
ICANN80 | PF – GNSO: CPH Membership Work Session
Thursday, June 13, 2024 – 13:45 to 15:00 KGL

SUE SCHULER: Hello and welcome to the CPH membership meeting. My name is Sue and I'm a participation manager for this session. Please note that this session is being recorded and is governed by the ICANN Expected Standards of Behavior. If you would like to speak during this session, please raise your hand in Zoom. When called upon, virtual participants will be given permission to unmute in Zoom, onsite 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 over to Samantha Demetriou and Ashley Heineman.

SAMANTHA DEMETRIOU: Thank you so much, Sue. This is Samantha Demetriou, chair of the registries. Ashley has very graciously given me the top few minutes of the meeting today just to cover something that we didn't have time to get to during our Registry Stakeholder Group meeting on Tuesday.

And that is just a reminder to our membership that we are in the middle of our nominations period for our elections for this year. We still need a nominee for the NomCom representative. So this is putting it out on, oops, sorry. It's putting it out on everyone's radar. If you are interested in volunteering for the NomCom, if you know someone who may be a good fit for the NomCom, please do encourage them to put their names forward or have someone nominate them. The deadline is

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Monday. It's the very end of the day Monday, but it is coming up fast. Seb.

SEBASTIEN DUCOS: Yeah, not proposing myself, but if I remember well, it needs to be a voting member of the RSD.

SAMANTHA DEMETRIOU: NomCom does not need to be a voting member because it's not one of the four officer positions. So we have a bigger pool to choose from, which is excellent. So thank you, please and thank you if someone stood up. And yeah, just a reminder, Monday is the deadline, so we are coming right up against it.

ASHLEY HEINEMAN: That did not take nearly long enough. I was like trying to shove a croissant down my face. Thank you, Sam. Okay, so welcome everybody. Nice to have you here on our last day being in Kigali for ICANN80. And so yeah, this is our second session as CPH and yeah, I'll leave it at that for now and turn it over to Sam, who hasn't spoken yet. But go ahead.

SAMANTHA DEMETRIOU: Thanks very much, Ashley. Yeah, I think we had a really great discussion about our Board seat 13 selection at the beginning of the week. We have a number of follow-ups from that session that we'll be following up with once we get back home from this meeting here.

But in terms of what we're meeting about today, we thought this would be a great chance to recap some of the important items that have come up this week, and then also touch base between our two stakeholder groups on anything that we may need to be discussing for input, for example, to the council and other further work down the line. So we have the agenda up here on the screen, it's in the Zoom room as well. Let's go ahead and start with some of the recap stuff. Is Owen with us? Yeah, Owen's on Zoom? Excellent. Thanks, I'm on an iPad and can't see the full list right now.

So Owen, would you mind giving us a brief recap from the payment fraud discussions, especially for those in the room who may not have been able to be present? I've been misled. I think it's retribution for forcing Ashley to take the microphone when she was in the middle of eating.

All right, apologies folks. We'll proceed to the next agenda item, which is any takeaways from the DNS abuse discussions that have taken place throughout the course of the week. And also that's the wrong Dennis, whose name we put on here. Anything you want to say, just attribute it to Dennis Chang. But yeah, the workshop just concluded right in the block, that was right before lunch.

There's also been a couple of other DNS abuse themed sessions over the course of the week. So Dennis, if there's anything you like to share, Reg as well. Reg was the co-chair on the registrar side from that session, so I will open the floor to you guys if there's anything you want to pass along to the group.

REG LEVY:

I think most people in this room were probably there, I thought it was reasonably productive. We have been holding listening sessions, outreach to the various stakeholder groups, the various ACs and SOs within the ICANN space. And we met with IPC, we met with BC, we met with-- have we met with the GAC, feel like we did, but now that I think about it, I can't remember when, so gonna say no. And we met with the NCUC, and a lot of what they requested in those face-to-face meetings was, or informed what the presentation was.

So they wanted to know how to get things taken offline, which we interpreted to mean how do you submit a correct report to us so that we can better make a determination about whether or not it should be taken offline. So that was the first half. And the major request from the NCUC was to perform a human rights impact assessment on the new DNS abuse amendments. And we said we don't have expertise in that. So if that's something that you would like to do, we are perfectly happy to provide the data, the support that you need, but also can you teach us. So that was the presentation from Farzaneh.

DENNIS TAN:

Last one, Reg. I would just only add that we have a few action items just from the sessions mostly on the abuse reporting side. I think one of the items, because it came across different questions, is how do we get email headers from email phishing or what have you. So that's something to consider to add to the CPH guide along those lines on the CPH guide to have you reporting abuse.

I think we had a side conversation with Leticia from compliance that let's look and assess the level of consistency as to what ICANN Org tells reporters or when they refer to registrars, what are the items they need to use to report abuse, make sure that's consistent with information that we are providing them.

And the third one, related to the CPH guide to reporting abuse, if we update the URL, we need to make sure we notify or well, not notify, it's a strong word. We share with ICANN the new URL so that they can update their websites, portals, notification, referrals, or whatever, because they use that URL to refer report and say, this is the way CPH likes the report. So just to keep that communication and synchronization happening. That's it.

SAMANTHA DEMETRIOU:

Thanks very much, Dennis. I'll also note that there was a session earlier this week that was sort of a joint effort between the Registry Stakeholder Group, the ccNSO with participation from some registrars, including GoDaddy. James was there. There he is. And it was about what lessons ccTLD operators could potentially take from the DNS abuse amendments. So we gave a bit of background about it and then James and a representative from, I believe it was Upper Link, a Nigerian-based registrar, shared some kind of practical implications as well as some good takeaways that ccTLD operators can take from the practices that are now being executed now that the amendments are in place.

I think it was a really good and informative discussion, I've gotten some good feedback about it. So big thumbs up to James. And I think this is also for the registries who are in the room, this was a good foray into having some more joint and jointly planned sessions between the Registry Stakeholder Group as gTLD registries and the ccNSO is ccTLD registries, and that's something that we're looking to have a more regular practice of going forward. So James, is there anything you want to add from that session?

JAMES BLADEL:

Yeah, well, first of all, thanks to you as well. You did an excellent job and we just received just universal positive feedback and that was very informative both in the room, and I think there was even a larger group that was remote. We did discuss some of the ways that CCs can use and leverage what we've done with the DNS abuse contact amendments in their own DNS abuse mitigation efforts. And they were very receptive to the idea of not reinventing the wheel and borrowing heavily from the work that we've done in the gTLD space under the rationale that abusive actors really don't care if it's a G or a CC, they just need a working domain name to conduct their activities.

