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## ICANN Transcription

### Transfer Policy Review PDP WG

**Tuesday, 12 December 2023 at 16:00 UTC**

Note: Although the transcription is largely accurate, in some cases it is incomplete or inaccurate due to inaudible passages or transcription errors. It is posted as an aid to understanding the proceedings at the meeting, but should not be treated as an authoritative record. Attendance and recordings of the call are posted on agenda wiki page: <https://community.icann.org/x/R4BFE>

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BRENDA BREWER:

Good morning, good afternoon, and good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group Call, taking place on Tuesday, the 12th of December, 2023.

For today's call, we have apologies from Prudence Malinki, (RrSG), and Rick Wilhelm, (RySG). And Prudence has 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. And I see no hands.

All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view

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chat only. Please remember to state your name before speaking for the transcription.

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

ROGER CARNEY:

Great. Thanks, Julie. Welcome, everyone. And just a couple of things before we get started. Thanks, Christian, for throwing the link in the chat. We have this meeting and next week, and then we'll take a break for a couple weeks and then get started back up in early January. The hope is that we can get through most of our discussions early next year and get on to writing our recommendations for the change of registrant and have all that drafted and discussed heading into ICANN 79 so that we can hopefully get everything wrapped up by ICANN 79 and then dig into our final report, hopefully by then or shortly after. So again, just this week and next week, and then we'll be off for a couple weeks until early January. Other than that, I think I'll open the floor up to any of the stakeholder groups that want to bring anything forward, if any discussions happening outside, hear any comments or questions that they want the group to take a look at. So I'll open the floor up to anyone.

Okay, good. We've had some good discussions last couple weeks. Hopefully we can get some things narrowed down to and at least in a direction that we seem to have agreement so that we can start again getting to those draft recommendations. So I think,

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again, great discussions last couple weeks. Hopefully we can do that this week and start moving ourselves toward some conclusions here. So with that being said, maybe I'll turn this over to Christian and he can take us through the security measures first, I think.

CHRISTIAN WHEELER: Thank you, Roger. And I will just add too that we have shared the questions that Sarah Wyld drafted last week and shared that with Holida and her compliance team. They're working on that now and they said that they'll keep us apprised of their progress on that. So thank you again, Sarah, for drafting that up and hopefully we get to hear from them to kind of further clarify and delve a little bit deeper into that data that they shared with us last week.

All right. With that being said, let's move on into our call for today, which we'll go over in a little bit more detail the options that we discussed last week so we can kind of nail down a direction that this group wants to go forward with. So I will just move on here.

So the first thing we're going to start with is regarding the added security measures to change of registrant, starting with improper changes of registrant. We're just calling it improper because you can think of that also as unauthorized changes of registrant what to do in those circumstances. We called it improper because unauthorized might kind of imply that they've authorized it like going through some kind of authorization process, which was formerly the confirmation request, which the group has talked about doing away with replacing it with a notification. So if the registrant just receives a notification, what other measures might

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need to be put in place, which would be the minimum requirements essentially for registrars when it occurs that there's an actual improper unauthorized change of registrant. So that's what we're going to be discussing today.

So the first option we can discuss is basically maintaining the current transfer policy whereby the registrar has to provide contact information for questions. So this is kind of as the policy sort of reads, that is before or within one day of the completion of the change of registrant, the registrar must send a notification to the new and prior registrant, which has to explain the request that was received, has to list the domain names and it has to provide contact information for questions. It also has to inform them of the 60-day lock, but we're talking about possibly getting rid of that lock, so let's just kind of put a pin in that for now before we move on to the discussions about when there's a conjunction with registrar transfer requests. So for now, if there's an improper change, the registrar has to provide contact information so that the registrant can contact them and ask questions.

So this option is essentially that the transfer policy shouldn't require any further measures, which would allow the registrar to address any reports as they see fit based on their policies and practices. So this is kind of maintaining the status quo. And just to provide kind of an example scenario of this, of how this would kind of look like, let's say John Doe, owner of johndoe.com, he received a notification that his email address associated with his domain name has been changed. Since he didn't request this change, he uses the email or phone number that was provided in that notification sent by the registrar to contact the registrar and try

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to address it. And that is where it would essentially end per the transfer policy. So he gets a notification with some contact details, and he contacts them to let them know that something's not right here. So why don't we just pause there and discuss to see if that's what people think about this option, as it currently states in the transfer policy. Over to you, Roger.

ROGER CARNEY:

Great. Thanks, Christian. And as Christian mentioned, this is basically, besides the number four here, basically what is required today out of the policy. And I think that through our discussions the past month or so, something similar to this is what's been talked about. Not necessarily getting a confirmation out of it, obviously, but just the notice to the registrar so that they're aware that there was a change made on their contact information. So again, this is probably the minimal step to take. I think when you look at it, again, this is what you have to do today. So moving forward, do we keep this? Do we add to this? Do we modify this slightly? So Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Roger. So my preliminary view, as I made known on our last call, is that there should be an ability of a registrant to actually stop the transfer. But just taking a look at this option one, I see there's a significant difference between before or within one day of completion, because within one day of completion could mean five seconds before the transfer, whereas before one day of completion would seem to mean 24 hours' notice. Thank you.

ROGER CARNEY: Thanks, Zak. Yeah, and I think that I think we talked, maybe it was last time or the week before, I don't remember. Most likely these things are occurring pretty simultaneous. And Zak, you brought up something that we should probably touch on, and you're talking about stopping a change of registrant. And I think that so far the discussion has led to the change of registrant occurs, and then is there a way to, if it's wrong, to correct it? But I think that that's still up for discussion. So I don't think we've made a decision as to is there a step that's pre-change versus a change and then an action after that. So something to think about and talk about. And I see a few chats that support [inaudible] in here, not necessarily as a complete option, but at least these things make sense as they stand with maybe something else added. So Theo, please go ahead.

