
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 16 May 2023 at 16:00 UTC

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JULIE BISLAND:

Good morning, good afternoon, and good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group Call taking place on Tuesday the 16th of May 2023. For today's call, we have apologies from Raoul Plommer (NCSG), Prudence Malinki (RrSG), Theo Geurts (RrSG), Crystal Ondo (RrSG), Catherine Merdinger (RrSG). They have formally assigned Juan Manuel Rojas (NCSG), Jothan Frakes (RrSG), Rich Brown (RrSG), Essie Musailov (RrSG) as their alternates for this call and for remaining days of absence. As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite emails.

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

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chat only. 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. Please remember to state your name before speaking for the transcription. Recordings will be posted on the public wiki space shortly after the end of the call.

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

ROGER CARNEY:

Thanks, Julie. Well, welcome, everyone. Just a couple of things before we jump into our agenda. Just a reminder that there was a poll sent out for August scheduling. Please get that answered as soon as you can and back to the group so we can get our August meeting set up for the best participation we can get for that. So please take a look at that and get that done.

And I'll open the floor up to any stakeholder groups that want to bring anything forward, any conversations they've been having or questions they have for the group. We'll open up the mic to any stakeholder groups now.

Okay, great. And as Emily put in chat, please try to get to that poll before the end of the week so we can get planning done for that.

Okay, I think maybe I'll turn it to Emily to do a quick look at our work plan. Emily?

EMILY BARABAS: Hi, Roger. Hi, everyone. So looking at our work plan, it's looking pretty familiar. Again, we're working towards having substantial progress completed by ICANN 77 to share some preliminary outputs with the broader community. So today the focus is primarily going to be on TEAC and firming up some of the work that we did on last week's call. And then we have three calls where the focus is going to be more substantially on TDRP, I think.

And we've now got calls scheduled through July. We'll get calls scheduled soon for August. The next topic after TEAC and TDRP is ICANN approved transfers, although we kind of need to see how the work is progressing and if there are some loose ends after ICANN 77 that we need to still wrap up on work related to disputes and reversals. So I think that's it. No open action items at this time. And Roger, I will give it back to you to kick off the substance of the agenda. Thanks.

ROGER CARNEY: Okay, great. Thanks, Emily. Yeah, and just following on to what we discussed last week, we put some more, I guess, better wording to our recommendations on our discussions from last week. So we'll go over those today on the TEAC items. And then time permitting, we'll jump into the TDRP stuff. But I think we can go ahead and jump into our draft responses to the TEAC. Emily, you want to walk us through those real quick?

EMILY BARABAS:

Sure. Thanks, Roger. Emily, again, from staff. So as Roger noted, there's a few areas where we got some positive reactions from the chair's proposal and not responses from everyone or indications from everyone. So for those items where we saw some initial indications of support, we've tried to firm up some language for what a recommendation should look like and hopefully help people visualize it a little bit better. And we are looking, of course, for reactions to whether this is something we're moving forward with. Opportunities of course for wordsmithing will come. So this is obviously not the last opportunity. But in terms of the sort of intent and direction of the recommendations, that's what we're looking for here.

So you'll recall that F2 and F3 are about the time frame for initial response to a contact via the TEAC channel. And I guess what I'll do is just read it out. And I'm sorry, that's a little bit tedious. You can see on today's wiki page that you'll be able to reference these slides after the call and read through it. So the first recommendation is noting that section 1.A.4.6.3 of the transfer policy states that messages sent by the TEAC communication channel must generate a non-automated response by a human representative of the gaining registrar. The person or team responding must be capable and authorized to investigate and address urgent transfer issues. Responses are required within four hours of the initial request, although final resolution of the incident may take longer.

And here the working group is recommending that the policy must be revised to update that required time frame for an initial response from four hours to 24 hours. And I just recapped as well

the rationale in brief that we talked about last week for those who might have missed the call.

So again, we heard some initial indications on last week's call that this seemed acceptable. I'll pause and we can see if there's any reactions further on this, positive or negative, to help us determine if we're moving forward. Thanks.

ROGER CARNEY:

Great. Thanks, Emily. Yeah, I think we've talked this through quite a bit, but just to get confirmation that everybody's good with this. I suppose that that's the purpose here, is changing that four hours to 24 hours and making sure everybody's comfortable with that and supports that. So if you have any issues, please let us know now and we can discuss. So thanks, Eric, for the support on it. Okay. I don't see any opposition. Thanks, Rick, for that. I think we can go with this and be safe to say that we've got good support on the 24 hour. So Emily, take us through that next one, please. Thanks, Sarah.

EMILY BARABAS:

Thanks, Roger. And keep those responses coming. We like to see that you're all out there and responding. So please do use the chat or hands. So F4, again, was about the two timeframes, one about how much time can pass after the alleged authorized loss of the domain before the initial contact happens. And the second one is about the timeframe for final resolution.

So two preliminary recommendations here, one for each of those timeframes. The first one quotes section 1.A.4.6.2 of the transfer

policy, stating that the communications to a TEAC must be initiated in a timely manner within a reasonable period of time following the alleged unauthorized loss of a domain. The working group recommends the transfer policy must be updated to state that the initial communication to a TEAC is expected to occur in more than 30 days following the alleged unauthorized loss of a domain. If an initial communication to the TEAC occurs more than 30 days following the alleged unauthorized loss of a domain, the registrar contacting the TEAC must provide a detailed written explanation to the TEAC justifying why this is an emergency situation that must be addressed through the TEAC and providing additional information about why earlier contact to the TEAC was not possible. So again wordsmithing is welcome. Now we're down the road, but we're really here. We're just looking to confirm that this is indeed what the group is moving forward with. And I think the 30 days was something that folks expressed some support for, but we have it in brackets here, should that be something that people need to discuss further. Roger, shall I pause for a moment?

ROGER CARNEY:

Great, thanks, Emily. Yeah, let's see, make sure we've got—and again, yeah, the 30 days was, I think, as some of the members noted, aligns well with the 30-day lock of the post-transfer. So I think that that's where we did see a lot of support, and thanks, Sarah, for that in chat. Again, open this up to anyone that sees issues with this. Again, we added some language around 30 days to, if it's past that, it still could be considered that as long as some

evidence or some reasoning behind it is provided. So, but, Jothan, please go ahead.