So my takeaway for everyone, especially the registrars in the room, would be that if you have a close relationship with a local ccTLD or it's a major part of your product mix, just be prepared to have those conversations. They may be coming to you asking for more information, they may be asking for your advice and guidance on how to incorporate some of the new practices into their own framework.

And one little bit of good news that one of the CCs actually said, do we really have to go through all the trouble of putting this in our contract?

If you're already doing it, can't we just say pretty please incorporate our ccTLD under the same umbrella, and I said, I think for the most part I can't speak for the industry, but heck yes, we would love that. So it was just an overall, I think a fantastic session. And thanks again to Sam and the ccNSO for inviting us both.

SAMANTHA DEMETRIOU: Thanks very much, James. Any questions about that session? Okay, then this time I did check the Zoom to ensure that she is with us, but Essie, if you wouldn't mind, can you give us a bit of a recap and the takeaways from the tabletop that the registrars held with compliance?

ESSIE MUSAILOV: Sure. Hi, I'm here. Overall, I thought it was a very productive session. Well, seem to cooperate and there were a lot of questions. The couple of things we came to them with is what are you doing differently now in terms of training your people?

We have these new DNS abuse definitions, are they able to recognize abusive domains based on that? And so Leticia went through what they go in terms of training and recognizing where it's phishing, where it's something else because they do receive complaints that are trademark and they claim to be phishing, but they're trademarked. So they are downgrading them into a different-- they will process them under a different section if they see that. If you're receiving a phishing

complaint, that's pretty much they confirmed that it was, so you should not be receiving anything else if it says it's phishing.

We have an inquiry, couple of us received an inquiry, so we literally went question by question, asking them, what do you want from us on this? How do you want us to respond? The takeaway for us registrars is that it's just not gonna be enough now to say, we did not find abuse, that's it. They want to know why, which is, I think is reasonable. If they're coming to you with a well evidenced phishing complaint, we should be able to tell them why we didn't find phishing. And if we're saying no, it's the complaint is not good or whatnot, that is what they want to know. What else?

There was a really good bunch of slides on registration data, and I suggest that everyone, if you have time to go over those slides, they did a really good job about explaining how are they gonna enforce it. One of the things, they're not really gonna come to us and say, what are you doing? But if they receive a complaint, they will come and ask the questions after August 21st, 2024, what are you doing? Are you with RDP? Are you doing temp spec or are you doing a mix? So you should not be expecting them proactively coming after you or asking you these questions, but if there's a complaint, they will come to you.

In terms of audit for registrars, end of July is when they're supposed to have the results or report the final report. In terms of, again, DNS abuse complaints, we have a compliance subgroup within registrar group.

So if you are having any issues, please reach out to Natalie, because we want to know, we haven't had a lot, so we don't know what it's gonna look, what the landscape is gonna look like. But if you do have them, if you have issues with compliance, please reach out to us and we'll address it.

Finally, I think Leticia said almost 90% of complaints they close, so it is a huge number. They're doing a lot of validation work and it's impressive to see how much work they've been doing, and I feel good about this. Hopefully we continue on this path. Thanks. Anyone has any questions?

ASHLEY HEINEMAN:

Thank you. So I unfortunately was not able to participate, and this was covered during that session. From what I heard is that if it's a well evidenced report of phishing, it should be fairly obvious for us to be able to explain why we did not take any action. I think the question is this, if there was no abuse, how do we prove a negative? And from what I heard is that should be possible if it's a somewhat well evidenced report of phishing, but there was no abuse.

But I guess the question is if it wasn't a well evidenced report and there's really nothing to respond to, is that an example of where ICANN compliance would've closed out the ticket and not even sent it to us? Because I'm still just curious what to do in a situation where we weren't able to act on it or we just honestly found no abuse.

ESSIE MUSAILOV:

We went back and forth with Leticia about how do we prove a negative? And she kind of assured us that's not the case. If they're sending us a Phish report, they pretty much are convinced it's a phishing report and it should be a phishing report. And so far, there were two, three cases, and they haven't had any issues with registrars.

They sent one to us and it was a phishing report. So again, we don't know what it's gonna look like, but from what I see now, it should be fine. However, if you're getting a report and it's not phishing, but they think it is, tell 'em why. That's what she wants to know. She said they're not gonna be necessarily pushing back and questioning our decision-making process. They want to know why you think-- because they thought it was, or their person thought it was. All you have to say is like, why it's not. So you can't just say we didn't find abuse. We need a little more than that. So I'm hoping I have faith that it'll work out, but we need to see how it progresses. Thanks.

SAMANTHA DEMETRIOU:

We have a question from, Catherine.

CATHERINE PALETTA:

Thanks. One of the things I was going to say here was how Leticia had said they hadn't yet disagreed with a contracted party. If they had sent something, the contracted party agreed with ICANN Compliance's determination, and so they haven't come across that yet. I expect that won't always be the case, that they'll bat a hundred percent. And that's where I think these conversations are really helpful and having

this stakeholder subgroup is really helpful to talk about those cases and how your registrar might have handled it. Which leads me into my other topic.

Two reports have been sent to registries that is from ICANN's blog, and they told me that during the session. And so I think that number will always trend lower than a registrar number, but it may be something the Registry Stakeholder Group wants to consider having meetings with compliance as well.

I thought the tabletop exercise was incredibly useful to review the actual questions they sent to actual registrars and talk about how you might respond. That might even be something you don't do in front of compliance. But this is something new for registries that registrars have had a lot more experience with answering these types of questions from compliance. I would encourage everyone to use the stakeholder group as a resource for that kind of stuff. And I think registrars would also be happy to share our experiences in more detail if that's helpful. Thanks.

SAMANTHA DEMETRIOU:

Thanks, Catherine. That's a really good suggestion, maybe for the incoming ExComm. All right, anyone else have any questions about what we've covered regarding the abuse discussions from the course of the week? Or were there any sessions, conversations, et cetera that fall under this that you'd like to share with the group? All right, not seeing any hands, I think we can move on to the next item. Okay. Ooh, this is a fun one. Do you want to tee it up or you want me to tee it up?

