LONDON – Contractual Compliance Program Updates and Q&A Session
Wednesday, June 25, 2014 – 09:30 to 11:00
ICANN – London, England

MAGUY SERAD: Good morning everyone. We will start shortly, just because this conference facility is like a maze. I, myself, get always misdirected. So we appreciate your patience while we let the audience join us.

We have a couple of more empty seats around the table.

So, just a little insight compliance check we do within our team. We always give ourselves the first five minutes, we call it the starting time, to allow people to run from one meeting to the next, and get a break. So we will start five minutes into the hour. But we promise to conclude on time, if not early.

We do not have technical issues. We're just giving everyone time to get here.

All right. It's 9:35. So good morning everyone. My name is Maguy Serad, VP of Contractual Compliance. Thank you for joining us this morning to the Compliance Outreach session. This session is recorded and the transcripts will be put on the ICANN website, including the presentation.

Before we get started, I want to introduce the team that is with me this morning, and then introduce the objective of this session. To my left, I have Seher. She's from our Istanbul hub. Next to her, Yan Agranonik. Yan is our risk and audit manager. Jennifer Scott, manager, compliance department.

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.

Victor Oppenheimer, senior manager also within the compliance department. Seher, our manager from the Instanbul hub. And then Selim from the Istanbul hub also. And before I get started, I want to say hello to our Singapore office. I know they're dialed in. Roger, Ashley, thank you for joining us. And I know it's 1:35 in LA AM, but I know some of the staff is listening in for support. We appreciate it.

So, thank you for joining us. This forum we put together a few ICANN meetings back, to bring us all together. We do a roadshow on Tuesday, we talk to targeted stakeholders, and we realized that there is not a strong handshake. Compliance provides a service to everyone in ICANN, everyone.

So we wanted to create a forum where everybody comes in together, to allow us to present you a more detailed update on our activity across all areas, but most importantly, to allow a dialogue amongst ourselves. This session has been productive in a sense that many times, for example, we will have some concerns from the community that they bring up, and we have registrars, or registries, or IPC, or ALAC.

So you have a very wide diverse audience that sometimes they just answer each other and help resolve it. So we hope that this session is going to be productive for all of us today. And we all…

[End of Audio 1]

[Begin Audio 2]

MAGUY SERAD: …we're going to proceed. We'd appreciate it if you can hold your questions. This session is an hour and a half long, we will present for

about 20 minutes, if not less. And then it's going to be a Q&A. Next slide please. Next slide please.

So, we all heard Fadi at the opening ceremony about our global staffing model. And global staffing, I would like to take it up a notch to really be what we call a global model. We have, since Fadi's arrival, established three strategic models for ICANN to be able to support the three regions, the five regions, and we also have regional offices.

Compliance being a critical service, is located in the three hubs, supporting the regional offices but also supporting the compliance model globally. In Los Angeles, we have fully staff, zero open positions. In the Singapore office, we are now two resources strong, and have one more open position. And in Istanbul, we have three, with one open position.

That's our plan for fiscal year 15 from a staffing perspective. Please keep in mind that if the environment changes and there is a need for more, we have the upmost support from our executive leaders, to staff augment where possible. But what I would like to do is also recognize that compliance does not operate alone.

We depend and collaborate on staff, ICANN staff, internally to support each other. For example, today's meeting is a great testimony to that. We have Jack. Jack used to be in compliance, but now he is a director for risk within the ICANN organization. We have John Crane from the security team. We have Gustaf, and Mike [inaudible], and many other of our counterparts from Cyrus's teams, who support the registrars and registries.

We also have some of the… We are supported or staff augmented by having support from different contracted parties. In this case we have [Maude], representing KMG, and [Maude] has partnered with us for the last two years to deliver the audit program. We also have full time equivalent staff to support us in the metrics space, and also in the audit space.

So in reality, if you start adding the numbers, we really fortunate to have the support and extension team. The staff page, if you are interested in who we are, we provide that link and it can tell you, what is the background of our staff and what we represent. Next slide please.

Again, global model, as Fadi mentioned, is also global readiness. We've always worked on institutionalizing a common process, and bringing… You heard [Akrim] talk about a culture of compliance. That's really the model that all of ICANN is really institutionalizing. But from a compliance perspective, I want to highlight that this common process and approach, and is used and is applied globally.

