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TORONTO – Contractual Compliance at ICANN  
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FILIZ YILMAZ:

Since you worked in your team and started bringing new tools in place and procedures. So they have a very active team and this is Maguy, Maguy Serad, our Vice President for Contractual Compliance with ICANN. And she has her team both in the audience and at the stage. I'll introduce Pam, Pam Little, she's working with Maguy. And I'll leave it to you guys, so tell us about contractual compliance, Maguy.

MAGUY SERAD:

Thank you, Filiz. It's always a pleasure and I'm not saying that because I like and enjoy Filiz as one of me counterparts at ICANN. But we look forward to the newcomers' session. Guess why. Because you don't have complaints yet, or maybe you're just so anxious to learn about who we are and what we do, and how you can be part of this community is really, really important to the success of not only contractual compliance, but to the ICANN world.

So before I get started, I would like to recognize our team who is in the audience with me today. I have a lot of newcomers on my team and they have green tags, too, guys. So I'd like my team to stand up, so they are recognized. I have newcomers — I'm going to start from my right here, in front of me, Leticia Castillo, Sumi Lee, Victor Oppenheimer, and Atif Beg. A lot of newcomers, green tags; I wore that same green tag a year and half ago.

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On the right-most over here, raise your hand. My Risk and Audit Manager, Jacks Kawaja. Of course I have Pam Little with me here. Pam is our Senior Director, who also has a very strong Asian Pacific role, but she also receives a lot of our registrar space. We have a lot of wonderful team members back in different offices. We have team members in Sydney, Australia. We have Washington, D.C., and of course in California, also. So again, thank you Filiz for this opportunity, it's always a pleasure to be here.

What we want to accomplish in today's session, is to give you an idea who we are, what are our contributions to the ICANN community, and how can we make a difference with everybody's help. So I hope we accomplish this objective. We will start with the session, and we like to hold all questions until the end, if that's okay. We will allow time for that.

So an overview of our ICANN community. How many of you have seen this shot already? Be careful, if I don't have more hands raised I'm going to talk to it. Okay, so I think the most important message on this slide is to say that we are — you see the big, blue box — Contractual Compliance. We are ICANN staff and we report directly to the President and CEO of the ICANN staff organization.

We have a lot of great interactions and interfaces with not only the stake holders, communities that are officially here represented at the ICANN meeting. But we also reach out to a lot of registrars, who are not part of the stakeholder community, because we really collaborate and work with every contracted party. So our focus is not just what you see on the slide here; it includes every contracted party.



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On our team, as I just mentioned, as of about a month ago, we started reporting to the CEO. This was to heighten the importance of compliance. Contractual compliance is really one of the three legged stools that ICANN — ICANN delivers policy, contractual compliance in this Multi-Stakeholder Model. So our role is very critical and has been recognized by the new CEO, thus I today report to him. So the pressure is even more on for us to meet the expectations and deliver and make sure that our contracted parties are held accountable.

I just presented some of our new team members; our team is amazingly diverse. I'm really blessed to work with such talented staff. I'm not saying we learned these languages as second languages, me included, I learned them from birth. We are from those origins. We speak, we live, we understand the nuances, the culture, the dances, the singing, everything within those cultures. So today on our team, we can cover eight languages.

It's really important, because even though English is what we call the global language, we find ourselves when we are talking down business, sometimes speaking in a native language, dialoging, understanding what the issue is — communication takes on a different level.

I personally experienced it when I first joined ICANN. We had a major issue with a registrar in Europe. I understand the French culture; I grew up in it, I speak it. So I picked up the phone. My team was complaining communication breakdown. I talked to the registrar at a presentation, compliance in not communicating. I read it — it's in English. I hear them; I hear him in French. So I bridged the gap, and in one session we were able to get back on track and address the issue. So



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communication on paper and verbally can take on a whole different meaning when you take it to that level.

The compliance department consists of 15 members. What we are trying to do is we identified, when I first joined, about a year and a half ago what is missing. I was employee number six on the team. We knew about new gTLD coming, but we didn't know what's the volume, what's going to happen, what's the program. But we knew that with our current state, we needed to really be able to manage contracts we have and support the community requests and demands.