So one of the things that we've been discussing at a few ICANN meetings now, is the general topic of transparencies in statements of interest. We provided input through representatives on the continuous improvement group within the GNSO, we've talked about it with the ICANN Board at public meetings with them, we talked about it with the GAC when we met with the GAC last year.

We understand that this continues to be an issue of priority for the GAC, and lo and behold, it came up on the agenda during the GAC meeting with the GNSO Council. What we learned over the course of this week is that the Board is directing ICANN Org to publish an ethics policy.

And so we're, I think, looking forward to reviewing what that says. But what we thought we'd pose as a question for consideration and for discussion here today was whether as registries and registrars as the contracted party house, whether we wanted to think about or consider whether there's some action that we could be taking up to further this goal and to work on this issue within the GNSO, understanding the track that this has gone within the GNSO so far.

So we got Greg here as well, who can speak to any specifics on the GNSO side of it, but it was just a topic that we kind of wanted to throw out for consideration and get members' thoughts on this. Oh, and I've got a bit of a queue. I have James and then Jeff and then Brian.

JAMES BLADEL:

Thanks, Sam. Thanks, Sam. James speaking. And I wasn't prepared to go first, but I'll give it a shot. I think that we should take any and every opportunity to participate in this and to be consistent with our position that we took when we were coming out of the SOI task force, which I think is very, not only a solid and principled posture for us as an industry, but also, I think was very well received by other segments of the community, and I think kind of shows us as being out front on this issue.

So whatever the channel, whatever the group, whatever the animal that comes out of this effort that absorbs the SOI, I think we should go forward. I did want to note something I raised in the Registrar Stakeholder Group, and I think it came up during the GAC/GNSO discussion, maybe Greg can correct me if I'm wrong, is that all of this doesn't work if it is on the honor system.

If there is going to be some an ethical policy or guideline for participation, it should be considered under the same umbrella as the standards of participation and all of the other requirements that people have to adhere to when they come to ICANN and participate. I think this should definitely fall into that bucket. Otherwise, it's just performative and it's not gonna actually address any of the problems. So, thanks. Oh, and I'm sorry, I volunteer to keep doing stuff, I don't know, whatever ends up being the continuation of this work, I want to continue. Thanks.

SAMANTHA DEMETRIOU: Thanks, James. Really appreciate that. Jeff, and then Brian will come after Jeff.

JEFF NEUMAN: Thanks. Hopefully you guys can all hear me. One piece of good news on this that I've been working on in the background is, and some of you may have seen it during the GNSO council meeting, is that there's going to be a group called the Spirit.

I think people probably know what that is, which is the standing implementation team that's gonna be set up for new gTLDs for changes to the program in that charter, which follows or provides more information from the SubPro final report. It does state that anyone who participates must disclose-- well, the first part is if it's during the application phase, like before applications are revealed, you have to, if you're a member of that team, state on the record that you are associated with in some capacity, and you have to describe the capacity with one or more applications in the process.

And then once applications are revealed, you have to state which applications you are associated with. And that holds true for consultants, attorneys, objectors. So that was presented to the council yesterday during the council meeting. Did not get any negative feedback on that. So it's already starting to bubble up at least with the Spirit team, and hopefully we can use that as precedent for all other ICANN activities. Thanks.

SAMANTHA DEMETRIOU: Thanks, Jeff. Brian, and then Michael.

BRIAN CIMBOLIC: Thanks, Sam. I'm Brian Cimbolic, PIR. I'm certainly not opposed to any sort of, like work within the GNSO to try and advance this further. The only hesitation I have is that we've now heard from the Board that they are going to be pursuing this ethics policy.

I wouldn't want to do anything that makes them in any way hit pause and let the GNSO process to run its course before that they really then come down and hand something down. So if we were to do anything, I think it should be to just clearly articulate that we expect or hope to see a draft of this ethics policy well in advance of Istanbul so that we as a community can be discussing it together then.

SAMANTHA DEMETRIOU: Thanks, Brian. That's a really good point. I think I saw some agreement in the chat. And I think we can make sure to coordinate these efforts if we choose to pursue something. I think James wanted to respond to this, and then we'll get back to the queue.

JAMES BLADEL: Yeah, thanks. And I didn't know if I'm jumping the queue and I apologize, but just to respond to Brian. I see your point on this, but I also want to point out the GNSO was way out in front on this topic, and if there's an opportunity or a window for us to either in the GNSO or something to be a first mover and put something out early on this that

has been adopted by that broader effort and kind of transposed into other communities, I think we should hit that opportunity while we have a chance because we've done so much of the preliminary work and other folks are seeing it kind of for the first time.

So I can kind of see both directions, I think that we could also take the wheel on this and then come to Istanbul and say, Hey, guess what? Here's 90% of what you're looking for in an ethics policy, and we've already done all the hard work for you. Just kind of copy and paste and go.

SAMANTHA DEMETRIOU: Thanks James. Michael, then Ashley, then Greg.

MICHAEL PALAGE: Thanks. Michael Palage for the record. So I would kind of agree that I think we want to act where we can, and part of what I would encourage is for us to look at what else is going on. And as I look across the ICANN community, I really think ALAC kind of has a best-in-class practice. If you look at the positions that ALAC put out, they literally say, who is the author of the document? And then they literally document how each ALAC member voted on that position. So if we're really talking about transparency, I think this should be important. And I think it's important for two reasons.

First, something that was documented in the registrar meetings this week and something that the registries have been dealing with as well, each of those stakeholder groups have actually been having declining

memberships, even though the number of registries and registrars are going up. So that is a concern when the stakeholder groups may not be fully representing the groups that they're supposed to be representing, and then being able to document what those votes are.

And the reason I think that this is so important was going back to Sunday's high-level session that talked about the continued evolution of the multi-stakeholder model, particularly heading into WSIS20 and the GDC. I think as contracting parties, we should be setting best in class practices regarding openness and transparency beyond just the SOI. So it's SOI, yes, but there's a lot more that I think we need to do. Thank you.

SAMANTHA DEMETRIOU: Thanks for that, Michael. Ashley.

ASHLEY HEINEMAN: So yeah, kind of returning back to the conversation that was starting between James and Brian and some others, I tend to lean more towards Brian's. I know, yes, boss. And I say that only because I want to see what their policy says, and if it's awesome, I don't want to get in the middle of that. And I also like it because if it's a GNSO only effort, that makes it hard for the GAC to participate, and I feel like they are a primary interested party in this, and that's not to say they couldn't, but we would have to orchestrate things in a way that includes their participation.

