands when it comes to .nl are very competitive and they really watch each other because you can lose your portfolio from a reseller real quick if you are being a crappy registrar. So Dutch registrars are usually not renewal machines, as we can point out to several gTLD registrars who operate on very ancient backends and know that it is basically impossible for a large reseller to move. So I think it will foster more competition and more innovation when we have decent bulk transfers. Thanks.

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ROGER CARNEY: Thanks for that. I think that helped out a lot of people understand that there's different ways of doing this. So, Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. Quick answer to Volker's comment in the chat. Volker is replacing me permanently from April 9. But that was not why I had my hand up. So currently, also, at the moment, I'm working quite a lot with bulk transfers, and bulk transfers in the last couple of weeks as my work with One.com. And what Theo just described is great for a lot of TLDs.

But for a lot of ccTLDs, they provide free transfers. So actually, for those, it's even easier, because we basically just login into the old registrar account, take out the auth ID, log in to the new one, transfer without anything else, since the transfer is instantly just like we talked about with this new policy.

But the fact that the domain will not be renewed, then the transfers really makes it quite a lot easier. This is the fact for like that .se where I'm soon going to work, the fact for .no and also quite a lot of others. So in those, we don't even need a bulk transfer policy, we just fix it with a script. Thank you.

ROGER CARNEY: Great. Thanks, Kristian. Keiron, please go ahead.

KEIRON TOBIN:	Thank you. Yeah. Thank you, Theo. Just in regards to kind of back to gTLDs and stuff like that. As Theo mentioned, there are a lot of people out there who, especially domain investors, who I deal with very regularly, who would be very happy to see something like this. But on a gTLD side, I think in terms of the bulk updates, if this was to proceed, we would have to make clear that you can only put gTLDs in this list, and that if a ccTLD was added, it would have to be rejected because of the different rules and criteria that kind of are put in as Theo mentioned.

So it could be something that we could do. I would also personally as well probably like to see an additional security level put in here, just because of the amount of what they would be kind of transferring over. And also a potential clawback as well. So for example, if someone did lose a large amounts of domains, though, essentially, the registry would get involved in order to physically claw back those domains, kind of like something that we've already discussed. But it would kind of add additional security for those people so that large portfolios weren't kind of being transferred away without authorization. As much as I think many people here like to think that domain investors are very savvy and quick, you would be amazed. So I just want to kind of think that an additional level there would kind of help a lot, and especially give them a bit of extra protection as well. Thank you.

ROGER CARNEY:	Great, thanks, Keiron. Owen, please go ahead.

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OWEN SMIGELSKI: Thanks, Roger. So thanks, Theo, for giving us that background intro and context. I am supportive of that. But I think we should make sure to be aware that this is something that actually does already sort of happen in the gTLD space. So the transfer policy provides for two types of transfers, registrant-initiated transfers and ICANN-initiated transfers. Quite noticeably and tellingly, it does not prohibit any other type of transfer. So as long as there can be transfer that is not going against any of the policies in the RAA or consensus policies, transfers similar to what Theo described can and have happened in the gTLD space. I'm aware of it from my time at ICANN Contractual Compliance as well as my work at Namecheap where there have been—it's generally reseller transfers to their own credential. But through that process, and it's done in ways that do not conflict with the current ICANN requirements.

So I think it would be good as this is going on and there is perhaps not some guidance or clarity on what is or is not required, I'm happy to put together a little bit of stuff about what I have seen and done, maybe coordinate with ICANN on this because I know that they also have some opinions about what is, I guess, sufficient under this to kind of draft something in this kind of form as a framework to just put into writing what is already going on. and what I've been involved with at least a half dozen times or so in all my years in this ICANN community. Thanks.

ROGER CARNEY: Thanks. And just let me follow up with you real quick. I know Crystal has talked about a lot of this in chat, about the s BTAPPA. And BTAPPA specifically was going to be part of our phase two

discussion. And as Owen mentioned, that's an ICANN initiated transfer. And for a couple good reasons. The registrar [inaudible] accreditation or some other—I can't remember the other reason. But that's my point, Owen, is we're kind of talking about it's large-scale transfer that's outside of BTAPPA and I think that's what we had to be clear, is BTAPPA sort of emulates what Theo was saying, but we don't want to get into that spot, because we're talking about initiation from some other source, not ICANN. So just wanted to throw that out there just to be clear. So Theo, please go ahead.

THEO GEURTS: Yeah, a couple of pointers. The thing that I've pointed out is a solution. I'm not saying it's the solution. I mean, if there are better solutions, go have at it. I would be very glad to hear such solutions. To Owen's point and to Crystal's point, yes, those like the BTAPPA and the ICANN initiated ones, they are there.

I have a very bad experience with them and I'm not going into the details. Plus, I find the cost of BTAPPA—I mean, if you do a large portfolio, you end up paying $50,000 which is, in my opinion, very much. But let's not get down that path. But I always thought that the current bulk transfers under ICANN were overly complex and didn't always work out very well.

We had instances that we wanted to initiate those transfers. We were granted them for .com but we couldn't get them granted for Afilias. So we ended up transferring A large amount of domain names manually, which was quite problematic, which cost us a lot

of money because there was tons of manual labor involved. So it's not always great, the current situation. Thanks.

ROGER CARNEY: Great. Thanks, Theo. And again, hopefully we get into those discussions in our phase two about how we can improve that that current process to help everyone including ICANN on that spot. So Sarah, please go ahead.

SARAH WYLD: Hi. Thank you, Theo, for the information in the context, definitely helpful. I do support in general the idea of a better bulk transfer process with additional security measures. And like always said, I was also thinking that this does kind of already happen. But I think we can make things more secure or streamlined with some policy. Overall, I would think that the bulk transfer process should be very similar to the single domain process. And Owen, I'd be happy to see your write up if you do still do that.

