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## ICANN Transcription

### Transfer Policy Review PDP WG

**Tuesday, 05 December 2023 at 16:00 UTC**

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JULIE BISLAND:

Good morning, good afternoon, and good evening. Welcome to the Transfer Policy Review PDP Working Group call taking place on Tuesday, the 5<sup>th</sup> of December 2023.

For today's call, we have apologies from us Osvaldo Novoa, Catherine Merdinger (RrSG). And she has formally assigned Rich Brown (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 e-mails.

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. Seeing none, 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

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before speaking for the transcription. And as a reminder, those who 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:

Great. Thanks, Julie. Welcome, everyone. Not a whole lot to talk about before we jump into our agenda, but just a reminder that we have just two more meetings after today for the year, and then we'll take a couple of weeks break for the holidays. And then we'll get started back up in January after the holiday. Other than that, I think the only other thing I'll do is open the floor, an opportunity for stakeholder groups if they have anything they want to bring forward, if they've been having discussions that they want the group to know about. Please come forward and we can get them to talk about. Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Roger. So just to update the working group briefly, Arinola and I updated the Business Constituency the other day on where things are at with our deliberations of change of registrant lock. I did point out to them that there wasn't a decision point upon us at this point. But I did give them some indications of the nature of the discussions that this working group had undertaken to date. And I did receive some feedback from the BC on what the BC would be prepared to accept in terms of changes to the Transfer Policy in terms of the registrant lock. So I'd be happy to share that in the course of the discussion. Or I'm happy to do it now, but just with the caveat that this isn't the BC's position because there's no

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decision to be made as of yet. But I did receive some general feedback. Thank you.

ROGER CARNEY: If you'd like to give it now, that'd be great, Zak, if you could just run through that for us now.

ZAK MUSCOVITCH: Sure. I'm happy to. So I'm going to just put into the chat what the BC's formal position has been to date. And this was a position that was developed towards the beginning of the Transfer Policy Working Group, and it hasn't been revisited since. It's not long so I'll just read it out into the record.

“Regarding change of registrant lock, the default rule should be a transfer lock following the change of registrant, wherever a registrar should be required in a transparent manner, to enable a registrant upon request to opt out of the transfer lock or to reduce the transfer lock, rather than leave it up to each registrar to decide whether they will generally permit opt-outs. Nevertheless, each registrar should retain discretion as to whether to permit a transfer even if the registrant has ostensibly opted out for security reasons. A transfer lock should not prevent registrants and businesses from affecting bona fide transfers when necessary or desirable. There should be a fact-based rationale for the determination of the length of the default transfer lock, whether it is 60 or 30 days, for example.”

So that's been the BC's position to date. But when Arinola and I updated the BC, what I explained to them is that there had been

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some preliminary discussions on removing transfer locks entirely as one of the options under discussion. And part of that suggestion could be that there was only notification to the losing registrant rather than an ability to stop the transfer. And some of the preliminary feedback I received from the BC on that question was that the BC would be prepared to accept the removal of change of registrant locks altogether. But as a quid pro quo of that the BC would want to see that there was more than a mere notification and an ability of the registrant to stop the impending transfer.

So, as I said, this is preliminary. No decision or formal policy change has been made. But just to give you a sense of what the BC is thinking at this early stage. Thank you.

ROGER CARNEY: Great. Thanks, Zak. Thanks to you and Arinola for bringing it up to the BC and getting that discussion going. It's great to have those discussions as we're having our discussions. It will help feed us and move us forward a lot quicker that way. So great. Thanks. Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. Can you hear me?

ROGER CARNEY: I can. Thanks.

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OWEN SMIGELSKI: Thanks. I'm using my backup headset today because my regular AirPods decided to stop working on me. So I just had a quick question to Zak, you mentioned a quid pro quo at the end there. I was just wondering if you could just kind of clarify that, explain it. So they'd be okay with removing the lock if the registrant could get out of such a change of registrant? I just want to clarify what that statement was. Thanks.

ZAK MUSCOVITCH: By way of background and explaining this, the BC, of course, I emphasized that we'd already agreed as far as the working group's concern on the 30-day change of registrar lock. And that provided significant amount of protection for registrants in terms of preventing more than one hop in terms of somehow getting back that domain name. And so, in that context, it was somewhat persuasive to some in the Business Constituency, I think, that removing the change of registrant lock could be acceptable, given that additional protection was in place. Nevertheless, if that were to be the case, from a registrant's perspective, some believe that it would only be fair if there's going to be no change of registrant lock to enable a registrant to have more than a mere notification with uncertain recourse after receiving the notification, but to actually stop the transfer between registrants. Thanks.

OWEN SMIGELSKI: Okay. Great. Thanks, Zak, for that explanation so I understand that better. Great. Sounds good. I mean, it sounds good, I understand, not 100% that I agree. I just want to make that clear. Thanks.

ZAK MUSCOVITCH: Fair enough, Owen. Thank you.

ROGER CARNEY: Thanks, Owen. Thanks, Zak, for that. Again, I think we touched on a little bit that last week in our discussion as well. Rich, please go ahead.

RICHARD BROWN: Hi. I just wanted to further clarify something with Zak. You mentioned that your group is talking about the notice to undo a transfer. During a COR, transfer has been taking place, that notice is just letting them know a registrant change has happened. If a transfer is happening, they're already getting notified via the FOA during the five-day period. I just want to clarify if there's an understanding that those were two separate things, or whether maybe they're getting confused together. That's all. Thank you.

ZAK MUSCOVITCH: Thank you, Rich. My understanding was that the preliminary discussion this working group was having was that one of the possibilities under consideration was that upon a change of registrant being initiated, the registrant would be notified right away that the change of registrant had been initiated. But at that point, it would be too late to stop it in any event. So if the registrant got the notification, that'd be like essentially a fait accompli in most cases, and then the registrant would be left to deal with the registrar to try to reverse it. So, from the BC's

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perspective at this preliminary stage, they wanted something more than a mere notification of that effective fait accompli and rather inability to stop that transfer. Is that consistent with your understanding as well, Richard?

RICHARD BROWN: Yes and no. Regardless ... let me put this together in my head a moment here. Sorry. I think there's a little bit of debate here on whether or not—so the change of registrant, there's a notification that sent. There's also verification of the new details that are happening on the RDDS side. So that's another process already happening. So they're probably getting another notification of the change from that as well confirm it. Then, after such a change during the COR, as it stands right now, there is a lock but we're discussing removing it. Then a request for the Auth-Code needs to be made, at which point, those verifications kick in and the five-day FOA to reverse the transfer, which is already in place and already part of the process. I'm just wondering if a further lock is necessary, or whether we can continue with just removing the lock from the change of registrant. But anyway, that's what I'm thinking. I really don't have an opinion yet either way. I'm just listening to things. Thank you.