That being said, I think we should take advantage of what we have in terms of leverage in the GNSO, whether it's submitting comments that continues to elevate the importance of addressing this. And I think that includes a number of what you're thinking and referring to. But I think coming up with our own plan as a proposal, I would probably go more towards the, let's set some benchmarks or not benchmarks, but some things that are important and make sure that whatever those are, is covered and whatever happens.

I was put under the impression that this ethics policy would be available for public consumption sooner rather than later. So I think it might help us to keep that pressure up so that we see it, if not in Istanbul, before Istanbul. And if that doesn't happen, I think we go to plan B, which is, charge down the part of a GNSO effort. I agree with you, James, I just agree a little bit more with Brian. How about that? Okay.

JAMES BLADEL:

Am I able to respond? I don't want to turn this into a GoDaddy meeting. But yeah, Ashley and to Brian, the goal I think is shared. We want to keep this moving, we don't want the moss to grow around the feet of this effort, and we want to keep things moving. My intention is, having gone through the ringer on this thing, is not to discard the body of work that we've already done, which is fantastic to preserve as much of that and the momentum as possible.

Ashley, maybe the approach is to let the Board take the lead, but our wonderfully revamped registrar/CPH comms team could put out a

statement or a position that references all of our previous comments and work on the SOI and says, this is what we would like to see as some necessary ingredients in whatever the Board is developing. And then just continue to kind of keep our position front and center. Thanks.

SAMANTHA DEMETRIOU: Thanks, James. We've got Greg in the queue next, and then Jeff.

GREGORY DIBIASE: Yeah, so I think there's two ways to go about this. So like for something broader like an issues report on Brian's side, that it would be nice to have an ethics policy in our hand and say like there's very specific task. Like hey, we have to reconcile GNSO operating procedures with this guidance that the Board has given, but like Jeff cites, the Spirit charter has that language in it.

Like, I don't know why we wouldn't fight any new charter that comes out of the GNSO. We can fight for incremental, every charter has this. And I think I'd also note like plus one to Jeff describing that as a big deal that, A, no one objected to it, B, it was IPC members on the team that wrote it. So I think that is positive in bridging the gap.

So I think there's both ways, right? I think there's, for an issues report way further ethics policy. And then the last thing I'm wondering is if we want to think about closer collaboration with the GAC, like a joint letter, like something like that. And we'd have to be careful that GAC is not commenting on GNSO procedures, but we can share a sentiment,

for example, if the ethics policy is lagging, if it's just not coming out, maybe we do consider we more engagement with the GAC given that it seems that our priorities are fairly aligned here.

SAMANTHA DEMETRIOU: Thanks, Greg. I think all those are good ideas for us to consider and kind of keep tabs on. Jeff, over to you.

JEFF NEUMAN: I'll make it quick because I think Greg said almost all of it. In addition to IPC members, there were GAC members on the drafting team of the charter as well. So I do think it's a big deal and I think that let's move that through next month and use that in future charters. Thanks.

SAMANTHA DEMETRIOU: Catherine.

CATHERINE PALETTA: Hello, this is Catherine Paletta. I'm just wondering, we're talking a lot about Istanbul and before Istanbul or by Istanbul, is there a way to effectively communicate to ICANN the urgency? And I said in the chat I would, I would like to see a draft well in advance of Istanbul so that, or the ICANN can have meetings with stakeholder groups to discuss the policy.

But in order to do that, we have to see the policy in advance. And I think working with the GAC on that would be great if we could get that

in the communicate to say, we encourage the GAC or whatever to tell ICANN that this really needs to happen no later than Istanbul. But I'm wondering is there something we as contracted parties can be doing to kind of keep that heat turned up? Thanks.

SAMANTHA DEMETRIOU: That's a good question, Catherine. I think we can channel that to the-- Ashley's got it in hand. But yeah, I think we can channel that to our board members. Some of them are sitting with us today. Hi guys. To convey to ICANN, and then, I mean, if you want to go get it in the GAC communicate, I think you can run, they're still finishing up. I'm kidding on that obviously.

But yeah, I think just using the open channels that we have for communication with the board, for communication with leaders within the staff and the staff who may be working on this that, yeah, conveying our views on this is absolutely something we can take on. So thank you for that suggestion. All right, Brian, Jim, Edmon, and then I think we'll maybe draw this one to a close in the interest of time.

BRIAN CIMBOLIC: Thanks, Sam. Brian Cimbolic, PIR. And this may be a bridge too far, but to kind of further Catherine's point, is it too much to suggest by a specific date, you know, a month ahead of Istanbul? Because if we say in advance of Istanbul, then typical ICANN fashion, it'll come out Friday evening at 8:00 PM Pacific time while everyone's getting on a flight.

I think if we say, I just checked the meeting schedule, it's November 8th is the start of the meeting. If we respectfully request that you provide this draft to the community on eighth, that way we all have a month to look at this, at least. It's plenty of time to draft this policy. I don't think this policy will be particularly challenging, I don't think it's gonna be particularly long. I think that that would be a reasonable request. So just perhaps we plant the flag and say we would really like to see it by this state.

SAMANTHA DEMETRIOU: Thanks, Brian. And I think as we consider what actual format of the input becomes, we'll keep that in mind for sure. Jim, and then Edmon.

JAMES GALVIN: So yeah, Jim Galvin for the record. And to Brian's comment, I just wanted to observe for your timeline discussions. The Board has a workshop first weekend in September, so any date in October or anything after that first weekend in September would probably be something to ask for and see to work out. So thanks.

SAMANTHA DEMETRIOU: Thanks, Jim. Edmon.

EDMON CHUNG: Yeah. Edmon here. I guess to add, I think kind of having a correspondence to the Board would be useful. I did want to also add that I think the Board is quite aware that this is becoming a priority,

not becoming, it is now a priority and in fact, I think there is a little bit of a delay even that in us being able to come up with a draft. I think it's high up on the radar screen at least, and having a correspondence coming from you guys to the Board, especially as Jim said before, our September workshop would I think really help kick things out.

SAMANTHA DEMETRIOU:

Okay, great. Thank you, guys, very much for that input. So this is something we'll take back and maybe get cracking on once we all get back home next week. Jim, is that an old hand or did you want to get back in the queue? Did my Zoom not update? Okay, perfect. Anything else on this before we move on to our next item? Okay, can we get to the next slide, please? Before we go to wrap up and open questions, this is sort of just an AOB item.

