ICANN Transcription

Registration Data Accuracy Scoping Team

Thursday, 20 January 2022 at 14:00 UTC

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TERRI AGNEW:	Good morning, good afternoon, and good evening. Welcome to the Registration Data Accuracy Scoping Team taking place on Thursday, the 20th of January 2022 at 14:00 UTC.
	In the interest of time, there'll be no roll call. Attendance will be taken by the Zoom Room. If you're only on the telephone, could you please identify yourself now? Hearing no one, we have no listed apologies for today's meeting. Statements of Interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now. Seeing or hearing no one, if you do need assistance, please e-mail the GNSO secretariat.
	All members will be promoted to panelists for today's call. Members, when using chat, please select everyone in order for all to see the chat. Observers will have view-only to the chat access.

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

As a reminder, those who take part in ICANN multistakeholder process are to comply with the Expected Standards of Behavior. All documentation and information can be found on the wiki space. Recordings will be posted on the public wiki space shortly after the end of the call. Please remember to state your name before speaking. With this, I'll turn it back over to our chair, Michael Palage. Please begin.

MICHAEL PALAGE: Thank you, Terri. Good morning, good afternoon, and good evening, everyone. As usual, we will start off with a brief administrative update. Item number one, has anyone expressed any interest in serving as vice chair? I believe we had set the deadline of the 19th. That was yesterday. I did not see anything on the list. Marika, did you or ICANN Org see any Expressions of Interest?

MARIKA KONINGS: No. I haven't received anything either, nor directly nor on the mailing list.

MICHAEL PALAGE: What I would like to do here is since there does not seem to be anyone stepping up to serve in that capacity, my proposal will be we will move on without a vice chair until a specific need arises. What I would ask—and so this question is going to Volker and, I believe, Marc that have asked questions about this role. If in fact, I am unable to make a meeting for personal or professional reasons, would there be any objection to Olga stepping in in an

interim basis to chair that meeting? Would there be any problem? Well, does anyone see any problem with Olga stepping in in an interim basis to chair that meeting if I'm unable to attend? Volker?

VOLKER GREIMANN: No, and I didn't have any objections to Olga in the first place. We have followed the process and seeing that there has been no other candidates, I think the qualification of Olga is beyond doubt. So if there's any reason to doubt that, then that's not within my head.

MICHAEL PALAGE: Volker, I apologize if I mischaracterized. Yes. Your original comments were focused on process, so I apologize. Moving on then to our second administrative update, there are two particular items that I see on our horizon. The first is there will be a GNSO Policy webinar update on the 22nd of February. So this is going to be hosted by ICANN Org, although obviously all members are welcome to join that as well. We also have slotted in for ICANN73. Our day, I believe, that is going to be on a Monday. So there will be a change for that week. We will not be meeting on our regular Thursday slot but in fact on March 7. And as Terri has accurately pointed out in the chat room, it would be important for everyone to register so that they will be able to participate.

With that, just a little quick note. As many of us, after two years of Zoom, I'm trying to get everybody in the spirit. What I'm going to do now is I'm going to wear old ICANN T-shirts, so I'm actually wearing a T-shirt from the San Juan 2007 ICANN meeting.

Perhaps those that do turn on their video, you can wear some old, shall we say, ICANN swag or badges or something like that, because we need to somehow maintain our sanity, going on two plus years of Zoom and not being able to see everyone face to face.

With that, I would now like to turn it over to Brian and our ICANN Org colleagues so that they could, I believe, complete their Q&A. And then I begin opening it up to specific questions that the group may have of them. Brian, you have the floor.

BRIAN GUTTERMAN: Thank you, Michael. Sorry, I didn't have time to put on my ICANN bowtie, but perhaps next week. Good morning. Hello, everybody. I think what I'm going to try and do so you'll recall. For those that maybe didn't make the meeting last week, what I did there was sort of give a short overview of the Org answers to the initial set of what was a 25 questions from the group. And as I did that, as I gave that high level overview, we got a number of additional follow-up questions sort of in real time from the group. We also allowed everybody, I think, until yesterday to send additional follow-up questions. I didn't see any come through. But of course, I'll double check with that, in case anybody did send follow-up questions through.

So what we did was tried to work quickly but thoroughly to get back some responses to the seven or eight questions here, and that's what I sent through yesterday on the mailing list. Today we're lucky enough to be joined by my colleague, Jonathan Denison from the Contractual Compliance team, who is along with

us today to try and answer further questions specifically about Compliance processes related to accuracy, of course.

Marika mentioned in the chat—my apologies after not sending much through to the list for the previous weeks, I sent two pieces of content through. So just to level set, you also should have received a rather lengthy memo from my colleagues, GDS, Policy Research folks, memo on WHOIS ARS, sort of an up-to-date memo from the Org about our current thinking that complements some of the background materials that were sent through on ARS but that were completed sort of some time ago now prior to the start of our work. So I'm not going to go into that one. Maybe if the time comes, I'll ask those from the Org who authored that to come join a call if the group thinks that would be useful. But I think for now, I'll let everybody have some time to digest that. It's quite lengthy and comprehensive. So I hope that's helpful and we can decide when we follow up on that and how. So that's the ARS stuff.

Back to the questions. I do have Jonathan here. I will let everybody answer. Ask him follow-up questions for the allotted time in the agenda today. What I'm going to do, though, is answer two questions that sort of are obviously related but a little bit separate that came through. And we got answers from colleagues from our government and IGO Engagement team and from our Legal team involved in the DPA negotiation with the contracted parties. Thank you for putting these answers up on the screen. So specifically, the first question about the DPA negotiations came from Melina. The question was, what is the status of the negotiation between ICANN Org and contracted parties? What

we'd like to come back to this group with to keep everybody in the form the best we can was that the status is that following the Board's adoption of the EPDP Phase 1 recommendations, ICANN Org and group of Registry and Registrar representatives designated by the Contracted Party House have been working hard on a document to implement EPDP Phase 1 Recs 19 and 20. Again, some of you, many of you were involved in the Phase 1 work so this should be fairly relevant to you.

At present, we are aiming to produce a draft data processing specification to the Registry Agreement and Registrar Accreditation Agreement, which once finalized, a contracted party could elect to enter into for purposes of data protection compliance. Significant progress has been made towards a draft that will, once agreed, tentatively be shared with the IRT for feedback. So late last year, a month or two ago, ICANN Org and the Contracted Party House group held extended discussions regarding remaining open items with the aim to bring this effort to completion in the near term. We expect that this will be ready to share with the IRT prior to the draft Registration Data Policy document, the product of Phase 1 work being published for public comment.

