
ICANN73 | Virtual Community Forum – GNSO: Registration Data Policy IRT Meeting
Wednesday, March 9, 2022 – 16:30 to 17:30 AST

ANDREA GLANDON: Hello and welcome to ICANN73 gTLD Registration Data Policy IRT session. My name is Andrea Glandon, and I am the remote participation manager for this session.

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With that, I will hand the floor over to Dennis Chang. Please begin.

DENNIS CHANG:

Thank you, Andrea. Welcome, everyone. My name is Dennis Chang. I'm the ICANN Org GDD program director, managing this policy implementation project. And today, we will have a very full meeting. This is our agenda. We typically keep all of our agenda in the IRT wiki, fully accessible by the public. It's our tradition or working mode that we may have an agenda that is more than the time allows, and that is because we cannot quite accurately predict how long each topic will take to discuss. So what we tend to do is make a long agenda and get through as much as we can, and priority, if you will, of the things that we want to discuss and conclude first, and then we carry over the remaining items for our next meeting agenda.

So the way I will conduct this particular meeting, because this is a public meeting, it'll be a little different but not that much different from the regular IRT session. We want the public to see what the IRT is doing and what they're working on and how they're working. But at the end of the meeting, I will ask Andrea to remind me, maybe leave five minutes for your questions. So please withhold your questions until the end of the meeting and let the IRT members have time to discuss the agenda items.

So let me start by welcoming and checking. Is there anybody who has an announcement to make? If not, I have an announcement to make. Genie, if you will open your mic and say hello. Genie's back.

GENIE CHOU: Hi, everyone. This is Genie. I am back from maternity leave. So it's actually been really nice to have adult conversation. So looking forward to working together on this again.

DENNIS CHANG: Thank you. I just wanted to say hello and let everyone join in on the joy of new birth and new life. It's just a wonderful thing. I think you've all been with us because it has been many years since we've been working together. That's the third Registration Data baby we've delivered. So congratulations, Genie. You're already making an impact and helping us to progress here.

So what I'll do is for the public, I'll give you a very, very quick program overview, and then we'll get right into the IRT session. And as I promised, we'll have a community Q&A at the end.

The background. This was in July 2018. We had a Temporary Spec EPDP Phase 1 that got adopted by the Board. It was mostly adopted. There was two recommendations that did not fully get adopted. So that was the first thing that you should keep in mind, that was in May 2019. And then after that, there was also a couple of scope changes. One in particular was in July 2021, and this is for recommendation that was called Priority 2 items from Phase 2. So, what we typically refer to as Phase 1 implementation—and we now call the Registration Data Policy implementation—is actually Phase 1 and part of Phase 2 Recommendation implementation. So, that's something that you

should keep in mind and not forget the four recommendations that have been added by the Board adopting these recommendations and directing us to implement it right away. So, we didn't wait. We included, we added to the scope with IRT support. And thanks to the IRT, we have been able to do that rather efficiently.

The latest scope change is in March 2022, where early this month, we have adopted or added and recognized what they called Supplemental Recommendation for Recommendation 12. This was one of the recommendations that did not get fully adopted, if you will notice here, is an Org field. This is the one that had been in discussion with the Board and GNSO until now. Now, just last month, Board took a resolution and adopted it for us. So what we're going to do is today we're going to look at that recommendation and what it means for our policy implementation.

Then there's three stages of policy implementation that is important for you to know. Stage 1 is continuing the Temp Spec, and that is something that we are doing right now. All should be aware that we have something called Interim Registration Data Policy that is in effect right now and it had been since May of 2019 as we are working on Phase 2. The work scope for this policy implementation is rather expansive. It's a big, big work scope. There's total 33 recommendations, as I said, Phase 1 and Phase 2. There's, of course, a policy language that we have to draft which is essentially the requirement or implementation for the contracted parties, Registries and Registrars. But the Phase 1 recommendation asked for a series of reports for us to generate. Also the brand new thing here is the Data

Protection Agreement with the ICANN Org, with contracted parties and the third parties. And then more reports are what we call Wave 1, 1.5, and Wave 2. This is what we commonly refer to as Recommendation 27 report.