So we established our organization in what you the three pillars, if you want to think about it. We've got the contracted party pillar. Today we have subject matter experts that are more knowledgeable in the registrar space versus registry. Our objective is to build that cross functional learning and training across that team, so we can become scalable. You never know what issues may arise. You want to be able to support each other in that functionality.

We have a specific focus. And in any compliance, if you've ever been exposed within your organizations or your companies, you have always have a need within contractual compliance to have what we call a Risk and Audit Manager. Thus Jacks was brought on board last year, and has been helping us to establish those important areas in compliance.

And I also have another staff member that is solely focused on performance measurement and reporting, which is not just how is compliance doing? But how is the world of compliance? How are we performing? What's happening on that space? Generating dashboards for the community to know what's going on, but also for us internally to



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know where to focus on and what to do. And you can learn more about us on the website.

The next most important thing when I first joined, I don't know about you guys, but I like to know where I'm going. Where are we going as a team? We established as a team what we call a Vision Mission and an approach. Our vision is to become a trusted service provider. We really deliver a service here. We're not selling cars; I don't have a product. Our product is the contractual compliance service.

And the audience we deliver the service to is so diverse. We have the contracted party that we hold accountable to their obligations, but we also have different parties. We've got the intellectual property and the business constituents who have expectations of us. They have specific focus; they want to trust and protect the brand. You have the different constituents within the ICANN stakeholder groups who have different interests.

So when you are serving such a diverse stakeholder community. If one is happy with you, believe me another is unhappy. So it's not about who's happy and who's not, our focus is to really be able to say we are a trusted service provider. And trust is obtained by our actions. Our decisions are fact based decisions, process focused. We have standard operating procedures and we're working towards that foundation to strengthen it. You'll see more about that in a few slides.

Of course our vision is tied up with our mission. We are all about ICANN, which is the internet, the stability and security of the internet. And how we accomplish that is through our collaboration, transparency,



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communication, and last but not least is enforcement. We are here to enforce the contract.

The scope of contractual compliance can vary. It depends on which area you're coming from. You will not believe the certain expectations. People think we are agencies, "Go shut it down; go do this. It's like "Whoa, slow down." What is it that's not being applied to from the contract? Our scope is very limited to the contract. We have a set of rules, a set of expectations in those contracts that ICANN and the contracted party agreed to.

So we are here to enforce that contract that has been agreed to. In this chart we tried to depict the picture. You have the registry space, the registrar space; there are agreements between ICANN and the contracted parties that govern this relationship. And there are agreements between the registry and the registrars also, that govern the relationship there.

In this triangle those contractual obligations have to connect, have to have a strong handshake and dependencies. And in addition, the registrars who are responsible to provide domain names to the community have contracts with the registrants who are buying domain names from the registrars. Some registrars provide their services through these sellers — third party providers.

We also make sure through the contractual obligation that that contract has those provisions. We do not enforce the contract on the resellers or on the registrants. We enforce it at the registrar point. They are the party who signed the contract. They are responsible and accountable to run the business according to the contract. So our contractual



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obligation, the scope is very clear and it's very direct with the contracted parties.

How do we approach contractual compliance? There are many, many ways, but in our ICANN Multi-Stakeholder Model, as you know, it's a very strong bottom up approach. So responsibility of enforcing the contract lies upon us, but it lies upon all of us as community members, as stakeholder members, as contracted parties. Thus you see the foundation on the bottom that we hope to get to.

We started looking at that last year; we thought we were going to start with it. It's like, "You know what? That's where we need to start." Then we quickly realized that we needed to establish the foundation, the rules, the processes that are going to drive everybody towards the common process and common ground. So we lifted up and focused on the preventive, the informal, and formal resolutions, because those were the tools, the processes, and the standard operating procedures that are going to drive how we get to a contractual compliance.

So the focus has been in those three areas, and I have some slide to provide an update. We put the self assessment on hold for now. We launched it; we did a pilot. It was pretty good, but we realized not everybody's speaking the same language and understanding it the same way, so we scaled back. We're focusing on the other action.