So that's sort of the update we wanted to share. Again, for those following along, we hope that's useful. I'm sure the Legal team and others from Org will be given updates as soon as those are ready relevant for including ICANN73, which seems crazy but it's already around the corner.

The next question, and then I'll pause that I wanted to answer here aloud was a sort of a set of questions that came from

Stephanie's and good questions with respect to our ongoing engagement on behalf of the Org on the NIS2 in Europe. I think Stephanie sent some questions through in the chat. Again, we're just trying to be as transparent as possible. Our government and IGO team wanted to sort of level set and share a bit about what we're doing there to be a bit more specific, if we can to be open with you all, and you guys can take this information back to your respective SOs and ACs.

The questions were with respect to the engagement we are doing on NIS2. What kind of purpose are you lobbying for? What does it fit? How does it fit with ICANN controller role? Who else do you think should be available themselves for that legitimate purpose, etc., etc.? Who are you engaging with? I guess, actually, I won't—okay. As regards to the ongoing negotiations on NIS2, ICANN Org is engaging with the co-legislators, actually, the Parliament and the Council of the EU. The purpose of the engagement is to explain, which is a lot of what we do in our engagement work with policymakers is explain about how the DNS works, highlight what the community is working on, which is you all and identify the challenges that community is facing with respect to the application of GDPR to registration data in the context of ICANN policymaking. This engagement is with the aim to ensure that deliberations and decisions relating to the DNS in NIS2 are made with a full understanding of the current situation, possible impact of the proposed legislation. Again, the answer goes on. Please have a look at it in the document I sent over with some more details. But those are the two I wanted to cover now.

Now we'll pause for any questions or comments. And then with respect to the questions, specifically for Compliance, I will ask my colleague JD to engage with you all. So any questions or comments? I know that was a lot or anything that came through yesterday on the mailing list. I'm not hearing any.

MICHAEL PALAGE: Yes, there we go. Is there anyone that has any questions for ICANN Org directly in connection with what has been provided? I know what was just shared yesterday, even I, myself, have not been able to digest that. But I do believe there were a number of other previous questions that were asked and were hopefully answered in the document. So is there anyone?

BRIAN GUTTERMAN: Yeah. Again, sorry for the quick turnaround. If you have follow-up questions from last week that you weren't able to say on the call, then now is the time.

MICHAEL PALAGE: Stephanie's hand is up. Thank you, Stephanie. It would really— nothing good if we didn't have any questions, specifically since we've gotten probably some of our ICANN Org colleagues up early in the morning. So, Stephanie, you have the floor.

STEPHANIE PERRIN: Thanks very much. I see you're querying the intended meaning of it. What I mean is, with respect to it, is the lobbying. How do you

square your controller role with lobbying to the Parliament? What are your stated goals in lobbying the Parliament? It says here that you're explaining the difficulties. But I guess what I'm really wondering is, would you like a civil society representative to come along with you to explain how we regard the protection of the registered name holders? Because there are two sides to this argument, probably many sides, but there are two, it tends to be a binary issue in terms of how we see the impact of the GDPR. We view it very positively, others perhaps don't. They regard it as an impediment to getting access to data. So that's what I want to know is, as a controller, what's your position? Thanks.

BRIAN GUTTERMAN: Thank you, Stephanie. That is one again I think our team tried to answer a bit of that, but I appreciate and understand sort of the nuance there. Let me put sort of the more specific question that you just posed in writing and I promise to get back to you. I'll try to get back to you with, I guess, a more specific answer than what's provided here. So thanks for your patience. I know my colleagues are happy to talk with the community about what they're doing in Europe and elsewhere with policymakers. So we're going to take note of that and again try and continue to follow up best we can.

MICHAEL PALAGE: I guess, just to follow up on that, perhaps that's more of an Elena, Lana, or perhaps Dan Halloran question from, if you will, lobby advocacy before the commission, and then obviously Dan in his capacity is data—I don't want to call him the Data Protection Officer. I forget Dan's new specific term. I see Thomas. So I

believe if you can just also look into the chat there, Brian, Thomas is asking, again, to speak to ICANN's role as a controller or processor. So again, that's probably more of a Dan question. I believe Stephanie is more perhaps focused on Elena, and then perhaps Thomas there to Dan. So if you could direct those questions. I see Scott Austin. You have your hand up, you have the floor.

SCOTT AUSTIN: Thank you, Michael. I'm not sure if we're discussing—there's one document, several questions that are on the screen. But if we are able to talk about some of the earlier documents, the one that I was looking at was one that was called Review for Scoping Team Final Org Responses to Data Accuracy Scoping Team Questions. I was not on the call last week, unfortunately. I was out of country. But I noted in that particular document, if it's okay to shift to that— is that all right, Michael? Is that part of this discussion this morning?

MICHAEL PALAGE: It's all good questions, so yeah, because that was a previous question.

SCOTT AUSTIN: Yeah, it was five. It was question number five in that document. It begins in past meetings. ICANN Compliance stated—and it provided a chart. The response in the blue lettering provided a chart. And it was a chart that spoke to the types of reporters of registration data inaccuracy. It was very helpful in many respects

because it really detailed, gave specifics on sometimes the nature and the position of the person providing, serving as the reporter of data inaccuracy. But the problem I had with it was the largest group was Other. And with all of these detailed names for reporters, I guess my question is, what fell into Other with all of that is available for cubby-holes or identification of reports? Can you shed any light on the 66% and think of the reporters on that chart or Other?

JONATHAN DENISON: Hey. Yeah, this is JD with Compliance. Obviously, we came up with a pretty good list of potential options for reporters to use when submitting these complaints. But of course, we can't enumerate every potential type of background that someone may be coming from to file these complaints. Obviously, Other is the catch-all. So, it's kind of difficult to speculate. I mean, to be perfectly honest, since these are selections that the reporter makes themselves, to some degree, you have to take these with a grain of salt, I think. Some people who might not be as involved as others might confuse or misunderstand their role or what each of these items might be, but I think if you look at these, Other might suggest it's just anybody not affiliated with these other complaint types, and that could just be like regular third party, people complaining about the registration data. Maybe it's like someone trying to purchase a domain name or something like that and can't get that information, and maybe that could be an example of someone who would be considered Other. But, yeah, we don't have sub information related to Other and we don't track exactly that information. So it's kind of hard to say, basically.

SCOTT AUSTIN: Okay. So essentially, they reported themselves, determined which category they fit in.