So that's just to give you an idea of the scope. And when we say Policy Implementation Team, we are actually talking about Implementation Project Team, IPT, which is composed of ICANN Org, the staff, and the Policy Review Team. IRT is what you hear often, and that is made up of the community volunteer experts in the field and those who have been involved in the policy development to help us understand the recommendation better and make sure that we're implementing is in line and aligned with the recommendation.

So we have done a lot of work today and these are things that we've delivered. We've been delivering things since May 2019 starting with the Interim Registration Data Policy that is in effect today. We have within the recommendation required, they are all the consensus policy that is in existence and policies and procedures that needed to be reviewed and updated redline. So we've done that and you can see all these things that we have produced. All of this will be referred to as part of the public comment. We're talking more about that.

What's in progress right now is we have one more consensus policy we are doing. That is CL and D Policy, Consistent Labeling and Display Policy that we will be working on today.

There's a couple of RDAP Profile document that is in progress by another working group. This one we already completed, and that is a

reformatted Advisory that is appropriate and consistent with our policy that's been completed, and it's on the IRT wiki. I'll show you the IRT wiki in a minute here.

Other things are the Recommendation 27 Wave 2 report that had been on hold for the Recommendation 12 decision or consent, supplementary recommendation that we just talked about. Now we can proceed with that report, so that's something to look forward to.

Also just documenting here that these three documents are part of the scope that we have to review, but it turns out that we didn't need to update them. So, that is the delivery today.

This is the GNSO Implementation Review Team wiki. We call it IRT wiki, and this is what it looks like. It has all the agenda. This agenda is actually the IRT wiki. You all recognize that, right? It's the same wiki page. And within this wiki page, we have published or posted all the products, all the reports, pertinent correspondences, draft policy language that you can look at, and then all the red docs, and the timeline that is updated as of 1 March 2022. So I think after my overview, I wanted to show you—oh, quick implementation process. Let me show you what that looks like.

So we have an implementation process that we're following. For those of you who are new, it's essentially a 13-step process and we're here now. A series of analysis, reviews, and removing dependencies, but we are, I think, in good shape to start preparing for public comment. So that is the process.

What you're looking at right now here is what we call IRT workbook. The IRT uses this workbook to capture the working information, including the IRT task. This one in particular is the review of the Board resolution that was just taken for Recommendation 12. On today's agenda, we have that as the agenda right after we do our project schedule review.

So let's look at our project schedule. So this is a project schedule, very quickly, it's a PDF document. It looks like this. What I will do is I will just go through some of the words that you're seeing here. This is to provide you some context of the document that you're looking at, the schedule that you're looking at. As I said, the policy implementation for this is extensive and it's rather complicated and interconnected with many other things. So what we are trying to do is give you some context for evaluating this schedule.

One is some of the deliverables that I've already talked about, so you know about that. And the challenges that we have been facing, the fact that recommendations were subject to varying interpretation. You just saw one of those. Rec 12 has been one of those. Rec 7 is another one that, if you have been tracking, took a very long time to interpret in the same way where we are agreeing on the implementation path.

Then this is February call, the adopted resolution, we noted here. This was a very important progress, and we thank the Board and GNSO Council for giving us clarity here. Then IRT will have to now look at it and see how that impacts the work that we have been doing. So far, what we have done is hold off on anything that could be impacted by

Rec 12. But now, we are free to finish the policy language in effect. So we're excited about that.

These are other things that you should be aware of. I mentioned some of them. The things that are still very complex and difficult to predict when it will be done and it could be like a dependency. We're trying to see if we can work around it. Of course, DPA that I mentioned is a new contractually obligated vehicle between ICANN Org and the Registries, Registrars, and between ICANN Org and data escrow third service providers. So that is something that had been very challenging to get done. It directly relates to the GDPR, but that is something that we wanted to raise. Then any other items that may come up, we think that we're aligned in everything now, but as we discuss and maybe you will see some of them, there may be one or two items that the IRT is not completely aligned. When there's complete alignment, then, of course, it is work but we can make progress. Within the agenda items, you will see that number nine drafting error and implementation explanations, this is such a case where we may find ourselves with an implementation interpretation that is different than what the recommendation says. If we all see that as what we would consider a drafting error, then we agree to document it and then move forward with that.