ROGER CARNEY: Thanks, Rich. Thanks, Zak, on that. Theo, please go ahead.

THEO GEURTS: Thanks. I would like to remind everybody what we put in place in the first phase with the TAC and that we changed the system

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differently. So when you're discussing the current change of registrant process, you got to take in mind, "What do we replace it with?" and compare those two and not go back to the old transfer system because that is going to make your discussion more complex. We're moving forward on this. Thanks.

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

ZAK MUSCOVITCH: Thank you, Theo. So just to add a little bit more background and context to the discussion with the BC is that I believe that it was noted that there's going to be what's perceived as additional security provided by the new TAC process. So essentially, the argument goes that, well, listen, if your e-mail or your registrar account was penetrated, that's a whole other story. So we kind of presume that in order to have obtained the TAC that it's rightfully obtained, and that, by extension, the argument would go. So that's yet another reason for removing the inability of the registrant to stop the transfer at that point because the registrant is presumed to have already authorized that change by obtaining the TAC. So I understand that argument. I believe I conveyed that to the BC.

I think that the counter argument goes that, yes, that's all true. But when it comes to something more than a notification and ability to stop it, it is belt and suspenders. But that is an appropriate precaution for moving something as important as a name. Secondly, that the process of providing an ability to stop the transfer isn't so much more onerous than providing a notification.



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So for that incremental additional effort, if it is, it provides significantly more comfort for the registrant in having that ability to stop it if something had somehow gone wrong with the TAC. Thank you.

ROGER CARNEY:

Thanks, Zak. Again, I think that we were talking about a fairly good use case here that does happen, and we're talking about a change of registrant, followed by an actual transfer from one registrar to another. Again, we had the discussions back in Group 1A that there is that five-day window that the registrars have to provide the Auth-Code or to deny the transfer for whatever reasons, that the registrars need to do their due diligence. To me, during that five days, that was a look back and, okay, what was the registrant prior to this? Did someone make a big change? Or did they just make an acceptable, "Hey, my e-mail wasn't working. Now I have new one and that's been confirmed and verified." As people have mentioned, that has to occur anyway. So yeah, I think we're talking about one scenario where change of registrant leads to a transfer in those. That path does seem to be very secure. Again, registrars still had to do that due diligence up front before providing that TAC. Just my thoughts on that. Thanks.

Okay. Any other conversation on that? Or any other groups that have been having discussions they want to bring forward? Okay, great. And again, thanks, Zak. And thanks to Steinar for bringing up his discussions last week. I appreciate that ongoing discussions while we're having discussion. It just makes it much easier for this working group to get things done if we know where everyone stands as we're discussing them. And it makes a lot

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easier than bringing them up four months, five months from now when we have already made decisions, and then we have to relook at them. So I do really appreciate that.

Okay. I think we can go ahead and jump into our agenda. I'm going to turn this over to Holida, I think, so she can run us through some updates. Holida?

HOLIDA YANIK: Hello. Can you hear me?

ROGER CARNEY: I can hear you. Thanks, Holida.

HOLIDA YANIK: Okay. Thank you, Roger. Hi, everyone. Let me share my screen. Okay. Roger, can you confirm if you're seeing the metrics on the screen?

ROGER CARNEY: It small but it looks good.

HOLIDA YANIK: Okay. I'll try to enlarge it a little bit. Actually, we already shared this file with the group. We e-mailed it previously. So if you have any questions, if it's not visible, you can refer to the Excel file that was already shared, because I will be providing a very high-level information in here.

So this is the updated metrics relating to transfer complaints received by Compliance during the period covering from June 2018 to 31 October 2023. Previously, we shared compliance metrics with you back in June 2021 and covered the period from 2018 to 2021. Since that was two years ago, we ran this report again and provided with more updated data, including data for two more additional years, that may be able to give you better visibility to the transfer-related trends, to the trends relating to complaints received by Compliance during this period.

So the upper section, so this part of the table, shows the total monthly numbers of all transfer-related complaints received from 1 June 2018 to October 2023. Then I'm scrolling back to the end. There is a whole lot of data. And the total number of complaints received is 22,470. And the average number of complaints received per month is 346. So a disclaimer, number of complaints that we received from October, November 2020 through June, July 2021 was highly impacted by a large number of complaints received as a result from the situation that was caused by the failing registrar. So these parts.

Complaint categories and the naming services portal. As a reminder, this is the platform Compliance is using to receive and process complaints. So complaint categories are selected by reporters when submitting complaints to ICANN Compliance. So this means that the data that you are seeing is reflecting what the reporters selected while they filed complaint with us. The sets of data are the same as was presented before and include statistics for complaints where reporters are complaining about

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unauthorized transfers, inability to transfer the domain names to a different registrar, and inability to perform change of registrant.

Since the working group is currently reviewing change of registrant processes and requirements, I'd like to move directly to the set of data under 2.a.v here and 2.a.vi. This data here is displaying complaints received involving failed and/or denied change of registrant requests or to clarify change of registrant complaints received under the complaint types, registration data inaccuracy, generic registrar, and domain suspension mean that these are complaints involving COR that were misfiled as a registration data inaccuracy, generic registrar, and domain suspension complaints.

So, for example, in registration data inaccuracy cases, reporters usually believe that the registration data for the domain name is inaccurate and then they want to change it or were unable to update or change the incorrect registration data. And similar classification may apply to places as domain suspension complaints. So, these are the cases where the registrars may have suspended the domain name due to inaccurate registration data or failure of the registrant to verify the data. And the reporter is once again to update or correct the registration data and get the domain name suspended.

So, complaints about COR denial due to UDRP, URS, or TDRP proceeding that is displayed in here are the complaints filed usually by the domain name holders that claim that the registrar did not allow them to perform change of registrant because there is an ongoing UDRP, URS, or TDRP proceeding. The red note in here, no other complaint types of cases in this complaint category

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mean that there were no COR complaints filed under different complaint types other than those that are presented on this table.

With regard to complaints received involving inability to transfer the domain names due to a 60-day COR lock, as I shared during last week's call, the average monthly number of complaints in here is less complaints per month. So I will scroll. So this is the average. This number may not be presented in the Excel file that was shared with you. However, if you are interested, you can copy and paste this average formula in the desired field and you can see the average numbers.