To the right of this chart you will see a process that's going up. It's going to be detailed further on the next slide. But what the slide is really showing you is the model, which is on my left as I'm looking at my screen. The pyramid is the model. The approach is the process at a



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high level. And you see by the color coding how it lifts through the different tasks to get us to enforcement.

So how do we practice compliance? How do we ensure that our message is consistent with the contracted parties? It doesn't matter if it's a registrar or registry operator, our process is the same. There's a contract; we must abide by and follow the rules of the contract. How do we go about it? We receive complaints. That's the bulk of our workload. We receive complaints today through multiple sources that we're working hard to consolidate into one tool, and we hope to accomplish that by December.

So we receive complaints or we discover complaints. Remember the pyramid I just showed you? Whether it's through monitoring [that] we identify an issue, or whether through an audit, or whether we receive a complaint — no matter what, it's all going to go through the same process.

We start with what we call a first step. If we have enough facts, guys — keep in mind fact based decisions — then we issue what we call a first notice through an email, and there's a set date to respond by. If we don't hear by that certain date we issue a second inquiry, and then we do a courtesy of phone call in addition to an email. And the title is very clear when we issue this. So when our contracted parties receive correspondence from a compliance team, they know exactly where they are in the step.

Let's say we don't hear from them by the third notice. When we first implemented this, they'd say "Yeah, I'm not gonna do it," you know, they didn't pay attention to it and before they weren't consistent.



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Guess what. We reached the third step, by five business days from there we didn't have an answer and we issued a breach notice.

So we try to collaborate and give everybody the benefit of the doubt, to collaborate with us in what we call the Informal Resolution Phase. Because we don't publish here; we work behind the scenes. Our objective is not to shut down our contracted parties, it's to collaborate, to make sure that they are in compliance, to help us investigate and prove to us if this is a valid complaint or not, and take action.

But once we reach a third notice, for everybody who gets the third notice it is titled 'Third and Final.' Guess what. We mean it; we mean business. So immediately when that date expires and there is no response or no collaboration, we issue a Breach Notice. This is when all of you know what's going on with a certain registrar — why they have been breached, what is the noncompliance issue or concern at hand, because we publish it on the website.

This is the first time that it's communicated to the public and it's there. We have it on our webpage under the notices; you will see it. The breach notice has a certain period that they have to cure the breach by. And if it doesn't happen we take on what we call a Formal Resolution, where there is suspension, termination, or nonrenewal. So no matter what contracted party you are it is today followed as of mid September

I'm really proud of the teamwork we've accomplished. We've been renovating a house, guys for about a year. You know, think in your mind, we inherited all these different tools, no processes and the team is trying to keep the lights on, responding to complaints and remodeling



at the same time. So remodeling for us was bringing all of our tools, all of our processes to align.

We still have multiple tools we work with; we're consolidating them slowly and gradually. But I'm proud to say as of mid September all of our compliance complaint types, all of the compliance tools that we manage today are aligned to the process. That's quite an accomplishment, because we're going to next go to a consolidated tool, where we're going to merge everybody into one system and manage our compliance through that.

We put a three year plan because again, I've been here a year and a half, inherited a lot of different challenges; opportunities is how we like to think of them. And how can we report to the community — who has been very impatient, very unhappy with compliance — that we're making progress? So we published a high level, three year plan that we report on at every ICANN meeting.

We are in year 2012 and our objective this phase — we call it the Transformation Phase — will be to grow staff, not just in numbers, but in expertise, to standardize our operations. We're almost there; we're doing a lot of system enhancements and processes. We're adding metrics, so we are measured on. We put an audit strategy together and you will hear more about it. We're also going to start publishing annual reports, and in addition — never a dull moment — new gTLD readiness. So 2012 is very heavy for us. It's very intense and [the] staff has been amazingly passionate and committed to help us get there.

If you want to hear more about performance measurement for contractual compliance and contractual compliance audit strategy and



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methodology, please join us on Wednesday. It's an open session, we have tried to for the last couple of ICANN meetings so do different topics, outreach activities with the community on Wednesdays. It's open to the public. Come and join us and learn more about those two activities. With that, I'd like to turn it to Pam, to share with you more about compliance.