Ashley and I chatted and noting the discussions that have been taking place at council this week regarding the future of work on data accuracy, that having everyone here, not everyone, but like our memberships here together in person may be a good opportunity to just check in with each other on this topic. So does anyone from council maybe want to give a bit of an overview, a quick recap of what the open question might be and where things stand? Seb is your hand in relation to this? Okay, we'll come back to you then. Greg, over to you please.

GREGORY DIBIASE:

Yeah, I'll try to be quick with the history. But coming out of EDP Phase 2, there was, I don't know if it was a firm commitment, I can't remember the link exactly, but there was accuracy scoping team that was developed to scope issues related to accuracy.

That scoping team struggled with a lack of data and communicated that back to council. In other words, it was difficult to identify the problem if there weren't data sets to analyze, basically. So like in stark contrast from the WHOIS ALS days when there was these data sets to consider. So that work went on hold pending DPAs between ICANN and contracted parties, which some not in this room largely believe that that would give ICANN the ability to get more data from contracted parties for this purpose.

Subsequently, ICANN wrote a report saying, no, even when the DPA is in place, we can't pull data in bulk for the purpose of assessing accuracy. So this question of access to data to help this scoping team along is still an open question. ICANN suggested an alternative of looking at past ICANN audits on verification and validation which is, I guess similar or in the same vein as accuracy, but something that's different.

Verification processes are not data accuracy per se. And then they also suggested looking at European ccTLDs, and those practical, but at least from the registrar perspective, A, that probably is not a global solution, and B, that's talking about a solution to an alleged problem before we identify if there is a problem.

So kind of where it is at council now is an open question, can anyone identify additional ways to gather data to scope this problem? Or if the scoping team and formal policy development route is not the right route here, what are alternatives to keep moving on this work? It's established that the community cares about accuracy. So even if it's not a formal PDP process, the improvement of accuracy and data seems to be an expectation and a topic that people still want to work on. So that's kind of the second question is, if not formal policy, then what?

SAMANTHA DEMETRIOU: Thanks very much for that, Greg, for setting the scene for us. Before we jump into the queue and start hearing thoughts and reactions, Ashley, did you want to kind of give a brief overview of the conversations that you guys had in your registrar discussions earlier this week?

ASHLEY HEINEMAN: Sure, yeah. Just to try to recap and, you know, registrars, feel free to jump in here, but we discussed the issue and I think our reactions are pretty much the same as where they have been before which is, it's really, really hard to start rework on this when we don't even have agreement on what data accuracy is.

We have language to this effect in our contracts, but apparently that was not accepted by the broader community of participants on this anyway. And until we're able to meet in the middle, I'll say that for the

sake of diplomacy and recognizing that there are other perspectives here, that it really is gonna be hard to like advance work because we'll be working across purposes, and that's, I think, our primary concern. I think we're considering other possible ideas of being constructive, but overall without addressing the skating factor, it's really gonna be difficult. So I'll stop there, but again, I encourage other registrars to chime in as well. Thanks.

SAMANTHA DEMETRIOU: Seb, over to you. And then we've got Michael, and then we'll go to Nacho.

SEBASTIEN DUCOS: Yeah, I was gonna say the same. I fully agree with you, Greg, with all the work that needs to be done, but none of it is worth our time if we can't start by agreeing what it means.

SAMANTHA DEMETRIOU: Michael, and then Nacho.

MICHAEL PALAGE: So as the former chair of the accuracy scoping team, I would, as I said, I'll actually follow up with a written comment on what I actually saw as some of the deficiencies, but as far as moving forward, which is I think what we all want to do, perhaps we revisit the whole distinction between natural and legal, because if in fact, we can address that, we can probably get over half of the data that we could actually look at.

And I think perhaps stepping back and not looking at it as all data, but can we sit there and see how we can get access to data to start making an informed decision? Making that distinction between natural and legal seems to be the logical basis. And given the requirements in NIS2, I think that that is probably the best impetus for us to do so. I'm sure not a lot of people are going to agree with that, but again, that's my opinion. Thank you.

SAMANTHA DEMETRIOU: Thanks, Michael. And I'm sure if folks want to disagree, they'll jump in the queue to do so. We have Nacho first and then we'll go to Catherine and then Volker.

NACHO AMADOZ: Yeah, very quick thought, which is we can find ways to be constructive, but towards what end, this is what we all saying. I'm a bit in, in regards to what this is for. So we should, yeah, probably first identify that remit. I guess that I'm repeating what we are all saying, just to add my voice to that.

SAMANTHA DEMETRIOU: Yeah, thanks, Nacho. I'll just jump in as well to maybe understanding a definition or defining a definition or trying to articulate a problem statement since it's been so difficult, perhaps a way to look at this is what is it that we are hoping to achieve? And if that goal is set at a very attainable and tangible thing, then maybe that is what's gonna help

offer a path. But anyway, I have the queue and apologies for jumping it. Catherine, Volker, Beth, Seb.

CATHERINE PALETTA:

Thanks, this is Catherine Paletta. I think I agree, to what end, I think is a great short and sweet way to say that. But to take a step further back, why does the community care about accuracy? What problem is the community trying to solve? Why do they care about accuracy?

I think we've heard people mentioning various legislation from all over the world that may or may not touch on accuracy. That's not necessarily something we need to solve at ICANN, that's consult with your attorneys, et cetera. But maybe it's helpful or I think it would be helpful to think about why they care about accuracy. Is it just something to care about? I don't remember why they care.

So if people have ideas, I'd love to hear them, but if we're just caring because someone decided that this was gonna be an issue, I think maybe we look at whether this is something we should care about before we even try and say, oh, there's problems with the definition, there's problems with identifying what the problem is. Why does anybody care about accuracy? Thanks.

SAMANTHA DEMETRIOU:

Thanks, Catherine. I think maybe another way of looking at it is like the accuracy part of it seems very obvious. If you're gonna have data, there's no point in having that data unless the data is accurate, and that should be a baseline assumption that is made. So therefore, what

does work under that guise seek to achieve? What problem does it seek to solve? Great. Volker, Greg, Beth.

VOLKER GREIMANN:

Yes, I think Michael's absolutely right, I don't agree because I still feel that the distinction between legal and natural registrants is red herring. We are not concerned about legal entities as registrant or natural entities as registrant. We're concerned about personal data that's contained in the information. So the name of the person that is managing the domain for the entity, then the email address of the person that's managing the entity, the address that might be that personal information even though it's also a company address.