JONATHAN DENISON: Yeah, exactly.

SCOTT AUSTIN: That being left out. I mean, is there some way, maybe the form that's being submitted to be narrowed or provide some explanation? Because what I'm getting is that it was intentional or possibly intentional that they did not identify which category they applied to, just a way to avoid that.

JONATHAN DENISON: Yeah. That's certainly altogether possible. But I think, again, it just goes back to these are things that we have to codify into our systems and stuff like that. So it would probably be more speculative if we were to continue adding things and we could kind of do that forever. But it's certainly something that we can take back and consider how best to maybe provide further information about what this might be. But yeah.

SCOTT AUSTIN: Are the complaints themselves that are attached to that or are designated other, are they available for review? Or are they confidential once they're submitted?

JONATHAN DENISON: Yeah, yeah. Basically, all of these in what we call "informal" process, basically everything that we process prior to a public notice of breach of the like, those kinds of enforcement phases, those we generally consider confidential.

SCOTT AUSTIN: Okay. So we have some statistics on who they identify themselves as, but after that, it's very hard to put any value on this, it's not attached to anything to determine if they were accurate in their own representation. Where would the result of action that was taken based on or any kind of a decision that was made over on any of these complaints? Where do we find those results?

JONATHAN DENISON: We do have metrics. I think you've probably our Metrics page on the Compliance site. They, they basically provide a high level numbers of, for instance, how many first notices were sent, how many second notices were sent, etc., how many were closed? But I don't believe you'd be able to do like a one-to-one connection between the complaint filed by the authorized representative, and whether that complaint was one of those that got a first notice or second notice or was closed and that kind of thing. It's more high level than that. I can put the Metrics link in the chat here, if anyone's interested.

EN

SCOTT AUSTIN:	Yeah. Along those same lines further down, in response to question eight on that same document, there was a reference to Contractual Compliance to track individual details of registrar responses to each [inaudible] in an attempt to identify patterns or systemic issues. Is there anywhere that the patterns or systemic issues identified are shown or are disclosed? Or is there any ability to track that's been identified by ICANN? Does the data that's collected here yet they realized, recognized in the inaccuracy reporting anywhere? So that we could track that or benefit from?
JONATHAN DENISON:	It's a good question. Off the top of my head, I don't know, necessarily, if our metrics provide that level of detail regarding specific trends, like if there's a trend related to noncompliance with a specific provision to that level. But you can kind of get an idea of trends related to the volume of complaints for a specific type of issue such as WHOIS inaccuracy or registration data inaccuracy, or stuff like UDRP. You can see the trends related to how those are filed. But behaviorally, if it's specific to a particular contracted party, those are internal. Because our metrics don't identify contracted parties and how many complaints they receive, stuff like that.
SCOTT AUSTIN:	Okay. What about further on down, there next couple of lines says this effort is useful in identifying trends of issues, most probably identifying opportunities with the outreach. That didn't tell anything further about what that outreach is and is it from … go ahead.

JONATHAN DENISON: For instance, if we see perhaps a contracted party or maybe even like a region, we see high volume of complaints related to specific issues, complaint types like registration data—and actually, I'll just keep throwing that out there—we use that internally as a potential tool in our toolbox to kind of reach out to the contracted party or the region to provide some more in-depth kind of discussions, not necessarily training but clarification on expectations and requirements. Those could either be things we do within Compliance, hop on a conference call, that kind of stuff. Compliance is obviously involved in other kind of events throughout various regions, usually like the team-based events that ICANN holds where we provide general information about specific subjects.

SCOTT AUSTIN: Okay. And as far as the proactive monitoring, is there anything that ICANN discloses so that it protects, perhaps there is a particular contracted party that is under a proactive monitoring that would be publicly disclosed or being made aware of? Or are there are any kind of hearings on accreditation that affect the outcome of whether someone continues to maintain their role as contracted party?

JONATHAN DENISON: We have our outreach pages. But those are generally going to be covering the events that we're involved in. But as far as information related to specific types of proactive monitoring—if

you go up to that chart again, there is a section I think it says ICANN—I don't know if you can go back to that. It says, "ICANN Compliance as a reporter type." Those are internally created complaints for ICANN Compliance. However, based on the type of issue it is, it might be something reactive. It might not necessarily be proactive, but there is potential that there's proactive activity there. But that's really not going to be super detailed or clear regarding what's proactive, what's reactive, but those are internally created by Compliance. So I guess the answer is not really so much.

SCOTT AUSTIN: Okay. So there really is a sort of a public disclosure that would be helpful in determining what registrars, for example, may be allowing certain things to refer more than others and we can subject some kind of—

JONATHAN DENISON: Right. Again, many of these things will be kind of folded under the umbrella of that informal process, which is confidential. So you're not going to get information necessarily related to specific contracted parties.

SCOTT AUSTIN: Okay. I'll let somebody else ask questions.

EN

MICHAEL PALAGE:	Thank you. Thank you, Scott. Next up in the queue, we have Steve Crocker. Steve, you have the floor.
STEVE CROCKER:	Thank you. Listening to all of this and thinking about it feels like it's stuck in a deep ravine. I suppose one thinks about this from a slightly different perspective and say, "Why is it that the Compliance process and the auditing process and all of that is centralized in ICANN Org?" What are the prospects, for example, of distributing and having competition across that function? So, just as a way of stimulating discussion, suppose the requirement were that every registrar contract with a suitably suitable third party auditor and compliance function, maybe two to two separate functions, and then there would be a much more vigorous evolution of that function, competition and quality competition in price, etc, etc. in a big learning curve. ICANN is stuck in a position of trying to protect itself as much as it is trying to accomplish the function and we're just completely stuck.
MICHAEL PALAGE:	So, is that more of a philosophical … I understand your statement. Is there a specific question, though, that you have for Jonathan or Brian, I guess?
STEVE CROCKER:	No, I'm really asking more for you in terms of the scope of this whole scoping team here. So if you want me to transform it into a formal question, should the scope be expanded to include the prospect of having auditing and compliance transformed into

outsource functions, not outsource from ICANN so much but outsource from registrars under a very broad set of guidelines from ICANN.

MICHAEL PALAGE: Before answering that question, I would want to go back and look at the charter. My initial reaction is, I would be concerned about us exceeding it, but I do believe there is the potential in additional steps sort of assignment three and four, where we could perhaps address that. I will not attempt to answer that question on the fly. As I said, I want to stick to our charter but I do believe there is some flexibility in assignment three and four where that potentially could be addressed. Is that fair, Steve?