PAM LITTLE:

Thank you, Maguy. So Maguy just shared with you what control we are, what our remit is, what our approach is, and the three year plan that is being executed. What we're going to do in the future to prepare for the new gTLDs. So the next half of the time we have, I would like to share with you the more practical stuff we do on a daily basis.

But before we start with that, I'd like to just share with you this slide: Why it matters; why contractual compliance matters within the ICANN Multi-Stakeholder Model. As you know, ICANN is the technical coordinator for the two major naming systems that make the internet work, one of which is the Domain Name Hierarchy you see on this slide. The other one is the IP Systems.

Maguy talked about earlier the contract that we have registrars and registries that basically set up as a framework for the domain registration industry, if you like. So that's very important as a set of rules and performance expectations, as Maguy alluded to. Without those rules, you may not find what you want to when you browse or when you find [with] Google.com, it turns up a different page.



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To make this whole thing work, [so] you can find what you want on the internet, Domain Name System is a very important infrastructure. So we want to make registrars comply with certain rules to keep the internet working. That's why it is important.

One thing I'd like to stress again is what's within our agreement. For newcomers to ICANN sometimes people do not fully understand the distinction between Domain Registration issues within ICANN contractual compliance remit, versus domain usages.

And here we list a few examples of our so-called registration issues. It's not just restricted to say you registered a domain name at that point, but it's sort of issues arising from your domain registration within that registration cycle. Common issues such as trademark disputes, inaccuracy issues, transfer issues, resale issues or registration restriction, all fall within our contractual compliance remit.

Another point to know is within the current contract ICANN has with over a thousand registrars around the world, it doesn't contemplate domain buy and sell. That's what we here call Domain Aftermarket Activities. That's something that has evolved or developed over the last decade or so, as a very creative industry activity. And a lot of people actually buy domain names as an investment, but the RAA does not have rules to regulate that kind of activity.

I mentioned earlier about domain use issues that generally are not within ICANN contractual compliance contract authority to address, and here are a few examples. These issues usually are addressed or dealt with by law enforcement agencies in different jurisdictions, such as



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website content, spam, phishing, malware, cybercrime or other online malicious activities.

But this is not to say we don't work collaboratively with law enforcement agencies or authorities around the world. In fact we have a referral process where law enforcement agencies could approach ICANN Contractual Compliance to help them maybe approach a registrar or a registry, or have some suspected illegal activity that we might be able to help them and vice versa.

Here are some statistics to show. Maguy mentioned earlier about these multiple complaint intake systems we currently have. And these statistics show the period between June up to last month, September, the total number of complaints which ICANN received through those multiple intake systems. And you can see here under the legend, the domain volume. In North America for example, this is the number of complaints we've received for that region. These domain names are sponsored by registrars in that region.

And then we come up with a percentage and the registrar number in that particular region, who have complaints against them or about them, and therefore the percentage of registrars with complaints per region. So this gives you kind of a snapshot of the different registrar distribution around the world and maybe it's also an indication where we need to do more registrar outreach or education to improve registrar compliance.

This is giving a different view, so you can see the complaints against registries. There are currently 22 registries under different realms of delegation, and their distribution as well. We mentioned earlier about



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how we process complaints we receive. Again, during this reporting period between June and September we received a total of over 19,000 complaints.

And you can see the different areas these complaints are relating to, a huge percentage of which actually relate to WHOIS inaccuracy problems. Some of you might have heard about WHOIS data; it's really the registration data and records. When you go online to register a domain name, the registrar will require you as a registrant to provide certain data and contact information.

This information is supposed to be accurate and reliable. If people notice this information is not accurate, they can actually report such inaccuracies through one of ICANN's intake tools. And we will then process those reports by forwarding those inaccuracy reports for the registrar. So that occupies a big chunk of all the complaints we received in the last few months — a total of 13, 000.

We also receive a lot of customer service related complaints, which unfortunately are not within ICANN's contractual authority to address, because that's really more a matter between the registrar and their customer registrants. So that's not something we could address, but we also receive a lot of transfer related complaints. And our staff spends an enormous amount of time and effort processing and dealing with those issues, helping registrants [with] trying to resolve their transfer issues with the registrars.