So that's one thing that I wanted you to know. But let's go back to the schedule. I think, Sam, if you can open your mic and maybe explain how to read this timeline, that will be nice. Thank you.

SAMANTHA MANCIA:

Thank you, Dennis. So as Dennis touched on, the work is very complex. It involves many interdependencies. So in order to produce this timeline, we spent a lot of time behind the scenes kind of mapping all that out and allotting estimated time to complete the remaining things. So what we ended up doing is showing the work in several different ways.

So first here, you have the high-level timeline, which shows the major milestones for completion. You can see it's color-coded. So green represents something that's been completed, yellow is in progress, and gray is not started. The main ones here to pay attention to would be the opening of public comment in the third quarter of this year 2022, publishing the policy in the second quarter of 2023, and the policy effective date in the fourth quarter of 2024. If you can move to the next page, please.

Here we have the detailed recommendations timeline. So this breaks out the work for each recommendation individually with comments added for where that language is in the policy document itself and any other pertinent notes, and that spans two pages. So again, just showing which ones are complete, and which ones are in progress. Then the third one is the impact to existing policies timeline. So that's related to Recommendation 27, where we had to redline certain policy documents. As you can see, all are completed except for the CL and D Policy, which is on our agenda for today.

We will continue to update this as we make progress. It is posted on the wiki for everyone to see. And yeah, I think that's it. So I'll hand it back over to you, Dennis.

DENNIS CHANG:

Thank you, Beth. Yeah, I didn't really expect you to be able to see this on a screen. It is rather detailed and lots of information on this. But I again point you to your reference material number one. So if you click on this, you'll get the timeline. Also, I remind you that I have issued an IRT task homework that's due by today to review this timeline. So if you're going to be on time to do homework, you should be able to or you should finish your homework today. So you have end of today to finish and give us some feedback.

I think the schedule is challenging because there's still unknowns, but I think it's doable, achievable. But it does require your attention and support as we make progress. I think the key things are this Resolution 12, the supplemental resolution that we received, we need to jump on that. And you have a homework on Resolution 12 that's due today also, just remember.

But I noticed, one, I was looking at the Resolution 12. It looked like this. It looks like approved for resolution and if you go to the Rec 12 resolution, whereas, whereas, whereas, these are really good background, whereas. But the resolution itself says we agree with a supplemental recommendation by GNSO. So what we have to do then is go to the GNSO version of the recommendation, which is the GNSO Council motion and the recommendation. Here is where the language

really appears. So I wanted you to know that. But then there's a correspondence between the Board and the GNSO with pertinent information.

So I have good news for you. Antonietta, our team member, as you know, has done us a favor to create this document. So this is the Board resolution on 24 February 2022. What she did is collect, compile all the information or the resolutions, recommendations, language, GNSO language and the original language, and the correspondence in its detail so that you have just one document that you can look at to review all the pertinent facts for us to do our work. She even added all the relevant sources here for you. So I think this will be helpful.

Yeah, I thought you might like that, Sarah. She really helped me because I was jumping from one thing to another. So what I think I will do is—Sam, if you can share this document with the IRT right now, but I will go ahead and issue it through the IRT task right after our meeting so you can have it as a Task 197. We'll give you a little more time for this one, probably a couple of weeks because I want you to use this document as analysis tool. So anything that you want to add, edit, comment, let's use this document to go through all Rec 12 items. I think it's a lot easier to do it that way. Agreed? Any questions?

Okay. I'm trying to check the chat but let me know. Raise your hands if you'd like to speak. But this is a good time for you to speak. I'm not sure if I should be checking the chat closely. I hear Owen's blasting about do not think things are broken. I'm not also. Yeah, tricky. Yeah, Owen is basically saying what I was saying.

This is hard. This is not a straightforward “Here is the recommendation. So, that’s what we’ll do.” It was not as easy as that. But that is the challenge of policy implementation. A lot of things come to us in a form where it is not clear and you can legitimately take interpretation that are opposing. So that’s when the discussion gets very long within the IRT because we hear a lot about what we meant when we wrote this language that is not one way or the other and it can be interpreted in two ways. Such was the case with Rec 7 and Rec 12 that needed to be escalated for a decision. So that is Rec 12.