Since the group is also deliberating on canceling the COR lock and relaxing the COR process requirements, I want to draw the group's attention to the data relating to unauthorized COR complaints. So the average monthly number of complaints that the Compliance department receives on a monthly basis is approximately 8 complaints per month. So just something to think about, we are receiving 12 complaints about the COR lock and 8 complaints about the unauthorized CORs that were performed without the registrant's authorization.

The main issues the reporters are identifying in their complaints in unauthorized COR-related complaints are involving hijacking of domain names or hijacking of e-mail accounts, control panels. Sometimes this also may involve private dispute issues. These are the complaints about the third parties who allegedly own the domain name and are not transferring the domain name to the complainant.

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I guess this is it about the updated data. Just a small reminder, all Compliance metrics including the data on transfer-related complaints volumes and types are available under ICANN Contractual Compliance Performance Report section on our ICANN Org website. I will be sharing the relevant URL in our chat box shortly. I guess this is all that I wanted to share. And if you have any questions, I will be happy to take them. Thank you.

ROGER CARNEY: Great. Thanks, Holida. Owen, please go ahead.

OWEN SMIGELSKI: What a surprise that I'm jumping in on the Compliance metrics section. Holida, thank you for this. I appreciate the information. I have two questions here. One, I think I know the answer. The other one, I don't. So first question, there's a section in all this data where a line is labeled a Kayako and one that's labeled NSP. I think I know why. But if you could just kind of give an explanation so that those people who did not formally work in Compliance could have a better understanding of what that differentiation is.

Then the second one is it appears from this data that there have been no other unauthorized transfers or domain hijack complaints recently. Can you confirm that? Thank you.

HOLIDA YANIK: Okay, regarding your first question. Compliance has been using a system called Kayako for receiving the tickets, so the complaints, and then it retired in August 2020. In August 2020, Compliance

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transitioned to a portal, a new platform called Naming Services Portal. So the data presented in here in separate groups as Kayako and NSP reflect the data that has been retrieved from the relevant systems. But as you can see, the Kayako did not provide us the opportunity to review the data in details. We don't have complaint categories as detailed as in Naming Services Portal. And then the reporters did not have opportunity to choose the complaint categories by themselves that would most suit the type of the complaint, that type of a claim. So all the information that happened after August 2020, it reflected under NSP source, so Naming Services Portal group. And then anything before August 2020 is the data retrieved from Kayako. So the Kayako is already retired. And unfortunately, we will not be able to retrieve any other data if, for example, the group will ask anything relating to 2017. Or prior to that, we won't be able to retrieve that.

Regarding the second question, we have in here, actually, the data relating to unauthorized transfers, covering the period up to October 2023. Let me see. For example, this is unauthorized Inter-Register Transfer complaints, and I still we are receiving them and reflecting in our metrics. Owen, when did you mean this data or anything else?

OWEN SMIGELSKI:

No, that was it. I'm sorry. It's kind of small on my screen so I wasn't able to see. But then I also do see that there are transfers, unauthorized COR. You're grouping them all together even though they might be from separate complaint types. But thank you. I'm all set.

HOLIDA YANIK: Yes, exactly. I'm sorry. There is too much information and very long table and I was playing around and you might have missed it on the screen.

ROGER CARNEY: Thanks, Owen. Thanks, Holida. Rick, please go ahead.

RICK WILHELM: Thanks, Roger. Rick Wilhelm, Registries. Maybe I missed this. Why does the data stop in 2021?

HOLIDA YANIK: You mean the previous report that we provided?

RICK WILHELM: Okay. So I popped up an e-mail that got sent on Wednesday, the 15<sup>th</sup>. Okay, so maybe that's different. Okay. I'm looking at a different file.

HOLIDA YANIK: Oh, yes. I'll explain it to you, Rick.

RICK WILHELM: Okay. No, no, that's all right. You don't need to. I'm looking at a different file. I'm looking at the one that I had on my screen. So when did this get file get sent out? When did this file get sent out?

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ROGER CARNEY: Christian sent this out last Thursday.

RICK WILHELM: Last Thursday. There it is. Okay. I will look at that. I will look at that file then. Thank you.

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

JOTHAN FRAKES: Thank you. I saw Sarah had her hand up first. Go ahead, Sarah.

ROGER CARNEY: Sarah, please go ahead.

SARAH WYLD: Thank you, Jothan. My hand went up and down because I was indecisive. So that's very kind of you. Hi. Holida, thank you so much for providing all of this data. It's a lot of data. What I'd really like to understand here is how many complaints there were about unauthorized transfers. Number one, inter-registrar transfers. Number two, ownership updates. How many complaints were there? Ideally, total complaints, and then ones that were actually valid that were sent over to the registrar to address. And I'd like that to be in a context. But I'm not sure what's the most useful context. Is it the total number of complaints that come in? Is it the

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total number of transfer complaints? Is it the total number of transfers? I think what I'd like some help with is thinking about what is the most useful context for us to interpret that data. But then also maybe somebody else could gather up those totals because I'm not the best with numbers. Thank you.

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

THEO GEURTS: Thanks. I was sort of going along with Sarah here until she mentioned context and that sort of triggered me like, "What is context? And what is a complaint?" When we are dealing with complaints about non-transfers or illegal transfers, 99% of the time, even if not more, it's a reseller who didn't inform the customer or the registrant didn't understand that he was still with the same reseller but they changed registrars. So I think it's going to be very hard to get that context. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Obviously, there's always the caveat of when you try to do these numbers, those scenarios like that don't get caught or get placed in a bucket you weren't expecting.

HOLIDA YANIK: Roger, may I?

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ROGER CARNEY: Please go ahead, Holida.

HOLIDA YANIK: Okay. I didn't know. I'm sorry, I'm sharing the screen, and I didn't know where to raise my hand. Sorry.

Your comments are noted. This data is only showing the complaints that we received and nothing relating to how many complaints, or how many of these complaints are valid, or how many have been already addressed with registrar. This data was produced according to the requirements in the charter. However, if you need context, can you please specify? I will be glad to take your requests and work further with my team, and then to try to generate the data that would fit and respond to your needs more.

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

JOTHAN FRAKES: Hi. Thank you. Holida, this is a lot of work it looks like went into this with you and your team, so thank you. I can't imagine it was a simple process. So it's certainly appreciated.

