
ICANN81 | AGM – ccNSO: Policy Gap Analysis Working Group
Saturday, November 9, 2024 – 10:30 to 12:00 TRT

CLAUDIA RUIZ:

Hello and welcome to the ccNSO Policy Gap Analysis Workgroup. My name is Claudia Ruiz, and I, along with my colleague Susie Johnson, will be the remote participation managers for this session.

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Please state your name for the record and speak at a reasonable pace.

Thank you very much. And with this, I will now hand the floor over to Jordan Carter.

JORDAN CARTER:

Thank you, Claudia. Good morning, afternoon, evening, everyone. My name is Jordan Carter. I'm the chair of the Policy Gap Analysis Working Group of the ccNSO, and this is our meeting on Saturday the 9th of November.

Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.

For the agenda of this meeting, we will follow the outline that Joke circulated on the email list on the 7th of November at 8:00 AM.

So the first thing is to welcome you. During this meeting, the main substantive piece of business is the classification of the gaps that we've identified and the prioritization. We will get as far as we can through that. It's more important that we have the open discussion that we need to have and do the analysis than that we finish that work.

So we have a target to be presenting the findings of our work to the ccNSO members later in this meeting. We will present as much as we have done. So if we finish the analysis and if we have a priority issue to propose, we will talk about that with them. If we're still grinding through it, we will keep grinding through it. So I don't want to stress people out by saying that we have to finish that work today.

We've got a straw dog or a draft set of analysis to work through. People may not have had time to come to grips with that on the trip here and so on. It was generated and circulated late in the scheme of things. But we'll do as much as we can.

And there will be probably, I think, a bit of Mentimeter to do towards the end where we try and look at the importance and urgency dimensions of tackling these gaps. So we will do what we can. And if we get to that point of being able to propose an issue to take up afterwards, that will be great. And if we don't, we'll get a long way towards it.

In terms of administrative matters, Item 2, for updates or statements of interest, if you have had a change to your interest since our last meeting

on Wednesday or Tuesday, please let the Secretariat know through the usual process.

And for Item 3, the overview document, I'm going to hand that to Bart to walk us through the doc. I realize there will be some people in the meeting possibly who have not engaged with this before, but we do get people at ICANN meetings coming along to check out the work. So we will spend a little bit of time going through that overview and hopefully agreeing that we're ready to share it with the community during the ccNSO members' meeting.

So Bart, I'll hand it over to you to do that.

BART BOSWINKEL:

So what you see in front of you is the clean version of the overview document as was adopted by the working group on the 5th of November, so last Tuesday morning at 5:00 AM. So I'm just telling you, our dedication.

You scroll down. So this is the introduction, sets the tone. Just a brief explanation for those who are not familiar with the work of the PGA and even of the ad hoc council group. We started, or the ad hoc group started the exercise, excuse me, I would say almost a year ago as one of an attempt to capture the applicable policies because Kim noted—Kim Davies, welcome Kim—noted, say, there is not really a resource or a point somewhere in, say, on the ccNSO website or IANA website where you can see which policies, practices, and potential advice are relevant for ccTLDs and maybe other interested parties.

And so what we try to do is capture all these relevant policy guidance and advices for ccTLDs in one document, which, say, if adopted by the council at one point, will be published on the ccNSO website and then maintained so at least you have a kind of library of relevant documentation. That's the intent of the document.

So it starts out with, say, a few categories, say, policy, why does the ccNSO make policy, and its background. The rules for selecting a country code. When is a code a country code? Or when is a TLD, say, a country code? Two letters, so the ASCII ones, so that's fairly straightforward, but also the IDN ccTLDs, so the IDNs. And that's, again, something people do not realize. There is a policy, not yet, but that currently the Fast Track process is that policy. Scroll down, please, for the other categories.

Probably the main one is around the, I would say, the basic processes, IANA processes, around ccTLD or the core processes is delegation, transfer, revocation, and retirement. Again, they are listed here, and the relevant documentation. What you see is a category pending as well. Next one, please. And that's all pending, and I can't read the next category.

What you also see, and if you scroll up and if you check it, you see some two relevant sections. One is the—and then I'll quit. One is the one on conflict resolution, specifically between ccTLDs and PTI/ICANN. It refers to, yeah, what you could say, the review mechanism, but that's still pending.

It includes the reference to the—and there was a debate by the working group. It includes the reference to the section 8.1a, I believe, from the IANA naming function contract, and 8.1c, and these 8.1a is about the complaints procedure, and 8.1c is about the mediation procedure between a direct customer and IANA, or PTI, and it also includes a reference to the IRP and the reconsideration, because up and until, at least that was the sense of the working group, up and until the bylaw changes are effective, the requested bylaw changes, the IRP and reconsideration are still applicable to the retirement of ccTLDs and the IDN ccTLD selection procedures, so they've both been excluded. So that's one.

A second area of interest is probably, I would say, advices, yeah, lightweight, say, voluntary practices developed by the ccNSO for ccTLDs. This includes the wildcarding study report, the recommendations contained in that report, emojis, also the ccTLD financial contribution, because it's there to assist ccTLDs and ICANN in their relation, and the accountability frameworks. And that's it. That's the overview. Back to you, Jordan.

JORDAN CARTER:

Thanks, Bart. That was a lightning talk-through where the visuals weren't quite matching the dialogue, but you've run through the five sections of that doc, the substantive ones. And so just a reminder about what this document was for. It's to give greater visibility of the whole policy. It's been through a few reads of the group. We looked at it and approved it on the 5th of November, and it was circulated there. So I guess my question at this point is whether anyone has picked up any

last-minute issues with this document, or if you've read it the first time in coming along to this meeting, whether there's anything you notice about it that you've got any questions or comments about. We have a moment for that.

NICK WENBAN-SMITH:

It's Nick Wenban-Smith, dot UK, for the record. We discussed it in the ad hoc council group, and we've discussed it in the other meetings. But just for clarity, I think it's on the record that there's a number of dissenting voices in terms of some of the elements. I think it's a very helpful overview of all of the different documentation from various different places.

But in terms of having a discrete piece of work with a focus on an achievable objective, I think we want to narrow the policy gaps down specifically to things which are integral to the relationship between IANA and the ccTLDs, and not get too distracted on things like the financial contributions, which I don't really believe is a policy, either with a capital P or a lowercase p. It seems to be an entirely different work stream from this, and we shouldn't get distracted into that.