STEVE CROCKER: Well, you're chair so you determine what's fair.

MICHAEL PALAGE: Well, no. Actually, I opine and then what happens is the members will. I view this as a community. I just offer what I think and then I listen for feedback.

STEVE CROCKER: Absolutely. So this is as much for the group as it is for you. But it's not specific back to ICANN Org. It's really for us as a scoping team to think about how best to get the job done and what the ground rules might be for that.

MICHAEL PALAGE: Beth, I see your hand raised. You have the floor.

BETH BACON: Thanks. Steve, it's an interesting question. It seems beyond perhaps the scope of what we have in our charter to do is to suggest a complete change to how compliance functions, as opposed to focusing on how to measure accuracy. I think it's a huge jump to say maybe we have some questions, and maybe we have some changes to let's completely overhaul the function and structure of a department. We don't even have recommendations yet. So we don't know if Compliance would need to ramp up or do training like they could do it. So I think it's a very large question. Again, I'm not dismissing it. I'm just saying it's a big question, and especially since we don't really even have any recommendations so we don't know if Compliance could do or not. And Compliance is a fine group of humans so I imagine they could. I think there'll be a lot of costs. I'm not sure what problem that solves. But I just wanted to give you a first blush kind of reaction to that question. It seems huge.

STEVE CROCKER: I appreciate that. Let me just add one little comment. One could divide the question that I've asked into two parts. One is the auditing aspect and the other is a compliance aspect. I think that given the discussion about whether this is within or within the charter, the auditing aspect to determine accuracy I think submit is within scope. And the question of whether or not to reorganize how compliance is done might be separable and might want to

MICHAEL PALAGE: So if I can, are there any additional questions to Jonathan that we have as a group? Scott, I see your hand up again.

SCOTT AUSTIN: Thanks, Michael. I'll try and make this quick. But there were some really important things that were said in this original document and this is the first time I've had a chance to actually address or ask them these questions related to it. One of the things that I'm noting—and this is the first document, not the most recent answers to follow-up questions but the one prior to that that I'm looking at—and the reason I'm asking this question—I'll pull up the right number here. This has to do with number four, to what extent will ICANN Compliance respond to complaints that a registrant is using contact information that does not belong to them. There was a response below that says if a reporter provides requisite supporting information or evidence, ICANN will initiate a notice or inquiry with a registrar. And it does show that it gives some specific examples, which are extremely helpful. And the second one is a complaint from a representative of a legal person that alleges the registration using entity's contact information without authorization. I think that happens quite a bit given the amount of—well, at any rate, from UDRP cases and so forth. I just wonder if that is tracked from a statistical standpoint of the number of complaints specifically of that kind of identity theft, for lack of a better term, or registration theft, if you will. If there was any

tracking of the response and the result of the response of ICANN to that legal person whose registration information was taken. Is there any place that that appears that could be followed up or just look for—

JONATHAN DENISON: Again, this is one of those things that if we go up to that chart—sorry, Merika.

SCOTT AUSTIN: That was question five, I believe.

JONATHAN DENISON: Yeah. I don't think we would have specific information related to the legal person is claiming identity theft, that kind of thing.

SCOTT AUSTIN: Okay. But those do exist but they show up none. If it doesn't show up in the charter, it's not like a statistic. I guess the question is, would there be any sample but to the point where that did occur that we would follow up [inaudible].

JONATHAN DENISON: Yeah. I don't believe our metrics goes down to that level. Probably, again, you wouldn't necessarily be able to make that one-to-one connection between what someone identifies themselves as, what happened to their specific complaint.

MICHAEL PALAGE: Scott, are you done? Or do you have any other—

SCOTT AUSTIN: Well, there was one other item that I thought it was very important that I believe it was in this document where there was a distinction between verification and validation. I was just trying to find which question that was because it seemed to be at odds with the definition that we had originally come up with regarding the scope of the team, when we had created the definition of the use of valid or validation. It seemed to be at odds with the way it was defined or the way that it was treated in this document, that they were swamped. Validation really had to do with the fact that all registration data elements were present and verification was more along the lines of [inaudible] validation [inaudible] document.

MICHAEL PALAGE: Scott, is it possible, myself and others, can you just get closer to the mic perhaps? You're breaking up a bit.

SCOTT AUSTIN: Yeah. In question 10 … Can you hear me better now, Michael?

MICHAEL PALAGE: Much better. Thank you, Scott.

SCOTT AUSTIN: Question 10 is the one I was looking at, verification and validation. How does ICANN define and differentiate between existing verification and validation requirements? Specifically, it says verification, and this is the response that was received from ICANN Org. Verification is the process by which a registrar confirms or corrects the accuracy of registration data by contacting, receiving an affirmative response, etc. And then it said validation is the process by which a registrar ensures that the presence and format of registration data for all required fields is consistent with applicable standards. We had a definition that we were using for our Accuracy Scoping Team that the registrars and I think everyone was relatively in agreement with, but it seems to me that it used validation in the place of what by this presentation would be verification. And I just wondered if anyone else, including ICANN.org, would agree with that that perhaps we should change within our definition, our use of validation with verification. I think it's important that because these two terms are central to what we're trying to do here. That's my last one.

MICHAEL PALAGE: So, Jonathan, do you have a specific response to that question?

SCOTT AUSTIN: Michael, I don't know if you have handy or we have to put up what our definition was our team's definition.

MICHAEL PALAGE: Well, what happened is we have an explanation. Yes, if we do have a definition. Well, I want to be careful here before Sarah,

Roger, or Volker correct me. The registrars have cited to their existing contract which they believe set for how it is defined. Did I get that right, Volker?

VOLKER GREIMANN: It's been put on the screen now. That's excellent.

MICHAEL PALAGE: Sarah, did I get that? And it's on the screen. Sarah, you have the floor.

SARAH WYLD: Thank you. Hi. I hope you can hear me okay. Okay. I think we have a little bit of confusion around which one is validation and which one is verification. I am very sympathetic to that because I have to look it up every time. I mix them up. But I'm looking at the WHOIS Accuracy Program Specification right now. Validation is making sure that all the fields are filled in and they're in the right format. Verification is sending the domain owner a message and requiring an affirmative response. So I do believe that what was in question 10 that we saw a moment ago matches to the definitions in the WHOIS Accuracy Specification. I hope that is helpful. Thank you.

SCOTT AUSTIN: Well, in response to that, Sarah, I guess my question was what is up on the screen now? I see the use of the term validity in the second paragraph which says by all requirements for validity.

