ICANN80 | PF – GNSO: Transfer Policy Review PDP Working Group
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MODERATOR: Hello and welcome to the Transfer Policy Review PDP Working Group session. Please note that this session is being recorded and is governed by the ICANN Expected Standards of Behavior. If you'd like to speak during the session, please raise your hand in Zoom. When called upon, virtual participants will be given permission to unmute and zoom. On-site participants will use a physical microphone to speak. Please state your name for the record and speak at a reasonable pace. I'll now hand the floor back over to Roger Carney. Thank you.

ROGER CARNEY: Welcome everyone. I think we got the last session of the day. So, let's be efficient so everyone can get to their social hour after we finish up here. Just a couple quick notes before we jump in. When we get back, we'll have a week off as we typically do after ICANN, and then everyone should have on their calendar six invites for the next six weeks. Our hope is that we will finish our review by the end of July, and everybody can have a great August and we can move on from there. If not, we may have to extend into August a bit, or the other option is we may double up the last few weeks of July to get the work done if we need to.

Just something to think about. Again, we're shooting for the end of July to get through the initial report review so that we can get it published for public comment. Other than that, I didn't have anything else to add, so we can go ahead and jump into our agenda. Okay. This is going to be sort of a repeat from last week, but we've got a few more details so that we can cover.

First of all, we're going to cover the list of cannot live with and updates basically to the current recommendations. Again, we did this last week as a first chance through it, so I think that now that everybody's had some time to think about it, we can have a little better discussion, and we've got some more details specifically for those things. And then we'll get a swim lane update from Berry, and then we'll move on to the high impact topic discussion and then we'll close out.

So, I think we'll go ahead and jump into our updates. Let's go ahead and move to the next, there we go. Again, we've seen these for one week now, but at least one week if you ever have been reading it. So, maybe I will go ahead and turn this over to Sarah, who gave us good explanations last week of what these were meant for, and then we'll walk through each one, one at a time. We'll walk through any proposed changes or discussion on them. So, Sarah, if you could take us through this. Yeah, you're just going to read this, and then I'll take it through. Thank you.

SARAH WYLD: Sure. Thank you. So, the first thing that the registrar group submitted together as a group was that we note that although there is a requirement to provide instructions for how the registrar can take action if they believe the transfer was invalid, there's really no guidance about what kind of process should be followed, what the recourse a registrar could have available to them if the transfer was invalid, and it needs to be reversed, but it's within the policy requirements. So, it's a requirement that's a little bit unclear as to how to actually carry it out. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. And staff threw in here a couple of the references that Sarah made. Multiple notifications give the registrant information on how to handle a transfer request if it's not valid. I think there's two or three different notifications that give them information about it. Thank you. And I think that the question that the registrars are asking is more about the registrar's ability to reverse a transfer if they feel that it's not correct.

And last week we got into the discussion of the TAC, and is that the appropriate model, and is that something we need to expand upon, or is it just good enough to notice that, and do we need to note it somewhere? So, I open the floor for discussion. Is the TAC the right response to that? How does a registrar process a reversal request? So, comments from anyone on that? And Sarah, I don't know who put this in for the registrars. I don't know if that specific person has any specific comments. Does the TAC answer that for them?

SARAH WYLD: Thanks. This is Sarah. I think that the TAC is, as we know, available to registrars, and it's available when the policy itself was not followed. So, if there's a situation, for the example that I think we often go to, where an account was compromised and then the domain was transferred and it shouldn't have been, I don't think the TAC would cover that situation, and so I do like some of the other ideas that we've considered suggesting to be explored, such as a process the registrant could follow in that situation. Thank you.

ROGER CARNEY: Thanks, Sarah. So, again, I think for the registrant themselves, we let them know multiple times in the notifications how to stop or reverse it. To your point on if the policy's broken or not, I guess I would have to read that again, and staff can tell me if the TAC is only for policy or if it's for any transfer issue. I don't know that specifically on the top of my head right now. Maybe no one knows. Maybe we can look at that. Okay. Maybe we'll take a look at that and see if that is. Rick, please go ahead.

RICK WILHELM: I thought it was the-- Rick Wilhelm registries, not my circus. I thought that the TAC was for registrar to registrar contact when things have gone sideways, and it is sort of like the red, the hotline, the red phone between the desks of the registrars is my mental model of it, but again, I'm a registry. Thank you.

ROGER CARNEY: Thanks, Rick, and again, we can review it, but I don't know that the TAC can only be used for policy, and then to your example, Sarah, is, if it's hijacked, whatever reason it is, and the registrar feels that. I think they can still process it to do that, but yes, Sarah, please go ahead.

SARAH WYLD: Thank you. This is Sarah. I was definitely mixing up TAC and TDRP, so the TAC is, it's the bat phone. It's the something is wrong, I need to talk to you, phone. TDRP is a reversal policy, but it's only available to the registrars when the policy wasn't followed, the transfer policy. So, thank you.

ROGER CARNEY: Great, thanks, Sarah. Catherine, please go ahead.

CATHERINE PALETTA: Thanks, this is Catherine Pauletta from the registrar stakeholder group. I think maybe it'd be helpful to think about, if I'm the registrar sending the notification of transfer completion, what does my email say? So, I imagine for this bullet, my email would say, if this was not a proper transfer, reach out to name. com by filling out this form, but there's not process beyond that. I can use the TAC. I can call Roger if the domain went to GoDaddy. I can do lots of different things, and it's going to depend on the situation, and I think what the registrars are saying is, like, we're not really providing information how to initiate a reversal, because we can't guarantee a reversal.

And so, maybe this, is it helpful, registrars, to reword this to say, contact information for the registrar if the transfer wasn't authorized, and it's not instructions on how to reverse it, because we don't have a process. We don't have an undue process for inter-registrar transfers, and so I think that's maybe where the conflict is, and I'd encourage a registrar to correct me on that, but I just think there's not this, this implies a process when there's not a process.

ROGER CARNEY: Great, thanks, Catherine. Yeah, and I'll just add on to that before I get to Sarah. Yeah, and I think that, our instructions here say action, and it doesn't say reversal, so I think that, it does say how to initiate a reversal, but yeah, I think that that's maybe something we can clarify that, this isn't a process to guarantee a reversal, and I don't know if we need to get more specific to Catherine's point.

The TAC is one way to do it. You know, registrars do talk to registrars, surprisingly, and they do work things out without that having to go through a specific process, so a lot of times, if it's a pretty obvious hijack or whatever, it is a pretty simple phone call that gets them, reversed, so again, I don't know if we need additional language, but that's what we're discussing, so Sarah, please go ahead.