Because if the scope of this project becomes too expansive, then I think it's going to take years and years and be doomed to failure, and I think we're much better counseled to look more specifically on the problem areas, the true gaps, the dot LB situation, and the dispute resolution mechanisms between ccTLD and other interested parties and the IANA functions is, I think, the core of the problem, and I think that's where we should be focusing our time.

JORDAN CARTER:

Yeah. Thanks, Nick. This overview came out of this work because we needed to know what the existing body of policy was, so by things being in this overview, it doesn't mean we're going to be doing any work on them. It doesn't mean we think they might contain gaps.

The problem we started with that led to this overview was that many of us didn't know where to find all of the parts of the policy framework, because you get told if you're a newbie at a certain point that you just need to read RFC 1591, and then you do, and you realize something is wrong here.

So this is not to suppose anything about gaps or anything like that. This is meant to be a resource for the community, pulling it together, and the question is not whether it summons up fears of other issues being addressed. The question on the table now is whether anything is missing there, really, and we think there isn't, but it's always good with more people in the room—and I wish I had eyes in the back of my head to hide all the people sitting behind me—is whether anything is missing or not, and if it isn't, we can call it sort of read a second time and ready to share with the community as a piece of information.

And yes, there were some issues there where we weren't sure whether it exactly meets the definition of a policy, but we decided to go err on the side of comprehensiveness rather than not. So...

PETER KOCH:

This is Peter Koch from DENIC, for the record, and I don't think there's anything missing. I would just second the observation brought forward by Nick and the clarification that followed that. I think we might want to emphasize that at the introduction of the document a bit stronger for two reasons.

One is that the fancy title of this working group, talking about policy gaps, could mean to some readers that what the deliverable contains is actually policy gaps, presupposing that the solution to anything we found would be a policy process, and I don't think we believe that.

And the second one, which is close to the first, we should also expect that other advisory committees—and I'm thinking of a particular one—would be very much interested in reading that. I would like to say that we help them with the framing not to go astray. Thank you.

JORDAN CARTER:

Thanks, Peter. No, that's a good point. The fact that this emerged from this working group might be seen to lend a view that this is about gaps, and this is actually about what the framework is today.

If no one does have any remaining issues with this, I'm going to deem it read a second and final time and ready to be shared publicly with just a little bit of a tidy-up in terms of the formatting. And thank you, Bart, for being the lead drafter and author of this. It is a useful resource, I think, that will help people get to grips with what the policies that apply to guiding IANA's work with ccTLDs is, so that's good.

Thank you. Let's move on to item four, which is the types of gap and prioritization, both the types of gap and the tool that you might use to resolve it. And what we're looking at is a placeholder draft, if you like. The document was drafted to give us something to push against, rather than crowdsourcing the answers to these questions through a Mentimeter process. It isn't a draft that the group has worked on, so nothing that's in it has any standing. I want to emphasize that, because people can read more into these documents than they deserve from time to time. It's the first working draft for us to deal with in this meeting. And Bart, do you want me to sort of...

BART BOSWINKEL:

I think that's best, because you did the main heavy lifting on the contents of it.

JORDAN CARTER:

So yeah, for my sins, I pulled this together as a first draft, and it was circulated on the email list a couple of days ago by Joke, so hopefully some of you had a chance to read it. Can I just get an indication around the table? If you have read it, can you wave your hand? I read it as I wrote it. There's a few hands waving and a few hands not waving. So if we can put it up as a Google Doc, Claudia, onto the Zoom and the screen, it's there. Yeah, there we go. A little bit hard to see at that level of Zoom.

The left-hand column is just what the issue is, and we used the same headings that were in the documents that we've been doing, the slide packs and so on. And whether the issue type and the approach to the issue, so the middle and the right-hand column, are the ones where there's some analysis and some things to work through.

So I think what we'll do is we'll just look at them one by one. They're only in an order that there's no particular order to them. And the issue type is whether it's a policy gap, if it isn't a gap, whether it's a guidance gap, an implementation issue. And then in terms of how to resolve it, whether it's a PDP, a CCWG, or a study group, or so on. And in each of them, we've tried to give some arguments about why that one has been proposed, so it isn't just like a heading.

So we'll go through them one by one and invite any sort of comments or discussion. The first item on that list is data accuracy, and the issue there was whether IANA records need to be published and whether they need to be accurate. And as a draft point, I suggest that this is a policy gap. Having the data in the root zone accurate is required by accountability framework guidelines, but there is no consequence to the data not being accurate, and you don't have to have an accountability framework with ICANN as a ccTLD either. Policy doesn't set requirements around it, and my argument would be that if you did require accuracy in record keeping, there would need to be some consequence for not doing so. If you're going to say it's mandatory, then you need to have an impact for it not being mandatory. And only policy has the standing to do that. It couldn't be introduced as a requirement through some kind of contractual process, given that none of us as ccTLDs need to have contracts with ICANN. And that was why, then, a PDP would be the approach that would be used to resolve such an issue. This would only be through a PDP that we could set policy that included any enforceable approach to dealing with them. So that's the first one. Who has any thoughts about that? Do you have a different view about the type of issue it is, or the approach that should be taken?

BART BOSWINKEL:

The reason for it, and this is more as a suggestion, is going back to the discussions, I think this was from the San Juan meeting. And I think, Jordan, you captured it well, is there is this, I would say, expectation, at least, that the data needs to be up to date. And I think that's not to debate the real issue, if I understand it from the discussion at the time, is a matter of compliance. And if it's a matter of compliance, is it only associated with this one? Or is it empowering PTI to take steps? Because there are mechanisms for compliance. And as we will discuss on the number three of this list, because that was, I think that was one of the items, as well, in the Kigali meeting, is, or five, on compliance, and whether to use this mechanism on compliance, and empowering PTI/IANA to take steps. Because if you look at it, it's only being friendly, or the nuclear option they have right now. And the nuclear option, we need a revocation for cause. And you could argue, at the end of the day, if ccTLDs really, really, really, really do not want to update them, that's a revocation for cause. So the question is whether you need an additional PDP to make this happen, or to allow IANA to do this, or you need something else empowering PTI to take intermediate steps. And you could argue, but that's, I would say, almost like a legal doctrine. If you have the power to do more, you can do less always. And it's more providing the guidance, and then using something like a framework, or recommendations, or something else, to allow PTI to take those steps. Because they are allowed to take the final step. But that's an alternative approach, and that's what I wanted to capture, and draw your attention to. And yeah, again, being selfish, I want to avoid a PDP. Thank you.