The bottom half of that right-hand side slide shows all the enforcement activities or statistics. In one of the earlier slides Maguy showed us, the prevention versus enforcement activities within the compliance



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department. So when we cannot resolve matters through the informal resolution process, we would escalate the matter to what we call Enforcement.

And what we do with the enforcement phase will be issue a Notice of Breach to the contracted party, usually these are registrars. Or under the contract we have a right to suspend their right to add new names or accept domain names to transfer into that registrar. So that's a suspension enforcement tool.

We could also ultimately terminate our contract with that accredited registrar. And in these other figures you can see we issued eleven breach notices during the period, nine of which have been closed. That means the breaches were cured by those registrars who received the breach notices. We also terminated or didn't renew three registrars altogether within that period.

This slide shows you the distribution of WHOIS inaccuracy complaints by region, and as you can see a huge percentage comes from North America. I think the reason is because a lot of domain registrations are sponsored by North America based registrars, so by ratio have a higher percentage of WHOIS inaccuracy complaints. This is another view of looking at it, not only broken down by geographic regions, but also by the gTLDs.

The enforcement activity I mentioned earlier, these are all the breach notices, or terminations that were effected during the period. We used different colors to depict whether the breaches are being cured. You can see from this slide, as of September 30<sup>th</sup>, two notices of breach



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were outstanding, which means the registrars have not cured those breaches under those notices of breach.

So this slide basically just shares with the newcomers there are actually 315 TLDs out there at the moment in the world, but only 22 of those 315 are so-called generic top level domain names. You can see the 22 box there, out of which those are the 22 that have contracts with ICANN. So 15 are sponsored, four are unrestricted, and three are generic, but restricted. So there slight differences among those TLDs, for example unrestricted would be like the .com, .net, .org, .info. It means everyone can register those domain names; there's no industry or other registration specific requirements.

The reason I want to show you is to segue to the next one to show you the registry activities we have in terms of compliance. Registry at the moment, has to submit a monthly report to ICANN regarding a number of contract compliance areas. One of which is their DNS availability, their WHOIS availability, and they also have a contract obligation to provide equal access to all registrars.

So this is what they reported, although most of them report complying, we do have one slight deviation with .pro, reported in June. Otherwise based on the reports they submitted, they seem to be all in compliance with their contractual obligations in relation to those areas. This one shows you where the registries are geographically. You have eleven in North America, six in Europe and one in Asia. We have two registry contracts up for renewal later this year, for .info and .biz.

Here are a few links if you are interested in contractual compliance or want to contact us for anything, feedback, issues, compliance please



feel free to send us an email to [compliance@ICANN.org](mailto:compliance@ICANN.org). If you are interested in looking up who is behind the domain registration you can use that WHOIS lookup link. Or again, if you have a problem with a registrar or a dispute there's another link. And if you want to file a WHOIS inaccuracy report there's a link there to do so. If you have a complaint about a registrar there's another link. That's why Maguy mentioned all these multiple intake systems we have.

We have a list of approved dispute resolution service providers. You can find NAF WIPO who'll provide you the RD service providers, all the details are listed here.

That concludes our presentation. We're open to questions. We're actually slightly over time.

[background conversation]

MAGUY SERAD:

So what I'd like to do is add a little bit to what you just saw Pam talk to. For example when you see the slide and we point in here, there are upcoming renewals. What do you think we do when there's a renewal happening? Do you guys rent a house somewhere? Do you have a business? When you have a renewal coming up, what do you do before you renew a contract? It's too late in the day — you check on them, right? Are they doing what you expected them to do?

So we are involved in the process of the renewal. We investigate, we look in the records. Are there noncompliance issues? Are there reports



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of noncompliance that need to be closed? So we, from contractual compliance look into that and provide a standard compliance report to our registry stakeholders' team, who is responsible for the contract management aspect of it. We are responsible for the contract enforcement, so we give them that report.

We do the same thing with registrars when they are up for renewal. And the registrar space, as you can imagine, it's very, very active, as you saw the volume of complaints that Pam was talking to earlier. We have stopped renewals from happening until a noncompliance issue has been addressed. And the registrars know that their renewal is pending because of this, and they're now being proactive and making sure they are in compliance, because the process doesn't wait until day minus one of renewal — we start 120 days in advance.