SARAH WYLD: Sorry. Yes, so that's referring to the validation, making sure that all the fields are filled in and that they're formatted properly.

SCOTT AUSTIN: But the lead in to that same sentence says to be determined to be syntactically accurate. And syntax seems to be in the definition of verification or the type of work that is done with regard to verification. So that to me is either ambiguous or inconsistent. And then down below, it says to be determined to be operably accurate. The contact must be operable as defined. Sorry. The RAA currently requires validation of some syntactical accuracy and verification of operational accuracy. Well, validation, as you've just said, has to do with the location of all of the registration fields. And wouldn't it be more appropriate to say verification of syntactical accuracy?

SARAH WYLD: I do not think that it would be more appropriate, no. We are validating that they are accurate. That's how the terms are defined in the Accuracy Specification. Maybe Volker can help. Thanks.

MICHAEL PALAGE: I see Volker. Volker, you have your hand up, you now have the floor.

VOLKER GREIMANN: Yes, maybe I can bring some light to that because I was in the room when these terms were defined. It is basically, as Sarah said, we needed different terminology for different kinds of checking of accuracy. And what ICANN and the registrars had agreed to in the 2013 RAA is that we would agree to check that all fields are in the format that they have to be in. So, for example, that e-mail field is correctly formatted as a functional e-mail—that's validation—that the postal address is formatted in the UPU standard that we basically took as the baseline for accurately formatted data that the phone number is in a certain format, and that was what we called validation. And then we had something going deeper further than that, and we called that verification. That is basically making sure that not only is it in the right format but also it works. That was what we called verification in the end. So the terminology between verification and validation is you can call it artificial, but it was what will we basically came up with when we discussed 2013 RAA to differentiate between those two concepts, checking that it's syntactically accurate, which we called validate, and checking whether it works, which we called verify. Thank you.

MICHAEL PALAGE: All right, Alan Greenberg, you have the floor.

ALAN GREENBERG: Thank you very much. Let's be honest, these are definitions. They may be poor choices. They may in some people minds not correspond to how these words are used in our normal life, but they are the definitions we have right now. We can certainly propose that we invert them next time around or pick some other

words that are less under dispute or less confusable. But these are the definitions and they're really clearly defined in the RAA. I'm not sure how much further elaboration on them is a good use of our time. Thank you.

SCOTT AUSTIN: If I can just respond quickly to that, Volker, that was very helpful in terms of verification being deeper after validation and I think that does help clarify. But I just wanted to make sure that we were on the same page with ICANN Org in terms of application of those terms. I think I can live with what's been presented. But there is still one aspect that is open-ended and that is the use of the term applicable standards. And I would like to find out if ICANN Org had the opportunity to light on that or if there's any basis for that. If they are defined, Sarah, if it's limited to what is defined or if there are other applicable standards that are in.

MICHAEL PALAGE: Volker, you have the floor.

VOLKER GREIMANN: Yes. By applicable standards, we basically referred to the standards that we defined that would define the accuracy. So proposed addresses the UPU standard for phone numbers, I think it was an ISO standard. And those are listed in the WHOIS Accuracy Specification as the standards that basically the verification and validation schemes were supposed to follow. Therefore, this is basically just not having to say those words again.

SCOTT AUSTIN: Okay. If it's limited to that and that's how ICANN sees it, then that makes sense to me.

MICHAEL PALAGE: All right. Do I see any further hands up? Volker, do you have a question? Hand down. If I could, Jonathan, I just have one question to ask you. You're kind of, I would almost say, an old timer now. You've been there for since like 2008, correct?

JONATHAN DENISON: Yeah. I'm the eldest.

MICHAEL PALAGE: You're the eldest in Compliance. So there you go. This is perfect for you then. One of the things as chair that I see is there's kind of two viewpoints. Again, I'm just generalizing here. There are some people that have questioned is there even a need for this working group, because they point to some recent statistics by ICANN Compliance saying that the number of accuracy complaints are very minimal. They're very small. There's then another part of the working group that believes that there is a problem and one of the reasons that the complaints have kind of gone down is the inability of the nonpublic data that has largely become inaccessible since GDPR. So they're kind of the two competing viewpoints. And again, I'm just generalizing here.

So my question to you is, I was actually going through the Competition, Consumer Trust and Consumer Choice report from 2018. And one of the things that jumped out at me on page five was the statement that WHOIS Accuracy complaints remain the largest category of complaints to ICANN Contractual Compliance. So I guess my question to you is prior to 2018, would you agree that that was an accurate statement, that WHOIS complaints were the largest number of complaints and now it's no longer the largest number of complaints? Would you agree with that characterization?

JONATHAN DENISON: I don't have the numbers in front of me, but I do believe that is accurate. Historically, WHOIS accuracy—this is anecdotal, just from my recollection—is generally was prior to GDPR, it was certainly one of our one of our highest, if not the highest, volume of complaints received. I think if you go on to our Metrics page now you should be able to see the volume is shifted pretty dramatically.

MICHAEL PALAGE: Okay. So I guess my question to you is, as the senior Compliance person, do you have a professional opinion on that change?

JONATHAN DENISON: I have to give you the canned response of I don't really have an opinion on the change. I only have the facts.

MICHAEL PALAGE: Okay. There we go. I was hoping for a little bit of candor before the morning coffee. There you go. So we'll stick with the Consumer Trust report that says accuracy complaints remain the largest. So that's factual that's in that report.

One other follow-up question that I have for you is, in the current accuracy compliance, I believe it was one of the footnotes that I read that stated that if a complaint is received by ICANN Compliance regarding accuracy but the domain name has been removed from the zone, ICANN Compliance will close out that ticket. Is that correct?

JONATHAN DENISON: Yes. So generally, basically, if upon review a domain name is already, for instance, on client hold, suspended, those tickets are closed, I believe, prior to going to the contracted party.

MICHAEL PALAGE: Again, I'm trying to look for what that delta is. When did that particular processing decision—and I'm just trying to look at it because in the Registrar Accreditation Agreement, it doesn't say anything about that in the WHOIS Specification—so when was that decision made and by who or why was that decided? Just because the domain name is not active, doesn't mean that there is true and accurate information associated with that. So can you shed any light in on when that change happened and why?