JORDAN CARTER:

Thanks, Bart. And it is, I guess, a fair point to remind that the group's discussions throughout have been generally PDP avoidant. We've sort of felt that if we can avoid doing a policy development process, we would be happy campers. So it didn't bring me any joy to define this as a policy gap. And you introduced the point that maybe it isn't. So who else has views about this?

PETER KOCH:

So having some scars from other discussions about data accuracy, and at the risk of sliding into maybe not the PDP, but the phrasing of the task here already, I take issue with the term data accuracy, because we don't know how far that goes. And Bart covered part of this. There are some inaccuracies where the PO box number, or sorry, the street address might be wrong. And so there's a whole scale of things that can be considered accurate or not, and can be considered accurate enough or not by different people. So this is not a yes and no. And I think we need to be very careful to address that, because primarily the task of registry is, and in that case, the root zone registry, is to make sure that given one or two competing parties, and not competing for the TLD, but competing claims over a particular resource, the data is accurate enough to tell between the two or more competing parties. And that might be a different requirement from, oh yes, your phone number needs to be accurate, and it's only accurate if somebody actually answers the phone. And we have had these discussions in other spheres, so I'm just warning against continuing to use that term if we

drill down in a more detailed problem description. We need to be more precise on what we're actually asking for. Thank you.

NICK WENBAN-SMITH:

I completely agree with what Peter said, and I'm uncomfortable about, when you start pulling at the thread here, we talk about for-cause termination, revocation of a ccTLD for something which is essentially administrative and quite trivial. I think none of us are very comfortable with the idea of taking a ccTLD out of the root zone because there's a relatively trivial error. And I'm not sure if I'm, to be honest, very comfortable about the consequences of something as nuclear as removal from the root for any sort of reason, even if it is willful noncompliance, if I'm honest. I'm not sure whether, although I strongly believe that ccTLDs need to keep their contact details and things up to date, I don't think that revocation is the right remedy for IANA. There must be an escalatory path where there's sort of notices and things done. I'm very uncomfortable talking about that sort of thing, or even, as a British person, I'm very happy with the unwritten constitution in general terms, but this is not an area where we can do with one of my favorite ICANN words, some unclarity.

IRINA DANELIA:

Maybe I should give Kim a chance to answer the previous points first, because mine is slightly different.

KIM DAVIES:

Thanks. Just a couple of observations. I think, I'm not sure if I agree with Peter or not about his definition of what the contacts are there for, but I think that speaks to the second item here, which is that there's not a commonly held definition of what they are. Is it really just to distinguish between entity A and entity B? I think that's frankly an unknown.

So I think we all have assumptions about what data elements are there and for what purpose, but that speaks to another sort of gap in understanding that we intend to talk about. And bringing this issue to the group, I just wanted to remind you that it's a reflection that we do not have a practice in this area. And we don't necessarily have the confidence that we're fully empowered to have a practice in this area.

Now, part of the outcome of this work could be that, there's a consensus that IANA should feel empowered to have some kind of escalation path, for example. And for me, just having that on the record, if you will, would go some way to relieving my anxiety when I contemplate some of these problems. So if the outcome really is that staff should feel empowered in some of the areas as we get into some of the details, I think that's an okay outcome. Thanks.

JORDAN CARTER:

Thanks, Kim. Irina.

IRINA DANELIA:

Thank you. I think there might be some confusion about the scope of the policy here, because we have always been saying that ccNSO policies are directed on ICANN and PTI IANA, telling them how to deal

with the ccTLDs. It seems that here we are discussing what should be the obligation of the ccTLD managers in setting requirements that ccTLD manager must fulfill, if we're speaking about IANA database. I fully support the idea that the records must be accurate, or they need to be accurate, but I don't think that sounds like a right topic for IANA PDP process.

JORDAN CARTER:

Can I ask you a follow-up question then? If it wasn't the right topic for a ccNSO policy process, how would you, how do you think this community should make decisions about a question like that?

IRINA DANELIA:

I don't know, but my guess is that community at the moment does not have mechanism to tell a particular ccTLD manager what he must do and that's the reality as I see it and if we are going, if we have an idea to change this, it's quite a complicated topic.

JORDAN CARTER:

Yeah, I think the table is a really interesting, almost an existential issue in some ways for the ccNSO because you can interpret a need to keep data accuracy as imposing an obligation on a ccTLD manager, but you can also turn it around and say the policy is about IANA and what IANA can or cannot do in response to a lack of data accuracy. And I think we've had from the dialogue already today the view that there is, at the moment, the answer is either nothing or the remedy that's on the table is the transfer or revocation with cause and people seem to have the

view that it would be preferable that the records are up-to-date and that you shouldn't transfer a TLD to another operator because the phone number was wrong or something.

So it may be that the item C in terms of enforcement or graduated compliance is the way to go and I think we all need to think carefully about whether, you know, that the ccNSO through its policymaking or guidance giving or study processes is the forum to that. It's clear there is no other forum within ICANN that has the power to deal with these issues per se.

IRINA DANELIA:

I personally am very sympathetic to the idea that IANA should have graduated mechanisms in place but probably the right place to start all this discussion is the purpose of the data we have in IANA and what's accurate, how accurate, and to what, why we need them, to fulfill what. Maybe this would be the easier path.

STEPHEN DEERHAKE:

Thank you, sir. Nick, to your point, I'm not sure a written Constitution is any more advantageous to an unwritten one based on what happened Tuesday in my country. I apologize. Fasten your seatbelts for the next couple of years.

But with respect to this topic, referring back to the FOI's conclusion, I do not think that an error in postal box number or postal code rises to what the FOI described as a substantial misbehavior on the part of the

management which would be the criteria for initiating a revocation and transfer. So that's my thoughts on that. Thank you.

JORDAN CARTER: Thanks, Stephen. Peter.

PETER VAN ROSTE: Good morning, everyone. My name is Peter van Roste from CENTR. I remember from a couple of meetings ago that Kim shared the astonishing number of 10% of the data being inaccurate for ccNSO, ccTLD data in the IANA database. But I think we probably need to look a bit closer at that number. Following up on what Irina said, the purpose of the accuracy in my mind has always been to ensure the security and stability of the DNS system and therefore it would lead to the conclusion that the technical contact details are probably the most important ones. And the other discussions on identification of the manager who serves the ccTLD—carefully say, not saying owns or runs the ccTLD—is probably for another forum.