I will issue a homework assignment for a couple of weeks. Our team here at the IPT, we don’t have to go through the whole policy language. This is the policy language. So we’ll have to go through this whole thing to make sure that we’ve captured everything that anything that has registrant organization. There was discussions in the past, but we decided not to pursue it until Rec 12 is clarified. I hope that we all can agree that it is clear this time. Okay.

So next item is the RDAP Working Group questions. This I thought was timely, critical, meaning that there is another team or RDAP Working Group that is working in parallel to the IRT, us, and they’re coming two items that they question from the technical side. So they are seeking clarity on how they should be reading this. Is Marc here? Marc, speak up. I am doing this for you, buddy. Let me see. IRT questions. Gustavo made this file, right? And I added to it and I’m trying to make it useful for you, but I think you should probably re-familiarize the IRT with the RDAP Working Group questions. You can lead me and I’ll scroll for you.

MARC ANDERSON:

Okay. Thank you, Dennis, and thank you for the opportunity to bring this up. Again, it's Marc Anderson for the transcript. For anybody that might not be aware, I am one of the liaisons between the EPDP Phase 1 IRT and the RDAP Working Group. So it's my job, in this case, just sort of coordinate the flow of information between the two groups.

The RDAP Working Group has taken up the task of updating the RDAP Profile which provides additional instructions to registries and registrars on how to implement RDAP in support of ICANN policies and contractual obligations. It's important to note that the RDAP Working Group doesn't create policy at all, it is completely dependent on existing policy and contractual obligations, and is simply providing additional technical instructions registries and registrars on how to implement those policies in RDAP.

In the process of going about reviewing the RDAP Profile, and considering how to implement this policy in RDAP, two issues were flagged. I was asked to bring those issues back to the IRT for direction and potentially clarification.

I think the first issue is a little bit more straightforward and that deals with phone and fax extensions. Oh sorry, I see that. I'm going in reverse order. But since I teed that up, I'll continue with that phone and fax first. So you can see in the example up on the screen, the registrant phone, fax, phone extension, and fax extension, are all separate lines. That's how you would expect to see output in a WHOIS response.

In RDAP, however, the implementation is a little bit different in that the phone and phone extension, fax and fax extension are essentially on the same line. They're part of the same data element. There's a vCard specification, which is incorporated into RDAP, which provides instructions on how to return a phone and phone extension, as well as the fax and fax extension. It's all in the same line, part of the same element, so to speak.

So where this came up in the RDAP Working Group is it became a question when it came to redaction. The question really is, in WHOIS, it would be possible to redact the phone and the phone extension, the fax and the fax extension separately. In the example on the screen, the phone number and the fax number are redacted, but the phone extension and the fax extension are not redacted. Theoretically, the opposite scenario could be true where you could try and redact the phone extension and the fax extension but not the phone number or the fax number. Either way, there's not a readily available mechanism to do that in RDAP. You could either redact the phone and phone extension or the fax and fax extension but not the phone extension.

So, generally speaking, within the RDAP Working Group, we didn't think that this was likely to be an issue. It didn't seem to be a realistic scenario where you would want to redact one but not the other. But as I mentioned in teeing this up, the RDAP group is tasked to implement policy, not create policy. And as such, we didn't feel comfortable just sort of making that assumption without coming back to the IRT first. So this is me, essentially coming back to the IRT and asking, is it okay for the RDAP Working Group in drafting an updated profile to proceed

with the assumption that it's okay to make the phone and phone extension, fax and fax extension would be sort of an all or nothing proposition when it comes to redaction? I think that was a little long-winded, Dennis. I apologize for going long. But let me just stop there. Hopefully that explanation is clear. Maybe I'll throw it back to you if there's any discussion or questions you want to have on this one.

DENNIS CHANG:

It's okay to be long-winded, if you will. But I think you did a really good job explaining it. I understood it. And I hope all the IRT members understood it. It seems like Alex and Chris is responding already. With the affirmative, I think the question may be—maybe this is a yes or no, right? So far, I'm tracking Alex and Chris as a yes in the chat. Correct me if I'm wrong, Alex and Chris, but are there anyone in the IRT who think otherwise, like no? Chris, do you want to speak up, obviously, or not?