THEO GEURTS: Yeah, thanks. This is looking pretty good. And as you mentioned, we already have that requirement. We also provide a reseller data because if there is a real issue, the reseller can actually check with the registrant control panel if there is some issue with it, maybe being hacked or not. But it's all good information. You know, and any example that was just put out where there's a change of email address, that is not a change of registrar or anything. This is just normal updates that occur on a daily basis. And depending how large you are, you're talking about thousands and thousands of them each day. And if you're a small registrar, it happens a couple of times a day. But you know, it's just business as usual. There is usually nothing nefarious going on when these

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updates are being made. I mean, people change their information all the time for various reasons, of course. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Yeah. And I think that's a good point to bring up, Theo, is if there's a change of contact information, it's not necessarily a change of registrar or registrant. But you know, this notice still is applicable and makes sense to do. And as you mentioned yeah, there'll be potentially for larger registrars thousands of these going on a day. But it is that just that notice, hey something on your contact information was updated here. It wasn't. There's been whatever, however it happens. And as people are suggesting, I think number three is what people are suggesting is providing information. The registrar contact information. Hey, click here or hey, call here. Hey, do this to view it or to see what's happening. So I think that, yeah, that's definitely in that notification that whoever's the registrar, and as Theo just mentioned, they include the reseller as well, the registrar contact information. So but Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Roger. So just two points I'd like to briefly make. First one is that if you look at the first bullet point, the registrar must send a notification. And so I think we have to conclude that that is the previous registrant if there's going to be a change of registrant and a change of registrar at the same time. So that's a previous registrar. And I guess they would be providing under number three, the contact information for the new registrar if there was also a change of registrar involved, because the old registrar, if

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there was a transfer going through, would have very little to do other than possibly invoking the informal dispute resolution mechanisms or the transfer policy dispute resolution mechanisms registrar to registrar.

The second point I'd like to make is that if you look at the very top, just under security measures, what should be the minimum requirements for registrars when an improper COR occurs? And I don't think this option is responsive to an improper COR. I think this option is just responsive to what the minimum requirements for registrar when a COR occurs. Thank you.

ROGER CARNEY:

Great. Thanks, Zak. And to your last point, I think that that's true. I think that this implies across any change of registrar, but it's open for debate. I guess I read it as that way. But to your first point, I think that this is just dealing with a change of registrar and whatever affects that that occurs. With a change of registrar, we should have already had that information in our group 1A requirements, hopefully. And if you're in doubt, let's check that out to make sure that that's there. But this is just a change of registrar, not contemplating if there's a step beyond it. This is obviously these things happen first and how we handle that is what we're dealing with here. Now, if there's a change of registrar, that should have been in our group 1A discussions and what happens then. But obviously, there is one point in here that we have to decide. If there's a change of registrant information, and then it's followed by a change of registrar within X amount of time, as we've discussed, we're not sure what that is. Is there something to happen? But I think we have to focus that this is just about change of registrant.

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And our group 1A requirements should have handled anything that happens when it's a change of registrar. So, but Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. And I think Zak pointed out the correct thing here. I mean, we're not talking about an improper change of registrant. I mean, we don't know that as a registrar, especially as a wholesale registrar. It's an API call. There is no extra information that says this was malicious, not intended. We don't know anything. We only know it's an API update. And there's a change of certain fields with the data in such fields. That is what we know. What we're talking about here is that when a change of registrant occurs or modification of its data, that there's a notification sent to the registrant. So if the registrant gets that notification and goes like, oh, that's not me, I haven't done anything, then we kick off the process where the registrant can contact us. So we can lock the domain name and make sure that we sort out any issues that there are, depending on what your process is as a registrar. We lock the domain names directly when we get a notification from the registrant that there is something going on. That's our process. But it's basically two separate processes. You get the change, which can happen for various reasons, which we don't know. And then you have a process where the registrant kicks in and tells us something is not right here. Please help me. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. And I think Sarah put it in chat just to follow up and agree with you. And I think that from what I'm hearing is

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besides that, the first line here, this is not improper. This is any change of registrant. But it sounds like everybody is good with this data in here. But there's got to be one more. Something else everybody's calling out is there's a next step here. And as Theo just talked through. That next step really is probably where there's an indication of improper or not. Obviously, it still has to be investigated and those things. But until that time, you really don't know if it's improper or not. But what we're seeing is any registrant change should follow this option one plus with a little additional information. So I think that's what I'm hearing. So jump in if I'm wrong. So Berry, please go ahead.

BERRY COBB:

Thank you, Roger. Berry Cobb for the record. Something for the group to consider here. And granted, this isn't a preliminary recommendation text. But I do note that there is connective tissue back to the WHOIS accuracy specification. And I wonder as part of this, of these first three steps, that there's a 2A or a 3A or maybe a new number four where applicable the WHOIS accuracy specification may be invoked, which would likely become maybe an implementation note as this recommendation starts to mature some. So I'd ask that the group consider that, because it's conceivable that some of these changes to contact information will trigger that part of the specification.

And then, Roger, for the group 1A, I can't say with certainty that where a core is or where changes to contact information and then a request of the TAC has been completely satisfied under group 1A. When we think about the swim lanes, there's the frictions to cure. But if there are frictions to cure, that was really more

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applicable to if there were locks or some other kind of nebulous things going on that would prevent the TAC from being presented to the registrant. But I don't think we dove into the details enough about what happens when the TAC is requested and it is understood that the primary communication methods have been changed. And so the group still may want to consider that.

ROGER CARNEY:

Great. Thanks, Berry. Yeah. And again, I think that the group 1A was focused just on that registrar transfer. But I think that one of the pieces here that we have left is that piece that we've kind of stumbled on or walked through a few times in the last few weeks is, okay, a change of registrant happened. And then at some point, 30 minutes, two days, whatever it is that the group may decide or did not decide, and then a change of registrar is initiated. Is there something that occurs? And I think that that-- and then if it does, and if it goes on, a group 1A handles the change of registrar issues, I think that what you brought up, Berry, is, yes, there's a change of registrant and then something, and then a change of registrar is initiated. Is there something that has to fall in there? But I think that, obviously, to me, the group 1A handles everything about a registrar transfer, and now we have to deal with something that happens prior to that possibly.

And to your point on, Berry, on the WHOIS accuracy specification in the RAA, I think that that is going to get handled, has to happen. Again, that's something that we're contractually obligated as registrars to do, so that has to occur no matter what this policy says. So I think that that's a good call out there. The other thing I was thinking about as you were describing it was the annual

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WHOIS reminder. I can't remember what that name of that thing is that we have to do to just nudge the registrants, "Hey, if you have new information, update it." And I think that that sort of plays in here too, that when we send out that WHOIS-- Thanks, Owen. When we send out that reminder, it'll probably trigger a lot of these notifications here. So just something to think about. Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. So going back to what Berry said, and thanks for the heads up there, very good, actually. But I don't think there's going to be implementations issues. I mean, a lot of this stuff is already happening nowadays. So I don't think there's an issue there, but still good heads up. When there is a change of registrant and then sort of talking about followed by a transfer that there needs to be happening somewhere there. I understand it. But I think we shouldn't go there, because especially in the wholesale registrar model, it is very common. I'm not saying that I completely agree with what some of these resellers are doing, but some of these resellers put everything on their own name. And they do that with a reason to make sure that there's less burden on the registrant. Unless the registrant wants to transfer, then it all gets updated to the information from the registrant, which is intended because then the registrant needs his authorization code or the TAC. So that's all intended. And I do get that people on this group are going like, yeah, but maybe that is going to be dangerous, etc. I understand the arguments, but there are some very legit reasons here that stuff is happening. Thanks.