I want to kind of build on maybe what Theo was saying and what you were saying or asking for. I have a theory and I think it ties to some of the areas that complaints may originate with respect to change of registrant, is that there is some interplay where you might be seeing complaints about EDDP or ERRP, and I don't see that necessarily reflected here. My theory is or my suspicion is

that there may be some missing data that might overlap between EDDP or ERRP complaints that may have been received and the change of registrant aspect of how change of registrant works. So I wonder if there could be additional data that could be sourced that might look at those or complaints in those buckets, and see if there's something related to change of registrant. And it would probably be something that was in the other category on those reports.

That typically stems from how registrars may have differences in the manner in which they expire or otherwise dispose of domain names as they're going through a deletion process. There can often be a registrant who fails to pay their bill, the domain name goes through some sort of expiry restoration or process whereby the registrar tries to recoup their lost money or things of that nature and how expiries are processed. And so I suspect there may be some missing numbers here just related to that. And that might touch on what Theo was suggesting. I see a comment there in the chat about that. But I think that there's a lot of work that goes here. So I'm not trying to necessarily point out any gaps here. But I do think that there may be some data in those two areas that might help inform the change of registrant work that we're doing. Thank you very much.

ROGER CARNEY:

Thanks, Jothan. Again, I think you were adding on to how Theo started that. Obviously, as Holida mentioned, these are just the raw numbers coming in. And obviously, those can be affected somehow by exactly what you're saying, Jothan, for different policy or whatever reason. I think that's kind of what Sarah was

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trying to drive at in our chat as well. There's reasons here. Can we get to really what the true transfer or change a registrant, either one of them, complaints are and try to remove that noise level of either invalid complaints or reasons other than true transfer, change registrant complaints.

I'm glad Sarah volunteered. I saw her volunteer in chat. So I'm going to hold her to that, to start that discussion about how we can kind of refine these numbers to get down to something that's more truly useful for the decision-making on change of registrant. So great. Thanks, Sarah. Holida, please go ahead.

HOLIDA YANIK:

Regarding the metrics, including complaints involving non-compliance or anything relating to EDDP and ERRP, we have a separate type of complaint called renewals/redemptions, so where the complainants send/file a report with us on the specific category. Am I understanding correctly, you also need statistics on renewal complaints and anything relating to ERRP and EDDP?

ROGER CARNEY:

Thanks, Holida. Jothan, please go ahead.

JOTHAN FRAKES:

Thank you. Holida, I think it might be subgroups of that, and I don't know if that's something that's tracked versus having the whole aggregate number for renewal complaints. If you drew two circles and did a Venn diagram overlap, which would be the renewal complaints or the EDDP or ERRP complaints that were maybe

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misunderstandings about—that they didn't pay the bill or how the registrar/reseller provided their deletion or expiry process. I wonder if that's a gap in how that might be documented or how that might be reflected here. But I do see that there is row 20 there that you're highlighting, it perhaps might be that I am pole vaulting over a grain of rice with respect to statistical impact here. I just wonder if there are some numbers that might be being missed about that whereby there were some complaints that might fall in another category in those different areas, ERRP, EDDP that if one were to have pulled the registrant at the time, did you pay the bill, did the registrar dispose of your name, that it would probably fall into something in the COR work that we're doing? Thank you.

HOLIDA YANIK:

Thank you. As long as the reporter select the relevant category like when they are filing complaints, for example, in here I highlighted the unauthorized transfer complaints that were misfiled under domain renewal/redemptions. So, for example, these are complaints where registrants lost the domain name due to failure to renewal and they did not know about it. And then they noticed it afterwards and they [inaudible] unauthorized transfer. If we have the reporters providing that type of information while they are filing complaints, we have that information reflected in our metrics as well. So this is the unauthorized inter-registrar transfer complaints involving renewals.

And, for example, we had also in here inter-registrar transfer complaints involving renewals. So these are the types of complaints where the reporters are complaining that registrar did not allow to transfer the domain name because it expired. So I will

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just take it back to my team again and see what we can do if we can pull more data on that one.

ROGER CARNEY:

Thanks, Holida. Again, Sarah will be sending a note shortly. So I encourage everyone on the list to take a look at her note and see if there's anything that you want added to that or if it makes sense to you and add your viewpoints there so that Holida can take that back and take a look at it and examine it. Great. Okay. Well, thanks, Holida. Again, great to get the updated numbers so that we can take a look at them and see how they're impacting them. Thanks for Rick for breaking out the years there as well. Theo, please go ahead.

THEO GEURTS:

Yeah, and maybe this is completely impossible to do, but I'm reading Jothan's comment there that the numbers feel low. I sort of agree with him and sort of wondering, is it maybe a couple of registrars generating some statistics here or is just all over the place? That would be maybe handy to know also. I mean, for all we know, it could be just two, four registrars mucking it all up for whatever reasons because maybe they implemented it really bad back then and never improved at processes. But that would be good to know also. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Yeah, great. Another good way to look at it, the data itself. Okay. All right. Again, thanks to Holida and Compliance for putting that together.

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Okay. I think we can jump into our next agenda item then. Christian is going to take us through this first couple of slides here. So I'll turn this over to Christian.

CHRISTIAN WHEELER: Thank you, Roger, and thank you, Holida. So we're going to move on now to our agenda. We're going to move on to the next part, which is just a quick recap of the process. The group, we went over last time redlined version of that, just kind of an overview. So we've kind of reduced it to essentially four steps so far. Again, this isn't all solidified but just kind of laid it on here as kind of a recap.

So I just wanted to start with the first section, which is the eligibility for a change of registrant. So the first step is still to confirm that the change that's happening is going to be considered a change of registrant. Now, the group, because they were talking about removing the confirmation aspect of the change of registrant, whereby the prior registrant and the new registrant have to confirm and authorize the change before it's implemented. If that's being done away, then the requirement as part of the eligibility that they had properly authorized it would also possibly be done away. So rather than confirming that the registrar that it was authorized, it was more so that it's been properly requested by the prior registrant, and then also probably their designated agent. Another designated agent is something that the group is going to talk about upcoming, that along with privacy/proxy providers. So just kind of keep that in your head. Again, we don't need to go into wordsmithing right now. This is just kind of more conceptually. But I just wanted to highlight that that authorization aspect of the



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eligibility would be done away with, because that authorization is referring to those specific confirmation requests.

