
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 28 November 2023 at 16:00 UTC

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JULIE BISLAND:

All right, good morning, good afternoon, and good evening. Welcome to the Transfer Policy Review PDP Working Group Call, taking place on Tuesday, the 28th of November, 2023. For today's call, we have apologies from Osvaldo Novoa, Prudence Malinki, RrSG. She's formally assigned Essie Musailov, RrSG, as her alternate 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. Statements of interest must be kept up to date. Does anyone have any updates to share? If so, please raise your hand or speak up now. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only. Please remember to state your name before speaking for the transcription. As a reminder, those who

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take part in the ICANN multistakeholder process are to comply with the expected standards of behavior. Thank you. And over to our chair, Roger Carney. Please begin, Roger.

ROGER CARNEY:

Thanks, Julie. Welcome, everyone. Just a couple of things real quick before we jump into our agenda. I think we have, including this meeting, four meetings remaining this year. And then we'll take a couple weeks off for the holiday break at the end of the year. But again, today's meeting and I think three more meetings after this in December that we'll have should wrap us up for the year and actually take us quite a ways into our discussion. Outside of that, I think the only other thing I wanted to see is Steinar had just sent, I don't know, in the last few hours or so, I suppose, a message to the working group about their discussions that they had last week or over the last few weeks. And I don't know if Steinar wanted to talk about that real quick, but take a look at his email and it provides a nice little poll that they took. And again, kind of informal poll after their discussion. They took a poll of removing the change of registrant from the policy or not. It's a nice checkpoint on that after their discussion. But I didn't know if Steinar wanted to bring up anything else. Steinar, please go ahead.

STEINAR GROTTEROD:

Yeah. Hi. Thank you. I just want to first of all thank Theo for attending the call and give an excellent background information about how this change of registrant policy was adopted at some time ago and also the registrar experience, at least from his point

of view. So that's a great thanks. It was kind of a lively discussion. And what you see from the poll is that only 23% voted yes to remove the change of registrant from the present inter registrar policy. And what is also quite interesting is to see that more than 40% was not sure. I take that as some sort of a learning process. And that was one of the objectives with having this discussion at the Consolidated Policy Working Group because there are members there that are not familiar with the technical and the operational issue that will have to take place in updating inter registrar data. So I'm going back and will continue to kind of in bracket educate the Consolidated Policy Working Group. And at some point we will hopefully get more consensus and a more clear view on what we recommend or what the stand is from At-Large. So I hope I'm not disturbing too much. But it was a very, very lovely discussion and a pleasant one. Thank you.

ROGER CARNEY:

Great. Thanks, Steinar. That's excellent. When I read your note, I was thinking the same thing as a lot of people weren't sure. So it's that opportunity to educate and inform. It's great. And I appreciate you taking all that back and Theo sitting in and helping out on that. And again, I think just providing the information so people can actually make that decision as a lot of people aren't in it day to day. So I think that's great. Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. And going back to the discussion which ALAC had, like last week, I wasn't even sure what my position was on this very subject. But it sort of dawned on me when I was going

through the new registration policy there is this part within new registration policy where we need to ask the registrants if we can publish the organization name. And going through our database, I noticed like 50% of the registrants just copied their first name and last name right into the org field. And I'm going like, okay, if I'm going to email all those people, that's going to cause a flood of material changes there. So you know, I think removing this policy, the COR, from a transfer policy, I don't think that is a very wise thing to do, actually. I think we're going to regret it at some point because it's going to be an operational nightmare if everybody is going to start a material change. I mean, 50% is a large amount. I'm not saying that the company I work for represents all the registrars, but you know, registrants do follow certain patterns here which might be present with other registrars. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Okay. Zak, please go ahead.

ZAK MUSCOVITCH: Thanks, Roger. So yeah, I wanted to ask Steinar what the arguments were against it and also in favor of it out of curiosity might help us in our own deliberations. But also, Theo, just if you could explain a little bit more about what you mean there. If there is no registrant transfer lock and we're really relying on the 30-day change of registrar lock only, then wouldn't there be no locks for material changes because changes aren't relevant any longer? Thanks.

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

THEO GEURTS: So I'm not going to in the details of the locks or whatever. I'm just sort of proposing that we have done substantial work on this change of registrant policy already. And posing the question now if that is part of the transfer policy or not, I would highly advise against that because we don't know how that looks like. Most likely it will go back to the GNSO council where it's going to be delayed because those people are very, very busy and we don't have much bandwidth there. Furthermore, you're going to open up a can of worms because the COR has been part of the transfer process. Now, regardless if there's a transfer in place or not, at some point we had a recommendation approved by the board. So I'm just saying even if the discussion is right, like it shouldn't be part of it. It needs to end up somewhere. And I'm just saying we shouldn't be delaying the change of registrant process. And you know, continue with what we are doing and make sure that we end up in a good place because if you're going to delay it, it's going to cause major headaches at some point somewhere else. And I don't think that is very beneficial for anybody within the community. Thanks.

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

SARAH WYLD: Hi, this is Sarah. Thank you. Thank you, Steinar, for sharing that information from the ALAC. That was helpful to see. The thing that

I found most interesting is that the same number of people had an opinion as did not have an opinion. And so that sort of makes me less inclined to do anything with that info. I don't know. I'd like to see the COR process change, as I think I've said before. I think we can keep the definition of a material change. When it happens, the registrant should be notified. But I think what we're seeing from ALAC is that there's not really compelling reasons to keep the approval process. And so I think the approval should go away. I'd also like to see the lock go away. I don't think it's required. I don't think it's necessary or helpful here. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you, Roger. So this is a question about the terminology. When we're talking, this is a genuine question, not an argument. When we're talking about removing the change of registrant from the transfer policy, are we talking about removing it from the transfer policy and putting it somewhere else? Or are we talking about removing the restrictions on change of registrant? Thank you.

ROGER CARNEY: Great. Thanks, Zak. And I think that obviously I don't think we've gotten far enough in our discussions to go down either one of those paths. I think both of those paths are valid. And I think that if it's removed out of policy, it's assumed, and maybe even language put back in, that the registrars are responsible for that. But again,

I'm not sure that we're far enough down the path to say either way.
So Theo, please go ahead.

THEO GEURTS: Yeah, I'll let Steinar go first.