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ROGER CARNEY: Thanks, Theo. Yeah. And the way I say you describe a nice scenario that I think occurs more than people realize. You know, a lot of registrations, I think, are under someone's managing them for the registrant. You know, maybe it's a web developer that's managing their website or whatever. And they have it under their name and not the underlying registrant. And to your point, if there is a transfer or something, they'll update that so that they can do that. And I think that to me, that still falls within line of that, okay, there's a change of registrant and X days again, whatever it is, five days. Within five days, then there's a change of registrar requested. To me, that's a simple thing that the registrar looks at and says, yeah, we understand why that happened and it's perfectly valid.

So I think that those valid reasons that we have today for a change of registrant followed by a change of registrar is still one of those things that falls neatly into a solution where, hey, if a change of registrar is initiated five days after a change of registrant, there has to be some kind of due diligence, even if it's as simple as, yeah, we know that that occurs because the reseller handles that way or this person does it that way. The registrar is aware of those things. So just my thoughts. So, Zak, please go ahead.

ZAK MUSCOVITCH: Thanks, Roger. So I get it from the registrar's perspective, like the less friction with these things and less notifications and emails, the better. And to a large degree, same for the registrant. I mean, we're getting close to requiring an in-person interview for a change of registrant, right? So I get it that's not what we want to do. But I'm thinking it's really a question, like, at what point would a

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registrar, at what point in the process would a registrar do the WHOIS accuracy verification with a change of registrant? Would it be prior to the registration with the new registration data? And if so, that would seem to require like an affirmative action of the new registrant. And if that is an email that's going out requesting an affirmative action of the new registrant, which is obviously kind of friction and one that's unavoidable because of the WHOIS accuracy verification requirements, then it wouldn't seem to be too much of a stretch to also require the losing registrant to make that affirmative action by either approving right away or taking some action to stop the transfer because they didn't approve it.

ROGER CARNEY:

Great, thanks, Zak. Yeah, and people can correct my timing here. But if a registrant comes in and updates their phone number or email address, then the registrar has some action. You know, if it updates anything else, there's most likely the system is managing the updates and the other requirements are syntactical versus email and phone, which have to be functional. So if they come in and update their phone or email address, then I think the registrars have 15 days to verify that that email address is operational. And then obviously they'll accept that email address as good. But, again, people can correct me on that. Theo, please go ahead.

THEO GEURTS:

No, I'm not going to correct you because that's basically what happens. I mean, the contractual language requires you to have a confirmation, a response from the registrant, either by email or

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telephone. So the registrant, the new registrant has to do something before anything starts to happen. You know, and some registrars wait 15 days or give the registrant 50 days. Other registrars like us, if you register domain name and you haven't verified your contact details yet, your registering details, the domain name will not resolve and we build our system entirely on that. You need to do something first and then you get to do all the other steps. So that can differ from registrar to registrar, but regardless, confirmation is always required. So that's always a step. You know, so I think we're in a good space there and I don't see any changes coming from this policy so far. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Sarah, please go ahead.

SARAH WYLD:

Thank you. Hi, this is Sarah. Theo wouldn't, but I would correct Roger. It's not that the registrar has 15 days to confirm. It's the registrant has 15 days to confirm that their data is correct. So there's the WHOIS accuracy policy. There's the WHOIS data reminder policy. Those both touch registration data. They could be triggered by a transfer of ownership or contact update. But I think although those processes overlap, we do need to be careful to keep them separate mentally.

So for example, there could be a domain where the contact info is updated, so it triggers whatever core process we're going to have, but it would be updated to a data set that has already been verified because that same person data set owned a different

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domain. So that's a situation where we have a core process, but not a WHOIS accuracy policy process being triggered, right? So point being, they overlap, but they are different, and we should keep them mentally separate. Thank you.

ROGER CARNEY:

Thanks, Sarah. Yeah, you're right. They're completely separate. And I think that you're just running into them on either side of it. The reminder that gets sent yearly may trigger something like this, and then this actually may trigger the WHOIS accuracy specification. So they're completely separate, and they only come at different ends of this possibly. So yeah, and keep them separate so that we know where we're going.

Okay. And again, I think we're in a good spot here in that this option one, as it stands here on the screen, is good except for we all recognize this is for all change of registrants, not improper changes. And again, the improperness will probably be not known until after this notice is sent out and the registrant actually does something. So if it is improper, I should say. So I think that what I'm hearing is everybody agrees and likes this. Yeah, thanks, Sarah. Yes, for all change of registrants. But I think that our other options here, and Christian will take us through those, will take us into maybe that next or additional step that should be taken or not. And we'll take a look at several of those. So I'll turn this back to Christian.

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CHRISTIAN WHEELER: Thank you, Roger. And yes, you're correct. And this would be for all changes of registrant, not just improper ones. This is really just for the exercise of in the inevitable case that there is an improper change of registrant, what should be that additional measure that the transfer policy stipulates beyond just for what happens for all changes of registrant that are proper. So that'll become clear as we go through more options, which will get gradually more prescriptive.

So, the second option, which would be that in addition to providing contact information, registrars must investigate and respond to reports of improper changes of registrant. So again, it's getting a little bit more prescriptive. So beyond just providing contact information, they also have to investigate and respond to them. And a similar piece of language comes from the RAA regarding reports of abuse that states registrars shall take reasonable and prompt steps to investigate and respond appropriately to any reports of abuse. So this would be just kind of taking something like that and applying it to reports of improper changes of registrant, so that they have to investigate that. It would still be dependent on the registrar's policies, how they address that. But it essentially, this minor addition to that just providing contact information, essentially just requires that the registrars wouldn't be able to ignore those reports to the registrant's—changes to the registrant's [inaudible] contact method. So again, this is just food for thought for if something should be required more than just having a phone number and a notification. So an example scenario of this would be, same as the last one, John Doe gets a notification his email was changed that he didn't request. So he uses the contact information that's provided in the notification to

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contact his registrar. The registrar then responds to John's complaint and stating that based on the evidence that John would provide, the change of registrant was in fact improper. And so the registrar responds. So that could include reversing the change that wouldn't be required by this piece of the transfer policy, but the registrar would have to respond. Alternatively, the registrar could respond to the complaint saying that based on the available evidence, the change of registrant appears to be proper. So the change remains in place. So again, this would be requiring a little bit more of the registrar beyond just providing contact information in the notification. So I'll leave it at that.