SARAH WYLD: Thank you. This is Sarah. Yeah, I really agree with what Catherine said, and I do think it's hard because it says how they can take action, but what action can they take is they can contact the registrar and say, I have a problem here, and so this group, I think, decided not to create a fast undo process or some kind of way to reverse the transfer, perhaps, and I don't remember, but maybe we wrote that sentence expecting that there would be such a process available, and so maybe it is just instructions detailing what to do if transfer was invalid, or that doesn't sound great, but, thank you.

ROGER CARNEY: Thanks, Sarah, yeah, and again, I don't know, to your point on if we were thinking of something else, I don't think so, but I think that really to me, are we just asking here then to be more specific here in this instruction to say, how to contact your registrar if you feel this is invalid or whatever it is. Again, I'm trying to look for wording here that we can put in here, so Steiner, please go ahead.

STEINAR GRØTTERØD: Hi, this is Steiner, At-Large. This is a notification that is being sent by the new sponsoring registrar.

ROGER CARNEY: No, this will be sent by the losing registrar, so this will be--

STEINAR GRØTTERØD: Oh, there's a losing one, okay,

ROGER CARNEY: Yes.

STEINAR GRØTTERØD: So, then the losing registrar has to inform the registrant about who is the new registrar, and that's kind of a process, but it will be hard not to make it complicated for the registrant to go into some sort of dispute between those two entities, so the process has to be registrant friendly, if that's the way to put it. Thank you.

ROGER CARNEY: Thanks, Steiner, yeah, and again, in this notification, the bullet two really gets into identifying who the gaining registrar is going to be, and probably that'll be the first clue to the registrant is if there was something wrong. It's like, I don't know who that even is, so it may be, that identification saying, oh, I didn't see that, and I don't know who that is, and maybe they just don't recognize it, and it's an easy thing to fix, but to your point on, making it easy, I think that's what Sarah is trying to do as well, is trying to make our last bullet more precise or more prescriptive about what the register name holder should be doing, and, again, I think the suggestion was maybe putting in more contact to your, the current register, the losing registrar, or contact us here, basically, because it's coming from the losing registrar, but Sarah, please go ahead.

SARAH WYLD: Definitely went for the Zoom. Okay. I put some suggested text in the chat. We all know what I think, which is that I would have loved to have a reversal process, but I'm trying to live in the reality, and so if the reality is-- and so the text here should be tied to the realistic options available, which is instructions detailing how to contact the losing registrar for help if the transfer was invalid. Maybe that's a way to go. Thank you.

ROGER CARNEY: Thanks, Sarah, and I think that that's what I was thinking about all we could do in this, and maybe that's if the transfer is perceived to be invalid or something along that line, not that it is invalid, but they think it is, so maybe that wording that Sarah puts there is, I don't think it changes our last bullet that much, but it does add some precision to how to do it, so I think that's good, and to Steiner's point, making it easy for the registrar. Berry, please go ahead.

BERRY COBB: Thank you, Roger. Berry Cobb for the record. I was contemplating almost what Sarah was saying, almost like strike through the how to initiate a reversal, because at the end of the day, not much is changing from current state in this particular instance, at least not until there's an issue report about, registering access to transfer disputes and those kinds of things. The only suggestion I'd make to Sarah's suggestion is instead of losing prior registrar, we maintain consistency registrar of record, and then the gaining registrar. Thank you.

ROGER CARNEY: Yes, Sarah, please go ahead.

SARAH WYLD: Thank you. This is Sarah. At this point, if the transfer has completed, didn't we say they're not the registrar of record anymore?

ROGER CARNEY: Sorry, at this point, yeah, they wouldn't be the registrar of record, and again, I think, this is truly the instructions for the registrar to send instructions, so I don't think that it's going to be mentioned in the instructions, contact the losing registrar, or I think they're going to say contact us is what I would expect, but Sarah, please go ahead.

SARAH WYLD: Thank you. This is Sarah. I was also for some time thinking that this seemed kind of redundant, but a registrar might send an email from a no-reply email address and tells the domain owner, your domain transferred away, it's this domain that went here, it happened yesterday, if you think there's a problem, contact us, like that makes sense as what to send. I think the hurdle here was just the instructions on how to take action is its own type of specific, and there is not really a lot of action to take other than call us, so new text in the Zoom, thank you.

ROGER CARNEY: Great, thanks, Sarah. Berry, please go ahead.

BERRY COBB: And thank you for that, that's a good point, or a great distinction that this is, a specific policy recommendation for instruction of the policy that the registrars would need to adhere to, not the contents of the actual messaging, and so I might suggest that we include a footnote on that to make it clear for a future implementation team to take this on.

ROGER CARNEY: Great, thanks, Berry. Thoughts? Support? Non-support? Support? All right, good update. Okay. Let's go ahead and move on to the next one that Sarah can walk us through really quick.

CHRISTIAN WHEELER: Roger, I actually had a question.

ROGER CARNEY: Sorry.

CHRISTIAN WHEELER: I can't raise my hand. Sorry. The working group also has similar language as far as like how to initiate reversal and other recommendations that are on the screen here. I'm just curious if that also would impact the language in these instances as well, if it would just kind of remove the parentheses or whatever Sarah had recommended.

ROGER CARNEY: Great, thanks, Christian, for bringing that up. Yeah, and thoughts on that? Again, this will be a different starting process. Again, the comment the registrars made was on the after fact of a transfer and how to do that. The transfer actually hasn't happened here yet, so I don't know, but Sarah, please go ahead.

SARAH WYLD: Thank you. This is Sarah. I was going to say that I would think they should all be as consistent as possible, but now I'm reading the chat and I feel like I want to think about it more. Making me think, how dare you.

ROGER CARNEY: Okay. Let's take a read of it. Catherine's got her hand up, but let's take a read of it and make sure. But I think that Catherine's comment that to me seems right. I mean, it's different, kind of a different situation, but maybe it does still apply. So, Catherine, please go ahead.

CATHERINE PALETTA: Yeah, I think while we don't, oh gosh, now, sorry. Catherine Paletta. I don't recall if there's specific recommendations on how to invalidate the TAC, but that seems like something that is wholly within that registrar and contingent on that registrar. And the registrar should have a process for invalidating the TAC.

Similarly, with the change of registrant data, that is still wholly within that registrar. And I think that's the distinction for me, is that I can initiate the reversal of the change of registrant because I still control the domain because it's at my registrar. And it's because we're talking about two different registrars in the other example that I can't, it's not the same thing where it would be like, here, instant reversal, get it back, and I can revert your change of registrant data instantly or I can invalidate the TAC instantly, instantly with quotes. And so, I think the text of it currently is fine. If we want to harmonize that to be more similar to the other one, I think that's also fine, just for consistency and if that's helpful, especially for the IRT to see, did they mean different things and whatnot. But I don't see that these pose the same risk that the other one did.

ROGER CARNEY: Great. Thanks, Catherine. Yeah, and I think you've got agreement from others that, yeah, it doesn't pose the same risk. So, maybe I'm going to say, let's leave this as it is. And if someone thinks they can come up with some language that's better for it, we'll talk about that later. But I think from this group, I think it works the way it is. So, let's leave it that way. Berry, please go ahead.