STEINAR GROTTROD: Thank you, Theo. And this is Steinar for the record. Well, first of all, one of my objectives was to actually trying to get the CPWG members to understand the process in general as it is today. And I also wanted to make some sort of a kicking a little bit by putting up this kind of dramatic question about should we remove it totally. So it was at least my intention to make it more interesting to discuss. Because if we go into details about what is the change, material changes, and what is the designated agent and so on, it's getting rather sleepy for those who are not having the operational experience. So that's why I kind of put some pressure on maybe a dramatic question. The slides that I presented ended up in two alternatives. If we remove it from the inter-transfer policy, does it have to be a sort of a new PDP process? That could be the alternative. But it could also be that that is something, this is an operational issue that can be handled directly by the registrar. And we have experience from a lot of ccTLDs that actually do this totally by the responsibility of being a registrar and acting in good faith on that one. So this was something that I, again, At-Large haven't made the decision yet. This was the first step in a kind of a learning process. And I honestly believe that the change of registrant policy is of importance for the end users. So that's why I

kind of put it into that angle. Thank you very much. Theo, you're in.

THEO GEURTS: I'm going to let Berry do his thing first.

BERRY COBB: Thank you, Theo. Berry Cobb, ICANN staff for the record. And just hearing some of the exchange here, which I don't think we accounted for in the agenda, but we're practically already in number two anyway. But I did pick up on a couple of comments. You know, for kind of two aspects I'd like to discuss or to mention here. First is before IRTP completed its work, and especially when the change of registrant or COR was initiated, the transfer policy was technically an inter-registrar transfer policy. As part of implementing COR, at the time, it seemed like an appropriate decision to drop the inter-registrar transfer policy and call it a transfer policy that really has two sections, inter-registrar transfers and COR. And I think that that gives a misimpression that it's a single policy, when in reality it's really two separate policies embedded on the same policy page. Because when you read through the definitions and the process for COR, it has zero connective tissue to anything of the traditional inter-registrar transfer policy. And so there have been discussions about can COR somehow be embedded into the inter-registrar transfer policy? And maybe it can, maybe it can't, maybe it needs to be something standalone. Because I think what is somewhat new to us are twofold. One is there is connective tissue back to the WHOIS accuracy policy. And some of those changes that occur

there also align or coincide with what is being labeled as a material change in the COR policy. So we need to look out for that. And also thank you to Theo for mentioning the emphasis being provided on the organization field from the draft version of the registration data policy. And I think we this group may want to pay a little bit of attention to that. So that's kind of block one. The second block is we need to constantly remind ourselves of the draft preliminary recommendations that the group has come up with, with the inter-registrar transfer policy. And the entire field or foundation has shifted because we're introducing the TAC. Meaning that there are several steps that are going to occur before the TAC is actually revealed to the registered name holder. And because of that bright line, there is a difference of when COR, assuming that it were to remain in its current state, that it could be invoked before or even never of the actual inter-registrar transfer policy. Put another way, visualize the swim lanes that we put together and where we traverse over that the registered name holder decides to request the TAC. Based on that setup, if the registered name holder makes a material change as defined in COR today and doesn't have the intent of doing an inter-registrar transfer, these material changes are still invoked, whether that includes notifications or locks or whatever the group ultimately comes up with. So it's conceivable that if these aspects of material change occur, they're going to occur before the larger transfer policy even gets started. And so recognizing that, I'm starting to wonder if it's even possible to salvage components of the COR that would be embedded just in the transfer policy by itself when they're in fact kind of distinct components and, again, do have some sort of connective tissue back to the WHOIS accuracy

specification as well as the organization name field that now has bigger emphasis. Thank you.

ROGER CARNEY: Great. Thanks, Berry. Theo, would you like to go now?

THEO GEURTS: No, actually not.

ROGER CARNEY: Okay. Great. Thanks, Theo. Zak, please go ahead.

ZAK MUSCOVITCH: Thanks, Roger. Berry, that was very helpful. Thank you very much. And it reminded me that, and I think this is in the working group's documents previously, that one of the original concerns for registrants was navigating what is even to a lawyer very complex and intricate document to this transfer policy that combines those two spheres as Berry mentioned. And so, there was this interest in discussing and considering whether there should be a standalone portion just dealing with the change of registering provisions that a registrant can more easily comprehend and navigate. But I think that based upon my understanding of this group's discussions, particularly in the last call, there seemed to be some suggestions of getting rid of the restrictions on change of registering altogether. And it seems to me that if that suggestion were to have considerable support in the working group, then that could impact the group's decision about whether there's a need to have it as a

standalone policy or whether there's just nothing to say because there's no restrictions or maybe it just has to do with the notice provisions. And so, I think that rather than discuss the removal of the transfer locks in the sense of transferring it to a new standalone document, it might make sense to discuss the merits or lack of merit of changing and/or removing the transfer restrictions first. Thank you.

ROGER CARNEY:

Great. Thanks, Zak. Yeah. And I think it's a good callback to last week's discussion. And I think we kind of just threw that out there as it sounded like the working group was heading toward replacing the majority of what's in the policy today with more of just, as Zak just mentioned, notification or communication to the registrants that are involved and leaving the rest to the registrars. So I think that that's a good point Zak brings up. Depending on where we go on that path, if we end up changing certain things, does it make sense to, as Zak said, make that decision later as okay, this needs to be a standalone policy or it can be worked into here, or maybe we get through those discussion points before we get to that where does it actually live kind of idea. So Jim, please go ahead.

JIM GALVIN:

Thanks, Roger. Jim Galvin, Registry Stakeholder Group, Identity Digital for the Record. Something Berry said just reminded me of something, and I really appreciated when Berry said this. And so I wanted to make a comment for consideration here in the group as we're going through this. Berry talked about maybe the overall

model infrastructure has changed especially given the existence of the new TAC. So I want to go back and make a comment about the overarching security model as I understand it, and as I think it developed more than a year ago when the TAC was coming into existence and all the rules about how the TAC was applied and offer a potential interpretation of what's going on here and what you could do. As I understand the overall security model, the transfers in general are not based on contact information, not based on registrant information. They are per se, okay? They're based on the existence and use of the TAC. So the losing and gaining registrar or incumbent and gaining registrars are just exchanging a TAC. And from the gaining registrar's point of view, all they know is a TAC has been received, which they're going to submit up to the registry, and the registry is going to let them know if that's a valid TAC. And as long as it's a valid TAC, that's all they've got. Somebody came forward and gave them a valid TAC, and they're going to take it on faith it's the right person, because they don't actually do any comparisons and they don't actually do any checks. And along the way, what happened is that the incumbent registrar, when the TAC comes through, this process has notifications that happen to the existing data at the incumbent registrar. So it's about contactability of something is really the basis of what's going on here. It's the TAC and its contactability. So from that perspective and with that in mind, nobody really cares about what the registrant information is, as long as some kind of contact exists and all of that seems to work. And that's what we've agreed to. And in that sense, it occurs to me that changing the registrant, I think there's room for lifting that out and making, if it needs to exist, make it a separate policy. But

honestly, I'm thinking it doesn't. I'm thinking that whatever happens inside a registrar is a registrar's responsibility to do the right thing, which they do today. And if they don't, they eventually get called out and that all gets sorted out. So it matches in the security model that maybe all you say is with an intra registrar action, which might have been construed as a transfer of sorts, it's up to the registrar to sort that out. And a notification to old information is sufficient. And that's all you have to worry about. You might want to think about the transfer locks as they exist, if you want to bring that down. But I really don't think you need to. I think the security model completely allows for a registrar to be completely responsible for the information it has. You don't need any additional policy. And it's only about inter-registrar transfers that matter. And you've created this new TAC model, security model, where it's not about contact information. It's about contactability and notifications. And the existence of that TAC just makes everything possible. And the TAC itself is not tied to any other thing that has to be compared and authorized. So just an observation, I wanted to remind us about all these discussions from a year ago and bring forward an interpretation of that security model into this discussion for continued consideration. And I hope all of that made sense. Thank you.

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

THEO GEURTS: Yeah, from what I've been hearing so far within the discussion trying to sort of move us forward is no locks within the change of

registrant policy. Notifications only. But I heard from Sarah and I sort of got a sense that most of us sort of are moving that way. You know, and if you look at the material change, if you're talking about notifications, I would suggest that to expand the notifications, not just focused on the material change, but on any changes. If the phone number changes, the registrant should receive a notification. And I think that way we have expanded a little bit more on it. And we sort of reduced the operational challenges that we currently constantly face on a day to day basis. And I think the discussion where this piece of the policy should exist is a completely different discussion. But I think for this group, it is sort of necessary to complete it now within the time that we have remaining and come up with a recommendation. Thanks.

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

JOTHAN FRAKES: Hey, yeah, thank you. I think a lot of what I was going to say got covered, which is fantastic. But I mentioned in the comments that there is a difference, I think a pretty big difference between two contexts here on what we may want to be looking at. So there is a concept within a registrar of account A and account B and a domain moving between those where there may be a different manager of the second account who could affect and control or manipulate the domain name. And the change of registrant, which would be where the contact information might alter. And I think one could be material from a transparency perspective, but the other would probably be opaque for most intents and purposes to

any public eye other than the registrar themselves. I think if we go back to what our principle was here, I think it's really about having some appropriate level of friction to protect the registrant from somebody stealing their name or moving their name and having it go to another registrar in an inter-registrar transfer. I think the integrity of the registration is super important here, right? And the concept we're looking at here with the change of registrant was that if domain ownership appeared to change or the title appeared to change on that domain, that there should be a lock period just to let things settle out to make sure it wasn't going to be stolen or something like that. This concept we have now, I agree with Jim that this intra concept, whether it's change of registrant or account change, that that is really kind of falls outside of what we're doing here. But we can't ignore the fact that these are really tied together with respect to there being some overall way to make sure that that registrant doesn't have the domain transferred away from them, that there's integrity to the transfer process. And so if this did decouple from what we're doing here in inter-registrar transfer, that we would certainly want to put some placeholder text to make sure and inform some separate group about the interdependencies in interrelation with those things to preserve the integrity of that registration so that you don't have the introduction of some means for someone to perform a transfer or otherwise affect things in a negative way. I hope that wasn't too much of a ramble. I agree with decoupling this, but I want to make sure that we're not decoupling in a way that introduces so much fluidity that we're not protecting the integrity of the registration. I also want to thank Steinar for his work in getting feedback from the public. And I wanted to ask if that conversation explored the nuances, the

differences between those two contexts of an account change inside of a registrar and the change of the contact information as a change of registrar. Because I think that having those contexts blurred may affect somebody's understanding of what maybe the survey was and to see if that's something that might have resulted differently if that were more teased out. Thank you.

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

BERRY COBB: Thank you, Roger. So I don't disagree with Jim's framing about intra activities belonging within the confines of the registrar of record. And again, I think that that was kind of part of the premise when we pivoted over to group two to better understand possibilities around dispute mechanisms in the instance where there is a dispute where the domain never left the registrar of record. And to carry a little bit further on to Jim's point, and again, this bright line is there's a point where the inter-registrar transfer process is never even considered in this up until the point that that TAC is requested. And at that point, then the transfer, the inter-registrar part of what we did in group one is invoked and there's opportunities for the group to come up with an extra protective mechanism that in the instance, these items that are considered a material change do indeed change prior to that TAC being requested. Could it be an additional restriction or extra notifications or verification that the changes—That's up for the group to determine. But certainly after that point that the TAC is requested, then we know with certainty that there's intent for this

domain to be transferred away from the registrar of record to a new gaining registrar. And then finally to Sarah's point about spinning up a new PDP I do some research on the side, but again, this group was chartered to handle the change of registrant as a policy. There are other options, certainly another PDP could be recommended by this group, or if the group believes that there still have the expertise or the right stakeholders involved that we could consider a project change request and a change of scope should the group feel that that may be necessary. But as of right now, I'm not seeing the need for a separate PDP to address this. And then one final comment that I saw in the chat with respect to accounts, I think Sarah is mostly right that we're crossing a line when we're talking about the accounts. But one of the things that I picked up on that I hadn't noticed before is going back to the WHOIS accuracy specification and it specifically calls out changes to contact information in WHOIS or RDDS and the account level as well, which I found intriguing. And seeing that immediately, I see connective tissue forming between the current aspects of what is contained within the COR today versus when that WHOIS accuracy specification would be triggered as well. And that's why I think we need to pay a little bit closer attention to that this time around. Thank you.