JONATHAN DENISON: Okay. Sarah's right. Yeah, that was actually program specification. It does mention suspension as a potential outcome of an investigation. But that didn't exist prior to the 2013 RAA. If I recall correctly, that kind of process that we had actually existed prior to even GDPR and might have even existed prior to the 2013 RAA. I can only speculate, I have a terrible memory even after this many years. I think a lot of what it came down to was also kind of how a suspension impacted registrants' ability. And maybe some of the contracted parties here can shed some light on that too, as to how that impacted the ability for updates to be made to stuff like the WHOIS data, but I don't recall specifically. It also depends on how those domains are suspended.

MICHAEL PALAGE: All right. Thank you. Again, that was kind of the two high level questions that kind of jumped out at me in last week and this week's conversation, so I appreciate that. Volker, you have the floor.

VOLKER GREIMANN: Yes, Mike. Thank you. A lot of interesting questions that you asked there. I think the main reason, even though I'm not from Compliance, that suspension causes a domain name to be not further pursued or a ticket before pursued, the reason is that there are essentially two ways to react in case the registration data is found to be inaccurate. The first one is to delete the domain name and the other one is the suspension of the domain name. So if a domain name is already suspended, what exactly is ICANN going to ask the registrar to do. If they have already suspended the

domain name, they will probably have a good reason for that and they can double suspend it. So I think because the remedy is already in place, there is no further use to making further inquiry as to the accuracy of the WHOIS for ICANN at least. Because the registrar basically already has done what it's supposed to do in case he finds the data to be inaccurate. That was my main point there. Thank you.

MICHAEL PALAGE: If I can respond to that, Volker. I'll give you a specific example that I'm dealing with now in a professional capacity. I'm working with a client that there was DNS abuse associated with a domain name. They requested that the domain name be taken down at both the registry and the registrar level. They were unsuccessful at the registrar, they succeeded at the registry. So the registry under their abuse policy took down the domain. The client still wants to obtain the information from the registrar regarding the registrant so that they consider their potential legal recourse. So that would be an example where a third party still has a legitimate interest. They don't want to double suspend. The registry is suspended, they're happy of that. However, they still need to obtain the underlying information regarding the registrant so that they could consider their legal action. I guess that would be an example of why suspending a name and closing a ticket at ICANN Compliance might perhaps be short circuiting, if you will, the spirit and purpose of that. Again, I'm just giving you one example that I'm dealing with professionally right now that perhaps gives some insight into that. Alan, I see you have your hand raised. You have the floor.

VOLKER GREIMANN: Can I come back on that, please?

MICHAEL PALAGE: Sure. Volker, you could go.

VOLKER GREIMANN: I mean, ultimately, I can get to where the interest of the complainant lies. However, the correction of the WHOIS data is not something that can be enforced. I mean, if the registrar does not have that data, he cannot correct the data. If the data does not exist in the registrar's database, then where should it come from? If it's an abusive domain name, I think it's highly doubtful that the registrant would go out and say, "By the way, here's my correct data. Give that to the complainant so he can sue me." I think that's a ridiculous situation that will not occur. We, as a registrar, are faced with a situation where we are looking at a domain name. And speaking frankly, I like a domain name that has incorrect WHOIS data that is being abused or used abusively, because then I don't have to prove the abuse, I can just prove the inaccurate data and suspend it for that. It makes my job in the Abuse Team much easier if I have something to point to that's very easy to prove. And therefore, if we have domain names that are with registration data that is incorrect, that's the quickest way to suspend it. Thank you.

MICHAEL PALAGE: Well, there's a lot there. Yes, we're encouraging inaccurate data so we could more quickly suspend.

VOLKER GREIMANN: I wasn't saying that. I'm happy about that because it gives me a much quicker road to suspension.

MICHAEL PALAGE: So what I'm going to do is I'm going to go back to the charter, and our charter here is about promoting the accuracy of the underlying data. So I think that's what we're going to stay focused on, is promoting that accuracy. Alan, you have the floor.

ALAN GREENBERG: Thank you very much. A couple of comments that may be relevant to some of this. Number one, there's a history in the past of inaccuracy reports resulting in a suspended domain, which then mysteriously a few weeks later gets unsuspended with the same data. My understanding is Compliance has now implemented routine checks to make sure that no longer happens. Presumably, if a domain is suspended due to inaccurate data, it stays suspended until that data is corrected or something else happens.

There was an RDS WHOIS review recommendation over the last review that recommended that a domain suspended due to inaccurate data be appropriately flagged. So it's understood that is why it was suspended and that it may not be unsuspended without correcting the data. That's a change which of course requires

either a negotiation or a PDP. And to my knowledge, neither have happened. Thank you.

MICHAEL PALAGE: Thank you, Alan. Susan, I saw your hand go up and then it go down. Do you want to speak?

SUSAN KAWAGUCHI: Alan covered the points that I was going to make.

MICHAEL PALAGE: Okay. I just wanted to make sure. Volker, you're next in the queue.

VOLKER GREIMANN: I can think of some examples where it would be legitimate to reactivate the domain name that has been suspended. Remember that just finding data that is incorrect isn't the only way that we can suspend in case of a WHOIS inaccuracy complaint. We can also suspend if the registrant does not respond to our inquiry to prove whether the data is correct or incorrect. And in that case, we can unsuspend the domain name if the registrant suddenly comes back after he sees that his domain name has been suspended because that is basically the final warning to him. And then he maybe checks his e-mails, his spam filters and says, "There was a question that I didn't answer. Please activate my domain name again. Here's the evidence." And in that case, we would be perfectly legitimized to reactivate.

In other cases, I think it's a problem with either how the registrars implement the suspension. Sometimes the domain name might have been transferred after and reactivated at the new registrar. That is a possibility. But the agreement is quite clear that we cannot unsuspend unless there has been either a confirmation from the registrar or the data is corrected. Those are the cases that I can imagine this happening and everything else will be a problem, and that would be a case with ICANN Compliance. Thank you.

MICHAEL PALAGE: Scott Austin, you have the floor.

SCOTT AUSTIN: This goes to question number 17. Your conversation, Michael, has given me an opportunity to think about something else that is in here that I really wanted to find out about. That is at the end of the response to question 17, it has to do with reverification. And it says if the registrant has additional domain names already registered with the gaining registrar and the registrar previously performed verification e-mail or telephone, and I'm assuming that means because it has additional domain names for those additional, then reverification may not be required. I guess my question on that is do registrars prohibit new account holders from naming registrants that are the same as ones that are already registered with that registrar or with another registrar?