ROGER CARNEY:

Great, thanks Christian. Yes. And just to be clear, the option one is basically repeating of current policy, most of it. And this is just in addition to that, this is not current policy. This is trying to get to that next step that everybody keeps talking about. And again, one thing to keep in mind is something that Zak touched on earlier, is it going to the prior? Is it going to the current and things like that? Obviously, the thought here would be that the prior registrant, and again, it's probably the same registrant, but you know, changing their email address, that gets a little tricky, right? Because they probably changed it because the old one doesn't work, or they got rid of it or whatever. So it becomes a little more difficult and you have to kind of think about that. And we should be thinking about that here as well as what those requirements would be. But you know, someone goes in and changes their billing address or whatever. So you send that to their email address on file that

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wasn't changed. And they can say, "Oh, yeah, I didn't make that or I didn't make it." But anyway, Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. So while I think generally, I like this approach of having your registrars do something so that it's not just a chain thing, improper change of registrant happens, and then the registrant is just out of luck, I would want to move away from the wording, must investigate and respond, specifically the word respond, because that was something that came up under the recent DNS abuse negotiations that the registrars and registries did with ICANN. The word respond can be interpreted as a definition to send a reply to, as opposed to take action. So we want to make sure we avoid that ambiguity and make it so just the registrar doesn't have to say, Hey, thanks, we heard about your about this improper change. Thank you. We want to make sure that something happens. I don't know exactly what the wording would be for that. We just want to make sure that it is something that is addressed or is resolved or is reviewed or is actioned or some sort of wording there to make sure that there is either an outcome or determination. Thanks.

ROGER CARNEY: That's a good call out. I didn't think about it because it says respond appropriately. And I guess I put those two together. But yeah, I can see that. And yeah, thanks for bringing those conversations forward on the DNS abuse because that was a good discussion there. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. And like Owen, I agree. I don't mind language that sort of requires us to do something when a registrant notifies us. I mean, I have zero problems with that. But I also have the knowledge of over a decade and having a couple of million ccTLDs on our back end, which tons of changes over that decade. There is barely anything to investigate. I mean, it does happen. I mean, I'm not going to say it never happens. But yes, every time, like five times a year, you get a registrant that goes like, why did my registrant details change for the .nl that I own? Then you go investigate, you follow your procedure. And that same way it is for domain name theft. I mean, we talked about it. Still know that there are still people within the community who think it's still a big issue. But what people fail to realize, if there were real problems with the change of registrant or if there were real problems with domain name theft, we would already have addressed that because these things, regardless how many times they happen, they're still very costly. And I don't mind to go out five times a year to check with a registrant to see if everything was done properly or if there was an issue. I mean, I take the loss for that. I mean, if I'm going to sit down for half an hour to sort it all out. Okay, we'll never recoup the money from the registration. That's gone. Ain't going to make it back within the next 50 years. And we still need to sort of understand like, the margins are razor thin, so we can't lose money on big problems. And apparently this isn't a big problem. And if it was the case, we would have solved it. Thanks.

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

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ZAK MUSCOVITCH: Thanks, Roger. So, yeah, I do take Theo's point about registers having to deal with this stuff and it's a complete loss in relation to the registration fee and will never be made up. You know, conversely, from a registrant's perspective, and Christian, if I can just ask you to move to the next slide that you had on the screen before. Yeah, so from a registrant's perspective, there can be more than the \$10, whatever registration fee at play, there could be a significantly valuable domain name. And if it's a million-dollar domain name, there's a recourse, which is to go to court. But if it's a \$5,000 domain name or \$15,000 domain name, there isn't any real recourse. And I want to point out how that plays out on this slide. So if you go to the very end, the registrar responds to John's complaint stating that based on the evidence, the COR was proper, so the change remains in place. At that point, the registrant has zero recourse, I hope we could all agree, other than going to court, because if the registrar says there's no issue here, that means the registrar certainly won't invoke the transfer dispute resolution policy, won't do anything more about it. And so really, and particularly in light of Theo's comments that getting involved investigating is just a pure loss and a hassle from the registrar's perspective. The piece missing here is for a registrant to do something about it independently. That's the piece that I've always said is missing from ICANN's regulatory framework, which is a registrant-initiated procedure. It would take the burden off the registrar, put it onto the registrant, empower the registrant, and provide the missing recourse, instead of being an end-of-the-line dead end at that last point. Thanks.

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

THEO GEURTS: Yeah, I do get what Zak is saying, but that is always going to be problematic. I mean, we are basically sort of talking about, should we limit technology because there could be possible criminal activities like that? I mean, how far are we going to go as a group to sort of limit that technology, to sort of slow it down to what it is today? I mean, it sort of feels like comparing it like, okay, people are speeding in their cars, let's limit all the cars to 50 miles an hour. That is not really feasible. But I do understand Zak's point, but I think we've sort of got to separate that from this policy because we can't really solve that. Though, when I'm dealing with a registrant who makes a complaint like, hey, why is there suddenly a new registrant on my domain name? I go through a process like, okay, what happened here? Who did what? And can a new registrant even back up that this change was even legit? And if there is no evidence to support that, we revert the change. I mean, that is sort of what we are doing. I'm not saying that every registrar is doing, but that is sort of logical in my mind. I mean, somebody goes like, hey, this is not correct. Okay, then we're going to look in the logs, who did what, and try to figure out if it needs to be reversed. But that's my logic. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Yeah. And as John's typing in chat and as Zak's talking about it, I wonder if this is maybe in our group 1A

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discussions we talked about, or maybe it was our group 2, I can't remember, whatever, we talked about it. But the transfer dispute resolution policy is very registrar and really even just very policy specific. And we had talked about maybe a recommendation to council to take a look at a registrant-initiated dispute mechanism. And maybe that is not just for inter-registrar transfers, but maybe that's even we're at a change of registrant level as well, where the registrant has what I think Zak and Jothan call agency and has an ability to initiate something. But maybe that falls within that same, just thinking out loud and at the time. So, but Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Roger. So, just in terms of the slowing down of technology, I agree in principle with Theo on this. But the way I look at it is that if you want to not slow things down, if you want to have a frictionless change of registrant where the original registrant can't stop or challenge the process in all cases, or in any cases, but let's say it just goes ahead. That doesn't slow down the technology at all. But there's a backstop with a registrant-initiated dispute policy. And I don't think it becomes any more stark for the need of something like this to fill in that gap, especially if you want to go further down the road of a frictionless change of registrant. That's exact. And you don't want to tangle yourselves up in investigations and lost time and lost profits. This is exactly where the registrar should be saying the counterbalance to a frictionless change of registrant is empowering the registrant to do something about what it considers a wrongful transfer. It's almost like part and parcel of the deal, the way I'm thinking about

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it. You want to make fast technology frictionless transfer, then you have to have a backstop to that. Thanks.