So a lot of those slides that were shared with you here, all this data, is not to bombard you or say, "Hey, we have a lot of data." When we first started a year ago, we were looking mostly at [the] volume of complaints. Through this standard approach to our tools, we now are able to collect data in a standard format and slice and dice that data to be able to do our next step.

Like in here, if we have a high volume, now with the staffing on board, we're able to do proactive measures and proactive outreaches. For example, Pam conducted an outreach seminar in September. I don't have a slide here, but if you remember here under the transfer — we have a huge transfer issue in the Asian Pacific. Pam scheduled it and we did like a survey and collected the input from different people, from the contracted parties who are interested.



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And it was only focused on the Asian Pacific. The presentation, the PowerPoint was in English, but the whole outreach was conducted in Chinese. Pam led the outreach activity over a webinar. We had 40 participants that represented 27 registrars, out of 33 Chinese registrars. That is a huge accomplishment, guys, because those registrars are not part of the registrar stakeholder model that's out here participating. We are reaching outside of just what's here at an icon meeting. By looking at the data available to us, we're able to take those proactive actions.

PAM LITTLE:

And just to add to what Maguy just said, those registrars actually represent over 60% of transfer complaints we received concerning those registrars. We decided to kind of try to stop the complaints. The only way to really improve registrants understanding of the policy is hopefully for them to change their process, or practices to eventually reduce the complaints coming to us.

MAGUY SERAD:

So with that, I would like to open the floor for questions.

PAUL MCGRADY:

Hi, it's Paul McGrady. I'm not a newcomer, but I was concerned I wouldn't get the statistical update if I don't get to one of the other sessions later in the week, so thank you. I just want to do a quick commercial for the Compliance Department. I have asked all kinds of questions. I have raised all kinds of issues. I've never been made to feel stupid. I have always gotten a response and these folks do really good work.



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And in the last couple of years we're seeing more and more organization, more and more resources, more and more both technical and resources in terms of people. And so for those of you who are newcomers, who are new to the ICANN process, I encourage you to reach out. You won't be made to feel bad if you ask a question that you think you might should have known the answer to. They're always polite and willing to get back to you.

MAGUY SERAD:

Thank you, Paul. We didn't pay him or promise him anything. Actually Paul and many other participants in the ICANN Multi-Stakeholder Model are what make us do a better job. I'm serious. We love complaints, but please do it professionally. You cannot imagine — we have what we call a report now we generate about bad reporters.

Some of the language we get, I'm afraid to open the dictionary. It doesn't exist in the dictionary, some of the profanity, the accusations. You know what? We'll kindly respond. Please send us your complaint in a nice English format. You know, I feel like a mother sometimes; I want to wash your mouth out with soap. We have bad reporters who file complaints, not because of ignorance, but just they probably don't understand it, so we reach out to educate. How can we help you?

We have bad reporters who just like to pick on people and they file the same complaint a hundred times. Guess what. We're trying to stop those; we heard you — let the process take place, because believe me, if it doesn't, we're here to enforce it. So I really appreciate Paul's comment because it's been an uphill. Like I said we are living in a house we are remodeling. Have you remodeled a home and lived in it before?



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You know the challenges. And we still look good, guys. We have a great mission ahead of us; we're passionate about it.

Any other questions or comments?

MALE:

I have a question related to the new gTLDs. When it comes to the contractual agreements, as far as the terms and conditions, are the applicants going to sign the same contract in terms of terms and conditions, which has been already signed with the existing 22? Or are there significant changes in the contract itself?

PAM LITTLE:

Yeah, we really are not subject matter experts on new gTLDs or the applications. My understanding is there is a proposed agreement made and that's been published, the latest version. And the intention is to keep changes to a minimum. We're not really privy to that or have the authority to comment on that. Maybe we could take your question, or if you want to send us a note and we can direct your question to the right department to address your question. Does that work for you?