But here for the gap that we would need to solve and in response to IANA's very fair request, I think it would be interesting to identify how many of the technical contact details are inaccurate to a level that they would obstruct effective communication to that contact. Thanks.

CHRIS DISSPAIN: Thank you. Morning, everybody. A couple of points. I think tying the discussion about the need for data accuracy and empowering IANA to the one remedy is not—of removal—doesn't make sense to me. We all

know that absent a constant and continuous refusal to provide any data of any worth in respect to the ccTLD that there was a process in place that we could use or that could be used to deal with that.

But let's not worry about that. Let's talk about what can we do. If we all agree that accuracy is important and that it's important for all of us to sort of sign on to the deal that if we are responsible ccTLD managers we need to have accurate data in IANA's database, then the question becomes how can we deal with that? And it seems to me that the simplest and easiest way of dealing with it is to—and I agree with Peter's point about, you know, what is the accurate data required? Is it just the technical contact? We need to be clear about that.

But assuming that we've got a clear definition of what we think needs to be accurate, then simply to say that IANA—or in fact the ccNSO if we chose to do it—will publish a list of ccTLDs that have, after being requested to do so on two or three occasions, failed to provide accurate data may be at least a start of seeing something done without having to faff about worrying about whether they should be removed from being a ccTLD manager or whatever.

The name and shame game does work and if we all want to hold our heads up high as ccTLD managers then, you know, we should all accept that we have a responsibility to provide IANA with the data and that we will be called out if we don't. Thanks.

PABLO RODRIGUEZ:

Thanks. Good morning all. Going back to the purpose of that data accuracy in addition to—and I agree with Peter van Roste, that in

addition to the support, security, and resiliency of the system, but it is also important because this is the one database with which the community can reach out to identify who is that individual they need to speak to in the event that something happens.

So it's not only that communication between the operator and IANA, the operator and other bodies within ICANN, but it's also within the community itself that would want to know who is the operator in their respective country and reach out to them and have that conversation. Thank you.

JORDAN CARTER: Thank you, Pablo. Bart.

BART BOSWINKEL: Just to check with Chris, if I understand your suggestion correctly, I would say that's first step in a kind of escalation path is, so first of all you're informed the data is incorrect, then the ccNSO would publish it and then play the name and shame game and yeah whatever follows ever follows.

CHRIS DISSPAIN: Yeah, I don't think you need to have a pathway to the ultimate destruction of a ccTLD manager. All you need is a pathway that says this is what we require, this is what we think best practice is for data. It's this, whatever it might be. Everyone gets a note that says please provide it, you get a follow-up reminder, you know, two or three months later and then perhaps even another one, and then at the end of that process

IANA is empowered to say the data for dot whatever is inaccurate and that appears on the IANA database on the front page and says do not rely on—we cannot rely on this data—currently chasing to find out what more. We can stop at that point, see where it gets us, and if we then have to do something else later, we can do something else later. Thanks.

JORDAN CARTER:

One of the things I love about this community is our propensity to start solving a problem, and there have been quite a number of potential ways to deal with this issue on the table. I'm kind of conscious that we're almost halfway through the working session that we've got and we're on issue number one out of ten, I think.

So if I try and pithily sum up, there's no appetite around the table to do a PDP about this issue—that's quite clear. There is a bit of a suggestion about some ways to approach improving data accuracy, and there are some questions about what the level of data accuracy or otherwise isn't.

So I think that the next logical step, if we were to inquire further into data accuracy, would be to do some analysis of the level of accuracy and to—if we wanted to propose for community feedback the sort of name and shame approach—we shouldn't do that until we've actually looked at the scale of the problem.

So can I just sort of get a degree of comfort with saying that as far as this first sort of analysis of this is—and this is without any assessment of the priority of this compared to other issues—that if we were to take a next step here, it would be to do some analysis of the nature of the problem

and to look into what sort of information might be provided to the community about the accuracy otherwise of a record. How does that sit with people?

I'm seeing some nods and thumbs up. Nick?

NICK WENBAN-SMITH:

Yeah, just I completely agree with that, and I thought Stephen's point about the FOI in a sense in a sort of legalistic contractual thing that essentially data accuracy or lack of data accuracy is not something which is a standard breach which would lead to revocation because that's not, I think, what we're hearing from the IANA staff.

So I think having that clarified and I think, yeah, naming and shaming is probably, well, not just the escalation solution but probably the last step of that thing, and if it stays inaccurate, I don't think there may be further consequences, but that, you know, we can—we can not solutionize that now.

But I think it's important to say that lack of data accuracy is not something which leads to removal from the root, and if that is an outcome of socializing that through this because of the FOI predates my involvement and I have to confess I have not read it recently—so if we—shocking, as Chris says—so yeah, we should try to tease that out and that maybe put that in the notes.

JORDAN CARTER: Okay, thank you. No one has said—and IANA certainly hasn't said—that it would contemplate for-cause revocation of a name because that data was wrong, and I don't think they would, but Kim's about to tell us.

KIM DAVIES: Well, not to blow open the discussion, but I mean, I think we keep latching on this example that a phone number is inaccurate, and sure, but, you know, sometimes data accuracy is evidence of something that is pretty fundamental that's changed at the ccTLD. For example, you say it's a data accuracy issue that the address is not correct, but maybe they've moved the ccTLD operations out of the country, which reflects a pretty fundamental change.

So I think sometimes data accuracy issues can be a tip of the iceberg of a much more fundamental issue, which, you know, I don't want us to latch on to the one example of a phone number is wrong as the only issue.

JORDAN CARTER: Yeah, in terms of not blowing up that issue, Chris, is your repost there to not blow up the issue?

CHRIS DISSPAIN: I'm gonna not blow it up but just to say you're absolutely right, but then that ceases to become a data accuracy issue—it's a different issue. It's the data that's led you to that conclusion, but the issue is not data accuracy—the issue is they've moved it outside of the country. So all

that the data is doing is helping you define what another issue is, so that for that reason it's not the data that leads to the problem.

JORDAN CARTER:

Yes, that in fact was blowing it up, but just so you know. And that's item E, in fact, on our list of issues. But okay, so that's—I think we'll come back to that sense. This is not a PDP issue for us; we might wish to do some study into this, and there are probably more important issues on the way. So let's move on to item B, which is about the purpose of public records.