ROGER CARNEY:

Great. Thanks, Berry. Yeah, and I agree. I think that this working group was tasked with evaluating the change of registrant. So I don't know that it matters that if I don't know if it's happened before or not, but I don't know if it matters if two policies are created from this. I mean, this working group was established to

answer these questions. So I think either way that we come out of it, I think answering the questions is the important part. If that creates two policies, I don't know that that matters or if it's just a combined one. So I think that this working group is the one responsible for answering those questions. So Steinar, please go ahead.

STEINAR GROTTOROD: Yeah. Hi, this is Steinar for the record. And first, answering Jothan's question here. Well, I understand the account change or the push. That means there is a transfer between one account and another account at the same registrar. That was not particularly discussed at the CPWG discussion. So I'm sorry for not bringing that up. But these are kind of scenarios that most of the people are not familiar with. So that was only reason. But my key point here was that one of the arguments I have is that when I was diving into this and I see some purposes of the COR that was preventing domain name hijacking. And if I recall correctly from the previous discussion is that we haven't seen any evidence that this policy reduces the number of domain name hijacked at time. We do have, if I recall correctly, we do have some information that there is a very, very low number of domain name hijacking. And if we're going to have to keep on a policy that has the objective to prevent domain name hijacking added, the policy itself doesn't really work in that direction. But it makes it more complex for the registrant. And as Owen told us in the chat that there is a huge number of ICANN compliance tickets, [frustrated registrant] that was not able to transfer the domain name due to the transfer lock being initiated by the change of registrant policy. And that was one

of the objectives. I want to have update of the registrant data as secure and smooth as possible and not ending up in preventing the registrant to actually do what they want to do to maybe transfer to another registrar. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Catherine, please go ahead.

CATHERINE MERDINGER: Thanks. I'm not sold on this two policy discussion. I think we effectively have two policies right now. The transfer policy, I think it's part one and part two. Now it sounds like people are uncomfortable calling a change of registrant or changes to registration data a transfer. But that's a definitional problem, right? You could call it a wingy bat and it could still be exactly the same thing, right? It doesn't, that's just a word that we're using. I guess that doesn't really solve anything for me. Spinning up a new PDP to churn out a new policy doesn't get us anything that we couldn't do in this group and couldn't do as part of the transfer policy or do a hard return, put it on a new webpage and call it something else. But I guess I'm just not seeing—If the concern is we should handle changes to registration data outside of the transfer policy, and do it in other more appropriate places where we also handle changes to registration data, sure. But I'm not seeing totally why they can't live together. If in the end we have to put out a new policy or change contract language or do something, why can't this, okay, we won't call it a transfer policy, we'll call it an inter-registrar and change of—or change of registration data policy. You can call it whatever you want. It's just, I guess I don't understand why this is

so complicated. I guess that's really what I'm thinking. Either we want to solve the what happens when you change registration data issue, or we don't want to solve that issue. And I think that could be an answer from this PDP. We don't want to touch it. We think it should be dealt with another way. But I guess I don't see why we would want that. I don't see a more qualified group of people to make the decisions about how changes of registration information are processed. And I don't know why we would wait the long period of time it's going to take to spin up that PDP, the issues report, and get a policy when we could make it here. And so I guess I'm just not seeing why there's so much discomfort around this issue. Other than the language. And the language is, to me, a silly thing to get hung up on because it's just words and we can change the words. Thanks.

ROGER CARNEY:

Great. Thanks, Catherine. And I agree. I think that, I think from my perspective, this group will solve this problem. And if we run into something that the group just says that we can't solve, then that's when we'll look at something. But I think that we're tasked with answering these questions. So I think that we came into this knowing that we were going to answer these questions. And it was our responsibility. So I think we do do that. And again, unless we hit something that we can't do, I think that we do this work and get it done and get it out there. So thanks, Catherine. Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. This is Theo for the record. I think it's more or less a definitional issue, which is not that important. I mean, we were tasked back in the day to deal with this problem. We did it. Recommendations were approved by the board back then. We are now once again tasked by the same groups, more or less, to do it again. We're doing it. And at the end of the day, it is all up to the board to agree with it or not with those recommendations. So I don't think—we don't have to sort of discuss if it's really up to us or not to deal with this problem. I think the task is pretty clear. We come up with recommendations on to deal with this subject. Even if the board disagrees or the council has concerns during this process, then we will hear back from the council. I mean, we've got a GNSO council rep on this group to report back any issues. So I think from a process perspective, we don't have to do anything here right now on this topic. Going back to Steinar's comments, yes, there is very little evidence that the change of registrant policy prevents domain name theft. The only viable data point that we have was in 2018 when the GDPR kicked in and the WHOIS became redacted. All of us noticed a huge drop in domain name theft. So that is a viable data point. And going back to Berry's comments, that was very interesting to hear, actually, that account holder data was sort of tied into the mix of all this. I find that very interesting. But I will sort of point out, while that is maybe something we need to sort of take on, as it is maybe implied, the problem with here is, and I come from an operational background perspective here, is we don't have any information about any accounts on the reseller side from registrants or account holders or whatever they might be. So we don't have any information about that. If changes occur there, it could be

happening 2,000 times a day on the same account. We wouldn't know about anything about that. And secondly, I don't want to know about what that information is on those accounts, because there's most likely, I have zero legal basis under the GDPR to even have that info of these account holders who might not be even a customer of ours indirectly. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Okay. And a great discussion. And again, thanks, Steinar, for starting that within the ALAC. And I appreciate that that discussion is ongoing. So that's great. As Berry mentioned, I think that a lot of our discussion so far today is actually part of what we were planning to go over. So I think maybe we'll duplicate some of this discussion as we go. But I think we can move on from here and we'll jump into our agenda. And I will turn this over to Christian to take us through this. Go ahead, Christian.

CHRISTIAN WHEELER:

Thank you, Roger. And yeah, we've already had a great conversation today. So some of this stuff we might be fine with kind of flying through. But I do think it is important and good that we go through the actual transfer policy steps to see what these recommendations are, since the group does seem to be leaning toward getting rid of the confirmation and just doing notifications and getting rid of that 60-day transfer lock, what that looks like in terms of the actual policy steps. So kind of going into those details a little bit and seeing how that affects the current policy. And then whether it stays in the transfer policy or what happens with it that

can be discussed. We can continue that discussion a little bit later. But here, so we'll just go now.