BERRY COBB: I'm Berry Cobb. I'm kind of looking at all three of these, and I'm really shooting off the hip here. So, please feel free to shoot this down. If I recall correctly, there was template language for the losing FOA and the gaining FOA that's part of the policy. Is it worth trying to put template language for these types of notification for consistency across the namespace or do we just leave it up to registrars to work that language themselves?

ROGER CARNEY: Thanks, Berry. And again, one of the keys that we started three years ago with was, yes, trying to be consistent and standard across the board. But one of the other things we talked about was being flexible. And I think these allow that flexibility. But to the point of, should it be more consistent? That's a good question. And I don't know that we talked about that necessarily. Obviously, I'm looking at these two things, and they're slightly different on the screen here. I think it's fairly easy to update because it's registrant versus register name holder, things like that. So, that seems to make sense. But thoughts on trying to be consistent? Catherine?

CATHERINE PALETTA: I think this piece would always have to be personalized for the registrar anyway, for these two. And I think probably for the other one as well, since we don't have that set process. Because however I want to, maybe I put extra hoops, is this buyer's remorse or seller's remorse for a change of registrant. So, I want to look at it and say, did it change accounts when it changed registrants? That looks like a business decision.

And so, my process is going to be different. And so, I might have different hoops to jump through, and I might explain those in an email. Whereas Sarah's registrar has an automated process. You just click a button, and it's done, and your registrant data is always reverted back. And so, I think even if we did put like a form in there, you'd have to be like, registrar fills in their own process for this. So, I think this is, and I think this is fine. I think as it is.

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

SARAH WYLD: Thank you. This is Sarah. I also think that providing the specific bullet point requirements is fine, and we do not need to provide templated text. My marketing team would hate that. Thank you.

ROGER CARNEY: Thanks, Sarah. Okay. Was that the last one, Christian? That was, okay, great. Okay. Let's go on to this one, Sarah, please.

SARAH WYLD: Yes, thank you. So, looking at recommendation 22, the concern was that there's a requirement that says that there's always a lock, but then there's also a recommendation that says there can be exceptions to this lock. So, we think that in the chart of situations that do not or do allow lifting of the lock, it might need to refer to the fact that there could be an exception, which I think is difficult. It's hard for me to think about it until I see the actual rec text on the screen. Thank you. There we go. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Yeah, and here's what we had in our recommendation. Again, the slight update to this was just the 60 to 30 days, but I think if we move to the next slide, we'll see a proposal on the question. So, if you guys want to take a read of this real quick, and does it make sense? Does it work? Again, this will probably, it does, it doesn't, not that it'll probably, it does pop up a couple more times. So, take a read of it, please. Yes. And again, yeah, it does pop up a couple times. So, I think it's been put in all the spots. Sarah, please go ahead.

SARAH WYLD: Thank you. This is Sarah. My first thought is yes, I like it. In this text on screen, I'm not sure that the word however needs to be there because it starts the sentence, but maybe it makes sense in the full context. I'm a little bit bumping on the word necessary, but it's not necessarily wrong. So, I just feel like I want to think about that a little bit. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. And the registrars pointed to REC 22. Was there an update to REC 22 to include this text? I don't remember.

CATHERINE PALETTA: I think our statement said we need to update per REC 19, I think.

ROGER CARNEY: Perfect. Thank you. Rick, please go ahead.

RICK WILHELM: Rick Wilhelm, Registries. Editorial amendment. I would suggest that 19.2,3,4,5, be indented to be 19.1.1, 19.1.2, et cetera, because right now there are met colon, and then they're sort of logically underneath 19.1.1 because the reader is maybe a little bit confused as to which are the sub-conditions that need to be met for the situations when the 30-day inter-registrar transfer restrictions may be met, right? So, that's just like an editorial kind of a thing. I see nodding from the corner. So, you're parsing?

CHRISTIAN WHEELER: Yes, we had that thought as well. This bracketed text in highlight is also fine at the end of Recommendation 19 as a suggestion to move it up into the recommendation itself so that, yes, everything kind of 19.1 and beyond would be a kind of sub of the original Recommendation 19. It's just something that hasn't been agreed to yet by the working group. Thanks.

ROGER CARNEY: Thanks, Rick. Thanks, Christian. Catherine, please go ahead.

CATHERINE PALETTA: Hi, this is Catherine Paletta. Can you go to the next slide? So, if we move the highlighted text up into the paragraph that is Recommendation 19, 19.1 starts accordingly, which would still put 19.2 indented under 19.2. And along with what Rick was pointing out, you've got some commas, an and, and then a semicolon. And so, I think both the punctuation being consistent and the ands being maybe however we do it in the rest of the policy, either each thing has an and so that they're all ands or whatever it is. So, it's clear that you need all of-- I don't even know if it's all four of those because I haven't read, okay, I'm a slow reader. So, I haven't read the whole policy yet. But yeah, that's again, just a formatting thing that I think adds clarity.

ROGER CARNEY: Great. Thanks, Catherine. So, is there specifically on where this goes, does it make sense that it is in the body of 19 to start this? Because then everything's just preference under it. So, I think that that works. Any issues about just moving it to the next? Catherine, please.

CATHERINE PALETTA: I think you'd have to move the entire text of 19.1 up, not just the highlighted text. And then 19.1 becomes subsidiary to 19. And then that would work. Yes.

ROGER CARNEY: So, 19.1 gets absorbed, 19.2 becomes 19.1, blah, blah, blah. Thank you. Okay. That makes sense to everyone? Okay. Sounds good. All right. Was there anything else on this one, Christian? I think that was it. Yeah. Okay. I think we can move to this one. Sarah, please.

SARAH WYLD: Thank you. This is Sarah. This is quite similar. So, it was a reason why there would be a lock on the domain, but there is no longer a lock associated with change of registrant. So, there shouldn't be a recommendation to have a lock there.

ROGER CARNEY: Great. Okay. And here is what was referred to, the current text being 60 days. Our rationale here was based on, we're going to circle back to it and we are circling back to it. So, that's good. I don't see an issue. Does anybody see an issue about removing this? Because this falls more into the change of registrant thing that we said we were pushing off to somewhere else we weren't going to solve. So, if that does occur. But I don't think this applies to the policy we're writing anymore. Are there comments on that? Concerns about removing it? Catherine?

CATHERINE PALETTA: It's me again. Catherine Paletta from the Registrars. So, to confirm, when you say removing it, the revision would no longer say, NA. We would need to say eliminate this, or do we just not have a recommendation for this section? And then if we include a revision, then we need a rationale. Is that what you mean?