So the question of legal versus natural and NIS2 also recognize that perfectly because NIS2 does not say that we don't have to publish the personal information. It says publish the information that is not personal information, that's basically the negative version. But that means that even if it's a legal entity that has personal information, we should not publish that because that would violate GDPR, NIS2 recognizes that. Yeah, that's it.

SAMANTHA DEMETRIOU:

Thank you, Volker. Beth, over to you next.

BETH BACON:

Yeah, thanks very much. This is Beth. And at risk of beating the dead horse, I do agree with Catherine, what problem are we solving here?

But I also look at this, it's a scoping team and a scoping team has a defined purpose within the GNSO process policy development process. And if it failed, then obviously then that what they were trying to do is either not achievable or not clear enough. So maybe ending that, starting from scratch and saying, what is it that we want? I think from the accuracy perspective, you can say, and I understand that people are trying to tie it to the language and NIST2. NIST2 has to be accurate it, but it doesn't say that it's not now.

And we, again, that data and the information, what does accurate mean, what is the data, what are the numbers around if it's accurate or not? So I think that trying to just conflating those two things outta the gate is not appropriate. It doesn't get us to the problem statement. So I think I would support folks if we want to just refine this.

And again, as we go into more new PDPs, something that the registries, I think have been focusing on is making sure that those are narrow and manageable and can get done at a pace and not trying to boil the ocean. I think that was another problem with the accuracy. I think it was too much, it wasn't targeted enough and it was too much. So just keeping those things in mind as we try and forge ahead with the solution.

SAMANTHA DEMETRIOU: Thanks, Beth. The order now is Jeff, Greg, and Michael. And I apologize if those got switched around. I'm just going off what Zoom tells me. Jeff, over to you.

JEFF NEUMAN:

Yeah, thanks. I have a little bit different of a take than Catherine presented. I don't think it's wise for the contracted parties to get into a discussion with the broader community about what the problem is or why do we care about accuracy? I think that that's just something that's that debate is three decades old now, it's enshrined, it was enshrined in the white paper by the Department of Commerce, it was enshrined in the formation of ICANN. I don't think it's wise for us to get into the why is this important.

That said, I completely agree with Beth that what we've been trying to take on has been way too broad and we need to be very narrow. I would just avoid externally any kind of discussion that makes it look like the contracted parties are going back to square one the day before ICANN was formed and saying why do we care about accuracy? Just kind of from a political perspective, let's not be seen in that argument, that'll happen with or without us. But I do think that where we focus is on how can we narrow this to figure out exactly what it is or whether data is inaccurate at this point. I know it's a subtle distinction, but it's really important. Thanks.

SAMANTHA DEMETRIOU:

Thank you, Jeff. If Greg and Michael will oblige, I think Catherine wanted to respond directly to Jeff, and then we'll go back to the queue.

CATHERINE PALETTA:

Yes, thank you Greg and Michael. Just, Jeff, I'm not trying to take us back pre-ICANN at all. I think there are obligations in the contracts, we are not trying to undo the obligations in the contracts. I'm more interested in why-- we have a system for accuracy, it's enshrined in the registrar accreditation agreement. Why do people care so much about the data being accurate when we have a system that seems to be working fine. But we have a system, I guess, I don't know why we're so tied to this accuracy as the, like, gold standard, especially because nobody seems to agree what it is.

And so not trying to certainly walk back anything that we're currently doing on accuracy, but just to look at why is this something that we are discussing at all? Is it because it came up in a statute somewhere? And so we're thinking about it again? Is it because a board member said something or a government or one of our contracted parties mentioned something about it? Where does the root of the current conversation go? Because it seems to have taken on a much larger life than it did even a few years ago. So I guess I'm looking for that kind of why. Not why did we care in 1999? Thanks.

JEFF NEUMAN:

So just quick response and then, sorry. I think Volker kind of puts it good in the chat. It's, maybe the question is, why are the current practices not seen as being fit for purpose? I think that's a better way to phrase it. The way that Catherine, I think that would be a much better way to say it than I think what's previously said just because we want to make it clear that we're not saying accuracy should not be

part of the program, we're not saying it's not important. What we're saying is why is what we're doing now not fit for purpose? Thanks.

SAMANTHA DEMETRIOU: All right. Thank you. Back to the queue. Greg, Mike, Beth, James.

GREGORY DIBIASE: Yeah, just real quickly, I was just gonna say, an example was raised at council today and I think it was an IPC counselor that said he's thinking about RDRS and if he requests data and if the data he gets is not actually associated with the registrant, then that's useless to him. That's the rationale that was provided. And I don't know if that's everyone's thinking, but the most recent example I heard is that. Yeah, I actually like what Volker put in the chat, and then I don't know if we're getting it here today, but I just think we should be bringing back some ideas other than there's nothing to do here, just as a general going forward comment.

SAMANTHA DEMETRIOU: Thanks, Greg. Mike, over to you.

MICHAEL PALAGE: Thanks. Michael Palage for the record. So one of the things that I want to draw everyone's attention to was a statement that was made by the Australian delegation during the high level session on Sunday about the multi-stakeholder model. And the quote is, "We have to accept that regulation can be part of the solution."

Now, I think one of the things that we've heard from IANA with regard to NIS2 and others is, regulation should always be the last option. We should want the multi-stakeholder model to solve the problem. Now, if the contracting parties feel that this is not a problem, make that statement and just say, it's not a problem, and then let this problem be solved in metaphor. I think it's that simple. Thank you.

SAMANTHA DEMETRIOU: Thanks, Mike. Beth.

BETH BACON: Thanks so much. So if we are going to think about shifting towards, let's not talk about the numbers. And Sam and I were just like chit chatting about this a little bit. What if you, we then, and we also don't want to go towards down the road of saying, I don't think we want to say, assuming out of the gate that our current practices are not fit for purpose.

Because again, like what's the purpose? So perhaps one thing we can noodle on is focusing on things that contribute to activities and practices that could contribute to having accurate data. And then what does that accurate data contribute do? What is it good for, RDRS? Does it not serve the purpose of DNS abuse reduction? And use that opportunity to make those points clear and the distinctions. So if we are just kind of floating around that, then maybe that's something we can all noodle on.

SAMANTHA DEMETRIOU: Thanks, Beth. James, and then Becky. Welcome to the table, Becky.