JOTHAN FRAKES: Yeah, I know that Mike Rodenbaugh early on had identified making as many of these dates consistent as possible, and I do like this 30-day notion. I wanted to maybe suggest that we tether it to other lock periods so that it's really clear and simple. So if we are identifying, for example, that the post-transfer lock would be 30 days, that we would maybe say that this duration should be the same as the post-transfer lock, rather than explicitly stating it as 30, but do identify that it is 30 days. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. Owen, please.

OWEN SMIGELSKI: Thank you very much, Roger. I appreciate the desire to align to those types of locks and things like that. I do want to make one suggestion here, and this is just to accommodate those edge cases there, just to make sure that all possible scenarios are there, because there are times when unauthorized loss of domains will be discovered more than 30 days after. Hypothetically, somebody is in France and takes a 30-day vacation in the summer, like those wonderful people in France are allowed to do. So I mean, the problem is if it happens during that—we have seen in the past where there have been domain hijacks that occur during closures in North America or closures in Asia during the Chinese New Year. And so they may readjust and

do these hijacks when people in France are on vacation. And so then it would be, in theory, possible for them to come back after their vacation and discover the domain is gone and no way to use this TEAC in order to do that.

So maybe instead of saying following the alleged unauthorized loss of the domain, perhaps following the discovery of the alleged unauthorized loss of the domain, that way that could cover that, give a little bit more flexibility for all scenarios. Thanks.

ROGER CARNEY:

Thanks Owen. Yeah. And I think that that's kind of the reason of the second part of that, was the idea that obviously there are circumstances where it may go beyond. And we did have discussions on the alleged loss date versus a discovery date. And that's kind of where the second part of this is, is if it's beyond 30 days, it's still allowed if there's reasonings. And again, that could easily be explained by, well, we didn't see this or that. And I think that that was the key to that second part was allowing for longer than that 30 days, setting the 30 days as a target, but allowing it. And I think Rich actually posted this in chat, allowing it to go beyond with a reasonable excuse there. So Owen, please go ahead.

OWEN SMIGELSKI:

Okay. All right. I am recovering from jet lag and I have about 17 other plates spinning here. I apologize for missing that, but thanks for clarifying Roger.

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

RICK WILHELM: Yeah. Thanks Roger. I may not need to say much because I think you probably clarified it. I think that the other period allows for the notion of discovery because discovery is notoriously unattractive. Thank you.

ROGER CARNEY: Great. Thanks Rick. Yeah. And thanks, Steinar, for the chat. It's one of the things about trying to tie it is, right, since you can opt out today anyway. But our plan in the future, our recommendation was there was no opt out for that post transfer. So there was some discussions around that. But that's the look forward.

And I think that one of the big things on this was today it doesn't specify anything and we were looking for a target just to provide some more clarity to it. And I think that the 30 days makes sense here. So I think that's great. Right. Jothan. Exactly. Yeah. And you hope that is true, is it's going to be less than a percent of the time, but obviously it's needed because we do see it. So, okay, great. Any other comments or questions? I think we can call this a good draft recommendation here. So, okay, great. Thanks, everyone. Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. So next up is group two, number three. This one is connected to the one above it. And it says that once a registrar has provided an initial non automated response to a TEAC

communication as described in section 1.A.4.6.3 of the transfer policy, that registrar must provide additional substantive updates by email to the registrar who initiated the TEAC communication. These updates must be sent every 48 or 72 hours until work to resolve the issue is complete and must include specific actions taken to work towards resolution. So again, these timeframes are bracketed here because the group had discussed both 48 and 72 hours as possible timeframes for updates.

ROGER CARNEY:

Great. Thanks, Emily. Yeah. And I think, again, we touched on the possibilities of different times here. And it seemed like people were gravitating toward two or three days, 48 to 72 hours there. Again, I think that we need to think about that and select that time period that makes sense. Again, this is mostly just to make sure that the process continues and that we know that from whoever's standpoint that work is being done. So good note in chat there, Rich, 72 hours should encompass most weekend periods. So if someone's gone or whatever, that does allow for that possibility that the update may come on Monday instead of a Sunday or whatever. So good. I like the discussion in chat there to the 72 hours. That makes sense.

And hopefully, again as we kind of talked about in the last part there, hopefully it doesn't even get to that one and it gets resolved before that first 72 hours. But it's always good to have that. So everyone knows it's still moving forward. Yeah, good point. And I think we are trying to be specific, thanks, Owen, for that. And the phase 1a recommendation is trying to be, and I think [inaudible] days on what that means by presenting it both ways. I think we did

both ways in most of the recommendations. But yeah, we'll make sure it's consistent with all of our recommendations for phase 1a and now. But we'll go with that 72-hour, three-day window thing.

Okay. I think that's great. If anybody has concerns on that, the 72-hour, three-day window, please let us know. Otherwise we will consider that a good recommendation as well. So okay. I think we can move on to the next one, Emily.

EMILY BARABAS:

So next up is a charter question F5. This is the one about the modes of communication to the TEAC. And the question about whether phone communication should be eliminated and whether an authoritative system of record should be considered. So our recommendation number four, based on discussion last week, is that section 1.A.4.6.2 states in part that the TEAC point of contact may be designated as a telephone number or some other real time communication channel and will be recorded in and protected by the ICANN registrar portal.

The working group recommends that the registrar must provide an email address for the TEAC point of contact and may additionally provide a telephone number or other real time communication channel. So this recommendation sets us up for number five, which is that the working group recommends that initial communication to the TEAC described in section 1.A.4.6.2 of the transfer policy must either be in the form of an email or be accompanied by an email communication to the TEAC and that this email will start the clock for that 24 hour response time frame specified in preliminary recommendation one.

The registrar then receiving the TEAC communication must respond by email within 24 hours and the registry and ICANN org must be copied on both the initial email to the TEAC and the initial response by the TEAC. So this is in summary saying that there needs to be a paper trail and that email is the marker of that window in which a response needs to happen within 24 hours. I'll pause here. Thanks.

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

SARAH WYLD: Thanks. Hi, this is Sarah. Just had a thought. I feel like we've discussed for a while how the registry is going to know that the TEAC was contacted. How does the registrar know what email address to send that to if they're supposed to copy the registry on that request? Is there a list someplace? Thank you.