A very good example of that, we were dealing with a non-compliance issue yesterday afternoon. We transitioned it to LA, woke up at 1 AM, the team was reviewing the templates, Singapore took over this morning, our time, at 6 AM while we were having our coffee, we were just dialoguing, and they were finishing it up.

So we are truly a global model, consistent process, consistent templates, consistent language. There is always for improvement and we are the first to acknowledge that, and we continue to look into those. The third item here on the culture of compliance that's critical to

everyone in the audience, that we stress to all of ICANN, compliance is fact based decision making.

If you worked with us, you know what we mean. We can all complain, but if you do not provide the right information that's requested, we cannot provide you that service adequately. So we really ask that if you are filing report, or if you are working with us as a contracted party to address either a non-compliance issue or an inquiry, to freely address those fact based. And that has helped.

The other item I want to highlight on this slide, is for the audience to understand and gain an appreciation for the process in two aspects. We are not here to shut down businesses or to expose problems. We are here first to make sure that there is a compliance within the obligations within the agreement.

The process was designed over two years ago, in collaboration with the entire community. We built it up from the bottom, took it to the different stakeholders for input. And we all agree that there needs to be an informal resolution process, which is the green, the color… Thank God colors work globally too.

So in the green, that means informally compliance, ICANN contractual compliance, is collaborating with the contracted parties to address and resolve any inquiry or notice. We always want to be given the benefit of doubt to address those. And none of that information is publically available, even internal to ICANN, it's very confidential and it's shared as needed.

If and when there is no resolution to the non-compliance issue, or there is some kind of challenges lead us to a breech, that's when we start the formal resolution process. So, in the informal resolution, it stems from anything and everything. It could be a complaint, a report that is sent to us, or it could be an internal monitoring that triggered a complaint. Even the compliance staff, even the ICANN staff, follows the compliance process.

For example, if we have an issue that's identified through the monitoring tool, that's managed by Gustaf and Francisco, they log in a complaint for us, exactly where it is with that tool. They are also some tools that are automated and generate exceptional reports. They go into this. For example, finance. Finance has their own process. If and when the finance payments are not made, then they escalate to compliance and the last notice to the contracted parties stating that, "You've been notified per finance process, now we're escalating to compliance because you do have a contractual obligation to fulfill."

Finance enters a complaint in there. So the process is truly global, internally, externally. And it's all tracked, reported on. In the formal resolution, we start publishing. When we publish the notices, it's obvious it's visible to all. I have had several occasions when I receive calls from frustrated contracted parties saying, "You're ruining my reputation." It's like, "I'm sorry, you did that to yourself. You've had every opportunity to collaborate and work with us."

So when it's published, we do not remove. We made a commitment to the community, that enforcement will be published. We keep the community informed on the progress of the enforcement, even when a

breach is cured, we do not remove it. It just updated. And the reason that is done is that the community also needs to know what's going on in the environment, even the historical aspects.

So again, I spent a little more time on this because we have a lot of new faces in the audience that I personally do not recognize, and I wanted to make sure it's understood. But mostly, I wanted to support the statement that Fadi made at the kick-off ceremony. So we are truly global and will continue to grow.

Our commitment to Fadi is the compliance staffing will grow in the hubs, no more in LA. We're fully staffed in LA, and based on the needs, we will start growing more in the hubs. Next slide please.

Our readiness. That's been the big issue. We were threatened last year, we're going to make statements, compliance is not ready, we need to stop the programs. Well, compliance has been ready and was ready. What we did, we showed this slide. What does it mean to be ready for the 2013 RAA or the new registry agreement? ICANN has had really a couple of strong agreements go into effect almost sequentially.

And that, in the environment, from those who have known ICANN and have been following ICANN for the last few years, from a compliance perspective, the impact was huge. Previously, the total number of complaints that we were managing, was a total of 10. We always have the other category, because you never know what else you might receive.

But in general, we took the agreements, and the consensus policies, and we group them into what we call complaint types. There are many

subsets within this, but at a high level, it's 10. When we launched the 2013 RAA, we worked in collaboration with the internal staff, and with a contracted party to make sure that when we were building those next level of complaints to be alignment with the 2013 RAA, that we were documenting it properly, addressing it, and informing them of what's happening.

The same thing with the new registry agreement. You will notice we don't refer to it as new gTLD, because there is always going to be some new gTLD. It's basically the new agreement. I wish they put a year on it because if you're familiar with the RAA, there is a 2001, 2009, now it's 2013. So, we refer to it as the new registry agreement, and you'll see the different categories identified within.