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

STEINAR GROTTOROD: Yeah. Hi, this is Steinar for the Record. I'm going back to what Theo said a few minutes ago. His experiences that there are very, very few situations where there is an improper change of registrant data. And also we had some data from ICANN compliance and last meeting kind of indicate this is in a very, very low scale. So my thinking here is that, is it really possible to make a process that kind of, in bracket, forced the registrar to investigate when there is a suspicious action going on and make that kind of process being set in a policy? I'm not sure that's possible. I think this has to be totally handled by the registrar and be controlled by the registrar. I don't think it's possible to make all these red light flags into a policy. So I'm leaning a little bit. This is something that the registrar most likely will have the total control and do it in a professional way. So I think that's my point. Thank you.

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

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JOTHAN FRAKES:

Thank you. And thanks for the credit on this concept of agency. I think what Steinar is describing—And thank you, Steinar, for standing up for registrants and as well as Zak, I think it's really important because there are customers as registrars and we want to make sure that they have the best possible experience with their domain name. And that includes not getting them stolen or not having improper transfers or what we're going to call this. We're starting to go down the path of talking about some sort of a registrant-led dispute process here. And I caution us because we've already -- I think we've already walked this tightrope previously when it had to do with inter-registrar transfers and it gets a little bit more complex when we're starting to apply it towards change of registrant. I mean, it's a good level of friction, a good level of remedy potentially. But the challenge that we run into, and I mentioned this in the chat, is that once a domain name transfers away from registrar A to registrar B, the remedies available for a registrar, should the registrant come up and say, hey, something improper happened, really are woefully diminished. And putting in place some sort of a dispute mechanism process that a registrant could initiate, I don't know if that's the right band-aid for this. So much as maybe preserving some of the integrity of the built-in lock that can be opted out of or something that -- I mean, we could diminish the time on the current 60-day optimal lock. I'm not sure what the specific proper solution is here, but I don't know that a registrant-initiated dispute is going to be the appropriate mechanism here. I do want registrants to have full agency here. I'm very clear about that, but I'm just not sure that's the right thing, so much as maybe an opt-outable lock mechanism, even if it's shorter than the current 60

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days, maybe if we're 30 days, that might be the remedy. But I'm going to not miss this opportunity to shut up, because I see other hands that have popped up. Thanks.

ROGER CARNEY:

Great. Thanks, Jothan. Yeah, and as you mentioned, and as I touched on earlier, we did talk about a registrant-initiated, and that's something that we weren't going to tackle here in this group. But it was something that the group thought that we could at least push along as an idea so that the council knows that this group found that there's a potential there. And I don't think it's new, because I think that the last time this was reviewed, there was something similar discussed. But I think that something like that should be discussed outside this, and more holistically than just this. So okay. Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. So I'm not against any dispute mechanisms for registrants, per se. I mean, I go with the will of the group. But again, if I would want to steal a domain name, I would make sure that I would do it in such a manner that there would be no notification that I would be messing around with the register data. I would leave it as is. I mean, I would find a way around it. And that is basically what the majority does when you are trying to do something criminal. You try to make sure you go undetected, regardless what kind of crime you are trying to do. Because the moment you are detected, like by a notification, then you have a good chance that your entire criminal plan falls to pieces. So in this case, when we're talking about domain name theft, possible

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domain name theft, I would make sure that I wouldn't make any changes there. So it becomes a little bit theoretical, this entire discussion here. Thanks.

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

ZAK MUSCOVITCH: Thanks, Roger. So just getting back to Jothan's comments, I agree with Jothan in the sense that to give a registering agency, there's more than one way. One way is that registrant-initiable dispute resolution policy. But as he points out, there could be other ways. And one of the other ways beyond that, the lock that he mentioned, is a registrant's ability to exert their agency by stopping a transfer. But let's say that we went with the bare minimum concept here, which is that there's notifications, no way to stop, no way for a registrant to dispute a transfer, et cetera, the bare minimum. What we would essentially be saying to registrants and prospective registrants, and I'm not saying this is necessarily a bad thing, but that the ICANN regulatory regime to protect registrants is minimal, and that registrants would be well advised to purchase a commercial safeguard, like a registry lock or something like that, a commercial product to best protect themselves. And so that is actually a kind of a strategic policy decision to make about whether the purpose of the transfer policy is to protect registrants, or whether the working group says we can't protect registrants because a professional bank robber will be able to rob the bank no matter what before the police come anyhow. So we're not going to lock the safe or put any

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impediments to that. And instead, we're just going to say that the registrant must take steps to protect themselves by purchasing protection that's beyond the scope of the transfer policy. Thanks.

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

SARAH WYLD: Thank you. This is Sarah. So maybe let's see if there are other options for protecting the means that we haven't talked about yet, because I don't really agree that we're saying that protections that we will provide are minimal. Rather, I think that we're considering what are the appropriate protections. So historically, we've got this two confirmation process where both the old and new owners need to approve the transfer. There's a delay in there for both of those approvals to happen. What we've seen so far, I think, is that people don't find it useful, don't find that it provides helpful protection. It is very disruptive. And I look forward to the data that I expect we will get from the compliance team to help confirm if that is a correct understanding of what we've seen. But anecdotally and within my own registrar, certainly that's what we're seeing, is a notification process is useful to make sure people know. And that goes back to empowering registrants. They can lock their domain. They can put a strong password on their account in the registrar's platform. They can know when things get changed. Maybe there should be other optional things to put in place. I just think I don't agree with that perspective that we're putting only minimal protections and requiring people to pay for extra protection. I think rather we are responding to what people are asking for and what

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real problems we are seeing. But I am interested because I haven't looked at a slide deck. I don't know if there's other options beyond option two that we're looking at here. So yeah, thank you.