ROGER CARNEY: Great question, Sarah. As we know, and as Rick had described in the last couple of meetings, they do get the registrar contact via the portal via a download from ICANN for them. And that's a good question of how—to me, the ICANN one is probably fairly easy. We'll have to—implementation can work that out exactly what that is. But the registry point of contact, that's a good question, Sarah. Any thoughts, anyone? No specific thoughts on solution. Anybody think that that's an issue? Or maybe that's not an issue?

Or, again, maybe that falls into the implementation issue. Okay. I think maybe give people time to think about that, how, again the recommendation five here, draft recommendation is specifically calling out contacting both ICANN and the registry. And as Sarah indicates, what email is that at the registry? And, again, I think everybody has the list, but is it going to be an assigned one, so forth and so on? So just give that some thought and see if we need to refine that and make any recommendations or make an implementation note that that be addressed. Thanks Rich. Yeah, exactly. Okay. Anything else on that? On draft recommendation four or five? Emily, please go ahead.

EMILY BARABAS:

So I was just going to ask if we perhaps want to be more specific here rather than saying the registry, if, for example, Rick, would you recommend that we specify registry transfer contact or do we just leave it at registry at this stage? And you think that that should be sufficiently clear for the purposes of the recommendation? Thanks.

ROGER CARNEY:

Great. Thanks, Emily. Rick, please go ahead.

RICK WILHELM:

Thanks, Roger. So I guess when Sarah first asked the question, my initial response is, well, what does a registrar do now when they're doing a TEAC and then the then the other registrar doesn't react fast enough and they want to call the registry to get them to do something? Like who do they contact? I guess I was not aware

exactly that this question was in doubt. So I know that every registrar has a registry primary contact. I thought that there might be a registry transfer contact in the NSp now, but I'm sort of looking up at the ceiling. I'm not entirely sure about that.

So we should probably look at the NSp to see if there's a specific contact that's already there. I would not suggest that we create another one because we haven't had one—Steinar says there's no registry. So probably just what the registrar is doing now would be the probably what the suggestion would be. I mean, obviously, if there's going to be a slot made in the NSp for it, that there would be a specific one, then the registry could just decide what contact to put in there and it could be the regular registry contact spot. But the registries already offer support for the registrars in this kind of 24/7 fashion anyway. So I'm not sure that there needs to be another contact, but might deserve further discussion. Question mark. Thank you.

ROGER CARNEY:

Great. Thanks Rick. Yeah. And I guess, as you state that, obviously, most registrars do have a good working relationship with the registries and do have contacts. I think the big question is, should it be—and again, something to think about. I don't think we can decide here, but something to think about as we move along and we can get back to it is, should there be a specific email for this to go to?

I think last week, someone—and maybe it was even Rick—suggested maybe the registrars just have a TEAC at registrar or whatever. And I don't know if that makes sense for the registries

as well or not. Something to think about. And again, I think when we run into these issues today, as Rick mentioned, the registrar does find a way to contact, but should we be calling that specific path out? So, Owen, please go ahead.

OWEN SMIGELSKI: Thanks Roger. I'm hesitant to make a role email that works across everybody because then that's going to just become a honeypot for everyone else out there. So I think it should be something that we should allow people to define, but we need to make sure that there's a clear place where registrars and registries can find where those are defined so that we can use our secret decoder rings to get in and get access to that, but then not have it defeat the purpose of having those direct escalated channels. Thanks.

ROGER CARNEY: Yep. Great. Thanks for that, Owen. Okay. Any other comments on this? Sounds like everybody likes that. And maybe just give some thought to exactly how Owen kind of described that, is, what is that process for making sure people have that access to those different lists? So Emily, is there another one we go to here? Oh, okay.

EMILY BARABAS: So that's it for our preliminary recommendations at this point. It sounds like we're pretty solid on most of them and welcome further input on this question about the registry contact. So if anyone feels empowered to do some fact finding about a

preferred path on that, we certainly accept that additional input and welcome it.

So now we're going to go into some outstanding questions on the TEAC based on the discussions from last week, and we'll start with the charter question F1, which is about whether additional data is needed to support evaluation of the effectiveness of the TEAC mechanism. And if so, what data is needed? We started to talk about this a bit last week, but then I think the group wanted to go a little bit deeper into the conversations about the communications channels that would be recommended, which would then inform what data might be accessible and easy to track based on the channels used.

So just to recap where we are. So some support has been expressed for the idea that more data is needed and is valuable to evaluate the effectiveness of the TEAC. And some working group members have indicated that registrars should be required to track and report on specific data points going forward.

So some of the things that the BC, registries and the NCSG identified as potentially useful data points for evaluating the TEAC include things like the number of times the channel is used, modes of contact to the TEAC and whether those are satisfactory, steps taken before the TEAC is contacted, quality of initial response by a TEAC, whether the timeframe for response is satisfactory, circumstances prompting the use of the TEAC, number of cases where there are problems associated with using the TEAC, so including things like abuse. And by abuse here we mean abuse of, for example, the window of initial contact. So it's sort of gaming the system or misusing the TEAC channel.

Circumstances of issues experienced with the TEAC, types of resolutions of cases raised through the TEAC, and the level of satisfaction with the final resolution. Also, the charter had a couple of metrics that could be used to measure whether policy goals are being achieved, including the number of TEAC requests responded to within the required timeframe versus those that were not within the required timeframe, and the number of TEAC requests resulting in a transfer undue.

So a couple of things to discuss here. The working group initially seemed to be converging on a recommendation, and now based on today's conversation also seems to be thinking that initial contact and the response need to include a paper trail, so email is what we're moving towards, I think. But the group is not recommending a centralized system of record, and such a system might be something that could be used to provide aggregate data about things like the number of contacts, the timeframe for response, and so forth.

Whereas an email paper trail, it's a source of information. Certainly you can go back to that and look at it to understand the facts of a specific case, but turning that information into something that's aggregate data that can be used for policy development requires quite a lot of manual work.

There might be some things that are easy to collect and aggregate, so number of times the channel is used, amount of time it takes for its response, number of times registries undo a transfer. So those sorts of things are fairly simple to put into metrics, but other things require looking at the facts pattern of cases and making an assessment and providing a narrative

response which could then, I guess, be analyzed more comprehensively.