So, we went from 10 to 40. In addition to that, all the documentations have been uploaded to our website, not just the web forms already to collect the reported non-compliance, or alleged non-compliance, but we also have the aspect of learn more and FAQs in the six UN languages to support it. If in doubt where you fit, there is always some type of other category you can go for it.

Next slide please. I wanted to put this forward. We had been talking about this, but that we received additional questions for clarification. This is regarding the registrar and registry compliance checks that the compliance team conducts, but also the compliance team is, has a voice when it comes to renewal of accreditation, new agreements, transfers.

The idea behind the compliance check is that we want to make sure that ICANN and the contracted party are being transparent with the community as it relates to compliance. So, before, for example, there is

a contract renewal on the registrar space, the registrar team under Mike's leadership will send us a heads up, and the process starts weeks in advance.

There is a renewal coming up, can you please conduct a compliance check? We have a standard template that is also populated, and the category where compliance has a big X that says, "No, we definitely don't want to support this unless these areas are addressed." If there is a breech in effect, it's a very simply binary, yes or no.

If there is a breech in effect, there is no renewal until the breech is cured. If there is a third notice, and/or enforcement which could be a breech or suspension, in effect, it's definitely a yes or no. If it's data escrow, so we looked at the areas that are high in risk but in exposure. Again, it depends on which audience or stakeholder you come from you may say, "I want to add this complaint type to be a high risk."

It's not just driven by the complaint types, it's driven by, what is the risk to the community and to ICANN? The performance history is part of the compliance checks we take a look at. We look at the frequency, how many breeches were done. We also provide a history of the registrars behavior.

When we speak about behavior, behavior is many things. It's collaboration, it's turnaround time, which would report to the community on. So it should be a full circle when you are hearing compliance updates or working with compliance on either side. You will, anything we are reporting on is also discussed and delivered at these outreach sessions.

Same thing applies for the registry agreement. So these compliance checks, some, we've had some where we have said, "You cannot renew your contract," or "You cannot move forward after you've addressed those." What better incentive to come into compliance? Next slide please.

I wanted to share this. For those of you who were here earlier, before the session started, there was a reporting on the performance measurement at ICANN that Carole and Aba delivered in collaboration with Xavier. These are some of the governance metrics that we report internally, and I know that our executive leaders are looking into bringing much, many more of those reports to the community.

But what we report internally to our global leaders is on these categories. Yes, we start with customer satisfaction survey, because it is important to report on this, but mostly it's important for us an organization, because this is where we get feedback to be able to continue improvements. We report on the audit results. We report on data escrow compliance, and the categories below that you refer, you see as registrar compliance, or registry compliance, these are tied to the compliance checks.

And then we also report on our closure rate. Next slide please. The next few slides are going to be presented by Jennifer. They relate to the 2013 RAA discussions. And as you see on the agenda, we've got a couple of more topics to discuss here.

JENNIFER SCOTT: Thank you Maguy.   Good morning everyone.   I'm Jennifer Scott, manager, contractual compliance. This slide just details some of the activity that's been going on since ICANN 49, and particularly registrars have been coming into compliance with the new 2013 registrar accreditation agreement and its specifications, including WHOIS format and WHOIS accuracy requirements.

Next slide please. And here is the list of some of the lessons learned in terms of registrars coming into alignment with the new provisions in the 2013 RAA. And today, we'll be touching obviously on WHOIS accuracy, of use reports, and some of the privacy proxy concerns. Next slide please.

Here is the metrics that are regarding the registrar complaint types that ICANN received between March 2014 and May 2014.   And it's a breakdown of complaint type, of volume by complaint type. And we've included also the turnaround time of registrars and how long it has been taking them to respond to complaints with regard to each notice, so the first notice, second notice, and third notice.

You can see there how many days it has taken them to reply to ICANN. Next slide please. This pie chart here shows the breakdown of the reasons enforcement actions. And we give you numbers as well for the complaints that have become breeches, suspensions, or terminations following enforcement actions, from March through May this year. Next slide please.

Recently ICANN has being seeing registrars align their efforts with the new 2013 RAA and its WHOIS accuracy program specification. This specification requires that registrars both verify and validate WHOIS

information for new and transferred registrations, as well as those that have a change in the registered name holder, or when there is information suggesting that the WHOIS information may be incorrect, such as a compliance notice that is forwarding a WHOIS inaccuracy complaint to the registrar.