ROGER CARNEY:

Thanks, Sarah. Yeah, and there are more and we'll take a look. I think that this is just trying to take us through that logical step that we've been working on the last couple of weeks. That option one, everybody thinks, yeah, that information notification is important. And it sounds like everybody thinks that this is important, that there is some kind of action by the registrar if a registrant's disagreeing with a change of registrar. So I think that we're taking that logical step. Now how detailed, and as Christian kind of hit on when he started this, each one of these options, and I think there's four or five, get a little more specific and a little more actionable. And I think there's going to be a fine line as everybody's already been drawing. Well, this could work, this is going to be painful. And as Sarah just pointed out, more of the compliance complaints were about the change of registrant stopping a transfer than it was stopping people from stealing things. So it was legitimate efforts to make something happen that the policy was stopping versus trying to stop other things. And to Sarah and Zak's discussion about if it's protection or not, obviously today versus, and I think Theo has mentioned this multiple times during our calls, today versus 12 years ago when the policy was written, registrars have a lot more security mechanisms in place for their registrants. I shouldn't say all registrars, many registrars have high levels of security. Again, as Sarah mentioned, stronger passwords, but also two factor, a lot of registrars have implemented to gain access to

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certain things or gain access to accounts or anything. So I think that we are looking at, as Sarah points out, anecdotally and through ICANN compliance, theft or changes to these things aren't dramatically big issues. Obviously, as Zak pointed out, it's not that it occurs 10% of the time, it's that one-tenth of a percent of a time that it matters because it's dealing with somebody's business that can no longer accept credit card payments or something because they don't have everything attached anymore. So I think it's not that it occurs often, it's just when it occurs, it can be disruptive. And I think that that's what you have to look for. But again, I think what we've seen through numbers, through compliance and through anecdotal stories is the policy of the current change of registrar is prohibiting valid things from occurring versus stopping invalid things. So I think that that's where the balance line. And as we'll see, we'll get to some more options here that are more restrictive. And I'm sure cross a line for some people and say, "Yeah, we can't do that. We got to back up to this and that." But what I'm hearing so far is, yes, option one, the notification, what's included, makes sense and should occur on all change of registrants. And some kind of action by the registrar, if a registrant indicates that they didn't do it or something happened, and again, maybe they did do it and they just did it wrong or whatever. But there's some kind of action that registrar should do. So I think that's where we're standing now. But Sarah, please go ahead.

SARAH WYLD:

Thank you. Hi, this is Sarah. So just with regards to the text on screen, and I know Owen had raised concerns about the word response, but also the word resolve. So maybe what we would

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say is registrars must investigate and respond as appropriate or respond as necessary to reports of improper [inaudible]. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Okay, I think we've done a good job here. I think we'll go on and as Sarah said, we'll see some more options here that we can go through and talk about and see where we can find that right balance. So Christian, can you take us through the next one?

CHRISTIAN WHEELER: Yep. Thank you, Roger. So yeah, so this one gets a little bit more prescriptive. So this one states that the registrar must provide a dispute or appeal process through which a prior new registrant can challenge and correct an improper change of registrant. So this goes beyond investigating and responding appropriately. This is stating that the registrars have to provide some kind of appeal process. It doesn't say what that appeal process has to be. So it would give registrars some flexibility in operationalizing that, and perhaps a lot of registrars already have something like this. But it would basically say that they would have to offer some kind of process whereby that improper change of registrant, if it was found to be improper, could be corrected. So that would also entail some questions that the registrar would have to ask themselves and of their policies and determine just based on the evidence of the actual incident. So there are just some things here as examples, like if it was a change to the registrant's account or if it was their anchor contact method, which is the group I kind of

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talked about. Were the registrar's procedures properly followed? Is there sufficient evidence? That sort of thing. So those are kind of questions that's already kind of asked when these things are reported. This is just a requirement that they actually have to offer some kind of dispute or appeal process where they could fix that.

An example of this, again, going with John Doe. So he gets a notification that his email has changed that he didn't request. So he follows the appeal instructions that are provided in the notifications. That could still be contact information or it could be maybe a link to the registrar's dispute form, something like that for these cases. So again, just as an example, he submits a ticket to the registrar and answers a set of their questions and provides the attached evidence and per their process, the registrar would review John's answers and the evidence and determine that it was proper or improper. And if it is improper, then the information would be changed back. So again, that is a process that would be up to the registrars to implement how they want to do that appeal process. But this would be a requirement that they do actually have to offer that process. So this is a non-prescriptive example. The next option, I'll just give you a kind of a sneak peek, would be having an appeal process with more specific criteria. So this is the purpose of this option is just to provide a generic appeal process, which they would have to provide.

ROGER CARNEY:

Great. Thanks, Christian. Again, this is that next step. And as Christian said, there's another step after that of doing something to it to be a little more specific about actually having a dispute and then the registrar being able to provide information back and forth.

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And still it's a registrar call saying, okay, yes, we understand. We take a look at what you're saying and it's, we agree with you or we disagree with you. So it gets a little more specific about having to do something. And again, it's that next step of, hey, registrars have to do something here to, hey, you have to be more prescriptive a little bit here and provide a mechanism and at least a communications channel for the registrar. So Ken, please go ahead.

KEN HERMAN:

Thanks, Roger. This is Ken Herman for the Record. Perhaps somebody can help me understand a bit better. It's particularly when it comes to the notion of an improper change of registrant. In the example given, is there any dispute that John Doe actually was the registrant of record for that particular domain? That should be fairly easy to establish. Either the change was done by him or the change was done by somebody impersonating him. So there, why wouldn't then there be the fallback to simply asking the question, did you or did you not, based upon the previous information that was in the records for this? Just like we would have the previous mechanism was to ask for confirmation. We're talking about how let's dispose of that because it's time consuming and it's blocking. When there is a dispute, John Doe simply says, hey, hang on a second, I didn't activate this. So go back to what was the previous information still there and ask for confirmation. There are two parties to this, the initial and the new registrant data. So I'm troubled to understand why it would be more complicated than simply going and asking confirmation from both the originator and recipient. Thanks.

ROGER CARNEY: Great. Thanks Ken. And just off the top of my head just thinking about it, as you asked the question, the first one that pointed popped up was if there was an agreed change of ownership somewhere and the prior registrant accepted or didn't accept, but you know, accepted the change of registrant to somebody else. And then you go ask them and say, and then they have a remorse of giving that name up or whatever, for whatever reason, they come back and say, no, I didn't do it. No, there was an agreement to it or whatever. So I think it can get more difficult than just going back to the prior registrant and asking them to confirm it. So just off the top of my head, Ken, thanks. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. So I have no objections for option three. Like I previously mentioned, we already have such a process, but I do want to point out that process is how we work. And we need some, we need room. This process cannot have too many requirements here in what a registrar must do. You know, the majority, I mean, like I said, we get five of these requests a year. Usually four out of five are no problem. But number five, like we had six weeks ago, suddenly one company acquired another company, and then the previous CEO backs out, takes the domain name with him. And you know, then it gets really, really problematic because then it becomes so complex. You really need to go like, okay, this is not something we can solve. This is something you need to have a judge for and have a ruling from a judge because sometimes these things can get very, very complex. And you know, you can have very high requirements into

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this process from a policy because that's going to be very restrictive and going to be very problematic. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Again, any other registrars have opinion about, and again, I don't know if this is formal or informal, but you know, a dispute, if the policy requires registrars to have a dispute process for change of registrant, obviously the option before wasn't specific about a dispute process. So it was just had to investigate. And again, the wording there, we weren't sure about exactly what that was, but you know, it was a much more simple versus this option is policy wise, either you have to have a dispute process for the registrants for a change of registrant. So Steinar, please go ahead.