So the question is, what are the costs and benefits here of recommending that these sorts of metrics must be collected and analyzed? And if there is more benefit than cost, who would be expected to do that data collection and analysis? And another question is, are there alternatives that this group wants to consider beyond mandating data collection and reporting? So for example, saying before the registrars are expected to do their own kind of internal maintenance of records so that should they want to advocate for changes in future policy development, they have something to draw from to be able to provide that evidence. So that would be one possible alternative, not necessarily a policy recommendation, but you know, that could be a response to a charter question if that's something the working group wanted to do. So a lot to chew on here, and I'll pause and hand it over to Roger for discussion. Thanks.

ROGER CARNEY:

Great. Thanks, Emily. Yeah, and I think Emily kind of touched on it, and we talked about it last week or maybe the week before as well as the idea of collecting metrics here is great, and it's informing for at least the next process, if not in between that. But something Emily said that makes sense is the cost benefit of this with the TEAC being used as infrequently as it has, how much resources do you put in tracking it when it doesn't get used all that often? So I think that's an important question everybody needs to think about.

The other important question is who's going to be responsible for tracking, providing that information? It is big to me as well. It's like, the registrars could do that, but then it's a couple thousand registrars doing it, so is that good or bad? And maybe it's not, again, because the numbers just don't figure out to be that much, I guess, overtaxing for anyone. But so I think that's another one, is, who's going to do that and who's going to be responsible for that?

And as Emily was going through that, it got me thinking about our requirements of sending an email to the TAC, and then as it progresses constant communication every 72 hours. I wonder too, if we missed something or it's not important on the closure side of it, we didn't say anything about when it's resolved that an email is sent or if the registry does revert it back to the original sponsoring registrar, should there be an email sent.

So again, closing the loop in spots, is that necessary? Again, is it more work that's not needed when we're talking about the limited [inaudible]? But just things I was thinking about is we know a TEAC was started, but we don't know the outcome unless someone supplies that information. So thoughts on that? Rich, in your comment, yeah, in chat, if ICANN is being copied, then ICANN would be a central location. I thought about that as well, but obviously if that's a path, then there's got to be discussion on how they get supported and supplying that resources to track all that as well. Any comments on this? Anything that we want to make called out as a recommendation? Does the group not want to recommend any metrics tracking specifically? Or is there something that we can consolidate around as a group that says, yes, we should make this happen and registrar should do it or

ICANN should do it? So I think that that's the question here. The answer can be simple. No, we don't see that there's any need for additional, or we make specific call outs. Any thoughts, comments? Sarah, please go ahead.

SARAH WYDL:

Thank you. I don't have a strong opinion here, but I kind of like the idea of ICANN being the collector and being the reporter of this because like when you think about who has the data, right? And each registrar has their own TEAC. The registry would have the TEAC data for all the registrars selling their TLDs, but ICANN has all the TEAC info because it's all getting sent to them. So it just seems to make the most sense to have ICANN track it.

And then just something else to consider for the long term, maybe in implementation, I guess, is the personal data processing as part of that reporting and tracking. Like I don't really anticipate there being registrant information, although maybe there is. Maybe it depends on what exactly is included in the initial request that ICANN's copied on, but also the data of the employee who is sending the stuff to ICANN, like that should maybe not be retained forever. So that's a thing for someone to think about at some point. Thank you.

ROGER CARNEY:

No, that's an interesting thing that you bring up. And I think that that's important. And how you solve that is maybe more difficult. Because as you were describing that, Sarah, I was thinking, does anybody really need to track it? I mean, is it a real time need for

this information or is it something that can set and reside? And again, to Sarah's point, you have to be careful on how that sets and resides. But is that something that doesn't actually get analyzed until the next review or the next—I would say review, just the next question of should it be reviewed or not?

So it's not necessarily any resource that's taken up until that such time as there's actually a look at it. Again, not real time or ongoing tracking, but the ability to analyze it at a certain point in time. And if that's the case, maybe that solves one of my concerns about overburdening anyone. And maybe it's more of a onetime thing that has to be done. And that can be accommodated much more easily. Any other thoughts? Emily, please go ahead.

EMILY BARABAS:

If the working group is going to trend towards a recommendation that ICANN org needs to—this is sort of perhaps a little bit of an unprecedented policy recommendation as far as I can tell in terms of content that it would sort of be monitor all activity and have a person kind of track information based on email to understand outcomes to support future policy development, I think it would be important for this group if that was a recommendation that it made to be clear what is expected to be tracked by org? What is the—so Sarah, thanks for the question about compliance metrics. Yeah, no. So compliance certainly tracks—and I'm not sure if Holida is on this call—complaints, for example, in their system. But this is sort of a different thing, which is sort of monitoring the email box. So this is routine activity not associated with specific problems and complaints to the compliance function.

So I think the group would need to think about what it is that it's expecting ICANN to track, what it thinks that that service—what purpose that would serve and what the future policy development would be able to get out of that particular metric.

So if it's just tracking, for example, number of contacts and time frame or if there's a more substantive analysis that the that the group is expecting to get. And I think, yeah, that's sort of an additional question here, is the group has sort of trended away from requiring a centralized system. But one of the advantages—and I'm not advocating for the centralized system one way or another, but one of the advantages of a centralized system is that you can have a clearer picture of at least things like time frames and numbers. You don't necessarily get any visibility from a centralized system into things like the fact patterns of cases. Again, that's always going to be manual. I'll pause there. Thanks.

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

ZAK MUSCOVITCH: Thanks, Roger. Forgive me, but remind me, the TEAC procedure under the pending proposal is to send an email. Does that email get copied to ICANN?

ROGER CARNEY: Correct. That's part of the recommendation.

ZAK MUSCOVITCH: So the volume of those emails shouldn't be too burdensome for ICANN to tabulate. And even a simple tabulation could give some indication about how many hijackings there were—unauthorized transfers rather—that involved the TEAC. That could be a very helpful data point, especially if we keep in mind that the transfer dispute resolution policy is rarely used and most other disputes are handled informally without a record. This might be the only data point, of course, with the caveat that the TEAC may be used even less regularly than the dispute resolution policy. But for what it's worth, that seems to me to be a simple data collection effort, which provides a simple data output. Thank you.

ROGER CARNEY: Great. Thanks, Zak. The only comment I'd make on that is it always seems simple. And we're not talking about anything complex here, but it still always takes resources. So that commitment of resources has to be identified and realized. But Berry, please go ahead.

BERRY COBB: Thank you, Roger. So I think I'm a little hesitant about where this is going. From what we understand, yes, there are very little TDRPs because registrars seem to work it out or it goes to courts and hardly ever contractual compliance gets involved, at least at this point.