Registrars must obtain an affirmative response from the registered name holder within 15 calendar days of an inquiry, or else suspend the domain until the registrar can verify the WHOIS information. ICANN's first notices have a due date of 15 business days, so there is some cushion built in there for the 15 calendar day deadline. And beginning with our second notice, ICANN will inquire of registrars why the domain hasn't been suspended yet.

ICANN has also been conducting a periodic review of suspended domains, to make sure that the suspension is remaining in effect, or if not, that the WHOIS has been updated. And if it has been updated, then we would request evidence from the registrar that the WHOIS, new WHOIS has been verified and validated. Next slide please.

Just to clarify and go over the difference between verification and validation, because we have seen some confusion from registrars on these requirements. There are two distinct obligations under the WHOIS accuracy program specification. And to clarify, verification is the affirmative response from the registered name holder, or something done manually by the registrar absent that affirmative response.

And that can vary depending on the claims, but in either case, evidence of verification must be provided in response to any claim of WHOIS inaccuracy. Next slide please. On the other hand, validation is to

ensure that the format of the WHOIS data is consistent with standards, and these standards are explicitly listed in the WHOIS accuracy program specification.

And there is a standard for email, for telephone, and for postal addresses. Sometimes we see registrars coming back to us with validation using like a Google maps type of propriety website, and unless those websites are relying on these standards, they will not be acceptable for validation efforts.

Next slide please. Registrars have also been aligning with the 2013 RAA abuse reporting requirements in section 3.18. They've been required to set up abuse reporting handling procedures, publish abuse report contact information on their website and in the WHOIS output, as well as take reasonable and prompt steps to investigate and respond appropriately to abuse reports.

Abuse reports must be investigated by registrars regardless of the jurisdiction from which the report arises, and whether from law enforcement or otherwise, and without a court order. Next slide please. With regard to privacy and proxy issues, we refer you to section 3.4.1.5 of the 2013 RAA, as well as the specification on privacy and proxy registrations. It's important to note that proxy services must be separate legal entities from the registrar to avoid any improper self-registration, which is prohibited by the 2013 RAA.

Additionally it should be noted that when there is a registration under privacy or proxy service, that it is still subject to the verification and validation requirements for WHOIS data. Next slide please. ICANN has been investigating an increased number of complaints regarding

deceptive transfer and renewal notices lately. And these notices attempt to trick registrants into taking action at the threat of losing their domain name.

And then when they do take action, the registrants end up unknowingly transferring their domain or renewing it with a different registrar. And although this investigation is ongoing by ICANN, we note that it is likely these deceptive notices would violate the registrants benefits and responsibilities. Next slide please.

ICANN contractual compliance has also been involved with policy and working group efforts. And specifically we list out here some of the ones we've been working with the policy team on, in terms of implementation and updates through policies. Next slide please.

One in particular is the uniform domain name dispute resolution procedure, or the UDRP. Here are some general issues that we've seen in compliance with regard to the UDRP. Of particular note, is the problem of registrars not keeping the status quo of a registration as subject to UDRP and/or transferring the registration instead of implementing the UDRP decision.

We hope that these problems will be addressed by the updated rules to the UDRP, which will approximately be implemented in the middle of the next calendar year, 2015. We've also note here that in June of 2013, ICANN reached out to UDRP providers to make sure that they were using our consolidated complaint processing tool, and filing formal complaints through that consolidated tool to notify ICANN of any problems with registrars during UDRP proceedings.

Next slide please. Another consensus policy that contractual compliance has been…

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[Begin Audio 3]

JENNIFER SCOTT: …show a significant decrease in the number of complaints, based on the same domain renewal issues that the ERRP addresses, and effectively shows that this policy is doing its job in helping registrants with their renewal issues.

At this time, I would like to turn it over to Victor Oppenheimer to speak to you about registry issues. Thank you.

VICTOR OPPENHEIMER: Thank you Jen. Victor Oppenheimer for the record, senior manager. So, I'd like to give you a quick update on about compliance and the registry space in ICANN 49. Starting with, of course, the scope of the compliance program and the registry space. It's limited by the registry agreement and any other applicable consensus and temporary policies.

And we cover, or compliance covers the life cycle of gTLD, from sunrise through claims, and general registration. Then the audit, which my colleague Yan Agranonik to talk later about it. We'll limit it to articles one and two. Next please.