Then the next part I wanted to highlight was the group had previously, last year, talked about denying the COR request if there's evidence of fraud or a security threat. When we talked about it last week, there didn't seem to be a lot of support for that. That there is this requirement already as part of the registrar transfer requirements that were part of Phase 1, and people didn't really seem to think that this really belonged here as part of the change of registrant, that generally that the registrant should be able to change their information. And that it was put in place might entail some other kind of lock. So it didn't really seem like there was many people supporting that aspect of adding in this piece of eligibility. So I just kind of wanted to highlight that, see if the group still thought that that was the case. Again, it's not in the policy currently, it's just kind of a reflection of from the registrar transfers. But I just kind of wanted to highlight that as part of the eligibility before moving on to the rest of the process. So I'll just I'll pause right there, just to see if anybody has any thoughts or questions about that.

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

THEO GEURTS: Thanks. When it comes to confirming if a domain name is eligible, that is going to depend on a couple of statuses that are either present or not present, and then the registrar must deny COR

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request if COR was not requested by the prior registrant. I do not know that, I have no information if that is the case. I mean, I'm getting an API call through our system initiated by our reseller. I have no idea where it's coming from except it is coming from the reseller that has a contract with us and has an API implementation with us. If there is a compliance requirement there, I'm going to fail miserably because I don't know that. Thanks.

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

SARAH WYLD: Thank you. I have two comments. I noticed here that step three has a timeframe on it, as is step four, but steps one and two don't. So the registrar's process of confirming eligibility, I guess, can take as long as it needs to, which, as I'm saying that actually sounds entirely appropriate, it should take as long as it needs to. But yeah, so I'm not saying that this needs to change. I just find it interesting. It's a thing to think about.

And then the other thing is just a note. On step two, the notification to both prior and new registrant, some people might think that the bullet point under it is mistaken because the bullet point only refers to informing the new registrant. And I think that that is actually correct and it is that way because only the new registrant needs to be told that they need to enter into the agreement, whereas both registrants need to be told that the change has been requested. So it seems correct to me, but I just wanted to flag it in case it does seem confusing. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. I think as Sarah pointed out, three and four have timeframes on them. And to Sara's point, maybe it's good that's not in one. But I think it's valid to think about that, should there be certain timeframes around them or not, so it's worthwhile bringing it up. Thanks, Sarah. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you, Roger. So I have two questions. The first one is this document that we have in front of us that's tracking the changes from the existing policy, it's great and I appreciate that staff are helping us move the process forward. But I'm trying to understand. This doesn't seem to be based upon any specific proposals by working group members, more distillation of general discussions we have. Is that a fair characterization?

CHRISTIAN WHEELER: Yes, that is correct. And it is very much a kind of a high-level summary because everything that you kind of see in black is coming from the current Change of Registrant Policy, a kind of a summary of that, but it is not direct language. So these are, again, just kind of capturing the discussion so far. Once we really drilled down into them with more detail, we can go into wordsmithing and all that kind of stuff. But right now, it is just, like you said, a distillation of the discussion so far.

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ZAK MUSCOVITCH: Okay. Thank you. Understood. I do have some hesitation about it because I was kind of expecting formal proposals to be made that would be up for debate and discussion. I hope we will get to that point rather than find ourselves with this distillation as the only proposal that's up for discussion. There's many other ways of skinning this cat. On one hand, I appreciate that this seems to me to be a fairly accurate temperature taking of the group. And on the other hand, I don't want to get to the point of no return where there hasn't been a formal opportunity to make proposals that are much different than this, for example. I do have a second question, in case anyone wants to respond first to my comment.

ROGER CARNEY: Thanks, Zak. Yeah. And I'll respond to that. Definitely, I think this is just helping us feed our discussion. But we will get to that point where this discussion leads to draft recommendations. And at that point, to your point, we'll get to argue those as valid changes to the policy.

ZAK MUSCOVITCH: Understood. Thank you, Roger. Now I just have a question about the actual text here, if I may. Just to go through the process. So number two, a notification is sent to the prior registrant, the new registrant, informing them of the request of the change of registrant, got it. And number three, the procedure to actually change the registrant should take no longer than one calendar day of providing notification. So in theory, if not in practicality, immediately, or even contemporaneously with informing the parties of the change of registrant in number two, the process

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could be initiated and indeed completed under number three, at least to my understanding. And number four, so then there's a notification, the prior registrant and the new registrant before or within one calendar day of the completion. So before or within one calendar day of completion, once again, that language seems to open up the possibility of notifying of the completion virtually contemporaneously with the processing of the change of registrant and with the notification, the way it's worded now at least. Thank you.

ROGER CARNEY:

Thanks, Zak. If you look at that last star item on the bottom, it was kind of that discussion as well. Are there multiple notices needed? Or to your point, realistically, it could be everything done and notified, as you said, basically, instantly. And is that the appropriate way or should there be a delay between some of those steps or not? So I think that that's all still up for discussion and anyone that has thoughts on that should just bring it forward and say, "Okay, maybe we should pause this," or maybe they should allow it to happen, and then have a way to go back to however. So I think that's still open to be decided.

And again, it's one of those where when we look at this, we're saying the prior and new registrant. So we're probably starting to make distinctions on what elements are being changed. So if someone comes in and change their postal address, you're probably not going to send a notice to the prior and new. I don't know, maybe you will. And maybe the group wants to do that. I don't know. But I think we have to start looking at those items. What are we changing to flag these things? Is it a phone number

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gets changed? Or is it an e-mail or is it a name? We had to go through those steps to get there. But again, we're talking about a prior and new, and maybe it's the same. So if it's the same e-mail address, you're going to send two notices, one to the prior and one to the new. And it just seems odd that if you're not changing the e-mail address, and that's the mode of communication that you're sending two e-mails on confirmation. So just a thought. Again, just keep thinking about those things, because we'll have to tie those specific changes and what those will drive to. Theo, please go ahead.

THEO GEURTS:

Thanks. On that point, to expand a little bit more on it, it's going to depend on the business model, I suspect, if you want to send a confirmation of the request and the completion. Looking at from a wholesale registrar perspective, I think we will go for just completion. I mean, that makes a lot of sense for us. We want to make sure that the accuracy requirements of the GDPR, that there are no barriers there. So we want to make sure that we only send a completion request to the previous and new registrant because it's going to be happening in real-time anyway at us. But other business models could differ and could take longer. Thanks.