Anyone who's dealt with privacy law, for example, will know about the importance of having reasons for retaining data. There's no framework through which to assess why the public records that are published by IANA are published. The contact model has evolved a bit but it's inherited largely from the pre-ICANN era.

I didn't have a type to propose for this; I didn't think it was a policy gap or an implementation gap, but I did think it would be helpful if there was a clear statement of such purpose. It could be a study group type approach which could look at the purpose of public records alongside data accuracy.

If it was designed to connect to something that was enforceable—again, enforceable provisions in any of these areas probably need a PDP. So does anyone have any—I don't think it matters too much if we don't have an exact label for the type of issue, but does anyone disagree with the conclusion that this would be something where it would be helpful

to have a defined purpose and the starting point would be to generate such a definition if we chose to do some work on it?

NICK WENBAN-SMITH:

Well, as a sort of privacy lawyer, I suppose I completely agree that there should be a statement of purpose. The IANA database is not a thin registry—it doesn't—it could be thin technically, right? It could be thin and still technically function, but I think we all agree that it's not appropriate to be thin. So the reasons why we keep the records and the purposes for which we're processing data—it's a very sad fact, but I do look at the IANA database quite often, and there is quite a lot of personal data in there. So there probably should be—that is personal data which has been voluntarily submitted by the ccTLD manager, so I think there's no sort of legal issues with it.

But in terms of why we require the data and what it's used for, I think Pablo's point about it being a public resource for the communities of the territories to see in terms of, okay, well, who actually is on record as the ccTLD manager, and who do I contact if there's an issue. It's almost like having a registered office for a company; if there's a legal dispute, there needs to be a point of contact in terms of accountability—it's basic. But I think it is quite a simple exercise, and it's probably—I think I've just done it for you in terms of what the statement of purpose needs to be. Thanks.

JORDAN CARTER:

I mean, the point of writing these things down is that then gives someone something to disagree with, right? So I don't mean you're

being disagreeable; I just mean that probably writing it down in the way you've just described it would then lead other people to think, oh actually I think there's a different purpose here. So does anyone disagree that it would be helpful? Yeah.

CLAUDIA RUIZ: We have two hands up, first Irina and then Pablo.

JORDAN CARTER: Okay, yeah, thank you for using the Zoom room, by the way, Irina.

IRINA DANELIA: Thank you, Irina for the record. I fully agree that—I just wonder, we say here public records, but there are also records which are not publicly available and which are probably very important for IANA, for example, to be sure that this person is authorized to request some changes with regard to that ccTLD. And I wonder if we should also include them in the scope of this discussion or not.

JORDAN CARTER: Interesting question. Kim, do you want to think about that for a minute? I'll take the next person on the speaking list. It's an interesting question whether it's within our scope to think about the private data held by PTI. I think my initial view would be that it probably isn't.

IRINA DANELIA: I'm not speaking about making the data public but about in addition to the public interest, having the records in the database, there is also important issue which Kim many times mentions, of who is authorized to request changes with regards to the ccTLD.

JORDAN CARTER: Yeah, there's a whole contact data set. Pabo.

PABLO RODRIGUEZ: Thanks, Jordan. In addition to the importance of the accuracy of the data and the purpose of the use of that data, I mentioned in a previous participation that the community has a purpose of use for that information. But in addition to that, it is important for the operator because in the event that, for example, in my jurisdiction, the Justice Department requires certain information, rather than to have to come to me and require that information and force me to go to the court and present this information, they can go to the database and find the information they need. So that would save the operator time and effort that could easily be found in the resources of the IANA database. Thank you.

JORDAN CARTER: Thanks, Pablo, that's another good example of the utility of the data. Kim, do you have a view about Irina's point?

KIM DAVIES:

I guess, you know, my reaction is that we don't feel there's a policy gap insofar as we feel empowered to make adjustments to that, which we have, and, in fact, one thing that we feel is important is that we're not asking for permission to do that. We're asking for customers to, you know, show ID, to do certain kinds of high-risk transactions, which is an evolution of what we've done in the past, but we, obviously, there's no specific policy, and we've not asked for permission to do that. We feel that's within our operational responsibilities to take those kinds of measures.

For me, this was about the public nature of it, that it's, well, it's twofold. One is data protection laws and such and having a clearly stated purpose is important for that reason alone. But just as a practical matter, we have TLD managers come to us and say, well, what kind of person should I pick for these records? And our response today is basically, like, well, they're going to be published, so you make the call what makes sense for you. But, like, we really don't have any guidance as to, you know, what kind of framework they should they should think about these records. We've heard a few examples, law enforcement or whatever, but I think this is something that everyone has their own opinion as to what they should be used for, and I think just having a common definition would be useful. And it doesn't have to be a policy, just be some kind of statement somewhere. If IANA is empowered to write such a statement, we can do a straw man, but I think it would be better coming from the community, thinking about the issue, about what kinds of things these records are used for and crystallizing a common expectation for that. And I'll note that just in the last week, we had one ccTLD manager saying, "We really think we should add an

abuse contact separate from the admin and tech contact.” Abuse contact is pretty common in other databases. And, you know, but, again, it all speaks to the same common problem, like, what is an admin issue, what is a tech issue, what is an abuse issue? And I think just crystallizing these definitions would be a very valuable thing to do.

JORDAN CARTER:

So this is something that could use clarifying, and it would be a low-key sort of study group-type approach to create a draft, perhaps, of such purpose statements for the various elements of the public record, and perhaps to offer some views about whether anything should be added or taken away from what's published today. Pablo?

PABLO RODRIGUEZ:

Thank you. In addition to what has been said, this is quite important, and I don't take this lightly, and I think we should have some kind of policy of some sort to clear that away, and the reason I mention that is because we also have a responsibility as operators. We do not want to be agents of facilitating to some unscrupulous users' causes of mayhem in our societies, in our respective societies, and all we have to say is, well, I just registered domain names; I don't know why he or she is doing whatever he or she is doing, and I have no responsibilities. I believe that we have a certain amount of responsibility, and we should be able to identify who these individuals are, and we should be able to facilitate that such that I don't have to become the policeman that has to follow through on who is that individual that is causing these problems in my community or some other community. Thank you.