So going into the change of registrant process as it currently is, the first step, which the registrar has to do, is to confirm that the domain name is eligible for the change of registrant. So if you want, I've actually put in the chat the actual link to the transfer policy as well as the slides too, if you want to follow along. But this is essentially in the first, this is like section B of the transfer policy that talks about making sure that it's eligible before it actually goes into that process. So in order for it to be eligible, the domain name can't be expired. It has to be authorized by the prior registrant and new registrant. And it can't be subject to a dispute such as the UDRP, URS, TDRP or court or valid court order. And previously, the group had discussed adding another requirement to this, which was kind of in line with the group A recommendations for when a registrar may deny a registrar transfer. So the group had previously suggested that the registrar must deny a court request if there's evidence of fraud or if the domain presents an active DNS security threat as defined on this link. So that language is taken from the recommendation referring to registrar transfers. And previously it had talked about reflecting this as well in the change of registrant policy as well. So I'll leave it there just to, if anyone has any comments or questions or wants to discuss something just with this first step and then we can move on.

ROGER CARNEY:

Great. Thanks Christian. And again, I think Christian has several of these, I think there's seven or eight of them. So we'll go through them and then we'll stop at each one and just talk about them if

we need to. So again, I think that just to highlight a question here, are there other things? And I think that really covers a lot of them, but obviously anything else that comes up. So Catherine, please go ahead.

CATHERINE MERDINGER: Thanks. This is going back now just to that red language that we drafted before. The phrase security threats stands out to me. I know we have this ICANN page. I'm thinking about it because the DNS abuse amendments to the registry agreement took out the phrase security threats. And I just want to make sure that that's the right phrase that we should be using here. It's not critical that we figure this out right now, I don't think, but just that that is going to be still the phrase that we use to refer to this defined set of terms, which is the same as the definition of DNS abuse in the proposed amendments, DNS abuse amendments. So flagging that is like anyone else concerned, or am I being crazy? Thanks.

ROGER CARNEY: Great. Thanks, Catherine. No, and I think that that's important as the amendment goes through the process. We'll fortunately be on the other side of that process and we'll get to be able to borrow any updates made there and update our language accordingly. So great, great catch there, Catherine. Theo, please go ahead.

THEO GEURTS: Yeah, so if there is evidence of fraud or whatever, I don't want to have the domain name to be able to be transferred out from me. That's my main concern. If the registrant or criminal wants to

change their registrant information, oh, go ahead. Please do so. I mean, maybe you leave me even more valuable data that I can use to turn you in to the cops. But you know, I don't see any real pressing reason to sort of prevent a change of registrant. You know, I don't think it's a very viable recommendation there.

ROGER CARNEY:

Theo, on that now, changing of registrant data, it seems logical not to stop that. But what about pure control or ownership change? Your thoughts on that being denied or not? Again, as you say, the registrar still has control of it. But then do they follow that path continuously if there's a change and then a change and then a change? Does that become a concern? But again, if it's a change of a true change of control, is that something that should be stopped?

THEO GEURTS:

The change of control, but that also implies a lot more than the change of registrant. And this is the change of registrant and we sometimes see that even when we suspended the domain name and locked it, that the registrant somehow starts changing their registrant information. I don't know why they do it, but you know, it could sometimes be useful. But again, let's not get hung up on this. I'm just pointing it out that it doesn't really matter as long as the domain name doesn't move away and becomes active again. I mean, that's the main concern, I think.

ROGER CARNEY:

Thanks, Theo. Catherine, please go ahead.

CATHERINE MERDINGER: Yeah, thanks. This is Catherine Merdinger for The Record. Theo brought me back to the real question here. And I think that language also makes sense when we're talking about an inter-registrar transfer, where you can put a lock and block transfers on domains that you suspend or that you have an issue with fraud or they're phishing or something. You can prevent that transfer programmatically. I don't know that it's as simple with a change of registrant, necessarily. This might be me showing my ignorance, but I don't know that we prevent currently, if a domain's engaged in DNS abuse, I don't think we prevent registrants from necessarily updating their, who is information. They can't necessarily transfer it and they can't do anything with it, it doesn't resolve. But I don't think we prevent that. And so how we prevent, how we would prevent updating contacts on that domain might also be a question, but I could be just forgetting about a lock that registrars have that they might put on the domain. But it is, would add another lock you would potentially have to put on another domain. Thanks, that's my thought.

ROGER CARNEY: Great. Thanks, Catherine. Any other comments on that?

CHRISTIAN WHEELER: I would just raise that in the current policy, so I'm just kind of moving it over to where we're at right now, this is kind of where the group kind of thought it would land, but there is a section two in the eligibility part where it said where it would not apply. And this

is kind of where it seemed it might be relevant. If the registrar updates the information in response to an abuse complaint. So I'm not sure if that changes anything, but that is currently in the policy where a change of registrant process that we're about to go into wouldn't apply is if the registrar needs to update that information for an abuse complaint. So that would just be kind of, this recommendation would just be adding abuse to this prior section where it would deny the request if there is fraud or DNS abuse probably stemming out of an abuse complaint. So it may not be necessary. You know, if the group doesn't feel that that kind of process is needed it's only for when they registrar, if there's a registrar transfer, then this piece already exists. So maybe that satisfies that requirement, but I just wanted to flag that.

ROGER CARNEY: Great. Thanks, Christian. Okay. Any other comments? Okay, Christian, I think you can take this along.

CHRISTIAN WHEELER: Thank you. Okay. So now we're getting into the actual process. So if it has been figured out to be eligible, then the first thing that the registrar would need to do would be obtaining confirmation from the new registrant or their designated agent and provide certain notifications. So there is a notification and a confirmation. That would be kind of the part of the primary step. This is going into the new registrant. So the registrar would need to use a secure mechanism to confirm that they've explicitly consented to the change of registrant. When obtaining that confirmation, the registrar would also inform the new registrant that it must enter

into a registration agreement. And it would also notify them that it will not proceed if it's not confirmed within 60 days or a number of days, but rather set by the registrar not to exceed 60 days. So the group had previously discussed getting rid of this confirmation requirement or pricing it with a notification to the prior registrant. Something I just wanted to raise as a question would be, should the notification also be sent to the new registrant here as well? And new registrants, again, would be referring to whether the group wants to change the change of control or focus more on contactability. So that would be essentially sending a notification to whatever new email address or new phone number that is being updated. That would go to the prior registrant and the new registrant, whatever that new information is as well, just the notification. Though this piece about the entering into registration agreement, that might stay there. That possibly could stay the same and be part of that notification, but not the confirmation piece.