ROGER CARNEY: Yeah. And I think I'll turn to staff, but I think that it would be appropriate if we provided, hey, we're removing this, and this is the rationale for removal, so that everybody is aware that, hey, when this policy does get implemented, this won't exist, so. Agreed. Great. Thanks, Christian. Okay. Great. Sarah, the big one here.

SARAH WYLD: This is Sarah, but I'm not well prepared to speak to this one, because I have a very hard time thinking about it. Is anybody else in the registrar team able to speak to the other renewal refunds concerns?

ROGER CARNEY: Thanks, Sarah. And I think last week, Jothan talked to this. Is Jothan available or not? I didn't notice. He is in the room. I will call him three times so that Beetlejuice does come on. Jothan? Jothan? Jothan?

JOTHAN FRAKES: Yeah, you woke me up.

ROGER CARNEY: Yes. There you go.

JOTHAN FRAKES: Yeah, I can talk a little bit towards this. Hi, everybody. I'm Jothan Frakes from PLISK Registrar. Yeah, so in the case of this particular item, there are many registries that will automatically roll back the one-year extension that happens at the anniversary of the domain name that is automatically done by the registry when the domain is not marked to delete. In talking with my colleagues, there were some that believed that this would happen and some believed that it doesn't happen. And the primary concern here is that a domain would automatically renew and extend the domain for one year and under a typical scenario, the losing registrar would have had the opportunity to delete it and then be refunded that year.

This is in the case of where prepaid funds are the style as opposed to being invoiced by the registry. So, the thought here is just to memorialize this in text that the domain would be-- if a domain occurred where the domain had been auto-renewed by the registry and the domain name was within the auto-renewal grace period, that the registry would explicitly roll back the one-year expiration extension and refund the amount of the auto-renewal fee to the losing registrar.

ROGER CARNEY: Great. Thanks, Jothan. Appreciate that. And thanks for waking up for us early. So, if we can go to the next slide before I go to Rick, I think maybe this is solved in the implementation guidance. If you read the revision in the middle of the implementation guidance, the last part of that says, provided that any auto-renewal costs borne by the registrar are reversible for future period, which would be that auto grace period payment fee. But I don't know if that works for everybody. Think about it. Read it. Let me know. And I'll go to Rick. Please.

RICK WILHELM: Sure. Rick Wilhelm, Registries. So, we're not supportive of this because this is out of scope for this REC. REC 24, which is what we're on, is on revised reasons that a registrar of record must not deny a transfer. This is not a situation where we're talking about the registries. And this is a situation where we're not going to entertain bringing up something about a registry's auto-renew refund policies that's out of scope for what we're talking about. And we're not going to entertain bringing that stuff up. Registries auto-renew refund policies, they are what they are, and they're not on the table for discussion. Thank you.

ROGER CARNEY: Thanks, Rick. Looking at the implementation guidance, you don't accept that?

RICK WILHELM: So, what's on here, A391, what we've got is registrars are, what I'm looking at, I'm looking at my copy, which is unedited. Registrars are prohibited from denying domain name transfer requests based on non-payment of fees. It says what a registrar is prohibited from doing, provided by, blah, blah, blah, provided by any auto-renew costs borne by that are reversible. So, there's no, we don't have a problem with what is, with what is there, right? That's fine. Okay. But that's not what was being proposed, was something about saying what registries may or must or whatever about what we can or can't, or got to refund or something like that, and we're not, we're just not going to get into that discussion. Thank you.

ROGER CARNEY: Great. Thanks, Rick. Any comments on that? Jothan, please go ahead.

JOTHAN FRAKES: Yeah. Thank you. I guess this dances perfectly with what I had just presented on. So, the concern that the registrars had was that in the case where a domain gets auto-extended through the auto-renewal process, and then the domain transfers, typically the losing registrar would have had the opportunity to delete the domain, and then the domain, there would be a refund secured.

So, this leaves room for the possibility of a domain to transfer that had been auto-renewed with that one-year extension at the expense of the losing registrar that they had not been paid for. And so, this means they're losing a customer and they're out an extra year of the registration fee because the transfer would have also extended the domain another year. Now this occurs inconsistently. Not all registries have implemented this in a consistent manner. So, memorializing it was just helping to ensure that this had behaved as expected. And that was why it was in there. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. And I think to Rick's point is that policy is up to the registry policy of that. So, this transfer policy won't change a registry policy on that. But Catherine, please go ahead.

CATHERINE PALETTA: Thanks. This is Catherine Paletta from the registrars. So, I hear a lot of what Jothan is saying, and I'm inclined, I understand where Rick is coming from. And I think maybe Jothan is directing the conversation in a way that is misleading us as to what this change actually says, not intentionally, Jothan, sorry. But what the change is that registries keep doing their registry stuff. They decide, do we refund that, do we not? And a registrar who says, identity digital doesn't refund me, can now say I'm denying the transfer because I don't get my money back. They're not saying that registries have to give me my money back, which I think is maybe what Jonathan's text proposed in the can't live with. And so, I'm wondering, Rick, to confirm, can you live with what's on the screen if we're not talking about the text like Jothan proposed?

RICK WILHELM: Yeah, I can. This is Rick Wilhelm with registries. Registries have previously gone over what is on the screen. We're fine with what is on the screen because that does not force a particular auto-renew refund policy on the registries. We're totally fine with that. Absolutely. Thank you.

ROGER CARNEY: Thanks, Rick. And to Catherine and Jothan's point, it does allow the registrar to handle it the way they want to handle it as well. So, I think that this text here that everybody has agreed to does facilitate that, and I think we've answered this issue. So, I think we can move on. Excellent. And now we're on to recommended updates or proposed updates. And maybe I'll turn this over to Sarah again so she can run through them. I don't know if she made these or where they came from. Sarah? Oh, this is a Jothan one? Okay. Maybe Jothan, Jothan, Jothan can talk to this one.

JOTHAN FRAKES: I woke up at the right time. So, in this case, there's wording in 25.1 that states that you must-- Where the email address changes, that's material. And so, you have to do this. But then 25.3 states that if it's privacy proxy services, when that's added or removed, that you don't. And so, my point or the point raised here is that there's a belief that perhaps some registrars might interpret this one way and other registrars might interpret it another way as to in which order this applies or which overrides. And so there was a proposed text that was a change to 25.1, I believe, where we would state unless. So, do you have a slide that shows the possible change text?

ROGER CARNEY: Thanks, Seth. No, we don't have that.

JOTHAN FRAKES: So, what we were going to suggest is that 25.1 would be amended to just state unless 25.3 is in effect. And that would help to clarify a crisper and more accurate and intentional interpretation of how these layers. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. Yeah. And we did talk about that last week, and I think that some language was thrown in chat on that. Just, again, not changing these. It's just, as Jothan said, more clarity on what is precedent when it occurs. So, but Steiner, please go ahead.

STEINAR GRØTTERØD: Hi, this is Steiner for the Record. My question is, do we actually need 25.1, 2, and 3?