CHRIS LEWIS-EVANS:

So it should be treated as one data element. It should all be redacted or it should all not be redacted. If these are selected for it not to be redacted, then it should be just treated as one data element.

DENNIS CHANG:

Anyone else? Roger says plus one. I got you, Roger. I want Marc to answer back so it doesn't hold up the working group's work in providing us with the redline. Jody chimes in here. Thank you, Jody. More importantly, if there is anyone who disagrees, this is your time to

speak up. I'm with you, guys. I think that nobody was thinking, "Yeah, we want to see the extension only and not the phone number." That just doesn't make layman's common sense. So I think that's what they meant to do. So let's wrap up number two, which is an easier one, as Marc said, but let's see. Let's go to number one. It's a harder one, right? Go ahead.

MARC ANDERSON:

Thanks, Dennis. Yeah, the second one's a little harder to wrap your head around. First, let me thank Gustavo for putting together the document here. I think that is helpful. So the second scenario also involves redaction, and it has to do specifically with the redaction of the registrant e-mail address. The reason why redaction of the registrant e-mail address is a little bit tricky is because the registrant e-mail address has some additional conditions attached to it if it's redacted, and that's specifically is that if the registrant e-mail address is redacted by the registrar, then the registrar must either provide an anonymized e-mail address or a link to a web form. So, Gustavo, in this document, has nicely provided sort of the three examples. In a domain lookup, you'll either get the registrant e-mail address, a anonymized e-mail address of some form, or a link to a web form for the purposes of contacting the registrant. So those three scenarios apply.

So the question comes in. If the registrant e-mail address is redacted, should that be indicated in the RDAP response? I think the question

here is, is there an expectation that an RDDS user should be able to differentiate between cases A and B from the RDDS input?

Gustavo maybe will want to jump in on this one. He has pointed out that currently—and in WHOIS there's not an indication of the difference. Someone doing an RDDS query would either be provided with the registrant e-mail address or the anonymized e-mail address, and there will not be an indication which it is. In some cases, an example you might be able to make some assumptions based on what the address is, but there's not an indication.

However, in RDAP, the RDAP Working Group is working on implementing a new RDAP extension in which in an RDDS response, RDAP will clearly indicate what fields have been redacted. So, basically, there's a redaction element which lists all the elements that have been redacted. So in RDAP, it would be possible to indicate where the e-mail address has been redacted even though an e-mail address is still being returned in the RDAP response.

I guess I'll editorialize here for a second. There are probably pros and cons to that. There are likely advantages to the indication that it has been redacted. But then there's also potential for confusion if you're indicating that the e-mail has been redacted, but then you're still providing an e-mail in the response. That could potentially lead to confusion as well.

So this one is a little less straightforward. I don't know if Gustavo was part of those discussions and helped put together this document. So I'll sort of look to him if I did a poor job explaining or misrepresenting

anything. But that's sort of the heart of the second question from the RDAP Working Group.

DENNIS CHANG: Gustavo, do you want to open your mic and talk to this?

GUSTAVO LOZANO IBARRA: Sure. Marc, I think that you did a great job explaining the question that is at hand. Really the question is, if these are the expectation that the end user should be able to easily differentiate between anonymized email address or not. I see other hands. So maybe we should just open the floor.

DENNIS CHANG: Yeah. Let's give the floor to Alex. Alex, did you understand the explanation and do you have questions? What do you think? Go ahead, Alex.

ALEX DEACON: Thanks, Dennis. Hi, everyone. I don't know if I have a strong opinion on this. It's curious that the RDAP Working Group had asked to add requirements beyond the policy, which is interesting, given the statement that Marc made during his intro. But all that aside, an indication as to what kind of registrant contact mechanism is displayed, I think, could be useful. But I think there's really four different scenarios, right? There's the real or unredacted e-mail address, there's the redacted or anonymized e-mail address. There's

the registrant contact web form, and there's also privacy/proxy. I see those all separate things. So if we were to do this, I think, ideally, we would be able to indicate and specify contact mechanisms of those four types. So I wouldn't object to that. But again, I'm still forming an opinion on it.

DENNIS CHANG: Okay. Roger, you're next.