JORDAN CARTER: I won't offer a view about that other than to suggest it's probably a bit out of scope for our work, but that might be a topic to bring up at the Domain Name Abuse Standing Committee meeting later on today. So I'm not hearing any disagreement with that. Sorry, Bart?

BART BOSWINKEL: One question going back to what Irina said and others as well. Do you want to tie this topic with topic one? So you could almost see an order in the way you handle this—first go for purpose and then go for data accuracy, because that one flows from the other.

JORDAN CARTER: Yeah. I think the two are tied together. They can be considered together with no harm done if the point is to study the nature of the issue. Does anyone disagree with that connection between A and B, the purpose of the records and accuracy, intentions, expectations? I'm not seeing any disagreement. Okay. That's, yeah, thank you for tracking that change. That's items A and B.

And we've talked a little bit about C, enforcement and/or graduated compliance options. And that comes back to the point that at the moment there's asking to comply and revocation for cause as shaped by the previous work of the FOI. And whether there should be any additional ones. My draft here suggests that that was a policy gap in a sense, because allowing there to be enforceable steps in a compliance chain was not something that there's any other way to create the power

for. Now, people may agree or disagree with that, but that was my analysis. I thought that IANA imposing such obligations unilaterally would probably be a bad look. And something as informal as a study group probably wouldn't be the way to do it. So that was the analysis there. Does anyone have any sort of comments or thoughts about this issue of an enforcement or escalation path? And this isn't attached to the previous two issues. This is about any aspect of ccTLD records with IANA.

NICK WENBAN-SMITH:

So my thoughts on this are that in most legal jurisdictions you are expected to go through some pre-action protocols, which are essentially what you're talking about here—an escalation path, i.e., you first raise the issue of dispute or noncompliance or alleged behavior in an informal way, and then you have a formal route.

So I think—what I'm trying to make life easier—I think these processes exist in most jurisdictions which I'm familiar with. I don't know if it applies to every jurisdiction in the world or every ccTLD, which could be a remote rock in the middle of somewhere without pre-action protocols in the same way you would have it in, say, the United Kingdom.

So I'm wondering whether this is a solution looking for a problem, because I think there already are existing mechanisms which you would, through legal processes, be expected to operate for any sort of formal sanction, whether contractual or non-contractual. So I think these sorts of things already exist, and they probably are different in different parts of the world, in different legal systems, different

countries, different languages, different cultures. There will be different processes, but we should leave those to the national processes, which probably already exist.

And I, for one, am not losing any sleep over it, because I know that in my jurisdiction there are really good processes to do that, and you would—a court—would expect you to have gone through those processes and will sanction you appropriately if you've not gone through that escalation process.

JORDAN CARTER:

So the actor that we're talking about here is IANA, which is in California. So that's the jurisdiction where we would need some insight about those obligations.

PETER KOCH:

In the abstract, I would probably agree with you, Jordan, that this is not tied to the previous points. However, developing something into a void probably doesn't help to focus that task. And obviously it is also inspired by at least one of the two previous points.

So I would rather suggest that this issue be reassessed after we have some intelligence from the study on at least point A—the scope of the problem. What are we actually talking about? And do we need that enforcement?

So yeah, just developing an enforcement process or policy without any guardrails seems a bit premature to me, thank you.

JORDAN CARTER: Thanks, Peter. Does anyone else have any views about this? Because it could flow in any of the issues that we're dealing with. It's like, if the policy isn't followed, then what? So it could be dealt with in the context of data accuracy and record keeping. The community might have a view that is as simple as the name and shame approach that Chris mentioned. It might go further. Don't know.

IRINA DANELIA: I would just support Peter's approach. And I would say that before we identify what ccTLD should be compliant with, what compliance means, it's a little bit early to talk about mechanisms to ensure it.

JORDAN CARTER: Yeah. I haven't had any sense from any of the discussions we've had about this that anyone senses it as a burning problem. And Kim, do you have any sort of comments on this issue that you want to add?

KIM DAVIES: I mean, it's not so much a burning problem in that we have known issues that we just don't pursue because we don't think that they're severe enough to warrant, as I said, sort of the nuclear option. But I think we do fundamentally want to have an accurate database. We want to have all ccTLDs operating well and effectively with operating name servers and up-to-date points of contact and the full gamut. So I think just in terms of best practices, we want to elevate the community.

And I think part of our reluctance to go too far is that we have no stick. We have ccTLD managers that don't respond to us, to be honest, unless it's a super severe issue or unless we find them through third-party channels and really hunt them down. And just that practical experience shows that they don't keep their records up to date.

I mean, without giving specific examples, sometimes I need to reach a customer and I just can't through the records IANA has. I need to go to ICANN's regional office to see if they have contacts to find out who really is responsible for the ccTLD. I mean, this is a lived reality that we have because for them, it's not really an issue if IANA knows who's running the ccTLD or not. It only becomes an issue when they want to actually make a root zone change. And then they discover that we actually need these people to approve the change, and, well, they'll say, but they don't work here anymore.

So I think we want our posture to be better where perhaps not immediately in sync, but it's roughly in sync with reality and building a suite—a tool set of mechanisms available to make that happen. And maybe at some point, making that public, naming and shaming, whatever the case may be, certainly could be part of it.

JORDAN CARTER:

Cool. Thanks, Kim, that gives us a bit more color. So I think these three, after the discussion, these top three issues, A, B, and C, do sort of bundle in a way. And some discussion of what happens if we're clear about the purpose and we're clear what accuracy means and what's important

and what might happen if that accuracy isn't maintained—it does bundle together.

So, but again, that feels then like a set of issues where some sort of a study group to analyze the nature of the challenge, propose some possibilities in terms of this is why we keep these records and publish them. This is why—what we think should happen if they're not accurate—can bundle together. So that sort of feels like where we're at. If it does, I'm not seeing any opposition to that.

Let's move on to item D, time-checking myself. We will need to draw this discussion to a close in about 15 minutes or so to just talk about what we're going to do with the public session later in the week.

Item D is about ensuring eligibility assessment occurs before practical changes. And that was around saying that there are changes on the ground that happen and then IANA gets brought into the loop. Asking for a transfer after changes on the ground have happened frustrates the intent of meaningful review and the policy assumes that approval happens before on-the-ground changes are made.