To be clear, what I'm trying to get at is—well, let's use the Mickey Mouse example. I've been told by Sarah that, yes, there are real

people perhaps named Mickey Mouse. But I've also seen in this response, the fact that Mickey Mouse, using that could be evidence of willfully providing inaccurate information, or at least if you add their address as Disneyland with 000, etc. But my point is if someone is going to use a registrant, could there be multiple account holders using the same registration information with the same registrar? Is that permitted? Or does the database prohibit the use of the same registration data by different account holders? Is it like a USPTO database that would say, "No, sorry, that's already taken"?

MICHAEL PALAGE: Sarah or Volker, which one of you want to respond to that? I'll let you choose among yourselves who would like to respond to that.

SARAH WYLD: I put up my hand first so I would like to. I hope Volker doesn't mind.

VOLKER GREIMANN: Never.

SARAH WYLD: Okay. Scott, thank you for asking. I really appreciate clear defined questions. That's great. So verification happens on a contact set, rather than, of course, a specific domain name. To your question about if registrars prohibit account holders from reusing contact sets, it really depends a lot on specific implementations. But no, I

can't imagine why that would happen. So if I own a domain name, why should I not be able to also own other domain names? Sometimes there is benefit as a domain owners being able to have different accounts in the registration system for different purposes. So maybe I have one account where I keep all of my personal domain names and then I have another account where I keep the domain name that I bought for my sister's husband's home business. And I want to keep those separate but I want to own two different domain names. So there's no reason that I am aware of and no requirement that I'm aware of to prohibit a domain owner from owning multiple domains, either in the same account or in different accounts. I hope that helps. Thanks.

SCOTT AUSTIN: If I can respond to that quickly. It does serve, but I don't think that's quite the question I asked. What I'm asking is if I purchase a domain name and use particular registering contract data that I think is catchy or is what I want to call myself in terms of a registrant and you go ahead and purchase a different domain name, can you use whether you have seen mine or know me or whatever the same exact registration data, assuming that it is a pseudonym? We'll use the term pseudonym for this particular purpose.

SARAH WYLD: There's some questions around the ability to use a pseudonym. And registration data needs to be accurate but that's a whole set of thing, for sure. But how would a registrar know? If you buy a domain name and then I buy a domain name and I give your

information, how would an automated system know that I'm not really you? That's what you're asking, right?

SCOTT AUSTIN: No, you're being more complex than I am—I'm just saying, can the registrar allow the same registrant data to be submitted by two different account holders? In other words, is there a conflict check? Is there something that says no, you can't have the same registration data where it's owned by two different account holders? Or could five different account holders have the same registration data?

SARAH WYLD: There is no policy requirement prohibiting that. So if it is not allowed, that would be a choice in a specific registrar's implementation. And I don't think that we here can speak to that for all registrars.

SCOTT AUSTIN: Okay. It is permitted is my understanding is the answer.

SARAH WYLD: I believe so, yes.

SCOTT AUSTIN: There's nothing that prohibits the same registration data being submitted by different account holders. My point in this is that it could be used as a basis to say, "No, I don't need to reverify."

SARAH WYLD: Sure, yes. If the registration data has been verified, then when somebody else uses it, it might not need to be verified again. Yes.

SCOTT AUSTIN: Okay. I just wanted to tie it into the response. But the answer to the question, I think, goes beyond just that response. Thank you.

MICHAEL PALAGE: Volker, you have the floor.

VOLKER GREIMANN: I'm not quite sure why there should be such limitation. I mean, a lot of registrars operate on a wholesale basis. And if Reseller one has one customer, it's entirely conceivable that the same customer has other domain names with Reseller B as well. So you are assuming that the account holder is the registrant. At least, for our registrant, 90% of the case is not the case. Our account holders are third parties who provide services to registrants and the registrant data that they provide is fully functional for them. On our end, we validate the data and the handle for each time that the handle—one specific set of data is presented to us but we do verify only on basis of the e-mail address and we have a separate database for e-mail addresses. So if two handles use the same e-mail address, then they both count as already verified for that purpose. If that is what you're driving at.

SCOTT AUSTIN:	No, it's not, actually, but I appreciate what you're saying. But that's really not what I was driving at. Thank you.
MICHAEL PALAGE:	Stephanie, you have the floor. Stephanie, go ahead.
STEPHANIE PERRIN:	Sorry, that must be an old hand.
MICHAEL PALAGE:	Okay. All right. Volker, I saw your hand. Did it go down? Was that an old hand as well?
VOLKER GREIMANN:	No, I just said my piece.
MICHAEL PALAGE:	Okay, excellent. Alan, you have the floor.
ALAN GREENBERG:	Thank you. I put my hand up for one reason, but now I have another reason. I was going to originally say that it is not particularly uncommon for someone to have multiple accounts and to use the same contact information in both. I'm in that situation because, again, I have accounts, as Sarah mentioned, for personal use and business use. I may well have the same contact information. My address doesn't change just because I'm using it for two different purposes. However, as the conversation evolved,

I think what I heard is that if someone provides an address or let's say an e-mail address that has already been verified by somebody else perhaps completely unconnected, then that address is deemed to be valid and doesn't need to be verified again. My understanding was always that the verification would essentially have to be from the same registrant, the same customer or client.

If I use Michael Palage's e-mail address and claim it's my e-mail address with a registrar that he uses, I presume that since I'm claiming it's my address, that it will be verified again. That message will be sent to Michael Palage saying, "Such and such domain was just registered, can you confirm it's yours?" And this address is valid. If simply picking a valid e-mail address is sufficient to not do verification because that registrar already has that e-mail address on file, that's really scary and that changes the whole perspective of what we're talking about.

SCOTT AUSTIN: That's what I was getting at. Thank you, Alan.

MICHAEL PALAGE: All right. Stephanie, that is an old hand. Alan, you were done speaking, I believe. Sarah, you have the floor.

SARAH WYLD: Thank you. So what I'm hearing is a concern that some bad guy would register a domain using a different person's contact set, which they know to has been verified in order to not have to verify their own contact info and then be able to use the domain name. I

am very curious as to whether this is a common occurrence. I have no idea if there is any ability to—does anyone have information as to whether this is a thing that happens? It's not a thing that I am aware of. And how would the criminal person know the validated contact set? How would they get that? The registration data is typically redacted. Thank you.

MICHAEL PALAGE: Susan Kawaguchi, you have the floor.

SUSAN KAWAGUCHI: Thanks. This does happen. In my previous roles, I saw it multiple times. Is it really frequent? Probably not. But what is interesting—and this is a question to clarify, Sarah—but I'm assuming we're only talking each registrar would validate a contact set given to them. So if it was a different registrar, there's nothing that goes across registrars in verification. Is there?