ROGER CARNEY: Thanks, Dennis. Kind of jumping on with what Alex said, I think maybe this example here was probably a little misdone. Maybe Marc can correct me or someone else. To me, B looks like—we're talking about privacy/proxy service there, but I'm not sure that's what we're really talking about. We're just talking about any kind of item anonymized because privacy/proxy actually is supposed to show the data, is that right, whatever the privacy/proxy data is. Not the actual underlying data but whatever privacy/proxy data is, it's supposed to show that. So I think, along with what Alex was saying, I think maybe there's a fourth thing here, but maybe the B should be changed to anonymized or whatever, just to try to clarify that. But to the point here, I don't think I ever thought that there was expectation of the output discerning between A and B. So, to me, I don't think there was any expectation that A and B would have anything different added to B to say that it's different, especially on the WHOIS output side. Thanks.

DENNIS CHANG: Thank you, Roger. Chris?

CHRIS LEWIS-EVANS: Thanks. I agree here with Alex and Roger. But I think the second one, maybe for clarity, should be anonymized that contracted party, for example. And then there's the fourth case, which is the privacy/proxy one that Alex first mentioned.

Then to disagree with Roger and Sarah in the chat, there is definitely an expectation to be able to differentiate in the output certainly between one that has been anonymized and a privacy/proxy service. That's certainly something we discussed at length during the Phase 1 discussions is that some standardized language to enable people to tell whether that was an anonymized or a privacy/proxy type example. By extension, I would guess, at this moment, just having seen it for the first time tonight, but we would probably also want to distinguish between A and B as well. So that's initial thoughts. Thank you.

DENNIS CHANG: Okay. That was Chris. Okay. Marc, go ahead.

MARC ANDERSON: Thanks, Dennis. First, I'll agree with what's been said about the example on B. Privacy/proxy is maybe a little bit misleading here. We're not talking about privacy/proxy at all here. That's sort of a separate use case altogether. So we're talking specifically about when a non-privacy/proxy registration, when that e-mail address has been

redacted, there's an obligation to either provide anonymized e-mail address or a link to a web form for contactability. So I agree with others who said perhaps just to sort of updating this and put anonymized just for privacy/proxy, it would help address that confusion.

DENNIS CHANG: Go ahead, Gustavo. Go ahead and change it if you want. I think that's—why not, right? Let's just make it clear. I think that's a good suggestion and I hope that makes it more clear. Marc, you may continue.

MARC ANDERSON: Thanks, Dennis. So to continue on that, listening to what others have said here, I do think there's sort of an argument to be made either way. I don't think that the RDAP Working Group is trying to create new requirements. We're trying to understand the intent here. I think on the one hand, there's an expectation that an RDDS user should be able to understand when a data element has been redacted. But on the other hand, this is not a scenario that was specifically considered or spelled out in any way. So I do think that there's an argument to be made either way. This is why I was tasked to bring it back to the IRT for further direction.

DENNIS CHANG: Hi, Susan. Welcome.

SUSAN KAWAGUCHI:

Thanks, Dennis. A couple of comments. I think the real e-mail address should be indicated as redacted. It is a little bit of a red herring before this was changed, but privacy/proxy—and if we were still implementing PPSAI—that would be indicated in the registration that it was a proxy registration so you would know, because that requires a different notice, different expectations, and you assert different parts of the RAA. So what I’m hoping we don’t continue to see, which I’m seeing now, is a redacted registrant e-mail address, then when that data is requested, you receive a privacy/proxy e-mail address, which still basically indicates that it’s redacted. So I’m hoping that will go away once we implement this new system.

Then I’m very concerned about the web form because in practice, what’s going on now, you have web forms that are pretty freeform, you wouldn’t want to paste in a whole book but you can send a notice to the registrant through a web form, all the way down to it being limited to just an e-mail address. You can’t put anything, can’t say, “Hello, I’d like to talk to you,” “Hello, this is IP infringement.” You can just put susankawaguchi@ whatever, and then the registrant is guessing why someone’s reaching out to them. So I think the web form has to be highly indicated in RDAP. And then somewhere in the ICANN sphere, we need to decide upon what is appropriate. There’s no need for tons of content but a reasonable expectation to be able to send a notice to a registrant. Because right now, what’s happening is they’re just going to abuse it, whatever registrar, then the registrars, in most cases, for reading those on.