My suggestion was that this was an implementation gap because of that assumption in the policy and it might be as simple as setting out expectations that such changes will be done after approval. But I did say there would need to be some enforcement framework as a logical part of such expectation setting and that the way to start on this would be a study group or a CCWG type approach to test the issue and develop such expectations. And that could inform ccTLDs in dealing with IANA

about what those community expectations are as part of setting out more clearly how this should work and then later if we continue to have evidence that it isn't, you can get into item C on the compliance graduated escalation path. Does anyone have any views or comments about this one?

CHRIS DISSPAIN:

Thank you. This is Chris, thanks Jordan. I don't think I have an issue with a study group. I think I might have an issue with calling it a CCWG and making it—to me it's a cross-community working group. I'm not sure that I think that's a desperately good idea.

The bottom line here is this: part of the reason why transfers happen without telling anybody is because, A, they can, and, B, people don't want interference. And what's the fear? The fear is that the government's gonna step up—and I'm just using government as an example but it's a perfectly good example—government's gonna step up and say, "We don't want—you shouldn't have it in the first place. You certainly shouldn't be able to transfer it and we should be able to take control of it."

And the challenge there is that IANA's perfectly sensible view on that is, "Well, sort that out at home." But of course, nothing will happen while it's being sorted out at home. And so therefore nothing happens. Whereas if the transfer has occurred and then there's an issue, too late. Ask for forgiveness, don't ask for permission.

So I think we need to get very clear what we're talking about before we start going in any way public, as in having the GAC involved in the

discussions. But I certainly think we should do a study. We should have a study group, yes. Thanks.

JORDAN CARTER: Thanks. So the point about CCWG-like framework of interpretation was just that it's a way to involve stakeholder groups outside ccTLD managers organized through the ccNSO.

CHRIS DISSPAIN: I think we need to get ourselves sorted out first.

JORDAN CARTER: You think not yet?

CHRIS DISSPAIN: Not yet, yeah.

JORDAN CARTER: Thanks, that's good to be clear about that. Is there anyone else on the speaking list on this one?

KIM DAVIES: I mean, just in response to Chris's observation. In my experience, I actually don't really see scenarios where parties try to avoid the IANA process to avoid government involvement. To me, it's more the converse, where parties within the country and often the government feel that they have a unilateral right to make such a decision without

following global policy, including going so far as to moving it beyond their jurisdiction, for example, which often comes back to bite them down the road.

But yeah, so I think that there's a lot of variety of factors here. I wouldn't want to presume one or the other. But it's a good point. I mean, there's very little penalty or consequence if you just move a ccTLD. IANA has no real enforcement mechanisms available to it other than denying a subsequent root zone change after it's happened. But is that a good state of affairs, to turn down what might be a routine update to a name server record? Because some years ago they made a move to a new entity and didn't record it with IANA? Thank you.

JORDAN CARTER:

So the study approach might be the one that works here. And no one is arguing for anything more interventionist, if you like, at this point. So we can have that on the table.

So, so far we've got a bundle of the first three and the second issue. We're going to move on to discuss item E, and I think that might be where we run out of time. Which is not surprising, because it's the local presence one, which is a significant issue, of course.

At least the administrative contact must reside in the country involved, says RFC 1591. And the IANA interpretation is there in the document. And that interpretation is a little bit more specific than the text of the policy. My view was that this wasn't a policy gap, because the issue is dealt with in the policy. And IANA's got some practice here.

I did note that some stakeholders may view it either as a policy gap, or simply as they don't like the policy, and they wish that it was different. But my view was that that isn't about what we're here to do, which is deal with gaps. So it might be slightly controversial. Let's find out. Does anyone have any views about this?

And my view was that if there was a view to look into this, it would be a study group type discussion. You wouldn't start with a PDP or anything more dramatic. Any thoughts?

CHRIS DISSPAIN:

So it depends on how deep you want to go. The current policy is, there are situations in which the current policy cannot be met, in the sense that there are TLDs for territories that have no humans on them. And therefore, clearly, the admin contact cannot—unless we appoint a penguin for Heard and McDonald Islands, which is unlikely to be satisfactory.

So I don't think that necessarily matters, and we've lived with it for quite a long time now. But my question is, how deep do you want to go? If we're happy to accept that there will obviously be occasions where you simply can't meet the policy because of those sorts of circumstances, then the next question becomes, there is a policy. How is it dealt with? Or do we want to examine it and say, is it still necessary as a policy?

I mean, that is a question about how deep we want to go, right? Because we could look at it and say, is it really strictly necessary, given the modern world where servers are everywhere, people are everywhere because of the Internet? Thanks.

JORDAN CARTER:

Thanks, Chris. Are there any other thoughts about this one?

KIM DAVIES:

So just to kind of restate why this is thrown into the list. So RFC 1591 has a very sort of specifically written requirement that the administrative contact be in the country. And to me, it's a question of, is that a sort of a minimalist requirement, that you just have to find a person that is willing to be in a public record that lives in the country? Or does that mean there needs to be some sort of meaningful operational nexus with the country that is available for legal purposes, for example?

And that latter interpretation is our practical implementation today. But playing devil's advocate—I could see someone coming to us and saying, "We have no basis to, you know, require that the ccTLD manager itself be in jurisdiction. It's just, as long as we nominate a person who is willing to be listed in a public record—which, going back to the previous topic, has no definition as to what that contact is for—that we meet this definition and, you know, IANA has no right to demand anything more."

I think the intent was that there is a meaningful nexus with the country, and we do consider for these sort of dependent territories that might not be populated that, you know, the associated country is sufficient. So when it comes to Penguin Islands, as long as they're in Australia, if it's some other kind of uninhabited island, as long as it's sort of the parent country is fine as a jurisdiction.

That's been our practical implementation for, you know, 20 years, but it doesn't align with RFC 1591. So, again, IANA has felt empowered to expand that definition, but, you know, I can see someone pushing against that interpretation as not being founded in the document as it currently stands.

JORDAN CARTER: Has anyone pushed against that?

KIM DAVIES: It's a good question. I don't think in earnest, no. I think academically, maybe. But no one to my recollection—well, it's not something we've accepted. Let's put it that way. We've said we don't feel this meets the local presence requirements in the context of an application. It's forced the applicant to go back and to, you know, modify their approach.

JORDAN CARTER: And so this is a theoretical problem then?