So this is a visual representation of the life cycle of a gTLD. And what I'd like to highlight here is that there are certain obligations that are triggered upon signing the registry agreement, and it is at that point that we start monitoring compliance activities.

For example, the rights protection mechanisms, code of conduct, and picks. And Maguy also alluded earlier about the compliance checks we performed prior to signing of the registry agreement, and prior to delegation of the string. Next.

So this is a list of complaint types that, for which we have FAQs on our website. We basically cover, compliance covers the entire agreement if there is no particular web form under which someone can submit a complaint, there is always a registry other, so compliance will make sure that all complaints are addressed properly. Next please.

This is a high level overview of some areas of opportunities that we've seen since ICANN 49, particularly under the rights protection mechanisms requirement, the improper allocation, or ear marking of domain names before the end of sunrise, or the, failing to provide the trademark database the list of registered domain names in a timely fashion.

We detected some registries with, or are not fully compliant with the website publication of abuse contact data, through proactive monitoring. We've also seen some registries missing the mandatory provisions in their registry/registrar agreement. We've gotten quite a few complaints regarding delayed responses, or denials of access to the zone file of particular TLDs.

Essentially what we see there is that some registries are denying access using reasons that are not allowed under the contract, so through an informal collaboration process, we've been able to address those matters. And then finally, we still see issues with data escrow

notifications. As you know, ICANN should, per the contract, ICANN should receive two daily notifications.

One from the data's [inaudible] and another one from the registry operators, and we typically get the one from the data escrow agent. The ones we're missing is, the ones from the registry operator itself. Next please.

And then finally, some statistics on particular complaint types that we've received from March through May. And so you can see for example that zone file access, and reserve, and the list of SODs to block are the top two types of complaints. We get quite a few complaints from consumers. You don't see those because we value the, or actually we guide the consumer, if you will, on why they're getting these notifications from registry operators stating that they cannot register those domain names.

And so we evaluate, if you will, the complaint, but at the same time, we guide on the process and we refer them to the name collision documents on ICANN's website. Next. And now I'd like to turn to Yan Agranonik.

YAN AGRANONIK: Good morning everyone. This part of our presentation will consist of three different activities, I guess, if you will. First is a few words about the year two audit program. You may or may not know this is a three year effort, which we started last year. Actually 2012. There was a year one audit program where we audited roughly one third of the registrars and one third of the registries.

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So this year, we completed the year two program that started roughly on the same time scale as the year one. We launched it in 14th of October. For the audit we selected approximately one third of the registrars and registries. Five registrars were rolled over from year one because they had some deficiencies they could not remediate by the time of the audit in year one.

So we have to look at them again in year two. Obviously, all of the registrars that passed year one audit were excluded from year two. That's brief update. Later you will see some statistics on the results from the audit program. The other activity compliance has involved in is the new registry audit program.

We have reviewed the key provisions of the registry agreement. And based on the verbiage of the articles in this agreement, we designed the appropriate audit program steps. We use the help of various ICANN experts in their respective areas to do that. And the third activity involved complaints internally, is the internal audit. This activity is directed at improvement of our own compliance declarations, meaning the objective here is to move the efficiency and effectiveness of our operations.

We've identified 45 controls. By control we mean a certain step that needs to be performed in order to process the complaint. We find eight findings that we can call them an opportunity for improvement, worked on that, and everything was resolved by September of 2013. Going forward, we will repeat this exercise as needed. Next slide please.

This is a summary of, that shows participants in year two audit program, which I'd like to thank for participation. The total number of registrars

was 322, including five roll overs from last year. You can see the breakdown by countries. And also you can see that we looked at the six registries. The general statement on the right basically says that 95 of the registrars were very proactive and collaborative working with us on the remediating of initially finding deficiencies.

The key word here is initial. When we asked them for information, and we receive subsequently some documentation, and if we see that something is missing, that's what we call initial deficiencies. It doesn't mean that, at the end of the day, it's states the deficiency. Next slide please.

This pie chart shows you that what percentage of registrars have initial deficiencies. As you can see, very few submitted the documentation that was completely acceptable and did not require work whatsoever. Typically, this came from the largest registrars in size where they have dedicated personal to process requests from complaints.

So other smaller registrars do need, would need some assistance from ICANN through the communication to resolve the initial deficiencies. Next slide please. Here you can see what types of those initial deficiencies we identified in the comparison, year one versus year two. If you try to create some kind of correlation between year one and year two it's not going to work, because the type of deficiency basically is coming from the randomly selected registrar.