ROGER CARNEY: I think we do. I think we all agreed to this. So, I think it's necessary to be clear on material change for the change of registrant data. Thanks, Caitlin, for suggested language to that 25.1. But Sarah, please go ahead.

SARAH WYLD: Thanks. This is Sarah. Just to think about why might we need that language. And so, if we're saying, we used to call it change of registrant. Now it's change of registrant data. Well, now what is change of registrant data? We have to carry over the other definitions that come with it, which are the definitions of change of registrant data is a material change. What's a material change? It's this. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. I think there's several people in chat saying a similar thing. And I'd like to suggest everybody take a read of what Caitlin put in for a suggested edit to 25.1, which scrolled past me now, so I can't see it, but it was subject to the language in 25.3. So, one love it, I heard. So, that's great. Steiner, old hand, new hand? An old hand? Volker, please go ahead.

VOLKER GREIMANN: Hello, everyone. Just to illustrate why this is needed, maybe. There are many situations where a privacy provider wants to seize providing the privacy services to a registrant. And if we had to get the approval from the actual registrant to deactivate the privacy service and reinstate the actual registrant's data, then they wouldn't be able to do so. So, that's one major reason why we will need this carve out. It also serves to make clear that while the privacy proxy service provider is legally the material owner of the domain name, there is someone behind it, and there's a beneficial owner to that domain name as well, and they can always request the replacement of that data as well.

ROGER CARNEY: Great. Thanks, Volker. Okay. If no one has, again, we talked about it last week as well, so if no one has any issues with what Caitlin suggested, I think that works, and it was very similar language to what we had last week. So, I think that's good. Thanks, Steiner. Okay. I think we can move on to the next proposed update. I don't know, was this a Sarah one? It sounds like a Sarah one, actually, to me.

SARAH WYLD: This is Sarah. This was a Tucows comment, where it says that the recommendation requires a notification, because right now the auth code is generated at the time of registration. It actually says whereas currently, but when I read that, what I think it means is because. But that's not why it needs a new notification. It's not about when the auth code is generated. It's about that there's not a separate notice required, and so it's not about when the time of the auth code was. It's about when it was issued, I think. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. And if we can go to the next slide, I think we've got it highlighted here, and this is what the Tucows comment was pointing out, is the whereas or the auth code typically is beginning, doesn't have a reason. It doesn't provide the rationale for the change or for the, so I think I agree with that. I don't know if others agree with that. It seems like it's not necessary there, as Sarah pointed out.

It doesn't explain why a new notification is there. Thoughts? Concerns? About updating that? And it is an explanation. It's not policy language, but our explanations to the public will be well scrutinized, so as clear as we can be will be helpful. Okay. I think we'll take a look at rewording that and pulling that out, because it doesn't support the reason for it. So, I think we can close this one as well with that. And we will go to the next one here. And I don't know, Sarah, does this look familiar?

SARAH WYLD: None of it looks familiar. This is Sarah. So, in the thing where it says that it's the registrar of record, but the transfer has already happened, so it's the losing registrar has to do the thing, I think.

ROGER CARNEY: Great. Thanks, Sarah. And thanks for making that nice and short and precise there. Because, yes, now that we see this, and we kind of touched on this earlier in our discussion, is registrar of record, as Berry claims, that we're trying to be consistent about this. But to Sarah's point, at this point when this notification is sent, the registrar of record is not the current registrar. So, Caitlin, please go ahead.

CAITLIN TUBERGEN: Caitlin Tubergen, ICANN Org. For Recommendation 5, there is an explanatory footnote next to losing registrar that says this is the registrar of record at the time of the transfer request. So, I don't know if that resolves the problem or if you would still like to-- I understand the concern, but there is a footnote trying to explain that distinction.

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

SARAH WYLD: Thank you. This is Sarah. So, also, I don't think there's a space between registrar and must in the first sentence. But so, I think it would be best, if possible, to use the same term to refer to the same registrar throughout the paragraph. And here we've got one term footnoted to reference the second term. But either way, in this paragraph, just reading it, it will be more-clear that both of these things are done by the same party, which is the losing registrar who was the registrar of record at the time. So, I still think saying losing registrar in both places will be more-clear. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Anyone have any issues with changing the registrar of record to the losing registrar? And we probably take a look at the footnote because maybe it doesn't apply anymore, if that's the case. Any concerns about updating this to be consistent with the first sentence or the first line? Thanks, Luke. Berry, please go ahead.

BERRY COBB: Berry Cobb. Not to be a buzzkill here, and I'm asking this question on the fly because I don't have the policy memo. Do we have formal definitions of losing and gaining registrar in the current policy? And if not, then should we have definitions in here? Asking for a friend.

CAITLIN TUBERGEN: I believe those terms are defined in the transfer dispute resolution policy, but not necessarily the transfer policy, but I can confirm.

ROGER CARNEY: What was that, Catherine?

CATHERINE PALETTA: They're not defined in the policy. I did not check the TDRP.

ROGER CARNEY: Okay. And to Berry's point, should they be? Should we put them in here? Losing registrar, registrar record, gaining registrar, should we define them here? I think that I don't know that it applies anywhere else that transfer is probably the only place that those really apply, those things. So, Berry, please go ahead.

BERRY COBB: And I'm not going to suggest that those become policy definitions that would go into a future policy, but at least for terms of reading the report to the layman.

ROGER CARNEY: Great. Thanks for that, Berry. Catherine?

CATHERINE PALETTA: Thanks. This is Catherine for registrars. I think if, I'd like putting them in the report at the very least. I think if we consider putting them in the policy, my strong feeling is that you should have things defined in one location because you don't want to end up with conflicting definitions. So, if we're going to leave the definitions, assuming they're in the TDRP, I think we would then maybe want to update and remove them from the TDRP so that they live in one place.

And then I don't know that I care so much about where they live, except people are more likely to read the transfer policy, so having them in there I think is more accessible. But then do we have to open a can of worms of removing them from the TDRP? We could leave them. It's a low risk. But if we're going to define them, I think we should have the one place they're defined because who knows when these will be updated next.

ROGER CARNEY: Great. Thanks, Catherine. So, yeah, I would say let's not worry about defining them here, but as Berry suggested, providing them for reference for those that are going through this. And thanks to, I think it was Rubens that put in that the registrar record is referred to other places, but the losing and gaining is not. So, I think it's better if we don't try to and then we're not impacting other policies, but just provide it to the readers for reference. Any concerns with that?

BERRY COBB: Berry Cobb here. I agree with the approach forward, at least trying to get this to public comment because we'll get into the weeds trying to move things around. But I think we will reserve the right to consult with our GDS staff, because I want to do everything we can to not trip them up in the IRT land. And if we're embedding these in specific consensus recommendation text, they're going to come back at us and why didn't we include a definition? And I agree. I think it does make sense that it maybe needs to find a home and perhaps we can take that up post public comment.