ZAK MUSCOVITCH: But what we don't know is the volume of transfer disputes from a broad spectrum of it's not a dispute at all to it is an actual dispute. And some percentage of those do involve TEAC. And we have

technically some two thousand ish registry operators. We've got two thousand ish registrars. And I'm presuming that trying to track TEAC email traffic, even if it's a lower amount, is definitely not going to be easy. And as I noted in the chat, this is further that it's unstructured data. And to Roger's point, yeah, that is kind of it is a resource issue. But you know, it's a data quality issue. To be honest, I'm not thrilled about anything of ICANN being required to track metrics based only on a carbon copy of an email to try to get to some kind of meaningful outcome or output of what that was about. So I'd encourage this group, if you really want metrics, then it probably does need to be attached to some kind of centralized kind of solution or ticketing system to get down to it.

And then the other aspect I want to comment on I think, Roger, you mentioned this and it's great. Well, all right, let's start collecting metrics. But what are we going to do with it? Are we going to wait till the transfer policy gets reviewed again another decade from now? And that's all well and good. I fully support that. In fact, I think all of us would maybe support it. But then we need to think about other metrics respected to the transfer policy that could be considered.

But concluding back to just the TEAC part, assuming that this becomes a supported recommendation that part of that recommendation is after two years of the metric system being implemented, that ICANN org can produce a report of findings and deliver that report to the council for further consideration to see whether it was on the mark or not. Thank you.

ROGER CARNEY:

Great. Thanks, Berry. And as I was thinking through that obviously just trying to process everything. To Berry's point, I don't even know that we know—because there's no audit trail, paper trail today, we don't even know how often the TEAC today gets used. We only have when it's a reversal or something, those are the ones we kind of know because it's impacted and ICANN's contacted and the registry's contacted.

But the simple fact of a registrar calling another registrar on the TEAC, it doesn't necessarily ever get recorded anywhere. So it may be happening more often today than not. And to Berry's point about the unstructured data, I was thinking about that as well. It's like, how do you even know if a TEAC is contacted and there's four multiple or four follow up emails from the gaining registrar as they've been working through things and they're all going to a centralized—how do you separate those and indicate that, oh, this is actually one TEAC versus multiple TEACs?

I think that as Berry mentioned, that unstructured look takes a lot of work to resolve into something practical. And the other point, good point, Berry, I thought was, what are you going to use it for? Is there a threshold of if we have so many TEACs, then that triggers the council to do something or is it just a backwards look for future workers, future reviewers? So Zak, please go ahead.

ZAK MUSCOVITCH:

Yeah, thanks. I'm not above changing my mind after hearing Berry and your point. So I mean, I thought this would involve just hiring someone from Fiverr and adding up. I take the point, it's more complex than that.

But beyond that issue, I think that the limited data obtainable from the TEAC procedure wouldn't really be a good indicator in respect to the number of unauthorized transfers generally, because it would only be one procedure, right?

And so it would be nice to be able to have some meaningful data about that for our grandchildren who are in the next working group, or just even it being reported on a regular basis. The difficulty, of course, is how does one acquire that data? And registrars understandably don't want to be tied to a statistic about number of unauthorized transfers, right? But this is an ongoing problem with the lack of data that's run through the whole working group on this issue beyond our control. And so maybe there isn't something that should be done in connection with data in the TEAC issue. But maybe there could be a general recommendation of an anonymous survey of registrars taken periodically to get some data on unauthorized transfers that they deal with. Now I'm sure that we're going to hear momentarily from registrars saying they don't collect that data, etc. But anyhow, the thought and suggestion comes from a good place. Thank you.

ROGER CARNEY:

Great. Thanks, Zak, for that. Yeah. And I think one other thing that Berry mentioned, and I think several people have mentioned now, is the centralized version may provide a cleaner solution here. But we've talked through that process and we came to the conclusion that the centralized is way too much overhead for just getting that out of this. So I think that at this point in time, I don't see that this group is supporting anything about a centralized system. So I think that that kind of goes away. And again, how often does this

get used? Again, we don't really know, but we don't expect it to be a high volume.

And I'm getting to the point here where the group is sounding more and more like not putting any recommendations for anything specific in. And it's not that there won't be any data. As someone said, 10 years from now, whatever that is, hopefully our grandchildren or great grandchildren, whoever is dealing with it then. I mean, there will be some that they can do—and if they wanted to, they could spin up and fund a study of those emails. I mean, they will exist.

To Sarah's point, how long should they exist is an interesting concept that will have to be taken into ... But from what I'm hearing is there doesn't seem to be enough support to recommend anything specific here, especially not a centralized system for tracking. But please let me know if I'm not hearing correctly, if I'm summarizing incorrectly. Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. While people are thinking about that, I wanted to just take one step back. If this group determines that there won't be anything in the recommendations regarding a specific requirement for metrics, and you know, that is fine, we can put a response to the charter question summarizing where the group landed on this, what data might be helpful, but not mandating anything.

Coming back for a moment to the draft recommendation about copying ICANN org on emails about the TEAC. I think a question

here, and I think what we need to understand is sort of what is the expectation or purpose of ICANN org collecting and holding on to that information, just so we can internally check and make sure that that's something that org feels comfortable with from a data protection and GDPR perspective. So yeah, so something for the group to provide feedback on, if at all possible. What is the expectation there, so that we can take that back. Thanks.

ROGER CARNEY:

Great. Thanks, Emily. Yeah, and I think that when we discussed this, the feeling I got was it was that additional—and it went along with kind of what the registries—not knowing when something was happening. It's that third party look at it, touch to it, that it's not just that he said, she said kind of thing by including the registry and ICANN, it provided that extra third party, at least that's what I understood from our discussions anyway. But others, please jump in on that question, because it is a good question.

Again, I think that's, to me, it was the safety net, it was nothing more than that. So, Berry, please go ahead.

BERRY COBB:

Thanks Roger. And this last sentence in the draft recommendation also kind of gives me pause to what Emily mentioned, is if there's no kind of an enforcement purpose behind it, or if the carbon copy there is to just increase the legitimacy of the issue, and by having a CC to ICANN org, then what bothers me about it is that immediately may give false impressions that org can do

something about it if something goes south in that transaction, when org wouldn't have any requirement to necessarily intervene.