So it would be difficult to explain why you have, for example, the differences in 20% in the deficiency one. It's just because some of the deficiencies, some of the registrars happen to be less sophisticated then

some of the registrars from year one. And if you have further questions about that, I would be able to explain. Next slide please.

More statistics, which by the way, is going to be reflected in the audit report that we are publishing on the compliance website. This table compares the scale of year one versus year two audit. The most important number, I suppose, is that three registrars did not pass the R5 stage, meaning that they were breeched and subsequently terminated. The reason for that was two of them completely just refused to communicate, and one of them was a recent purchase by another group and they realized that they are not interested in this business anymore, so they basically resided themselves.

The bottom two numbers are also important. It shows that we, again, rolling in five registrars into year three for a complete re-audit, and 10 of them will be partially re-audited, meaning we will just look at some of the deficiencies that they have remaining, because they didn't have time to remediate during the audit. Next slide please.

Plan for year three, for the third year audit program. Similar timeline as year one and year two. We're going to start in September/October. First we're going to send the pre-audit notice, that is the request for information. So before the request of information, we're going to send a notice to all of the registrars, and we're going to say, "The audit is coming. If you don't receive anything from us in two weeks, that means that you are not under audit."

We had a question yesterday, who will be selected for year three? So for year three, all the registrars that have not been audited in year one or year two will be selected. Some of them will be slightly more than in

year one or year two, because we had some new registrars that started their operations within these three years.

We expect to wrap it up in May 2015. The same approach, what we call compliance one, two, three, will be used meaning first we're asking for information. You have two weeks to respond. If we don't get any responses, you get a second notice, and then subsequently a third notice. Next slide please.

The new activity, the new registry audit program. Like I mentioned before, we internally reviewed the new registry agreement, and identified the provisions that we would like to audit. What has been done so far? So far, we conducted two outreach webinars in May to registries, collected… And then we had a follow up call in May again with registry stakeholder group.

We did receive some feedback from registries, reviewed it, updated our program consequently. Now we're presenting the audit program here, which will be on the next two slides. And we're going to start audit process in July. By start, I mean the same approach that we used as the regular audit.

First we're going to send pre-RFI notice. That is going to say that the audit is coming and then two weeks later, those registries who are selected for audit, will receive the request for information or R5. Next slide please.

This is basically just a graphic representation of a timeline. Pre-audit notification, two weeks later you're going to get your first notice, subsequently second notice if we don't receive anything, then third

notice. Then there will be an audit stage, where we analyze the data. During that stage, we will work with registries asking for clarifications, or for additional information if something is missing.

Then the audit report will be issued, that will list some deficiencies if any. And then we continue to work with the registry, remediating those deficiencies. The target day for final reporting is 30th of October. Yeah, next slide please. This is summary part one out of two. So this page and the next page shows what are the registration agreement articles we're looking at, and why are we testing them, briefly.

It does not show you detailed test steps, but we have them. So, I don't think I should review the articles themselves, you're probably familiar with them, if not, you can read it. It will be posted at the compliance website. But again, on the left you have the articles under review. On the right, you have test objective. Why are we testing this article?

Next slide please. And this is a continuation of the previous table that shows you the, oh okay. Okay. Next slide please. This slide shows you briefly the self-internal audit exercise results, which we already talked about. And at this point, I am turning it to Maguy.

MAGUY SERAD: Thank you Jennifer, Victor, and Yan for presenting. I know we shared a lot of information. It's not time for the Q&A. Before we start, I'm circulating a list, so we can sign your name and your affiliation. If you would kindly fill it out, we will be interested to know who is in the audience with us.

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I know we've met many of you, but I'm sorry, it's hard to remember everyone. So with this, what I am going to do is start the Q&A. Before you ask your question, please state your name clearly, with your affiliation. But mostly, please speak slowly so our interpreters can keep up with us. Any hands? Any questions? Alan.

ALAN GREENBERG: Thank you. Two questions. One of your earlier slides talked about the review of past performance at renewal time. And you said you'd take into account, breeches, suspensions, terminations. Not quite sure how terminations factor into renewal. But nevertheless, do you not take into account the rate of enforcements? That is the number of enforcements you had to take in relation, of course, to the total number of registrations?