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

SARAH WYLD: Thank you. This is Sarah. Just want to verbalize what I put in the chat. I looked up the TDRP. I think that's the current one. Oh, no, it's not. I'm going to look again.

ROGER CARNEY: Great. Thanks for working on the fly there, Sarah. I appreciate that. Okay. So, again, I think from this specific thing for five, we'll update it to losing registrar. And the discussion I think will, as Berry says, will hold off on making a complete decision on it. But for the report, we'll provide it as reference for the readers. So, Sarah, is that new hand?

SARAH WYLD: That was an old hand, but now I'll say the new TDRP from 2016 has defined gaining and losing registrars, which I expect is why the term registrar of record was in a footnote. But I think now I'm backwards on that. So, like losing registrar is in here footnoted to be registrar of record. We should just find two terms and use them. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Okay. And maybe that's something we consider when we're talking about if it needs to be defined or not, since it is in the TDRP. Okay. I think we can move on to our next proposed update on 26. And I think this was from Sarah, maybe.

CATHERINE PALETTA: Hi. This is Catherine Paletta. This one was for me. Yeah. What it says. To me, it's only one sentence. I would never write something more than that. Just added clarification that we are not calling for a new PDP, not that we can prevent anyone from doing a new PDP, but that please don't subject us to another one. Is there a suggestion on the next slide? Thank you.

ROGER CARNEY: Great. Thanks, Catherine. I don't think there's any suggested current language on it. So, if you can come up with that, I'm surprised a lawyer can do it in one sentence, but the hey, she did it. So, maybe you can provide that for us.

CATHERINE PALETTA: The working group does not believe, does not recommend a new PDP to, ah, dang it, can't do it live. I'll marinate on it.

ROGER CARNEY: That's okay. Yes, thank you. Okay. And, again, if anybody opposes that, I think everybody intended that to go along. So, I don't think this is controversial. Again, I think this was the intent, that we weren't calling for it. As Catherine says, maybe it happens, but that's not up to us, and we're not calling for one. Okay. I think that's all we need. Okay. And I will turn this over to Berry.

BERRY COBB: All right. Thank you, Roger. So, as everybody's familiar with that's been here for the last three years, we've had many iterations of the swim lane diagram, which is basically a process flow of trying to conceptually illustrate the start and finish of the transfer, the inter-registrar transfer policy. The version that you see on this screen, that you can't see on the screen, because it's extremely small, has been updated to reflect the latest recommendation text, although there may be a little bit of renumbering based on the 19 discussions on some of the highlights.

Anyway, so kind of repeating what we went through in the last call, I think when we pivoted back, I didn't say this part on the last one, we pivoted back from the phase or group two recommendations, and staff was preparing a summary of where we're at that particular time. I started going back and listening to some of the old group 1A calls and trying to look through the text. And even with the charter questions and the proposed recommendation text, the charter question itself had context to the recommendation text, but it still seemed very confusing. And even for myself, I wound up going back, let me go to the swim lane first, and then at the very least I can try to hunt and pack for the recommendation number to try to get some context. But even then, it still felt very confusing.

So, the way we had set up the overview document at that particular time was to invite the working group to review that January 17, 2023 call, where we kind of verbally walked through each step of the swim lane. So, now we're getting close to wrapping up or preparing for this new initial report that will include all three groups. And I think the initial attempt had the report at 150 pages or something, or close to that number, just in the core part that didn't include annexes.

So, the idea was to break with tradition, remove the charter question that's from the charter, obviously, and the working group's summary of deliberations, and move that down to an annex to help shorten and consolidate and condense the core body of the report. And that was a great idea until I started looking at it, and then I was like, well, now I have zero context for the ordering. So, then the follow-on idea, well, if we like the swim lane the way that it is, conceptually, not a policy diagram or anything, then it would make sense to follow that flow with the recommendation text. And I sent to the list, oh, thank you, Christian.

So, it really made sense for these top three recommendations that aren't technically part of the swim lane flow of an actual transfer and knock those out of the way because they didn't have any context. But then starting with currently what is REC 7 now, or the change would be REC 4, we get into the nitty-gritty of, well, what is the TAC from the old Auth Info code, and really trying to compact and reorder these things, so that everything TAC is together in the core part of the process. And then once you leave the core, I shouldn't use the term core. When you leave the main body of the of the transfer process and then you're getting into the notifications in the later stages of the process.

It just seemed to make more logical sense even from a readability perspective. So, this is not a die on the hill for me, but I'm really concerned about things that we've heard in the community before that the reports are too long. They're hard to follow, we need to make things easier. Anyone outside of this group is certainly not intimate with all of our discussions and the reason for it.

So, this is a proposal for reordering the group 1a recommendations, and we can do that at the kind of the middle of July when we know that all of our text is stable and then just go change the numbers and then everybody's got to use the men in black pen and you know erase your memories of previous numbering, then we move forward with that and this reordering is only in regards to the group 1a. We didn't see a necessity to reorder the 1b or the group 2 recommendations at the time.

Another idea has kind of occurred to me again also breaking Tradition from previous GNSO working group reports is, if this path is amenable to the group, what We're contemplating and we haven't even tried this yet, so it's merely a suggestion at this stage is, instead of having just dry text of recommendation number, recommendation text, impact indicator, impact statement and rationale. When you write that out in full-blown text, you have a lot of white space on the page and it'll make the document even longer.

So, when I rearrange the group 1a the number of pages, I think reduced down below 40 or so, and I think we could get that even smaller if we take a table approach almost kind of like a scorecard and It will still have the same logical flow recommendation number recommendation text, but we're going to utilize columns so that we can collapse those down and hopefully we can maybe even get this down to about 20 pages for just the group 1a.

So, I think that and really trying to highlight, the visual aspect of the swim lane will not only help us for future deliberations as we try to bring this home, but help the community better read this and I think that it also sets the stage that even though when we do get to public comment at least for the leadership team we're not done because we need to go evangelize through webinars the reports and those kinds of things. I think that this kind of helps set the script, the movie script for about how those presentations may go. So, thank you

ROGER CARNEY: Great. Thanks for that, Berry. Yes, and we all appreciate Berry's visual skills there to get a swim lane that actually looks like it works and for a process that really doesn't fit it all that. But I'll just ask Rick point-blank since he did express a concern about renumbering and I think most of us appreciate the fact that renumbering can be confusing and cause issues, but I'll ask Rick if he's appreciative of this. I'll say, when you read it through it does seem to read more logical than the charter questions did but I'll turn it to Rick. Thanks.