JAMES BLADEL: Yeah, thanks. James speaking just to kind of catch up with some of the points that were made in the last couple of speakers. I think I'm agreeing pretty heavily with Catherine and Volker. Our current practices, and to Jeff's point, yes, they've been in our contracts for decades, and I think that they originally served a particular purpose.

Data integrity is its own benefit and requiring that I think in a contract is valuable. I think what's shifted in the last couple of years or decades is that the use cases of why that data is being employed by different stakeholders for different reasons, is why now accuracy is coming again front and center, and they're questioning our long-held practices. And what I mean by that is that that they're projecting modern problems onto an older system that as for something they were not meant to solve. For example, some of this stuff was meant to cover against registry or registrar failure, business failure and recovery through data escrow.

Not the same use case that we're hearing today. And so what I think we should be challenging is the connection between accuracy and this kind of ill-defined nebulous problem of bad activity and nefarious behavior online because we used to say recoverability of the domain name and contractibility of the registrant was key. And now it's kind of morphed into, well, I want to make sure that if they're lying about who they are, that you are able to detect that and you are able to

report on that. So I was like, it's not us, it's them. The expectation has changed of how the data is going to be used.

The purposes have shifted, even though the practices were fit for purpose when they were. I think it's worthwhile challenging that new assumption that there's a connection between these things and the problem materials. And I think it was Michael, I'm not suggesting that registries and registrars come out and say there isn't a problem, I just think that the burden of definition of the problem needs to go back on the people who are requesting changes to our practices because I haven't heard that articulated very clearly yet.

SAMANTHA DEMETRIOU: Thanks, James. We have Becky and then Volker. And I'm gonna do a quick time check. We have 15 minutes left in this session, so we'll see where we are after those two next speakers. Becky.

BECKY BURR: So this is a really delicate issue and I am just gonna plead with you not to say there is no problem with data accuracy. I would approach this as we want to understand what you think is the problem with data accuracy, because whether it's right or wrong, there is a very deeply held widespread belief that the data that's available via registrant data, RDAP, RDRS, whatever, is inaccurate.

And I completely concede James' point about the shift in the usage. This is something that will spin people up, but I think it's totally fair to say we need to understand, one, what inaccuracies you're seeing, and

two, how that inaccuracy prevents you from doing something that is legitimate, and three, just in general, we need to know what you mean by accurate.

I think those are all legitimate, absolutely legitimate questions we didn't get in the accuracy scoping team. Sarah will tell you, we had very little traction on what does accuracy mean and what is the purpose of accuracy. Those things are fair, but I don't know if this is true or not, except that it's not true, but the GAC representative on the accuracy scoping team has loudly asserted that as a result of her participation in that group, she went back and wrote Article 28 of NIS2. I don't know if that's true or not. She said it clearly and loudly and she was really irritated by the conversation. So please, let's tread strategically.

SAMANTHA DEMETRIOU: Thank you, Becky. That is very good advice. Volker.

VOLKER GREIMANN: Yes, thank you. And I think Becky is right there. We shouldn't say there is no problem and I think everybody knows that there are issues with data that registrants provide us that especially if they're malicious actors. However, the question is how big of a problem is it and how widespread is it?

And I don't think we have any data on that because I'm grabbing a number out of the thin air because I don't have any data either, but 99.9% of all registrations, probably more, have 100% accurate data or

mostly accurate data because the registrant never feels of doing something bad with a domain name. Yes, bad actors will probably not tell us who they are. However, when I deal with --

SAMANTHA DEMETRIOU: Volker, if you can hear me, I think we momentarily lost you. So if you want to try to reconnect, please feel free to get back in the queue. Hold on, let me see if he's still on Zoom.

SUE SCHULER: Volker has disconnected.

SAMANTHA DEMETRIOU: Okay. So we'll see if he joins back in. But otherwise, to just maybe try to pull these threads together and respond to some of the things that I've been hearing. Understanding the problem that is posed when requesters with legitimate purposes encounter, if they do receive inaccurate data, I think is valuable.

In the context of the accuracy scoping team, I think the discussions got stymied over the attempt to quantify that issue. And we've, I think, heard very clearly from ICANN Org that there is not going to be a way to look at data on a wide scale and come up with a number. I'm also not sure what number we were looking for and what was going to be an acceptable or not acceptable threshold in that context. So I think maybe getting some of this input and then having an opportunity to

examine existing practices and how they work in the context of some of those objectives is maybe the start of a path forward.

And so this is maybe the absolute highest level. I've not given you being our counselors, anything concrete to go off of, but I'm just kind of trying to take Becky's advice here, which is to be strategic about this, be open to the needs of other parts of the community on this issue, but also keep it grounded in what it is that we actually can achieve through work within the ICANN context.

And so maybe that's something for us to continue thinking about it as a CPH. Maybe the most inarticulate I've been all week. All right, let me check the queue. Does anyone else want to weigh in? Oh, I do have a little bit of a queue. Volker's back to finish his point, Greg, and then Catherine, and then I think we will close this topic out. Volker, over to you.

VOLKER GREIMANN:

Yes. Apology for dropping, my MacBook was sitting under the sun all the time and suddenly overheated. I'm not sure where I dropped, but I would just make the point that, yes, even if there is a problem with accuracy, the question still remains, how widespread is it and does it warrant policy development?

For me, working abuse cases, having inaccurate domain name registration data is actually helpful because I can take action based on that alone. Even if the evidence is not quite there, but it's looking like something that I would like to take down, then I can do that, or based

on that incorrect data if I have that as well. That's usually also a good pointer for me. This is probably a bad domain name because there's no Mickey Mouse in Ducktown. So having that is good for me in doing my job on that front. Not having, that takes away one tool for me.

And I see that the other side might have the same argument, but do we really want to inconvenience 99.9% of all registrants to find the 0.1% of bad registrants and force them to steal their address data from the phone book or somewhere where they grab off the internet. So I don't think anything good is going to come from that, but that's a personal opinion as a group. I think we should be strategic as Becky said, and be careful about how we phrase that.

I also think that we should not over-regulate and anything that's already regulated by law does not have to be taken into account by ICANN policy. So where NIS2 requiring us to take certain steps with regard to accuracy, I'm already going to be doing them because I have a legal obligation to do that.