ROGER CARNEY:

Thanks, Theo. I think that that's the one thing Zak was mentioning. I'm guessing most registrars would process this fairly instantaneous. And to Theo's point, I'm guessing they're going to pick sending one, they'd rather, I should say. Obviously, this working group will dictate that, but we'd rather send one notice

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than multiples that are going to get ignored or whatever. So I think all that has to be taken into account. But I think Zak is right. When you look at this step—there's four steps. But really, it's probably, as Theo just mentioned, going to happen in one big transaction that occurs, so it's going to be done or not done. And so it's going to be the 24 hours, as Zak points out, is maybe a little move because it's going to happen and be done. So just things to think about. Zak, please go ahead.

ZAK MUSCOVITCH:

Thanks, Roger. For those in the working group that are interested in seeing no confirmation but notification, and I'm not one of those, but for those people that are, at least at this point, in favor of notifications instead of confirmations, I think that they would be well served to at least have meaningful notifications in the sense that there's some gap periods that enable a registrant to make a move. If there's three different notifications, even one notification, and it ends up just being a notification that it's all done, then it really takes away your argument that notification serve a meaningful purpose in providing a registrant an opportunity to do something. Thank you.

ROGER CARNEY:

Thanks, Zak. I agree. I think if you're sending a completion notice and that's it, then to your argument and your discussion with the BC, there should be some way for that prior registrant to recognize and do something about it, even after its completion and have a path to resolution there. Again, I think it gets back to specifically what data is getting changed. Again, if an e-mail or

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phone number is getting changed, then the registrar has the responsibility already to verify those two data points, one or the other, if it's being changed. So there is a process in there already built in to force that to happen, so that's good. But if it's something outside of that, the name or the postal address or whatever else there is, I can't think of anything else, but then that becomes a little more squishy in what's up and the working group needs to resolve. Theo, please go ahead.

THEO GEURTS:

Thanks. I understand Zak, and maybe there are a couple more people on the working group and definitely in the community, without a confirmation, that could sound scary. But the problem with confirmation is—and you put that on the registrar's task list to confirm those changes—you're going to have problems on the other side of things. I mean, this community has been yelling for years, "Accuracy, accuracy, accuracy." But if you put confirmations into the process, you're going to have very different databases because ICANN already imagined the scenario and it's actually already happening that certain resellers that the registrant changes the info at reseller, that change gets pushed through the API to us. Now, suddenly, the registrant has to sort of acknowledge that it's okay, and then the information doesn't get processed. So we already see large databases completely out of whack. So if we're talking about accurate data, you don't want to rely on confirmation processes happening on a very different level. Thanks.



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ROGER CARNEY:

Great. Thanks, Theo. When you look outside of our ecosystem we talked about, this occurs all the time in other systems not related to our business. So I think that we can borrow those concepts. And again, it's one of those where something on your Google account has changed, Google sends you a message, and you don't have to confirm it but they're letting you know that something changed. Again, a lot of banks do it the same way. They'll send a notice saying, "Hey, something's been updated," or shopping accounts, whatever, especially everybody is using them now for Christmas. When you change those things, you get a notice and the confirmation is on the user, the registrant in our case. But all of those notifications do have a mechanism for those users to respond if something's not correct. So I think that that's something to think about.

Okay. Any other comments on these? Christian, please go ahead.

CHRISTIAN WHEELER:

Thank you, Roger. Okay. I think that sets up pretty well the next step as far as security measures goes. If there was a change of registrant that was improper in the situation where someone, let's say, there was a change of registrant, either by someone e-mail was hacked or something that the registrant did not intend for, in those situations, what should happen? Staff is going to throw out some options there. Sorry about that. Start out some options to think about. These aren't limited to just these ones, of course. But I just want to throw some out there for thought.

The first option—they get more and more prescriptive. First option could be that the Transfer Policy doesn't require anything more

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than the provision of contact information in that notification, which is already a requirement as part of the policy, that they have to provide contact information. So that would allow the registrars or the resellers, whoever's handling it, to address those reports if they come in as they see fit, depending on the circumstance.

Another option would be that the Transfer Policy would require registrars or resellers maybe to address them or to respond to those reports of improper change of registrant. A third option could be that they have to have a dispute mechanism or process through which the registrants can challenge or correct an improper change of registrant. Or maybe there's something else there too. Again, these are just some options there that we can think about as far as what should be required as part of changing the Transfer Policy goes. Then there are some other scenarios in there too.

The first one's not really—if there was a improper change. It's more of just that there was a typo and they wanted to fix it, how could they... They got the notification and they said, "Hey, this has been changed," and they realize, "That's wrong." How can they go in and address that whether it's by mistake or if it's something abusive, like a hacked e-mail or something like that. I just wanted to throw those options out there since we are talking about what should those additional security measures be as part of that notification. Again, this is just for circumstances where there's an improper COR, not one that's associated with a registrar transfer. We'll get to that next. This is just in circumstances where there's been a change that the registrant did not intend to happen.

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

THEO GEURTS: Thanks. Those are pretty good examples there, especially the hacked e-mail address. But in terms of coming up the processes or procedures or solutions through a policy from ICANN, I think, already this is being addressed like the NIS2 and upcoming security laws that will spread globally in my opinion. I mean, you're talking about a hacked e-mail address and a customer notifies you, "Hey, my account was hacked through my e-mail address," or the account itself was hacked in a registrar level, you've got to have some processes in place to make sure that there is preventative action or investigative action on how did that account even get hacked, how did it happen. Is there a flaw in the login system? Is this not working? I mean, you got to be more vigilant when you get notifications. Whenever there is a mentioning, "This and this and this got hacked," you just can't ignore it as a registrar or reseller anymore. You got to really look into it like, "Okay, what did this incident entail? Can it be reproduced by others on our system or not? Was it an incident only, etc., etc.?" We already got a bylaw.

Option four, however, maybe I'm going a little bit too far with this so forgive me, we talked about as in the past. There's all these registry services, I don't believe every registry offers them, but there are certainly large amounts of registry lock as a commercial service an additional layer of protection. Obviously, realltimeregister.com, that's our bread-and-butter domain name. If that one goes down because it gets stolen or it gets updated incorrectly or gets deleted, we're going to have a major problem,

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so we take that service with Verisign. It cost \$10 a month or something. I'm not sure. But that's that additional layer of security that I find very handy, that if something is happening on our platform, it doesn't affect Verisign, and the domain name is still up and running. Maybe we want to throw that one in there for additional stuff. That could be a good situation there to solve those issues with the stolen domain names, etc. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Thanks for bringing that up. It's always good to recognize there are solutions out there and we don't have to duplicate them at all. If we can identify that they're available and reuse those ideas, that's great to bolster the security of any of this transfer stuff. It's something to keep in mind, and I appreciate you bringing that up. Jothan, please go ahead.