RICK WILHELM: So, it's definitely more logical to me. My only apprehension stroke misgiving about the renumbering is, if people were trying to connect the dots between current work product and prior work product. I may not have articulated it adequately. I had no doubt that whatever renumbering Berry and the team would do individually, collectively, was going to be an improvement over the current or ordering which it's sort of evolved and taken on a pseudo random or even purposefully confusing a set of characteristics. What the renew reordering as Sarah pointed out is like, yeah, this is helpful. So, it's only for people that were trying to connect the dots between the antecedent work product that it might be difficult, but for current consumption that's far better.

ROGER CARNEY: Thank you. Great. Thanks for that, Rick. And I'll say, I think from a chair's perspective, I understand what Rick is saying because I've done this and then had had those headaches in the past. I would say one advantage we have is our public comment that it did go through these 29 whatever it was the first set, was a while ago. So, I don't think people will be trying to attach those together, but to your point, it could be possible someone will, but I think the advantage of reordering for the logical reading overwrites that expression. But Berry, please go ahead

BERRY COBB: I just had this idea and Christian kind of surprised me putting this slide together but I even kind of like this visually. So, maybe to bridge middle ground here is at least for the initial report for public comment, we put it in this table form, we can still keep the old number as a reference and kind of a red line and we'll will preface this that the recommendation order has changed to make this more readable blah blah blah. The black text is the draft final that we're using, but if you need to go follow the breadcrumbs, here's the old number if should you choose to use it and then by the time we do get to the final report, then we can lose reference to the old ones or put it in an annex or something like that and get it out of the way. Thank you.

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

JOTHAN FRAKES: Yeah, I'll be brief because I think Berry just said it. There're people who work outside of all the policy development stuff and they monitor this or kind of keep a loose eye on what we're doing especially given that we've spent the last three years doing this. It's certainly possible they've drifted off to other projects where they had to and so, I was going to ask if we did renumber, I really think Rick makes a very, very solid point that it could confuse those people who haven't been at it as robustly as those of us in the working group, so that they have context as to a point.

Maybe they got disengaged and then reengaged to have this kind of glossary that helps that Christian is put together, so you can have some way to kind of leap back in and have a map to where you think you were but, oops, no, I see where I really am, and I think if we did renumber, at least absolutely keep the ability for somebody to see this kind of reordering number and a map to where they think they might have been, so that they're able to jump back in. And Christian, thank you for that.

ROGER CARNEY: Great. Thanks, Jothan. Okay. I think we have a path and when we start reviewing this as a whole package, may be everybody say, no, we don't need it, but I think moving forward we can throw those in as the slide shows here and again, we've got six more meetings and if everybody says, we don't need it, we can take it out but we'll plan to go with this as it is. And I think that was it, Berry? Okay, great. So, the next topic was the high-impact which I think we started covering last week or did we not make it I don't remember.

Okay. Maybe is when my sleep or a bad dream or something, but so, we've marked ten of the recommendations as high-impact and as you can see here, the meaning of high-impact isn't necessarily the amount of work or whatever it takes. It's just dramatic difference between current policy and new policy that we're recommending for example, we're removing a policy language. It could be a pretty big high impact. So, ten of them have been identified that way and I think we want to go through them to make sure first of all everyone agrees that they're high impact but also, that we have a good presentation of why it's a high impact so that the readers can see it.

I don't know anyone have comments before we jump in? Okay. I think we can jump in. I don't know if we'll make it through them all but we'll get started, it'll be less work for when we get back together in a couple weeks. So, the first high impact was Rec 26. The working group recommends eliminating from future change of registrant data policy, the requirement that the registrar request and obtain confirmation from both the prior registrant and the new registrant prior to processing a change of registrant data as detailed in those sections. Again, marked as high removal of a requirement is the main reason why this is marked as high and again, this is a removal of the requirement from the prior in post.

I don't know if anyone wants to talk specifically add to this. Do others see more language needed? Is it appropriate for? Is the one line from our attorney over there appropriate? So, no, sorry Catherine. Any comments on this? People good with it, they want to add to it, change it? Okay. I think we'll move to the next high-impact then. Berry, please go ahead.

BERRY COBB: Just one general comment and it makes me happy that the working group is warming up to this idea because we've really struggled in the past. It's practically a requirement for any new working group or any working group consensus recommendations to lay down an impact statement. In the past, I think we tried an attempt in the RPMs phase one, and that didn't go over very well, but I would ask that the working group when we do get this all into a full report to pay particular attention to this and in the back of your mind, think about how fit for purpose it is, because if it is useful, then hopefully we can replicate it for other reports

ROGER CARNEY: Great. Thanks, Berry. yeah, and to the point of yes, it's prior ones would have been great to have this in. yeah, I agree. So, and I assume this in your described update, will be just one of the other columns, right? it's our high. Okay. Good. I'll jump in and read the 26. 3. The working group one back, please. There we go. This is our second high impact on 26, same one but at 26. 3 this time. The working group—

CHRISTIAN WHEELER: Sorry, that was the first one you just read.

ROGER CARNEY: Oh, that was I thought that was 26. 2.

CHRISTIAN WHEELER: Sorry, we went back say-- I went back because I thought that Berry was going back to the original one. Sorry.

ROGER CARNEY: Oh, thank you question. I was a dot off there. Okay. 26.4 is our second. The working group recommends eliminating from future change of registrant data policy, the requirement that the registrar impose a 60-day inter-registrar transfer lock following the change of registrant. Requirement is detailed in Section II C. 2 of the transfer policy. Additionally, the working group recommends eliminating for the transfer policy the text regarding opting out of the 60-day lock as this text has been overtaken by the removal of the lock required from the transfer policy. Again, a high impact. This is a big part of the current policy and we're moving a big part.

I know that we discussed this pretty good. This was one of the big data points that we were provided, that caused a lot of confusions, but the high impact languages removal of post change of registrant data transfer restriction aka, the 60-day lock. And again, obviously, the opt-out falls along with this. I don't know that we need to say anything about the opt-out in our policy impact statement but does this make sense? Does this read correctly? Does the working group agree with this impact language? Great. Okay. I think I don't see any opposed views. Oh, let's go ahead and move on. Yes, Christian, please go ahead.

CHRISTIAN WHEELER: Hi. Christian Wheeler for the record. I just want to note that the policy, the high policy impact for recommendation 27 and 28 are the same essentially and they're for all of the recommendations. So, it's meant to be a policy impact for all of 27 and all of 28, so if you just want to recap kind of what those are it is that the change of data is a registrant data notification so there's a lot of text here before you want to start reading. It same with 28, but these, they are the same policy impact text.

ROGER CARNEY: Thanks, Christian, for that, and thanks for warning me about how much text is there, because I don't really want to read it all. I think that we've had a lot of discussion on this notification and we've even had discussion today on it. So, obviously, it's a high impact area. It's again a recommendation 28. These two recommendations 27 and 28, have a high impact in that the mandatory notification is now a notification that registrants may opt out of, which is a big deal and we had a long discussion not one but many discussions around that ability.