STEINAR GROTTOROD:

Yeah, this is Steinar for the record. I'm going back to Theo here because the way I understand is that you actually have this in-house, this dispute appeal process. And I'm curious to know why you established that, because my understanding is that that is not something that is required within the present policy. Was it based on some sort of requirement from one of your ccTLDs or was it purely your internal experience that settled this dispute appeal process? Thank you.

ROGER CARNEY:

Great, thanks Steinar. And Theo, I'll let you go ahead and answer.

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THEO GEURTS: Yeah, thanks. That's a very good question, Steinar, because that is indeed the case. I mean, we are not GoDaddy, but when it comes to .NL, we have a ton of them. And yes, it is a registry requirement in a sense like when there's a change of registrant for .NL, the registry sends a notification to the registrant. Then the registrant contacts the registry and then the registry goes like, this happened, you need to figure it out and sort it out. So there is already a process from a registry, which is for us very large, over 1 million domain names, so that is a lot of domain names for us. So that registry is pretty big to us. So we already had that in place. That being said, we can do that and registry has no problems with us doing the process because they know that we have the legal people within the team. But they also know that if it's a very small registrar who has only 200 domain names, I think the smallest one has 50 domain names as a Dutch registrar, they are not going to ask them to do it. They will do it themselves. So they will request the data from the registrant, from the previous and new registrant themselves and make their own legal determination because the Dutch registry has a couple of people who are lawyers and they are not going to leave that process up to a very small registrar. And that is basically also why I raised my hand. A lot of registrars can do this who are on a call, but if you are a small registrar, you might not have a lawyer on a retainer or whatever. So that again, you can't flesh this out into a very detailed policy level. Thanks.

ROGER CARNEY: Great. And thanks for that, Theo. And as Christian described this, the intent here was to be not as flexible as the option two, but still be flexible here and not prescribe a dispute process, but just that

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the registrar would have one. And as Theo mentions, obviously smaller registrars, the more policy you put in, the harder it is for them to take effect. And actually, sometimes it's harder for larger ones because it affects more, but you have to think about that broad mechanism of, can this work for everyone? And again, option three here is not dictating what the dispute process is, just that there is one that registrants have the ability to access. So Sarah, please go ahead.

SARAH WYLD:

Thank you. Hi, this is Sarah. I am not opposed to a requirement to have a process. I think you could take out the word dispute/appeal. We could just provide a process through which they can challenge and correct it. So not opposed. I do agree that it should be left open for the registrar to determine how to do it. Because as we've just heard, registrars generally have that type of process in place. And honestly, I am not sure that we need a policy requiring this. It sort of just makes sense that registrars would have processes to handle all kinds of account-related and service-related disputes, right? Domain ownership disputes can occur even without a COR happening. But yes, sure, let's have a process. Thank you.

ROGER CARNEY:

Great. Thanks, Sarah. Yeah, and that goes back to what Steinar and Theo were talking about. Registrars do a lot of things that aren't necessarily required by ICANN. And for a better customer experience, for many reasons, registrars go beyond what's required from ICANN on issues. But then again, this is just one of

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those that many registrars already have something similar to this. If, as Sarah mentions, if it's required in policy so that all do, is an interesting topic. Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Roger. So I'm remiss in not mentioning Christian. These slides are terrific, as you can see, that's really assisted in discussion and exploration of these things. But I'd also be remiss if I didn't criticize each and every one of your slides. But it's actually not on the slide itself. But it's regarding Sarah's point, I think it's a really good one. As a lawyer, I was thinking that it will never get past. If you just put it, go back, I think, Christian. Yeah. No, next one. And yeah, so I was just thinking in regards to Sarah's point, as a lawyer, I can't see lawyers advising registrars to have anything called an appeal process because we just opened up this can of worms for liability for registrars and it would make them so nervous. If you call it a dispute process, maybe that has more legs and that's kind of the answer to this.

The second point I want to make really briefly is that you guys, all you registrars on this call are participating in the policy development process. You're the A team. But have you seen the F team? And it proves the point that the registrars are already doing this kind of thing without it being an express requirement. And so really what you're regulating for is not for the best actors in the system, you're regulating for the worst. And so with thinking of the F team, it doesn't provide a lot of solace that they have a dispute process that's based upon their own policies. Then again, registrations are consolidated in the larger registrars to a great extent. So that provides some comfort. Thank you. All right.

ROGER CARNEY: Thanks, Zak. Volker, please go ahead.

VOLKER GREIMANN: Yes, thank you. I do not oppose having a process, but I think having it enforced by policy is a bit of a slippery slope, as Jack just correctly indicated. Essentially, what you're trying to do with such a requirement is have a registrar take the role of a court, because those changes of registrants may have occurred based on various reasons. Seller's remorse might be one. In the process that you've described here, you're just getting the evidence from one party, not the other party. You are expecting a registrar to be qualified in educating disputes, which not all registrars may be or may want to be. I mean, ultimately, we are providing registration services. We're a technical provider. We are not a court and we should not be thrust into the role of a court that has to decide who should own a domain name or not. Ultimately, while many of us do have a process and work on that, this is usually an informal process, not something that somebody can point to and say, "You have to do this and now you have to give me my domain name back." But rather, we do that when we have a preponderance of evidence that we can say, feel confident that our liability is going to be very, very low if we do that. Anything that you'd ask us to do where we don't have legal coverage, essentially, forces us into a position where we face liability if we get it wrong. And I don't want to have that liability on my books. So having a requirement of such a process or such a policy gives me pause and a little bit of a bellyache. Thank you.

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

OWEN SMIGELSKI: Thank you, Roger. This is Owen Smigelski. So I'm going to agree with Volker here. I kind of have some concerns about some sort of full process being set up for this. I think maybe, and this is just a big maybe, something such as if there's a WHOIS inaccuracy complaint, you must take steps to address it or something like that could possibly be there. Again, I'm not coming up with wording. This is just kind of brainstorming. But I really don't think the policy should be, you should have a process in place to do something and then not say what that process is, because I could then set up evil registrar corporation and our dispute processes is if you file a dispute process, we take the domain name from you. And in theory, that could comply with what the policy recommendations are. So if we are going to require some type of process or policy or something in place, there does need to be some guidelines and guardrails to ensure that registrants are protected. Thanks.