JOTHAN FRAKES:

Thank you very much. I am all about making sure that the actual registrant has as much agency as possible here, so that if something bad happened, whatever it might be, that they have some means to reclaim the name. We have to balance that against how our system actually works and certainty of other aspects of the domain lifecycle.

I think Theo covered a good scenario. We do want to make sure that there is some means. I call it an appeals process or something here, but I caution us, there's a challenge. Some sort of remedy for a change of registrant is much more available in a registrar where the domain has not left that registrar. So if it's just

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an account push or a change of registrant and everything remains in the same registrar, then that all works okay. But the moment that domain leaves and goes to another registrar and is at another registrar, then the means of remedy really, really are diminished at a given registrar to fix a problem process with something in some of the scenarios that Theo articulated and maybe some others where a change of registrant was in fact not actually desired by the registrant of record. Thank you.

ROGER CARNEY:

Thanks, Jothan. I think this really gets to the discussion we had last week in the discussion that Zak brought forward with the BC with a notification. Is there a path that can be taken for the registrant? And again, when you look outside of our business and look at other businesses, as I mentioned earlier, the banking system and all that, they usually provide—even if it's just, "If you didn't do this, call us or whatever," there's a way to get it rectified. Those changes happen somewhat instantaneous, but that notice always comes across as, "Hey, if this isn't you, then let's do something to fix it."

Okay. Any other comments on these options? Again, the working group will have to get to a spot where it's like, "Okay. We're not going to do anything or we're going to recommend option two or whatever, we implement, or a combination of them." So, just keep thinking about that. Sarah, go ahead.

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SARAH WYLD: Thank you. Hi. Sorry. Is there something comparable under the current Change of Registrant Policy or no?

ROGER CARNEY: That allows some kind of—I don't want to say dispute but I'm going to say dispute mechanism kind of thing. Is that what you're suggesting?

SARAH WYLD: Yes. Thank you. Comparable to what's on screen right now.

ROGER CARNEY: Maybe I'll let Christian answer that if he knows.

CHRISTIAN WHEELER: The current, it would be option one, essentially. Right now, the only requirement is that they provide contact information to the registrant when they send the notification.

ROGER CARNEY: Great. Okay. I think, Christian, you can take us on.

CHRISTIAN WHEELER: Cool. Thank you, Roger. This would be what should happen if it's followed by an inter-registrar transfer request. Again, we've just laid out some options for the group to think about. They're not exclusive. They get more prescriptive as we go down. I'll just start with option one. If there is a change of registrant, and then that's

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followed by a TAC request, first option is that no special requirements are necessary, then the TAC can be provided immediately upon the registrant's request or otherwise within that five calendar days. That's basically saying nothing new apart from those Phase 1A recommendations.

Option two is that before issuing the TAC, the registrar must send a notification informing them about the TAC request and recent change of registrant that might also include that kind of due diligence, that the group still needs to talk about as far as what should the registrar be looking for within that five-day period.

Option three would be that the TAC is only provided within five calendar days only if there's a recent change to the registrant's or account holder's information that's verified for that WHOIS Accuracy Program Specification. Include the account holder's information as well because that is part of the WHOIS Accuracy Program Specification, is that there is a change to the registrant or the account holder, which is defined as—I believe it's the owner or the person who is the payer of the domain name. Let me just verify that. The person or entity that's paying for the registered name or otherwise controls the management of the registered name when that person is not the registered name holder. It's that footnote at the very bottom. We can look at these too if you want to talk more about the WHOIS Accuracy Program Specification. But essentially, the option is that they can only provide the TAC if that recent change has been successfully verified, which might be the process already. I'm not actually sure about that. So maybe the registrars could inform us about that.

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Option four would be that the registrar would provide the TAC within five calendar days only if there's no objection from the new or prior registrant. So that would essentially be a waiting period. So there would be a notification to the new and prior registrant that, "Hey, there's been this change." And if there's been a TAC request, they would give that period essentially—it's almost like as a comment period or a period for the prior or new registrant to object saying that, "That wasn't me that requested that, I didn't authorize that," before issuing that TAC.

Then option five was another thing we thought, which was that the registrar has to offer an opt-in option to the registered name holders for added protection, such as a longer waiting period or maybe even multi-factor authentication. So it gives the name holder the option to have those protections if they want to, but they'd have to opt-in to it.

Then, of course, there's other options there that we could probably think about as well. Just food for thought for when there is a TAC request that's followed by change of registrant.

ROGER CARNEY:

Great. Thanks, Christian. As Jothan mentioned in the chat—I'll use his words—the spicier the possibilities here, where the true issues would generally come up. I think that this is definitely something that we need to look at and get resolved. Theo, please go ahead.



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THEO GEURTS:                    Actually, I would advise against that, because while this looks very sensible, this is an operational minefield. Option two, I'm not even going to delve into it, because you're spending the next 10 minutes on what is wrong with it. But in general, what is being said here, at first glance, this all makes sense. Until you actually put it on to production and then you notice like, "Okay, we didn't really think this through, and now we have a lot of other issues here that we've created." Because that is the same thing that happened with the original policy. It made sense on paper, until we put it on production and then, "That was not really thought out." This is really stuff that you need to take into account and sort of figure out or any of the development team while discussing this, because if you don't do that, you're going to have major problems. So I would say strike all five of them. Thanks.

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

RICK WILHELM:                Just a clarifying question. When we say change of registrant here, are we talking about change of control or things that are—my term, not even the registries' term—editorial updates to the registrant information that's better being made at the registrar? Thank you.

ROGER CARNEY:                Thanks, Rick. I don't think we've narrowed that down yet, Rick. But I'll let anybody else jump in on that. But I don't think we've

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actually narrowed that down to specific yet. I agree, Rick, in the chat.

Okay. Again, when we had discussed in Group 1A about the five-day window, and it comes up here quite a bit as well, the due diligence, when I was thinking about that, as we were talking about it, that a registrar should go through, obviously, a lot of that dealt with, "Are they requesting a TAC now right after they changed their e-mail address?" As Sarah pointed out in chat, I don't think there's any requirements today for registrars to have to verify that data before. I don't know if that was contemplated or not. I'm assuming it was probably not or wasn't fleshed out enough at the time. But if someone comes in and changes their phone number and then request a TAC, that verification of that phone number, the registrars have up to I think 15 days to verify it. That verification doesn't have to occur before transfer. Just things to think about as well.