ROGER CARNEY:

Thanks, Christian. Yeah, and I think that obviously the registrar is going to have to make that decision at one point if a new agreement needs to be put in place or not. Or agreement has to be put in place with the new registrant or not. So I think that that will exist either in policy or not. I mean, the registrars are required to have a registration agreement with all registrants. But yeah, we did talk about this and eliminating the confirmation. So I think a good time to talk about is this still true? Do we want to eliminate the confirmation and go to notification? And as some of the questions at the bottom of the page indicate, should the

notification be to both prior and new registrant and having their ability to interject at a point? Again, the notification isn't confirmation. So it's not like they're going to stop it or not, but at least they're aware of it and can make that decision or to pursue something else. So are we still good with eliminating the confirmation and just changing it to notification? Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. Yeah, I agree. That makes sense to go to notification only, except the notifications only. What I would be concerned about talking from a registrant perspective is that the current registrant gets informed about the changes. And you know, I don't really see the benefit of sending a notification to the new registrant. That doesn't make a lot of sense to me. But maybe that is just me, but I can't find a logical reason there. Thanks.

ROGER CARNEY:

Thanks, Theo. Yeah, and again, the new registrant is going to have to either already have a registration agreement assigned or signed another registration agreement. So they will be made aware of it. But I think the only reason to make sure that the new one is notified is, again, they're basically assuming responsibility. So if they're not wanting to do that, they have that opportunity to be aware of it. So just my thought, as you mentioned that, Theo. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you, Roger. So my question is this, is that if we go to notifications only, and we rely on the lock that applies for a change of registrar, so there's going to be 30 days where the name can't move, and that provides the window of opportunity for the registrant upon notification to do something about it, what can the registrant do about it? The registrant can't invoke the transfer dispute resolution policy. Some registrars may be happy to look into it for them, but there's no procedure in place. The UDRP can't be used for most cases of domain theft, unless the complaint happens to have a trademark and other circumstances. So my question really is, is that the notification seems like an elegant solution, but what can a registrant do upon notification if it's a bad transfer? Thank you.

ROGER CARNEY: Great. Thanks, Zak. And I think we did touch on that, and we didn't go down that path last week or maybe the week before, is that notification should probably include something if you disagree, contacts or whatever it is, but there has to be that next step, as you're mentioning, Zak. So Theo, please go ahead.

THEO GEURTS: Yeah. Thanks, and this is Theo for the record. Yeah, I would sort of follow the same path like we did with the TAC, expand a little bit on what that notification should entail so it's clear to the registrant like, oh, this and this has been changed, like my email address. Oh, I didn't do that. I now have a very short window to do something about this now, and contacting the registrant or reseller or whoever is best to deal with it, can deal with it, should be

notified immediately. That is the best course of action. And talking about locks, I would sort of remove them all together, but I leave that up to the group. I mean, with the current policy, the registrar may lift the 60-day lock after the change of a registrant. We always offer that option to our reseller as long they can document it. And we never had an issue that we had domain names stolen because the lock was lifted in any form or shape. So I think other registrars who did the same as us are seeing the same statistics, which are none when it comes to domain name theft in combination with a COR and a lock. Thanks.

ROGER CARNEY:

Thanks, Theo. Yeah, so I think, and Sarah's comment in chat as well, I think the issue is, do we put language around that registrar's notification has to include, whatever we're going to call it, at least a path for the registrant to, I wouldn't say dispute it, but at least ask, and is that as simple as, and the notification has to include contact information, whatever it is. So, but Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Roger. So I think if we as a working group proposed this, we would get all kinds of negative feedback on it, I'm afraid, because registrants would likely say that, yeah, that's very nice that all you guys from respectable, competent registrars in the working group know very well that if you got a complaint from a registrant after receiving a notification that it was a wrongful transfer that you would look into it in good faith and do something about it. But you guys aren't representative of all registrars.

There's all kinds of registrars out there that will do nothing or won't do very much. And so just giving a phone number or an email address or a link to a complaints form really isn't going to do much for registrants that are left to their own devices if we take away their right to stop a change of registrant. And so I think there's some real elegant arguments for removing the locks on the change of registrant, and there's elegant arguments for notification. But if you go to notification, there really needs to be another piece added to the puzzle to provide some kind of direct remedy that's an actual enforced standard for registrars. Thank you.

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

THEO GEURTS: Yeah, I'm sort of lost with Zak's argument there. I mean, we're talking about a change of registrant where a registrant can update his information, but we're not talking about a transfer. It's just a notification like the data set which you supplied back then during your registrations has changed. And it's up to the registrant, the current domain name owner, to go like, yes, this was an update. I moved to this and this address. I changed my telephone number and God knows what. That is all in order. There is nothing wrong here. While another registrant can go like, why did the reseller change my name? Or I didn't do anything at the registrar. I haven't logged in in half a year. Why has my information suddenly changed? It could be a notification as a warning to something that might be more malicious of nature. But we're not talking about a

transfer per se. I mean, that is not what this policy deals about. It's the change of registrant and not transfer. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. And I think that we see this. I mean, I think probably everyone has seen this with some online providers that they have when they change a piece of information. They either get an email or a prompted when it happens and they can accept it or not or whatever it is. It's just that notification that, hey, something's been updated. If this wasn't you, blah, blah, blah, blah. It's one of those standard things that to me occurs across the online environments today pretty regularly. So I don't know if it goes beyond that, needs to go beyond that. But I mean, I think that it's definitely a model that we can take a look at. So Sarah, please go ahead.

SARAH WYLD:

Hi, this is Sarah. So what I'm hearing now is consideration of a dispute process for a registrant contact info updates. And like, we barely even have one for inter-registrar transfers. The fast undo suggestion didn't go anywhere. So as we discussed, I'm not certain that the transfer policy is the right place for this requirement, especially since there are related obligations in the RAA, like the WHOIS accuracy program has validation and verification. That's also the same data set being reviewed. So if we're just keeping the COR and lightening it up to be a notification process, maybe even with no lock process, that would be great. I think it's fine. We're chartered to do it. Let's make a useful change. But if we're already considering some sort of dispute process, I

would want to think about why we're doing that here and not in a broader context. And I'm not sure that this is—I don't know, I'm just not so into it. Thank you.