SARAH WYLD: No, Susan. As you said, this is per registrar.

SUSAN KAWAGUCHI: Yeah. So the way this would happen sometimes, and you pointed it out in the chat, Sarah, was that that verification within come to the real registrant that own that identity. Then you could start figuring out, "Wait, I didn't register a domain name with this registrar. We've got a problem." The issue and it is few and far between, in my previous experience, I don't know what's

happened in the last five years. But it was historically all the way back in my eBay days also that someone that was planning to use the domain for abuse and usually a large abuse attack would do that would actually use the e-mail address of record for a major brand would use that like hostmaster@ebay.com, for example, and then I'd have to go back and figure out what happened. Sometimes it could have been an employee. Most likely, it was not. Another employee that didn't have authorization to register a domain. Then when I would contact Compliance and that registrar, one of two things would happen. If I contacted the registrar in my eBay days, the registrar usually went, "This is a bad player. Here, we'd hand the domain name over to you." That stopped probably 2010. That it wasn't quite as friendly of a relationship there. If I filed a compliance request or a complaint, oftentimes, then the abuser would have the option to change their information but keep the domain name that they've already started using as an abuse vector.

In my experience with Compliance and with the registrars involved, there was no clear way to resolve this quickly. The bad guy always got his 15 days at a minimum, which I think that probably is more like 30 days. Then often where it's able to maintain that domain name registration, it was not suspended, or like Alan mentioned earlier, could be unsuspended at a moment's notice. So there's definitely some issues there, and that is why I was on the RDS Review Team too and that's one of those recommendations. It's like if you're using someone else's identity, if the domain is suspended, it should be noted why that domain was suspended, not just suspended. For one thing, a suspension can be unsuspended at a moment's notice.

MICHAEL PALAGE: Alan, you have the floor.

ALAN GREENBERG: Thank you. In response to Sarah, you said how would I guess someone's contact information. Well, if I look up collage.com, I could probably make an educated guess what e-mail address Mike might have used with his registration, even if it's redacted. Or he may well be a person—he is, in this case, who has demanded that his personal information be revealed. There are multiple ways one can do it. Does it happen often? Well, I'm not sure we should really be concerned with how often it happens if it's something that's an obvious vector for abuse. Thank you.

MICHAEL PALAGE: Volker, you have the floor.

VOLKER GREIMANN: Thank you. I mean, the one thing that I, in my experience, have seen time and again is abusers registering domain names in the name of companies to show in the WHOIS that, yes, this is a legitimate site to basically fake it. I always like those because—it's controversial I think, but I like those because those allowed me to go to the complainant and say, "Hey, this is your domain name now because you're registered as the owner. You saved yourself a UDRP. Just create an account and we'll push it to you." That was the easiest fix for those.

We rarely saw registrants using the e-mail addresses of the abused entities simply for the fact that various e-mails get sent to these e-mail addresses. For example, the WHOIS data reminder policy e-mails, which also act as a warning to those entities that, "Look, these other domain names registered with your details. This serves multiple function to this e-mail." They try to prevent those e-mails to going to the registrant and therefore use generic e-mail addresses from somewhere else. This is also useful to identify such malignant domain names or registration. Essentially, this is a non-problem, at least in my experience. And this is maybe the more important intervention here. I don't see what this has to do with our mission here or scoping this. We have to look at the measures that are creating accuracy and not what follows from that. I think this is somewhat out of scope here. Thank you.

MICHAEL PALAGE: Sarah, you have the floor.

SARAH WYLD: Thank you. I appreciate the robust discussion on today's call. I'm hearing a lot of concerns and anecdotal or historical information. I do think that I disagree with the suggestion that we should not be concerned with how often these issues occur. So if anybody on this group would, for example, suggest that it should be more difficult to lift domain suspension than it currently is, which it sort of sounds the direction people might be thinking of going in. That would certainly also adversely affect many legitimate domain owners. There are many reasons why a real domain owner with no bad intentions might not verify their registration immediately be

suspended, and then reasonably unsuspend. Perhaps they went on a two-week vacation and didn't check their e-mail. So if we're going to make it harder to lift that suspension, that would negatively affect people. So the scope of the problem is a real crucial question that we need to consider when suggesting potential avenues for solution so that we make sure that we don't throw out the baby with the bathwater. We have to make sure that any response is proportional. Finally, I just want to encourage everybody to make sure that we are looking at facts and really solving concrete problems, and hopefully surfacing some concrete problems to consider. Thank you.

MICHAEL PALAGE: With that, I think we will be getting to draw the meeting to a close. So first, I want to again extend a personal as well as a group thank you to Jonathan for getting up early and answering a number of our questions today. Thank you. The offer by both you and Brian to follow up in the future with additional questions or clarifications on the questions is greatly appreciated.

One final thing, if I could, I just would like to comment on what I have heard as chair today and what I would say is perhaps the commingling of different concepts. I know, Sarah and Scott, you were talking about the confusion with validation and verification. What I would encourage you to do is read the FIDO and NIST standards that talk about authorization and authentication. That will even be more of a mind—add more to the confusion. But the reason I reference the FIDO and the NIST standards regarding authentication is I think that, Scott, goes to some of the questions that you were talking about regarding, if you will, identity theft. And

this has been reported in some ccTLDs, I believe, DK Hostmaster. There were some people that were misappropriating the NemID to go ahead and register a domain name using someone else's identity. I believe DK Hostmaster right now is beginning to put in authentication mechanisms to prevent that misuse. I know CZ.NIC has done some stuff as well as estonia.ee.

I guess the point I'm trying to say here is if you are worried about that identity theft—I know we all have a lot of homework on our plate—but I would encourage folks to read the NIST and the FIDO standards. I believe that will provide a little more clarity. Right now, to Volker's point, I don't believe that is within scope of our initial mandate. There is the potential as far as future work or additional work that could perhaps arise in our homework regarding question three and four. The reason I'm raising this is while most of the community with NIS2.0 has been focused on Article 23, I would really strongly encourage my contracting registry and registrar friends to please read Article 18 that talks about supply chain security, which I believe potentially brings in this concept of authentication and authorization. Again, I am trying as chair to stay narrowly focused on our charter, but I do believe we should be looking at some of these other peripheral issues as we get to those assignment three and four recommendations.

With that, I will draw the meeting to a close. I thank you everyone and look forward to seeing everyone next week. Terri, you can stop the recording.

TERRI AGNEW: Thank you, everyone. I will stop the recording and disconnect all remain lines. Stay well. The meeting is—

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