I don't need policy to do the same thing or do more or do less, I have a legal obligation under law, and that's something that most European registrars share and making policy will just muddy the water and might even lead to conflicting obligations, and I do not want to see that. So as a minimum, yes, I will do what the NIS2 says, probably something more as well, but I don't want policy on that.

SAMANTHA DEMETRIOU: Thanks, Volker. Greg and Catherine.

- GREGORY DIBIASE: Yeah, so just real quickly, the conversation has touched a couple times on what we do currently and maybe whether what we do currently is fit for purpose. Just circling back to one of the proposals before council is to ask ICANN for historical compliance data on their audits of registrars, verification, and validation procedures. So I don't think we have time in this to agree or disagree that that is a worthwhile approach, but just wanted to circle back because it was touched upon a couple times and I think that's related to the intervention you had.
- SAMANTHA DEMETRIOU: Thanks, Greg. That's a really good suggestion to base it in, the data that we do actually have access to. Catherine.
- CATHERINE PALETTA: Thanks. I think I'm not super inspired by the two options that are before the council but I think it may behoove us to do something, action rather than inaction even if we're not sure what the results would be. And I would go with the data from past audits would be preferable than looking at ccTLDs at this point, as has already been raised. But I was also thinking as, and this is probably more focused on registrars, but certainly as a CPH, might it behoove us to take these three questions that Becky so helpfully distilled for us and do community consultation. I want to hear IPC or CSG or whoever we met with, like we did with the DN s abuse amendments.

Would it be helpful to have those conversations? I think the DNS abuse ones went way more smoothly and constructively than I expected them to. And so, by taking it out of the scoping team where there's a dedicated work product that they're trying to create and just saying we're trying to understand the problem so that that can inform future positions when things get before council, I think that could be useful and something that we could potentially do between now and Istanbul.

And maybe it doesn't result in like a session we had today where we discussed the two big topics that came out of those consultations, but then at least we'll hopefully be better informed. Thanks.

SAMANTHA DEMETRIOU: Thanks for that, Catherine. We've got four minutes left. Sarah, you're in the queue. I know you wanted to introduce a new topic. Actually, did you want to have the last word on accuracy?

ASHLEY HEINEMAN: Yes, and I just want to plug some work that the registrars did because as what usually happens, we do a lot of work on something that's really good and then nobody reads it and is aware of it. So I just, if nothing else to remind our counselors that this work exists. I posted it in the chat, but we did I think a really good paper on data accuracy in terms of what registrars are doing. We, at the very start, say why registration data accuracy is important. We recognize that we list the reasons for why we think it's important.

We then articulate what our accuracy obligations currently are. We talk about what the definition is, and then we also address some of the thornier issues. We talk about what we're already doing to achieve and improve accuracy. We talk about third-party validation methods and we talk about identity verification. And we also touch on the issue already as to what linkage there is between DNS abuse and data accuracy. And our preliminary findings thus far is that there isn't.

I think it'd just be important to remind people that this documentation is here and we had a whole session on it. What was it? Hamburg. So there's already a body of work there, and so it is a little bit frustrating to hear that nothing is happening because we are doing work on it that we think is constructive and is recognizing the issue, recognizing the importance of the issue, and this is a good, I think, example of it. So that's it. Thank you.

SAMANTHA DEMETRIOU: Thanks, Ashley. Actually really good reminders. Seb, over to you.

SEBASTIEN DUCOS: Okay. So I had three little points, but I can go quickly. The first one comes out of the session that the registrars did with RDRS, which I thought was fantastic. It jumped at me the fact that the number of requesters that badly designate themselves, or at least that registrar say, no, it wasn't, it is not something that we can easily track in the sense that we know what they say.

We know that you disagree, but we don't know where the truth is and we don't know exactly. I think it's important for the final product to understand what the clientele of this product is. It's not vital for the decision making, the decision process, we established that yesterday, but at least to know where they're coming from, and I'd like to see if we can talk about it with registrars and see what they're seeing maybe anecdotally, and then see how we can resolve that. I see Sarah shaking her head.

SARAH WYLD:

Thank you. This is Sarah. So I think there's an idea that within the RDRS we can create the option for registrars to change the category of a request. We could track how often that happens, maybe that would be helpful. Thank you.

SEBASTIEN DUCOS:

Yeah. And if we do, then we need to do that faster because staff is getting very antsy about the fact that we're changing the data and the models and the reporting, and I understand why.

The second thing that I wanted to plug, and if Verna wasn't in the room, I would say it was my idea, but he is in the room. As we're all looking at, and particularly this from a backend point of view, we're looking what TLD is doing, what in terms of data implementation. Is it worth, and probably through tech ops or another body not here, but to start tracking who does what because registrars and backends are

gonna need to know that. So maybe create some kind of a matrix of this.

SAMANTHA DEMETRIOU: Seb, that's an-- too close to that mic. Seb, that's something that has come up in the conversations about the implementation. And I think where that got yesterday in those conversations was that this may be a good thing for the stakeholder group to be keeping track of, but that work is gonna be ongoing. So we'll keep you posted.

SEBASTIEN DUCOS: Okay. And last thing, but I'm looking at Dennis, in the last session you had the human rights impact assessment. I think that the last slide said, what are the next steps? And we didn't really come up with the next steps. I would personally suggest that maybe we try the exercise in Istanbul, have a tabletop something, but these things don't organize themselves. It might require inviting experts and et cetera. So I'd suggest, well, answering to the NCSG and seeing how we can organize these things if we want to do them.

SAMANTHA DEMETRIOU: Thanks very much. We are one minute over on time. Does anyone have any last questions or comments before we adjourn for today? Ashley. Hold hand. Sarah, go ahead please.

SARAH WYLD: This is Sarah. You're just all so great and thoughtful. It's really nice to be among so many people that care so much. So thank you.

SAMANTHA DEMETRIOU: Couldn't say better wrap up words if I tried. So let's just say thank you all so much for being here, we've had some really good discussions today. Clearly a lot of things that we need to keep carrying over into further meetings between our joint groups. So we will get right back at that once we all make it back home. Thanks all for the time this week. Have a great last two hours of ICANN80. Ashley, anything to close that with?

ASHLEY HEINEMAN: No, I don't think so. I'll keep my thoughts to myself at this point before I go back to my membership, but thank you. This was a very interesting conversation.

SAMANTHA DEMETRIOU: All right, we can close out the recording. Thanks everyone on the Zoom. Thanks for dialing in.

SUE SCHULER: Thanks. Please stop the recording.

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