ROGER CARNEY:

Great, thanks, Sarah. Yeah. And again, I think that's right. And that's why I didn't want to call it earlier. I didn't want to say dispute it. It's just if they have questions about it or whatever, where do they go? And it's one of those things where a lot of registrants sure probably could know, maybe know their registrar. But you know, when something changes, it's nice for them to have in their face. Okay, this this did change. Great. Thanks for the thanks for the notice. But if you know if you have questions about it, call here. Kind of simple, something like that. I again, dispute mechanism. I don't know. And to Steinar's point in chat. Yeah, it's one of the difficult things when someone's updating an email or even a phone number or whatever, and the old phone number is not valid anymore. That's probably why they're changing it to begin with. Or someone notice it and is why they have to change it. You know, it does become the difficult part of, okay, we're sending it to a known bad. And at least you'll get a bounce. So or even if it's a phone number or whatever, and you're verifying it, it's one of those where the email is probably the tougher one, because that's what the notification will probably go to. So but yeah, I think that the prior is difficult. You get it all the way down to the address where they're no longer there or whatever. But Zak, please go ahead.

ZAK MUSCOVITCH: Thanks, Roger. So I reached the confusion part of the discussion, which seems pretty normal par for the course. But so I don't understand why changes of registrant wouldn't necessarily equal a transfer to another registrant. And what I mean by that is that if my domain name was changed from Zak Muscovitch as registrant to Roger and my email address was changed from Zak to Roger@GoDaddy email address, and I was notified of that, and as far as I was concerned, that was totally unauthorized or there's some major problem with this, then I'm effectively—there's no title database other than the registrant data. It's as good as we have with the DNS. And so essentially, there's been a transfer at that point. And the control of the domain name will change the new registrant, new Roger. And so what I'm hearing is that in such a case, my only recourse is to call the 1-800 number when it seems to me that it would be much better, wouldn't it, if I could object to it and stop the transfer upon being notified. Thanks.

ROGER CARNEY: Great. Thanks, Zak. Sarah, please go ahead.

SARAH WYLD: Yeah, thank you. This is Sarah. So okay, calling it a transfer or not calling it a transfer is whatever. I'm not wildly concerned with that. As Catherine said, it's just words. But I don't think it's wrong to say that if there's a problem with your service, then you contact your service provider. Like if my phone bill is wrong, then I will call the phone company and I will assume that they know how much I should be paying them. And I will assume that they should know what name should be on my account. If I call my domain name

registrar, I would assume that they would know what registration data was on the domain name two days ago, if it's different than it was today. And I think there are requirements for what data the registrar maintains. Right. But none of this is about transfers. These are all conversations about registration data, about how long data is maintained for, about what happens if there's a problem with data. That doesn't feel like a transfer issue to me. And again, if we decide that we're covering this issue in this group, then that's fine and I will go with it. But it does seem—I think Zak is suggesting that we can't trust the registrar who you bought the domain name from to know who they sold the domain to. And I don't understand why. Thank you.

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

THEO GEURTS: Thanks. So now what Zak is suggesting, and it is not unreasonable because we've gone through this process before many, many years ago, and that's how we came up with this entire change of control, change of registrant. It must prevent domain name theft. But what we have learned now is that this mechanism doesn't actually prevent it. What it does, it puts a burden on the registrants, as we have seen earlier on in the discussion with ICANN compliance, getting all kinds of notifications, pleas for help from registrants who suddenly get completely stuck. And this was not only for the registrants, but back in the day when this policy was introduced, I can clearly recall the cries from the domain name investors who were definitely not pleased with this. So

basically, because they had major problems selling a domain name because changing a registrant within a legit deal, that became very problematic there. I mean, all these aftermarket platforms had to be very creative to be able to accommodate something simple as a domain name, a transfer of ownership. That was the reality here. And now we're back to the original question is, if a policy that isn't achieving its goal, but places an unnecessary burden on this, on the registrant, then we must do something about it. And that's why we are revisiting this, because we have come to learn that it doesn't actually add so much security on it. And to the point, when it comes to notifications not being sufficient, I'm not sure if that's the case. Because if you look at some ccTLD registries, who notify registrants when there is a change, we as registrars, I mean, those messages state clearly to which registrar you must go to. And we get sometimes these notifications, emails from registrants, like, "Hey, why has this and this been changed? I have given no authorization for that." You know, we immediately freeze the domain name, make sure it cannot be updated, cannot be transferred. And then we're going to sort out what has happened. And then we're going to compare the previous owner data with the new owner data. And then we're going to reach out to the new owner, like, "Do you have any piece of evidence for this change?" And if there is no evidence, it goes back to the old situation. I mean, we've been doing that for decades. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Yeah. And again, we do have a slide that talks about what needs to be in the notification and stuff. So we

will get to a more in-depth discussion on that. But Zak, please go ahead.

ZAK MUSCOVITCH: Hey, Roger, it sounds like you want to move ahead with the presentation. I understand that. So I'm prepared to defer my rebuttal to another date and time. Okay?

ROGER CARNEY: Great. Thanks, Zak. Right. Okay. Christian, please go ahead and take us to the next one.

CHRISTIAN WHEELER: Thanks, Roger. Okay. So as part of the COR process, so in addition to notifying the new registrant and getting their confirmation, they also need to inform the prior registrant that if it's their goal to transfer to another registrar, they should consider doing that transfer before changing their information to avoid triggering that 60-day lock. So if the group's talking about getting rid of this lock, then this sounds like we don't need this step. So I think we can move on from here, that this step wouldn't be necessary.

ROGER CARNEY: Great. Thanks, Christian. Yeah. I think that, again, I think one of the issues we're having today is this group is so efficient. We're talking about the things that we wanted to talk about. We're just talking about them in advance. And again, it's the intertwining of

everything that this deals with. So I think we're talking about things that we're going to talk about four steps later, but it's great that we're getting into them. So I don't want to say I'm trying to cut everybody off or not, but I think this group is just so well-versed that they see the issues before we even get to them. So that's great. But yeah, I think that we've talked about this and we can move on from this one. So go ahead, Christian.