And I think kind of to Sarah's point in the chat about the purpose, is it's very much likely that personal data one way or another would be involved in this email traffic, and I'm not sure that that rises enough to a level of purpose to justify the processing of that data. Thanks.

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

ZAK MUSCOVITCH: Thank you, Zak. Yeah, and Rich, I believe, just put into the chat the point that I was about to make, and I'll read it out. It allows for adequate enforcement should a registrar not respond. So because the TEAC, you'll recall, has this automatic transfer mechanism in the absence of a response, right? And so if a registrar used the TEAC and the gaining registrar doesn't respond, then I believe that the losing registrar would then go to the registry and say there was no response to the TEAC, and that email proof of copying ICANN would confirm the timeframe, and there actually would be a role for ICANN in the event that the gaining registrar in theory disputed whether that email was actually sent at all. ICANN would say we have a copy of it.

So I think that was the purpose of it. It seems to make sense to me. Thank you.

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

OWEN SMIGELSKI: Thanks, Roger. So I am really against copying lots of extra people here. I see a lot of times where people send emails, and I think they have a case of CC-itis or something, and they copy a whole bunch of other people, and then some people assume it is being worked on and followed up, and it just gets into a flow and a work stream and a difficulty and stuff like that. The concern is what are the registry and ICANN actually going to do with this information? Are they going to start the timer on their end and follow up? Are they supposed to or are they not supposed to? They won't know if there is noncompliance, because what happens if the follow-up from the other registrar doesn't copy ICANN and the registry?

So there is a lot of gaps that can be in there. If we want to have something that is trackable, we should do a centralized system. If not, then I think we just do gaining and losing follow-up on this and keep ICANN and the registry involved only if we get to a point where there is noncompliance and they need to be escalated in there, because, again, we are just going to have so many emails, and we already get so many emails that we ignore. Not saying that we should be ignoring emails, but a lot of us do for this.

I know back in the good old days, even before I joined ICANN in March of 2012, the way they counted their tickets or metrics for the community was counting emails that they had received, and we certainly don't want to be going back to that, because that was just a lot of useless work that they were doing there. Thanks.

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

HOLIDA YANIK: Thank you. Thank you, Owen, for mentioning the point when the registrar, responding registrar, forgets to reply all. So that was the first point I was going also to mention. And the second item is that from the practical perspective, compliance had been ceased by a few registrars in their TEAC emails, and this created confusion and did not help any party. So it can actually delay the TEAC process, as we have seen with some registrars in the past that believed that once ICANN compliance is involved or has been copied, it may mean that ICANN compliance is somehow involved, and they do not have to do anything or do not have to take any action without obtaining guidance or any confirmation or something from compliance. And then instead of acting promptly on TEAC requests, they may decide to wait until we contact them.

And regarding noncompliant registrars, compliance already has a way to get the visibility over nonaddressed TEAC requests. We have complaint forms through which contracted parties can submit complaints to us relating to other contracted parties' unresponsiveness to TEAC requests, and we have everything put in details in our NSp. So these are newly developed complaint forms. Thank you.

ROGER CARNEY: Great. Thanks for that, Holida. Rich, please go ahead.

RICH BROWN:

Honestly, I think the registry should be CC'd. That's where I stand. As for why all of these CC's, you've got to remember, this is an emergency contact. So the losing registrar has already sent out that, "Oh my God, we need help," email. They have waited 24 hours, if we go by the new idea that we're planning. And now they're reaching out for further assistance that they've been told they'll get from the registry.

So one, the registry should be aware. And I'm speaking from experience where I've been through a TEAC where a registrar did not respond, that I went to the registry and they were like, "Well, we need to verify everything ourselves." So that's another two or three days with that registry, because their internal process had like a 48-hour to response period.

The point being, one, with the registry CC'd, the losing registrar doesn't have to now wait for the registry to confirm a response because they saw, they have access to that original email.

As far as ICANN, like I said, I'm on the fence, but if I go to ICANN complaining about the registry that didn't respond, I have to provide everything. And well, ICANN already has that copy and can go to enforcement and handle that stuff. Instead of me as a registrar who is dealing with the transfer dispute, now dealing with an ICANN complaint that I probably have to file because somebody didn't respond, etc., it's just stacking up things. Whereas a CC is just an email that goes to the box at ICANN that they can deal with how they see fit. Anyway, that's all I wanted to say. Thank you.

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

OWEN SMIGELSKI: Thanks, Roger. And I'm going to, sorry, Rich, disagree with you on that. There are some ticketing systems that if a ticket is created via email, it ignores CCs and there's no visibility to that. So I would not be able to say that. I won't name any systems particular, perhaps one that rhymes with [Myako.] It doesn't see it. And so there's no way for them to even know. And so they can reply, things get cut off. I know that other registrars have had issues with CCs before having dealt with their ticketing systems when I was at compliance. Again, even if we're doing an email system, people are going to forget stuff. And then if you're the gaining registry, or sorry, if the registry involved in this, you're getting copied on something you might not even have to get involved with. But now that you've been copied, you've got to be aware of it, you've got to track it. It's creating additional work for a registry who might not even have to get involved at all.

So I think this should be something that is just only between the two registrars. And if we need to bring in the registry, or we need to bring in ICANN because they're not able to resolve it, then at that point, add that in there and just cut down on the traffic and noise and the ability to need to copy everybody with these emails.

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

ZAK MUSCOVITCH: Thanks, Roger. Boy, Owen, I hope my registrar has a ticketing and email system that doesn't send the TEACs into the trash. And of course, [inaudible]. If we're relying on our registrars to have those email and ticketing systems that are responsive, and there's an issue there, then we might have a bigger problem.

But my question really is, from anyone's experience, what will a registry require in order to verify that the TEAC wasn't responded to by the gaining registrar? Because really, that's the piece. That's the only crucial piece to this. What would you give the registry if they said, well, we need to make sure that there was no TEAC response? Thanks.

ROGER CARNEY: Great, thanks, Zak. Yeah, and I kind of want to go back to how the thought of the purpose, and it goes beyond just this one sentence that we're talking about. But you know, the idea of the he said, she said, which we thought going from a required phone to a required email will hopefully provide a paper trail for that. So it's less likely that that happens.

And I think that this sentence that we're really focused on now was an extension to that. And again, is it needed? Is it not needed? I think is what the debate here is. And it sounds like a lot of people feel that it's not necessarily a requirement here.