KIM DAVIES: Well, it's in the eyes of the ccNSO. But is this an operational... Is this an area where IANA has the operational latitude to define local presence? Like, based on that construct that's in RFC 1591 that only speaks about "you must have an administrative contact in the country," the fact that we've extrapolated that in reality to mean that the organization itself must be in country, that it must be accountable under local law via some legal nexus—is that an acceptable interpretation of the policy as

it's written? Or has IANA gone off the reservation? Like, you know, that's kind of...

JORDAN CARTER:

I think if IANA had gone off the reservation, you would have heard from us. That would be my short answer. But I've got Nick and Chris, and I saw Nick... Oh, Peter.

PETER KOCH:

First of all, I don't think that the fact that there is a practical impossibility for in-country—and in brackets, territory—presence, that this impossibility doesn't invalidate the rule as such. So nobody should be able to claim, "Well, it's impossible in these cases, and therefore you can't apply this to me," which is something that IANA seems to be doing.

In this case, I think there's a study group, if required, there. We seem to have some cases where other parties, to be a bit vague, have a political interest in getting... We should have an interest that they get a more advanced understanding of what this clause means and what it does not mean.

So I think I would support the study group approach. The question is how many study groups do we want to schedule and what the priorities are, which is something that we need to get at anyway after discussing these ten bullet points. But we should have—the reason so far, as somebody said, it's a theoretical problem maybe, but the reason is that we should signal that we understand the issue, which means we

probably should understand the issue, and then it's unclear where we take it from there—unclear to me at least. Thank you.

JORDAN CARTER: Thanks, Peter. I had Chris and Nick, I think.

CHRIS DISSPAIN: Nick.

NICK WENBAN-SMITH: No, after you.

CHRIS DISSPAIN: English people, honestly. For me, the bottom line is this. Everyone accepts, I think, including people in positions such as Nigel and Eberhard, that fundamentally, if the government of the country legislates that the TLD should be run by the president's cousin, Gary, that is it. And whilst there might be mechanisms of appealing to go to the Supreme Court in that particular country, fundamentally, if there's legislation, there's legislation.

And therefore, having the requirement that there is the local presence—that the actual TLD itself is effectively governed by the law of that country—is the baseline. And you can imagine circumstances where the ccTLD gets picked up and moved out of the country completely. That is not what this is supposed to be about. It is supposed to be a two-letter code representing the country or the territory. That's what it's meant to be.

And so to have a circumstance where it would be possible for the TLD to be managed outside of the jurisdiction—total jurisdiction of the country—seems to me to make no sense. And therefore, Kim's or IANA's interpretation of the policy by saying, "No, no, you need to be in that country, whether it's a person or whatever, there needs to be a legal nexus between the management of the TLD and the territory," makes perfect sense. Whether that means that we have to do anything or not, I don't know. But you seem to be interpreting it in a way that makes sense to me for the bottom line. Thank you.

NICK WENBAN-SMITH:

I was just going to say that 1591 obviously is a document of its time, and at that time I think the intent behind the nexus provision, if that's what we say it is, is when Jon Postel was allocating ccTLDs, there was in his mind a requirement for a nexus. I think a lot has changed since then. Basically all the ccTLDs have been delegated, so in a sense it's a sort of obsolete provision.

And I think you need to read the text as of its time, and I think you shouldn't conflate that with Kim's operational problems. And here, you know, we all operate quite large databases, and the IANA one at least is quite small for you, but we feel your pain, and it's every database operator's problem to keep data up to date and to try to administer it, and that's just life.

And I think we can do things to make it easier, but I think what we're doing which is very useful is socializing some of the issues and practicing. So whether you call it a study group or we have a more

structured approach to Kim, tell us about problems operationally in the database, the best disinfectant for sort of problems is a bit of sunlight. So let's talk about some of the things that are happening, and let's get the community collectively to pull its socks up, either by naming and shaming or other sorts of things there.

But I think we all agree and we all very strongly support a really professional and operationally excellent IANA database, so we will help you. But I think just talking about it in itself will shift the dial.

STEPHEN DEERHAKE:

Thank you. Nick, you need to read RFC 1591 in conjunction with the FOI findings. You cannot read it on its own. You really need to read it with regards to what FOI did. Thank you.

JORDAN CARTER:

We thank you for those comments. I'm not seeing anyone pushing the need for anything more intensive than a study group. We're also out of time. It was a useful discussion and the lesson I think for me is that we needed to start this part of this discussion about three weeks ago if we were to have our shared understanding and to be able to prioritize the issues which we're not going to do in the next four minutes.

So what that means in a practical sense is that this group's work hasn't quite finished yet. We're going to need to carry on with the work post-ICANN until we have come to a settled view about the types of issues and what to do about them and to then prioritize which, if any, we're

going to work on first. And there is no—we don't have to do that at an ICANN meeting, so we can do that intersessionally as we go.

So to wrap up item four around type of gap and prioritization, we've got a bundle of the first three issues, the next two are individual issues, and we need to keep working through the other ones on this list. Stephen, do you have a comment about that?

STEPHEN DEERHAKE:

Not about that. I just want to put in a good word for all the penguins in the world.

JORDAN CARTER:

Okay. Good luck to the penguins. So thank you all for that discussion. Item five is about the two meetings that we've got. We've got the members' update at 3:00 on Tuesday where my proposal—we don't have a thing to propose to them to get feedback on. So I think what we'll do is we'll give members an update on the work that we've done since the last ICANN meeting and just an introduction to the work—the dialogue that we've just had around the first five of those issues and where it got to—and presenting that as just a way to continue that socialization process that we've talked about a bit here and to see if there's any feedback on it.

And we can tell the council—those who are on the council—that the work will need to continue. I don't want to try and put a time frame on that at this point. We'll continue with our fortnightly calls for that.

And then we've got the joint session between the ccNSO and the GAC on the 13th of November. Bart, can you remind me why that is on this slide for us? Is it because they're expecting an update or we've offered an update?

BART BOSWINKEL: We offered an update and so now they expect it.

JORDAN CARTER: We offered; they expect, and we will deliver an update of a similar nature to what we will share with the ccNSO members on Tuesday.

BART BOSWINKEL: It's only 20 minutes. It's one-hour session. This is part of it. The DNS abuse survey is part of it, and the WSIS+20 dialogue is part of it as well. This one is one of the more extensive topics.

JORDAN CARTER: Okay, so we'll prepare some light slides to support that discussion as well. Is there any other business? Right, that then draws this in-person session to a close. Thank you all for the discussion and dialogue. The work goes on. Have a lovely ICANN meeting. Cheers, everyone.

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