So, again, very high impact because the ability to opt out here. Any comments concerns that are different than our prior discussions of how we got to here, but does this impact language makes sense for our change here? Okay. I heard agreement and this one is another one, Christian? Is there another? Okay.

CHRISTIAN WHEELER: This is the same text.

ROGER CARNEY: Okay. Same text. Good. I think we're good here as well then. Okay. We're making better progress than I thought, so good. So, Rec 33. This is the discussion we had fairly early on I think about the transfer dispute and policies around that. So, I'll read it really quick. The working group recommends that the GNSO request and issues report or other suitable mechanism to further research and explore the pros and cons of expanding the TDRP to registrant, filers and creating a new standalone dispute resolution mechanism for registrants who wish to challenge improper transfers including compromised and stolen domain names.

And making this recommendation, the working group recognizes that if such an effort were ultimately adopted by the GNSO Council, this request would be resource intensive and will require the Council to consider the appropriate timing and priority against other policy efforts. Again, I do kind of like the low high here impact, not necessarily for the policy itself, but this is a high impact across the policy development effort, so the language we have here is the changes or lack of changes to TPR result in a low impact to the policy however, the high indication denotes that the potential future work and completing an initial report on the requested issues. So, it seems to fit very well with a dual impact. I don't know if that's a standard thing, but we'll set it as a standard. Berry?

BERRY COBB: It's the first time we're using it, so we get to make it up.

ROGER CARNEY: so, it's standard now. Any concerns? Again, I think this makes sense and again, I think that the two noted notices here high or low and high make sense to me so but anyone else have any concerns or comments on it? Okay. Head shaking. That's good. I like it, yes. Oh, thank you. Okay. Let's go ahead recommendation 35 is the next one, which gets us into some later discussion, so this is good.

The working group recommends retaining both the current minimum number of domain names that trigger the fee at 50,000 names and the current price ceiling of USD $50,000, if the full portfolio transfer involves multiple registry operators, the affected registry operators, must ensure the collective fee does not exceed the recommended ceiling of USD $50,000, and the fee must be apportioned correctly or based on the number of domains transferred. When we discussed this, we knew this was a fairly high impact, so I'm glad it ended up on this list, but let me read the impact language.

The recommendation in combination with recommendations 36, 37, 38, introduces the idea of a collective fee and various requirements associated with this new calculus, specifically rather than a threshold of $50,000 per TLD this involves a threshold of $50,000 across all TLDs, which significantly increases the amount of full portfolio transfers where fees are involved. Additionally, these recommendations create new coordination requirements for registrars, registries and ICANN. And again, when we went through this, there was a lot of discussion on this coordination, discussion. So, I think again high makes sense here, but comments on this from anyone language? Good? Makes sense to the group? Sarah has a question. Sarah?

SARAH WYLD: Thank you. This is Sarah. I have a question that I have not thought through at all. It says that it increases the amount of full portfolio transfers where fees are involved. Which makes it sound like without this recommendation, we could do these transfers for free, but I don't think that's right isn't it that without this recommendation we just can't do a full portfolio transfer because it's not enough domains or something. So, that piece of the language makes me confused and perhaps, I need to think through it more, but there you go. Thank you.

ROGER CARNEY: I think when the current policy and I'll go to Rick here. I think the current policy says, it's 50,000 per TLD. So, I mean you're talking about if 10 TLDs involved you're talking about 10 fees. Rick, please, go ahead.

RICK WILHELM: Rick Wilhelm, registries. So, if this is okay, first off. This is Rec 35 that addresses a full portfolio transfer so that not be tapas so full portfolio.

So, there's an accreditation being moved about a whole accreditation being moved about and the way that the current policy works, it's 50,000 if any one TLD exceeds 50,000 names. So, if you're taking a credential, you'd look at the at the portfolio in their credential you apportion them out into how many names at a particular TLD and then you'd see which of those TLDs exceeds 50,000.

Historically, the way the math works, only certain TLDs exceed 50,000 for most credentials and so, it is typically only the largest TLD that gets in that range and then, there's a decision that gets made at that large TLD as to whether or not that fee is waived, but it's it typically and this is sort of quasi-public information that the way the math works, there's only one decision that gets made because in the size of portfolios that are being moved, they're not very, very large portfolios, where you've got a million names that are being moved in there, therefore the curve looks like you're going to have multiple TLDs.

It's usually sub hundred thousand name portfolios that are being moved and therefore the math works out a certain way. So, whereas under the proposal that we have on the screen any portfolio that is in excess of 50,000 names is going to be subject to this apportionment and the math kicks in at a 50,000-name threshold, and then there's a fee that is apportioned out accordingly, that sort of thing. Hopefully, that kind of help explain things a little bit.

ROGER CARNEY: Thanks, Rick. I think Sarah said that helped or not.

SAREH WYLD:

This is Sarah. That helped. I'm still confused I'm not sure if it's just me, and if so, then I will go figure it out later. Thank you.

ROGER CARNEY:

Great, thanks, Sarah. Thanks, Rick for that, and then, this was not an easy topic we only went through it to begin with anyway, so I think there is the ability for confusion there. Berry, please go ahead.

BERRY COBB:

Thank you. Berry Cobb. Rick, you seem to know this intimately, so don't be surprised if we call on you and at least one registrar to help us create materials to make it easy to digest in our little roadshow of webinars because sometimes I don't even get it and I've been involved in this for a while so we need to figure out a way to make this digestible for those not intimate with this.

ROGER CARNEY:

Great, thanks, Berry and I think that this may be a perfect spot to pause and pick back up when we get together in a couple weeks, and I think we can start actually back on this one because this one leads into the next few anyway. This did take us halfway through our high topics, which is great but I think that this is a good stopping spot, and we can pick these up as we meet again, but Rick, please go ahead.

RICK WILHELM: One question. I will offer that the registries did not we've not gotten in our comments. Sarah did a very good job of helping to wrangle the registrars. Good for you, Sarah. Between Jim Galvin and I being a bit on the road over the past couple weeks, we've not gotten our act together. what's our deadline or should we like just make sure we get it in by the next meeting or where we add on our timeline for getting our feedback, and we don't have a lot but we do have a couple of comments that we'd like to lob in for discussion. Thank you.

ROGER CARNEY: Great. Thanks, Rick. You are past time, so you can't say anything. No. Again, we're spending not next week. We'll be off next week, so maybe that's a good time for you guys to get those things together, but we're going to spend the next six meetings making sure everyone's good with how this report looks. So, if there are tweaks to that, that's perfect timing to come with that. So again, a couple weeks' time now would be great to come back on that? Okay. Any other comments, questions? Everybody gets an extra couple minute to make their way to wherever they're going. Okay. Great. Thanks everyone, appreciate it and we'll talk to everyone in a couple weeks. Thanks.

MODERATOR: Thank you. You can end the recording.

[END OF TRANSCRIPTION]