And again, maybe that goes to the point of maybe it's not a must to send it to the registry, but should, can send to the registry, whatever, or not even mention it. You know, it's one of those

where a registrar may do it anyway, because that was their agreement with their registry that they would do that. So maybe that's handled outside of that.

So again, it sounds like people are falling away from the ICANN as a third party there. So I think that that sounds like everyone is moving away from that. So it sounds like there's support for that, but the copying the registry, it seems like there's still maybe back and forth and maybe Rick can give us some insight there. Rick, please go ahead.

RICK WILHELM:

Sure. So as you folks can probably guess, it's pretty difficult to prove the negative, right? That the registrar didn't respond. So one of the things that happens is we say, well, show us the email that you sent, that you allegedly sent to the other registrar's TEAC. And so from there, we can tell if the alleged request—and I'm grinning when I say alleged, right, because we just get a copy of the email. We don't actually even know if that email actually went out, right? Because then you can tell if it was at least a well-formed request, if it allegedly had the right domain name in it, if it used the right terminology, that sort of thing.

Now, of course, we don't really know by looking at that, if that name, if that outbound email to the, I guess, typically the gaining registrar, because this is coming from the losing registrar typically to the gaining registrar, actually was responded to, right? We just don't know that.

There's not really a mechanism, something in the policy that says how we should validate it. But in practice, what ends up happening, I believe—and this is only kind of from my own personal experience as a practical matter, is the registry does their own reach out and says, basically kind of goes over and bangs on the door and says, "Hey, anybody over there?" And we kind of hold up the email. "We're being contacted about this. And we said that they told us that you got this email and you didn't respond. Did you really not respond?"

And then we sort of set our stopwatch, quote unquote, and wait for a response. It almost ends up being a do-over because as a practical matter, we really don't know, just in all candor. Hope that kind of makes sense. And that's probably what everybody here would have come to on their own, I'm guessing. Thank you.

ROGER CARNEY: Great. Thanks, Rick, for that. Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. Rick, I'm sorry to put you on the spot, but I'm curious from your perspective, because I'm hearing what this process looks like in practice. And I know we have these other charter questions actually further along in this deck going back to the registry pain points. So I guess I'm trying to understand from the registries' perspective, if there's a stakeholder position or direction in terms of whether indeed registries do want to be copied on these emails, noting both the practical concerns about copies being accidentally not included in the replies and so forth

and data protection concerns potentially and all the other things that have been raised along with the sort of practical benefit of having that record in your box. So I'd love to hear from you if there's a perspective on that. Thanks.

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

RICK WILHELM: Sure. So I guess for the initial request from the, I guess, typically losing registrar to the—if the registry is cc'd on that, I mean, that's fine. We obviously, if the gaining registrar doesn't respond, then we still don't know. If the gaining registrar doesn't respond to us, we still don't really know if the gaining registrar did or did not respond. It's just due to the limitations of email, as we all know from working in our own companies.

I mean, it does eliminate one piece of it because then we have a copy of an email that went to the gaining registrar and then it does shorten that cycle a little bit. But we would have to do that diligence of reaching out to the gaining registrar. And then it does end up checking, kind of doing the same thing over again. So it helps a little bit with transparency, but we would still have to do that confirmation reach out, if you will. So thanks.

ROGER CARNEY: Thanks, Rick. And I think in chat, it shows that I think everybody, as Rick said, I think everybody kind of probably understood what actually happens. And that's why the expectation that when that

clock breaks and a losing registrar makes the option of contacting the registry—again, it's an option. They don't have to. Just because it's passed doesn't mean that it gets reverted. There has to be an action by the losing registrar still to try to revert that.

But as Rick described, then they do a little due diligence on their side. One of the things I was thinking about as Rick said that is, we don't have anything in the recommendations that provide a timeline for the registries. Is that something that's needed so that the registry isn't sitting there for X number of days, weeks, waiting for a response? Because right now the TEAC is yes, okay, and it can revert back and then losing registrar can contact the registry, but then it could sit out there for a long time. I don't know.

Is there any desire to say the registry gets X amount of time for their due diligence? Again, the purpose of the quick turnaround was for emergency issues. So, Zak, please go ahead.

ZAK MUSCOVITCH:

Yeah, regarding the turnaround time, I don't have a position or thought about that. I'd like to hear what the registries and registrars think about that. What I was thinking, however, Roger, was that the procedure that Rick outlined really is the failsafe here by the registry doing this due diligence by reaching out to the gaining registrar and waiting for response. If they don't get a response, that will give them the green light to go ahead and reverse the transfer.

But that, as Rick also mentioned, that's not a procedure that is written down anywhere. It's not part of any policy. And so,

although I would imagine most registries would do that as a prudent self-interested matter, some registries might not do that at all and just transfer immediately upon an allegation of non-response to a TEAC. So I would consider a recommendation that registries do that extra step and that replaces the CC to ICANN, replaces the CC to the registry, which are really of no effect if the registry is anyhow going to do that do-over again, as Rick put it. Thanks.

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

RICK WILHELM: Thank you, Roger. Well, I think that's Emily that's got control of the slides. I think that she must be between my ears because I was going to point out that the registries have a requirement to, as it says there on Romanette 4, have a requirement to undo the transfer within five calendar days if they don't get the -- so there is a fuse on that. And so there is already time limits on that part.

And so if there is no response on the TAC, the registry is kind of bound by that notion. Barbara is telling me in the back channel that this is in 6.4.4, but I'll need to take her word for it. I don't have that encyclopedic knowledge. But we do obviously want to do some due diligence because if the registrar did actually respond and we undo it, that causes a whole bunch of problems. And we'll need to bring up the L word again of liability. So we want to be right about that if we're going to be undoing something for lack of response. Thanks.

ROGER CARNEY:

Great. Thanks, Rick. Yeah, and thanks for calling that out. Yeah, I glossed over that. So I appreciate that. So I think it gets back to the question—and the registries can think on this as well—should there be anything in there that says, okay, when a losing registrar communicates with the registry that the time has been [inaudible] whatever, should there be a policy statement that says that registries should do—[inaudible] that you could say what they should do, but should investigate or again, I'm not even sure how you would say that. But, I mean, this says that registry operator has within five days to make that transfer, but they [inaudible] actually have to do anything. It just says allow us for it.

So I wonder—maybe we don't need anything more than that. Again, I think Zak's concern is true third party here being the registry is that one extra check that could occur, but some registries may decide no, and we're just going to revert.