Okay. Any other comments here? Again, I think this is a big one, changing of registrant data. Again, I think you get back to what Rick brought up. It's probably depending on what data is changing. But changing of registrant data, followed rather quickly by transfer, we all know that this is very realistic and occurs legitimately all the time. I mean, someone comes in and wants to transfer their name and recognizes, "Shoot. I got an old e-mail address or an old phone number, or whatever it is, I'm going to update that before I transfer it so I can get the notices and everything." Legitimate reasons, this does occur all the time.

We also know this is how someone loses their domains as well. We had to balance that and provide mechanisms to allow for it. As

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most privacy laws dictate, we have to allow for the updating, and it shouldn't stop registrants from conducting regular business, meaning also transfers. But there has to be rails in place to catch when it's not legitimately occurring.

Okay. Any other comments here on this? I think that we will have to make a statement here. So be thinking about it. And again, the statement may be that, number one, there's no requirements, you just go ahead and do it as you would do it. Or you get into something else with allowing registrars to take more time or whatever it is. Theo, please go ahead.

THEO GEURTS:

Thanks. Should there be guardrails in place? Yes. Should that happen on a policy level? No. I mean, all this stuff, when we talk about domain name theft and so on, that should be dealt with by registrars competing on a level of security, which is going to be more and more important when we move forward in time. We were talking about banks just earlier on. There are several banks in the Netherlands that I avoid like the plague because they are just bad banks in terms of security. I wouldn't even deal with them. One bank forces me to do my banking stuff on an app on my telephone. I simply refuse that for several good reasons. So I avoid that bank.

I think I have the same feeling with registrars. If you are a registrar and you choose to ignore everything and anything and you don't offer multi-factor authentication, two-factor authentication, you as a registrant, you should do a risk profile and get the hell out of there. I mean, it is that simple. The moment we start to come up

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with all these guardrails to policy, what the previous policy to change registrant policy has proven to us that, A, it didn't solve anything, or at least we can even quantify that, but we do know that it caused a major operational nightmare. That is for granted. We know that history has proven that. Then we start on that same track again. I know it sounds a little bit scary, no guardrails. But I think when we're talking about technology in general, we often try to limit technology because bad stuff is happening with them, and I don't like that. There's lots of examples out there where technology is being heavily abused. But it is not always the question. Let's limit the technology because I think that's a very bad move in general. I would certainly—for this topic here, on these options that are mentioned—I think remove the guardrails and let the market solve it. Thanks.

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

JOTHAN FRAKES: Thank you. Theo, everything he's saying is really smart. I mean, different registrars have to operationalize this in different ways. And he's 100% correct that none of these options are trivial when you get out into actually implementing them. Because you have to factor them into a mature space and have obligations to the registrant or things that must happen as part of a process.

I think where I'd maybe disagree with Theo is making this just wide open. Because the issue I have there is just one of a consistent registrant experience from registrar to registrar, that I'm

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going to have to track 50 different ways for 50 different registrars that are going to implement some form of something for this. I don't know if that is the way to put protective frictions in place so that it doesn't get abused.

The integrity of a registrant agency to make sure something bad didn't happen with their domain name should be somehow preserved in this. I've identified that it's spicy. If I have something happened at my registrar and then the registrant comes back and says, "Hey, I didn't approve that. That wasn't me," I can protect them while it's within my registrar. But once it's moved on to another registrar, especially maybe in another country, another time zone, that domain is essentially gone. And that's not a good experience for the registrant. I want to have some kind of protections in here for where registrants, good or bad, are going to demonstrate their humanity. I don't know if there's a lot we can automate or protect here. But there should be some appeals mechanism and some room before a domain would leave a registrar.

We have a 60-day guardrail right now that protects us from credit card billings timing. It protects us and gives us quite a bit of time for somebody to catch that maybe something changed. Granted, it can be opted out of, but it's there to protect the registration integrity for that registrant. It just doesn't feel right to just abandon that. Now, I'll regret those words when I go to have to implement whatever we come up with. But I think we should be defining something that's consistent and predictable so that there is some consistency from Registrar A to Registrar B to Registrar C on how this stuff would work. Thank you.

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

RICHARD BROWN: Hi, everybody. Not really jumping in between Theo and Jothan. I'm in the middle between both of their opinions. I want to make another outside statement here. While we do have the 60-day guardrail, I want to point out that one, the opt-out option, remember, can only be done before you make the change. Once the change is made, there is no, "I made a mistake. Because there's an opt-out, I don't have to do anything." No, it's done. 60-day lock. End of story.

There is also nothing in the policy that allows for when a mistake occurs to remove the 60-day lock officially. There have been times even our registrar has asked ICANN Compliance to do—mistakes are made, is it okay to remove the lock to allow a registrant to continue what they want to do? But the COR, if we're going to keep it, which is another discussion, needs more resolution in it. Right now, it's simply you either opt-out at the beginning or follow the 60-day course of action, and that's it. That's all you get.

I just want to ask people to look at this more holistically. Remember, we're digging in deep in a tunnel vision view of this. But remember, it's part of a bigger hole. Just wanted to throw that out there. Thank you.

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ROGER CARNEY: Right. Thanks, Rich. It's good for that view to come up. The main problem is once you missed that box, it's locked in and there's nothing to do. And as you said, there's no way to get it. Everybody can agree that it should be removed and still can't be.

Okay. I think we're down to our last time here. Christian, did we get through everything we wanted to today?

CHRISTIAN WHEELER: Yes.

ROGER CARNEY: Okay. Great. Again, I think, a few of these items are still very much open on how resolution is. We still need to decide them. Again, maybe that decision is we don't do anything or whatever. But we do have to make those decisions on them. So think about them. Again, everybody talks about how this can be operationalized and everything. And obviously, that's a huge point. But in the end, we're looking for the solution that's the best, even if that does cost a little. If it's painful and doesn't work... As Theo mentioned, sometimes we put things in policy that just don't work. We're looking to avoid that. But take a look at these things. And again, read through them, think about them and come back with ideas of where do you think the group should be moving toward. Is it number one? Is it number four? Is there somewhere in between? Is there a different one as all these have and others?

Great discussion today throughout the whole meeting so I appreciate that. We'll talk to everybody next week. Thanks, everybody. Bye.

JULIE BISLAND: Thank you, Roger. Thanks, everyone, for joining. This meeting has concluded.

**[END OF TRANSCRIPTION]**