ROGER CARNEY: Great. Thanks, Owen. Which I think you just took us to our next option. So I'll turn this over to Christian so he can cover that one.

CHRISTIAN WHEELER: Thank you, Roger. And yes, and the group's already been talking about this quite a bit, just different aspects of this. But this would essentially be an appeal process that is more specific. So the

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registrar's would have a specific appeal process, which would be determined by the working group, by which the registrant can challenge and correct an improper change of registrant. So that could be a specific appeal process or rather an appeal process that has specific criteria that all registrars would have to follow, which again, would be up to this group to discuss what that looks like. So just some examples of elements of that could be that it requires them to retain the prior registrant's data for a period of time in order to kind of affect that reversal. Could be a specific timeframe that they have to respond or act. It could require a lock preventing changes until it's resolved. It could also be something maybe related to that the WHOIS an accuracy complaint, for instance, or require specific types of evidence from the registrant.

So again, this is supposed to be the most kind of prescriptive thing that the registrar, that the transfer policy could require as part of that appeal process. So if it's too generic to just say you have to provide a generic process, and again, that doesn't have to be appeal process, could be dispute process or rather just process. But that would be specific criteria with what that should look like. So this example, again, it's just, it would just depend on what that appeal process would be determined by this group. And so I'll probably open up for discussion. We do have a poll question after this, just to get people's feelings about these different options. So just wanted to flag that before meeting ends, but I'll just leave it here for, for talk about this one.

ROGER CARNEY:

Great. Thanks, Christian. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. So again, I wouldn't be too specific. I mean, leave it up to the registrar what that process is. It will vary from case to case anyways. And again, let's keep in mind that there is not really a big problem here. I mean, if there was a real problem, then every registrar would have made sure that two-factor authentication would be required for everybody. And that didn't happen yet. So there is no real issue here. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Any other comments on, again, as Christian laid these out and purposely trying to step us through, okay, the minimum to what would be the policy dictate the most here. So from our discussion so far, it sounds like people are comfortable with option one, the notification, what it includes and things like that. Option two of registrars having to do something. Again, I think the wording there, as Owen points out, may need some updating if we went with that. And it sounded like we were kind of stopping or slowing down to not getting to a defined process and not necessarily—as some of the lawyers here on the call have indicated, maybe not calling it arbitration, not calling it mechanism or we need to be careful there so that as [Sarah] indicated, registrars are not going to be a court system. You know, we already have those that can move to that spot. But I think that it sounded like option two, people liked with some wording changes, but maybe it's not quite in option three of having a process specifically called out in the policy. But I'll leave it there and open it up. Jothan, please go ahead.

JOTHAN FRAKES: Oh, thank you. And I was going to ask if Christian could flow the slides with your summaries. But on option one, there was strike through text on the lock. If we are saying that sounds good, I'd like to unstrike through or suggest that we maybe put it to X days on option one. So Christian, I was asking if you could roll back to—I guess we got to option two. Well, anyway, I'll let Roger lead that. But anyway, I wanted to propose it on option one that we not strike through that lock just yet. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. Yeah, and then again, I think the strike through came just because most people recognized that the biggest problem in a change of registrant was that lock and that lock preventing registrants from actually doing actual things that they wanted to do. So I think that that's the only reason over the last couple months, the group has leaned toward removing the lock. And as you point out, Jothan, maybe it's not removing it, maybe it's changing the timeframe. Maybe it's making it a security feature that's optional, whatever that is. But that's the only reason for that.

CHRISTIAN WHEELER: So. Yeah, and I would just add to Roger. And thank you for that flag, Jothan. The next kind of half of this conversation, which is about security measures, when there is a also coupled with a transfer request or attack request, that is one of the options that we have kind of pulled out, which is retaining that lock. So we'll get

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into that probably in our next phase of discussion. So yeah, that's right through will be—is just a pin.

ROGER CARNEY:

Great. Thanks, Christian. So, Sarah, yeah, we had that same discussion when we put this together. Is there an all above, and combinations. Are they cumulative is what Sarah is asking, is, if I pick option two, does that include one? I think everyone here, at least most people, anyone that spoke up, option one was definitely something people supported. So I think that that's great. I think that the key out of this poll question maybe is to try to drive to that next level of besides a notification that includes important information, which is option one, where do we fall between the degrees of policy language basically dictating what a registrar has to do if there's a change of registrant issue identified? So I think that to me, it sounds like the group has already voted for one. So I think that that's an interesting again, that covers the basics of if in any instance of a change of registrant a notice will be sent. So it's more of the degree of two or three or four or five really being, maybe five is in between two and three, or somebody has a completely different idea of what it is. Julie, would you like to do the poll? I think Julie actually has a poll that we can pop up for this. Perfect.

So hopefully that made sense. Again, and we have a ranked choice here. So it's interesting as well. And again, I think option one, it seemed like everybody was in agreement. So I think really what we're pulling for is the degree of two, three or four. So we'll give everyone some time. And again, this is just feeling for where everyone's at. And again, how far do you take policy language to

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make this happen? And again, I think several people have indicated, Theo and Zak, both indicating size of registrars and Zak was even grading them. But you know, it is that important thing where policy generally affects the lower end here. So it is that protection level. So we'll give a few minutes here, a few seconds for everybody to pick this. And we'll see where we land. And again, this is just kind of directing our focus from our discussions over the past couple months and actually getting to some actionable recommendations here.

CHRISTIAN WHEELER: So far, we have 10 responses.

ROGER CARNEY: Great, thanks, Chris. Okay, since we're almost at time, let's go ahead and show our responses. Okay. So I think I was hearing correctly then. I think that obviously option one had really good support. And I think that what I was hearing was somewhere between option two and three. And again, that somewhere is probably just language. So I think we're in a good spot there. So okay, and we are at time. So Volker, you've got the last word, please go ahead.

VOLKER GREIMANN: Yeah, just one point. I would treat this poll with caution. At least I was a little bit confused by it when it said first choice, second choice, third choice, because I had previously assumed that this was yes, no, maybe. Having marked the third choice for the later

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options, I couldn't unmark them again. So if I wanted to submit, then the third choices at least are probably a bit iffy. Thank you.

ROGER CARNEY:

Great. Thanks, Volker. We'll be meeting next week. And then it'll be our last meeting for the year. So again, thanks, everyone. We are a minute over. So I'll call it now. Thanks, everybody.

**[END OF TRANSCRIPTION]**