So again, I think just leave that as a thought process for everybody. Should there be anything? Again, I think that every registry does this, but should there be any statement that should call out, hey, I don't know, again, I'm not even sure how to say it, but call it out as a step in the process. Rick, please go ahead.

RICK WILHELM:

Thanks. In the absence of anything to the contrary, I think the registries would prefer that there be not any additional prescription here of what should be done, because by the time you're into this sort of a situation, things are usually out into the—if Jothan was

earlier talking about the 1%, that we're out into the 0.1% and things can get pretty weird.

So one of the things that happens in this five days is there is some ability to sort things out during this time period. So I think that the registries would prefer that in the absence of something that's going to obviously prove to be helpful, that the parties retain the flexibility, just given that we're already in a corner where we're in a TEAC situation and someone's trying to force some action here. Thank you.

ROGER CARNEY:

Great. Thanks, Rick. Okay. Any other comments on that? Emily, if you want to scroll back to the original line of question that we had, it sounds like the group is hedging onto removing this last sentence of draft recommendation five and just removing the contact, the CC of the registry and ICANN is what this sounds like from the group. So please let me know if that's not true, but that's what I've heard so far.

Okay, great. I think that's a great cleanup and a great discussion that we've kind of spread out over a couple of weeks here and got to a resolution there. So I think that's good that we can clean this up and get it streamlined here. So, okay. Emily, what was next on our list? We only have a few minutes, but I do want to ...

EMILY BARABAS:

Thanks, Roger. No problem. And thanks for recapping. So we will remove that. We can, of course, capture some of the discussion here as well in the response to the charter question. It sounds like

in the course of discussing that particular item about copying, we also hit on the second part of our F6, F7, which was about these pain points from the registries. And it sounds like the feedback that we're hearing at this stage is that no change is probably appropriate and retaining that flexibility for registries to navigate individual cases is the course of action. In which case we will not have any recommendations for the specific element. If anyone disagrees, please speak up if I'm misinterpreting.

There's one additional item related to F6 and F7 that we've previously discussed, which is this question, sort of an operational matter about the request to have ICANN org including updates to the registrar's TEAC and the list of updated registry contacts. I'm sorry, registrar contacts that is regularly supplied to the ROs.

So this is more of an update item. The policy support folks for this working group are connecting with our GDS colleagues to better understand the sort of history of this issue, the contents of the report, and the feasibility of addressing this underlying concern. So we're working on that and we'll provide updates to the working group, hopefully to provide some additional context and information and then we can figure out what next steps need to happen. And so we'll keep you posted on that.

With just five minutes remaining, Roger, maybe I can preview what's coming next. Is that helpful?

ROGER CARNEY: I think that would be great, Emily. Thanks.

EMILY BARABAS:

Okay. So we're going to be moving back to the TDRP charter questions after we—I think we'll go back to the recording, do some cleanup. We have some drafting work to do. But in terms of substantive deliberations, we're moving back to TDRP. And I'm just going to preview the two questions coming up, encourage folks to do a little bit of background thinking and work on that.

G1 is about whether there's enough information available to determine if the TDRP is an effective mechanism for resolving disputes between registrars in cases of alleged violations of the IRTP. And if not, what additional information is needed.

So if you haven't already done so, please go to the TDRP working document. You can look at the responses there from our groups in terms of written input. And also, please go back to the transfer policy status report and look at the data points that were available. And I can very briefly bring those up in just the last couple of minutes. Those are about, I'll just pull this up, on page 30 here.

And this is all summarized in the working document as well under this charter question. The number of transfer dispute cases through 2016. So this was when there was registry reporting at the registry level of disputes. So that's included there. The working document has a summary of the cases that have been provided through the dispute resolution providers. So please take a look at those decisions that are linked there from the working document.

And then there's just a couple of other data points that everyone should remind themselves of. Again, these page numbers are all included in the working document under this charter question. That is Global Support Center metrics, including inquiries about

the TDRP. And again, here, inquiries received regarding the TDRP as well. And then at the very end of this transfer policy status report, you'll find a summary of some of the TDRP cases.

So please do familiarize yourselves just with the content of the transfer policy status report that is intended to inform this part of the conversation. And that will help the group to determine if there's anything more that's possible to obtain that should be obtained, or whether this is what we have and that we move forward with that. So thanks, everyone, for listening.

And then the next charter question to be addressed is G2, which is about whether enough information is provided about the information needed to be provided by the appellate and appellee to support arbitration. And again, here, please take a look at section 3.1 and 3.2.1 of the transfer policy, which specify the details of that. So that's homework for our next call. And I'll put that as well in an email with the agenda. Thanks.

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

RICK WILHELM: I'll be very quick, Roger. So when those numbers were flashing by on the stats, it reminded me of something that I had the first time I looked at those things. Are there any numbers that are more up to date than the ones that we've seen? Because I believe that there isn't anything that's newer there than 2018 or '19. And so all those numbers are getting a little bit long in the tooth. Thanks.

ROGER CARNEY: Great. Thanks, Rick. Yeah. And I think that's one of the problems, is we don't really have a whole lot of data since then. But I'll let Emily interject. Emily, please go ahead.

EMILY BARABAS: Thanks for the question, Rick. So there's two things that we have that are more recent. One is that the dispute resolution providers are required following the IRTP Part D recommendations to track any cases that are—so you'll recall that the registry tier doesn't exist anymore. So all disputes now go through dispute resolution providers. And they have to put the cases that they handle on their websites. So the information about those cases is current. There's four in total listed on each of the dispute resolution provider sites. So that should be current. Those numbers are obviously quite small.

The other thing that we have that's up to date is new data from compliance from the last couple of years about complaints to contractual compliance about the TDRP or TDRP-related issues. And what compliance came back and said was that there were no valid cases initiated during that period. So valid meaning that they were checked in terms of how they were categorized by the complainant and determined to be valid. There were none of those from 1st of September 2020 through the end of December 2022. So those are the updated stats that we have. Thanks.

ROGER CARNEY: Great. Thanks, Emily. We are just over time now. So I want to thank everybody. Great discussion today. And just a reminder, we've got three more meetings before ICANN 77. So we've got some work to do to finish up. But hopefully we're on target for those. So we'll see everybody next week. Thanks, everybody.

[END OF TRANSCRIPTION]