MALE:

Yes, for sure. I have another question, if you don't mind. Again, there are 22 TLDs now in the gTLD space and sooner or later you'll end up with having 1,930 TLDs. Don't you think it's a big challenge for the compliance team, and what are the tools, and the measures you've put in place to take care of such a big effort? Every year you need to do a lot of auditing, a lot of compliance checks, even sending the monthly



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report when it comes to the necessary availability. It's a huge, huge effort compared to the current situation.

MAGUY SERAD:

I totally agree. I saw the number and the model will continue to evolve. And that's why new to TLD or not, from 2011 when I joined we realized we really need to take ourselves to the next level. And the foundation that the team's been establishing to date is what's going to get us there. It's not just about throwing people to process complaints; it's about the whole picture, people, processes and tools. So what we are working towards, by the end of 2012 our objective is to have the tools. And we have and VP of IT that joined the organization; we're aligned with him on that. They understand the urgency and the need for our business to operate and really good tools.

We've established all these metrics and we're also growing our knowledge — you see how we have under here new gTLD readiness. The contract is going to be different. We have a person, actually I'll point it to Victor, his whole world is focused on understanding the whole new gTLD program. He's partnered with multiple team members who are also building on that skill, which is Leticia, I have Carlos, I have Stacy, I have many people who are also building those skills to understand it. And we have Jacks in the audit world, also preparing for that audit strategy, so we're putting all of that together.

And then when we reach 2013 and the delegation begins, we all know it's not going to be turned on immediately; it takes time, right, to become active. So our model by 2013 is to do what we call Continuous Improvement, to do internal audits on ourselves and even engage with



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a third party, but most importantly it is to revisit. Part of continuous improvement, as you see my first bullet here is operational continuous improvement. Do I have the right tools? Do we need more people or do we need different processes?

We're evolving towards that. We're already exploring the tools and the processes. But I don't know the answer yet to the people; I'm being very transparent here. We are at 15 members, we're building the skills, we're building the tools, and we're building the process. And when we start ramping up it's going to depend on what we see and what is the activity.

And that's why with the compliance rules since my arrival and even now with the change of the reporting structure, we are a key strategic department and we have the trust and respect of our executive leaders and for their support. So we're just as curious to see how that's going to evolve. I'll be honest, some nights it's like you wake up, "Oh, my God, what's coming our way?" But the team is doing their work; we're preparing. You plan for success.

So hopefully by Beijing, we will have a little more information to share with all of ICANN. What does it mean to be gTLD ready? How are we going to do that? Because remember our vision is to be a trusted service provider. For me to tell you we're working on new gTLD, you say "Yeah, Maguy, I'm listening to you." But by the next meeting we hope to have a plan that you can measure us and measure our readiness to it.

If you have some good ideas, guys, please — Valium is also welcome, just to be calm and take it slowly. But we are getting ourselves ready, people, tools and technology.



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Any other questions? Like I said, it's always a great way to start our week. Thank you, Filiz for giving us this opportunity.

FILIZ YILMAZ:

Thanks for being here. I really enjoyed these sessions, so we save them for the last sessions always, because I love the cheerfulness and the enthusiasm as you can see. They make you all very [southern hospitality], right? Do we have any remote participation comments coming from remote participants? No. Okay, thank you again, guys. Thanks a lot.

I'm just curious, are you all newcomers? I see some not newcomers — I don't want to say old-timers — that's not nice. Are you all newcomers? Let me answer that for the general public here. They said they advertised these sessions mainly to the first time attendees of the ICANN meetings. But this is now growing strong and I know there are people who would like to come and hear the presentations, the news from you guys, from Michele about the gTLD registries.

Those issues are still moving, so there's always maybe second or third timers, or old-timers, as you called them, joining in the session. So if you are a first timer or an nth timer, please be involved, because it is an amazing Multi-Stakeholder Model. I have not seen it and I've worked for global companies — this is a whole different world and each and every one of you can make a difference in how it evolves and develops.

Thank you for the opportunity. Have a great week.



MAGUY SERAD:

Thank you guys. Yes, this was the last session and we'll let you go now. We're early, 15 minutes earlier than the scheduled time. I hope you enjoyed it. Again, if you have any questions grab the staff or go to the newcomers' lounge. We are here for you. Thank you.

[End of Transcript]