CHRISTIAN WHEELER: Yeah, absolutely. And I think it is good to go into the weeds a little bit about what this actually means on the ground to the actual policy, too. So the group has already made a lot of great progress so far. So thank you all for that. Number four is the confirmation from the prior registrant, the one who's requesting it, or their designated agent. And this also requires certain notifications that they have consented to the change. And it's essentially similar as the previous confirmation to the new registrant, which the group discussed getting rid of the confirmation and replacing it with a notification. So that essentially be a notification to the prior registrant, possibly the new registrant, just letting them know that there's been a change. And I also did just want to point out to the footnote here that is in the policy that basically says that the registrar may use any additional contact information on file in order to get confirmation. So it's not limited to that public WHOIS. So that was mentioned in the chat, I believe, of if the prior email is invalid, they don't have access to that, then they're not required to go through that. But that also kind of leans into the WHOIS accuracy policy that the registrar has to do regardless of whether or not there's a transfer. And the group has already kind of

discussed some of the about possibly needing more security measures if there is an unauthorized COR when it's not related to a registrar transfer. So that's still kind of an open question, but there's already been sort of discussion on that.

ROGER CARNEY:

Great. Thanks, Christian. Yeah. And this is, as Christian mentioned, the same issue just on the prior versus the new. So and again, I'm not saying that we've made these decisions. This is just where our discussion has gone. So this is why we're basing it. And I think that the good part of this group is we're able to take those in and have a good discussion around them. So I think, again, this is where the group has been leaning towards. So we'll take that path and see if we need to change or not. But I think we can move on from this as well, Christian.

ZAK MUSCOVITCH:

So then in the current policy, once it obtains those confirmations and needs to process the change of registrant within one day. Previously last year, the group talked about updating this just to kind of clarify putting it to two calendar days and putting in hours. So the group had discussed updating this language to something like that the registrar must process the change of registrant without undue delay, no longer than one calendar day, 24 hours of providing notification. And then in brackets here, we have to both parties because it hadn't been determined yet whether or not that notification would be sent to just the prior registrant or to the new registrant as well, or whatever the new email address or phone number is.

ROGER CARNEY: Great, thanks, Christian. Yeah, and I think throughout our policy discussions from group 1A on, we've made this tried to be clear as to what a day was and specifically calling out hours if we can. So I think this is useful in this scenario. So Theo, please go ahead.

THEO GEURTS: Can we go back one slide? I can't recall any of this and I've done a ton of these meetings, but I'm not sure how we came up with this language, but I'm pretty sure I wasn't present at that discussion and because I would never gone through this.

ROGER CARNEY: This is the current process, Theo. We're going through what the current process is. And the red line is what we were agreeing to.

THEO GEURTS: Okay, I guess I'm having the same issues as [inaudible]. Thanks.

ROGER CARNEY: Great, thanks, Theo. Yeah. Okay, go ahead, Christian.

CHRISTIAN WHEELER: Thank you. I think this is probably the last step of the process short of the actually imposing the lock. But this is about the notification upon completion. So in the current policy, as it currently is the change of registrant, the registrar after it's

completed needs to notify both the prior registrant and the new registrant with it before or within one day of the completion. And this notification has to basically explain the request that was received and provide the domain names that it's referring to. It has to include contact information for questions, which is what I think the group is kind of talking about. So I'm assuming that contact information is the registrar's contact information or possibly the resellers if the registrant has questions. And it has to advise them of the 60-day inter-registrar transfer lock or let them know if they had opted out. So since the group is talking about removing the lock, this last piece right here sounds like it's not necessary, but maybe there is still something there about what other information needs to be in that notification. And whether or not that extends to both the notification that's upon the change of registrant request is the same as the one that's upon completion. Just providing the registrar's contact information if they have questions or need help with the registration. If they want to say that this is unauthorized, that's still kind of up in the air. And did also want to just flag as well that the registrar, if you look at this little footnote, the registrar is still required to verify changes of phone number and email per the WHOIS Accuracy Program specification. Now that is just to make sure that the email and phone number are valid, that they work. So that verification request is going to be happening regardless of what the group decides to do here upon sending another request. So that is as it stands right now. So this is the current policy. All right.

ROGER CARNEY: Thanks, Christian. So yeah, and I think one of the issues here to kind of pull out is these two notifications, is it what the group's looking for as a at request and at completion? Is that still a valid notification process or should there just be one notification where a request is probably followed directly by the completion? So I think that some discussion around that or thoughts around that would be great. You know, a lot of these would be sent probably within hours of each other if it's moved that fast. So any thoughts, any comments on this? Okay. The current policy is calling for both a request when the change of registrant is being requested and then when it's actually completed in the system. So think about that and think about especially—call out Theo there for the operational aspects of that and does that make sense to do and things like that. So give it some thought. Otherwise, Christian, go ahead and take us into the next one.

CHRISTIAN WHEELER: Okay. And the last step would be imposing that lock. So the group had discussed removing that 60-day lock since the phase 1A recommendations has that mandatory 30-day post transfer lock, as well as the increased TAC security, that it's only provided upon request and there's some time there to provide it. So I guess this piece would be removed, unless the group decides that there needs to be another security measure in place to replace that lock. So one thing that was mentioned, for instance, was there is that five-day window when a TAC is requested. Could that be leveraged for some additional due diligence by the registrar if the registrar sees that there was an update to the control or to that contactability or that information? Does there need to be an extra

step maybe? Or is there anything that needs to happen more if the lock is removed? Or is it just that the lock is removed? So that's where it kind of landed.

ROGER CARNEY:

Great. Thanks, Christian. Okay. So we only have a couple minutes left. So it's great that we got through these steps, the process from initiation to the final completion here. I think that everybody kind of knew a lot of these steps. Maybe they weren't as detailed as they are here. But I think it's great that we went through them and we see what is being proposed to be changed going from confirmation to notification, removing certain locks here and there. I think that it's important for everyone to take a look at these holistically, look at all seven of these steps and see how it's changing the current process through these red lines on here. And I think it's good homework for everyone to take a look at and think about those things. And do they make sense? Do they still work appropriately if these red lines are done? Is there something that's missing? Is Zak's intervention, is there something else that needs to be in the notification? Should there be something in addition to what we're recommending here in red? So I think that for the group for the next week, take a look at these. Again, we've walked through the steps of this process. We've identified where the group has landed on a lot of them. And take a look at how that process looks now. And does it still hold as being a good solution? So, okay. We are out of time. So I think that we'll take back up next week on that. And again, give it some thought and let's see where we go with it. Thanks everyone. And a great conversation today. Thanks.

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