So I think with this that I'm in agreement with most of what has been said, but I do want to make another statement that we need to implement the PPSAI and because that RDAP and EPDP and GDPR does not solve the issues with proxy and privacy registrations.

DENNIS CHANG: Thank you, Susan. Chris, go ahead.

CHRIS LEWIS-EVANS: Thanks. Susan just flagged a thought process in my mind so thank you, Susan. So yeah, just another case for that sort of differentiation is that assertion that may be taken by users of the RDAP gaining that. And if they were to get anonymized e-mail address a mistake, that for really may address—they may start legal proceedings based off of that. So I think highlighting there is anonymized is really useful. So, it's another reason to have a think about how we do that differentiation. Thank you.

DENNIS CHANG: Thank you, Chris. Roger and Marc. I think this may be our last topic. We are coming up on five minutes to the end of the session. So go ahead, Roger.

ROGER CARNEY: Great. Thanks, Dennis. I want to just quickly say that I think we've kind of got off onto the wrong point here and we're not trying to answer Marc's question. PPSAI can do whatever it does. I don't think it bothers

this group, but I think something important here is—and maybe Marc can answer it since he’s got his hand up—I thought he said that RDAP does provide this functionality but WHOIS Port 43 does not. To me, nowhere in the recommendations is there a requirement that says that this has to be known. So I would be very hesitant on going back to trying to update a system that we’re trying to get rid of just on somebody’s wish here. Again, because I don’t think there’s a requirement that says that these need to be known discreetly. Again, I think RDAP does do that. So I think we’re getting that if we go to the right spot—and, Marc, you can correct me if I’m wrong—but I think it’s a bad idea to suggest that we go back to Port 43 WHOIS and provide more functionality to something that we’re trying to get rid of. Thanks.

DENNIS CHANG: Marc, go ahead.

MARC ANDERSON: Thanks. I might want to defer to Gustavo on this one. I saw his hand go up. I think he’s going to respond to what Roger said.

GUSTAVO LOZANO IBARRA: Not a response. I agree that in RDAP, I mean, because it’s so extensible, we can do whatever we want and we can provide the functionality. But if we’re going to provide the functionality in RDAP, I think that we need to update 10.2.2 on this policy to mention. Can you, Dennis, please? Can you scroll up? Registrar must publish an e-mail address and signal or somehow it needs to be communicated

that the e-mail address was redacted, right? We have requirement in the IRT. Maybe, Dennis, we need to show the IRT One Doc.

DENNIS CHANG: Yeah. I think we need to—

GUSTAVO LOZANO IBARRA: Of what reduction means and that's there. Can you up, Dennis, a little bit? Yeah. There it says, "For the purpose of this section, redact is defined as must not include the value and must indicate that the value is redacted." So if we are going to, in RDAP, indicate that the value is redacted, I think that we need to update 10.2.22. That kind of takes off "must indicate that the value is redacted," just to be consistent.

DENNIS CHANG: Sorry, we can't give you a definitive answer. I don't know whether you have enough to go back with the working group. But let's take this offline. I mean, go online. I'm going to take it out of the meeting. And then what I need to do is give our attendees a chance to ask questions. We didn't get through much of what we had wanted to, but that's okay. We have other meetings, we have meetings every other weekend, then we can work it on an e-mail trail, too.

So are there any questions from the public attendees who are not IRT members today? We're happy to answer. You may address questions to the IRT directly here, too. I'm seeing no hands. Andrea? No questions, no hand, nothing in the chat.

So let's do this. We're going to wrap it up. We will remember that you have homeworks and they're listed here. This RDAP Working Group was actually due on the 16th. I had hoped to conclude that today but we may have to extend that. At least number two is answered. So you're halfway there. And then the other things that we had extended was this item here. You asked for more time on B, C, and D. But importantly, this One Doc item, especially the F.c IRT comment or/and the addendum IRT comment that just came up, I think we need to work those, make sure that we can get through that in sufficient time to not to delay our public comment opening. I think the drafting errors are fairly straightforward. It's something that we've already agreed to that we're documenting. So after that, it's the end of the meeting. So thank you very much and I think we're done. I'll see you in a couple of weeks.

ANDREA GLANDON: Thank you. You can stop the recording now.

[END OF TRANSCRIPTION]