What I was also wondering that I don't think we've talked about today at least is, have we talked about the contact information on the domain? Which, of course, I'm thinking about in a lot of different contexts. But I know under the temp spec, the domain owner needs to provide contact info to the gaming registrar because it cannot be obtained from the public WHOIS. So I started to think about how would that be handled for a bulk transfer? Do would it be required that they all be the same contact info? Do they all have to be owned by the same person in the first place? Those are things to consider. And I tried to refer back to

what we had said about the contact info process for a single domain transfer, but I couldn't find it. And so I'm not sure, have we not talked about that? I went back to the gaining FOA working document. And it has the temp spec section that talks about what happens now. But the only recommendation is that we won't have a gaining FOA. So I wonder, did we forget about that? Did we put it someplace else? Are we doing it later? Or did we decide that it doesn't need a policy part right now? Yeah. So thank you.

ROGER CARNEY: Great. Thanks, Sarah. And I don't even think Rick was part of those discussions. But he must have went back and listened to all of our recordings, which is good for Rick. But I think that we did touch on that. And we decided that wasn't something we had to specifically cover. And not that we weren't going to, it was just I think at the time, we decided that was something we didn't have to just go through. Rick, please go ahead.

RICK WILHELM: Very good. Thanks, Roger. Yeah, so I could be wrong in that part, Sarah. But I think that probably the reason why—that was just sort of a quick assumption that the reason why that's not needed is that the gaining registrar needs to know the contact information already.

So anyway, regarding the topic that we're on, I think that we didn't really come up, But the BTAPPA thing that a lot of folks are talking about right now is actually an RSEP or it's a fast-track registry service. And there's preapproved boilerplate language here. And

so if we're talking about bulk doing something related to bulk transfer in this case, we would have to make sure that it does not interfere with things that already exist. And I would also offer that at least in looking at it here on the page—I'll admit that my review of all this stuff did not go far back enough, is that it's a little bit unclear to me in the context of what's on the screen what the definition of bulk is in this context. In the BTAPPA context, it's defined to be clear what it is, but in this context, it's a little bit unclear what bulk means. Thanks.

ROGER CARNEY: Great. Thanks, Rick. And I don't know that we actually agreed on what bulk was. And I think maybe that was on purpose to discuss that here. And I'll just point out that we have four minutes left. But I think that the idea of what bulk is, I think we were going to discuss here. So I think that's still open, Rick.

And I think the two biggest things between BTAPPA and what we're talking about here is who's initiating. BTAPPA is an ICANN-driven event where this—and this may come off as a little weird, but this is a registrant-driven—even though it's not specifically in certain circumstances, but it's on their benefit of—driven or initiated transfer, just on large volume. So, again, we've got three minutes and we've got Kristian and Kieron. So please go ahead, Kristian.

KRISTIAN ØRMEN: Thank you. I just wanted to echo what you said about especially BTAPPA but also bulk transfer being pain. And just wanted to give

a real life example for what we're doing right now at One.com and we basically saw that it was such a pain that we ended up taking some of our accreditations and basically taking those [inaudible] accreditations and integrated right into the other registrar system. So that system just handles the multiple accreditations so we can do our internal costumer migration. And then basically, when we are all over, we will have to look at all those, the pain from the bulk transfers since it's just simply impossible to deal with in the middle of the customer migration process. So if we can get to a point where this would be easier both for registrars merging, resellers moving and so on, that would really be fantastic for all of us. Thank you.

ROGER CARNEY: Great, thanks, Kristian. Kieron, please go ahead.

KEIRON TOBIN: Thank you, yes, I just have a couple of takeaway notes, just for everyone as well. And this is more to the registries. So just in regards to—obviously, we're looking at bulk transfers, I think, obviously, I understand from a registrar point of view how we accept them in terms of like priority and stuff like that. But if we're not putting a number to define these, let's say one registrar has a promotion on for one cent for a domain and someone orders 100,000 and overnight, someone wants to transfer them 100,000 straight into the registrar, it could cause problems, it could block systems. And you could essentially use it as a, I suppose, in a way as a [bulk] to kind of prevent that.

So I wonder if also from TechOps, if we can kind of start looking from that perspective as well as to whether we would need a fixed number or whether we can just leave it kind of to go off. Obviously, I think registrars as well should be able to kind of limit this. But also from a registry perspective, we also need to kind of understand the technical terms of it as well. Like, is 100,000 domains too much to move? Like, would that cause issues at registry backends? And just kind of maybe think about that a bit more, to kind of see how that kind of migrates. And again, I think TechOps could probably add a lot of value here. Thank you.

ROGER CARNEY: Thanks, Keiron. Sarah, please go ahead.

SARAH WYLD: Thank you. Just want to note that I dropped a whole bunch of questions into the chat which will hopefully be useful for this conversation as we make decisions. Yes, thank you.

ROGER CARNEY: Thanks, Sarah. And I was going to end with the same thing now that we've run out of time. But thinking about, obviously, some people pointed out in chat differences that we see here are a transfer adds a year on to it. And Theo's description just kept the expiration the same. So I think we had to think about that as well. Is there a bulk scenario where it's added? Are years added? Or is there not and we just say that the explanation stays the same? And again, just a lot of things that have to be thought out through

that process. And [inaudible] TAC needed? All those things and how that happens.

So I think we will definitely pick back up next week on this. So keep thinking about bulk and this scenario. And again separated out from BTAPPA. We want to separate those two concepts and see if we can come to some good discussion next week on it. Okay, thank you everyone. Great discussions today and we'll see everyone next week.

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