Because I would think that a registrar that has a large number of infractions, and yes, each time they correct them but, nevertheless, that's not the kind of performance and action that you want from a registrar. Do you factor that in also?

MAGUY SERAD: Alan, just to make sure I understand your question. If you could look on the slide, we put it there, it's slide seven. Are you referring to the underperformance history? The termination in the last 12 months. That's, not to mention, just brief suspension which are the enforcement. Is that the question?

ALAN GREENBERG: Yes, that is the question.

MAGUY SERAD: We're playing this tag again, you and I. Yes, we do take that into account.

ALAN GREENBERG: Next time I suggest you add it, because I think it's a very significant issue. By the way, for those who are new to this room, if anyone pushes the button, it turns off the other one automatically. Okay. The second question is, you talked about possible action on deceptive renewal requests, that is renewals from registrars who aren't really the registrar of record and such.

In my experience, a much commoner phenomena is getting a notice from a registrar, if you happen to own XXX dot com, you get a notice from some registrar, you know, saying, "This such and such company is attempting to registrar XXX dot CN, dot NET, whatever. We checked and we see that you own the other one, did you authorize them? And if not, do you want to buy it now to protect your brand?"

I see these all of the time, and I rarely see deceptive renewals these days. Is this one that you would consider actionable as well?

JENNIFER SCOTT: It's unclear whether or not the ones you are receiving are actually attempting, trying to attempt for you to take action to change registrars. It doesn't sound like it. So at this time, I think the ones that you're referring to would not be actionable as a compliance matter. I

think that would be outside of the scope of the compliance, or in any version of the RAA.

ALAN GREENBERG: No, it's definitely not an attempt to change a registrar, because they're trying to get you to register new names, which you have no need for, in fear of someone else using them. And because of some of the ones I've received, I know there is no one trying to register this other name. It's just such an unique string that there is no monetary value in trying to use that name and monetize on it.

So it's clearly deceptive marketing, but I might say you may want to look at it, because this is the kind of thing that maybe we need changes in the RAA to make it enforceable. It's really annoying, and for someone who is not familiar with the business, it's a really scary phenomena.

JENNIFER SCOTT: Thank you. Yes, if it's purely marketing, that's outside of the scope of the contract, and therefore outside of the scope of compliance. But if it's something that you feel is deceptive or might be violating the contract, please file a complaint. We'll look at it. We'll gather evidence and address it appropriately.

ALAN GREENBERG: It's clearly a use of WHOIS in determining who the current owner is, for which it was not intended. But whether it's actionable or not, it's a different issue.

STEPHAN: Good morning. My name is Stephan [inaudible]. I'm from German Registrar Internet [inaudible]. Thank you Maguy for your team. Thank you Maguy and your team for presenting. We saw some of the slides yesterday already in the registrar stakeholder group, and we talked about changes which should have been made to the presentation.

One of them is with the dates of the audit 2014/15, and I've seen these changes, and the other was a discussion on the requirements for legal enforcement. And I had understood yesterday, that there will be changes on the slide and I have not seen these changes on the slides, which have been presented.

Could you please point out where these changes have been made?

JENNIFER SCOTT: Thank you. Yes, that's slide 17. And I believe you're referring to the jurisdictional limitations that are imposed on law enforcement reports in section 3.18.2 of the 2013 RAA. And it's the second bullet here, which we did make a change to. And just to clarify, this issue that did come up in yesterday's registrar stakeholder session.

Under 3.18.2, reports from law enforcement entities may be limited to those that are designated as such by national or territorial government of the jurisdiction of which the registrar is established, or maintains a physical office. And such reports must be handled in accordance with the requirements of that session, including with, reviewed within 24 hours.

However, if a law enforcement entity is not designated as such by the local government, it may still submit reports of abuse under section

3.18.1, and registrars will need to handle those reports in accordance with that section, which includes taking reasonable and prompt steps to investigate and respond appropriately to those reports.

MAGUY SERAD: Stephan and to all the registrars that are represented here, I did send the updated slide deck to Jenifer, Stanford, and [McKaley], and they should be routed to you guys.

ALAN WOODS: It's Alan Woods from Right Side Registry. I have several questions, but I'll just ask one or two of the main ones, if that's okay today, and I'll hold off on the rest until at the registry meeting tomorrow. The first one is with regards to second and third notices, the informal notices.

What actually… I mean, whether there is a period of talk between, say, ICANN and the compliance departments, at what point does that turn into a second notice? Is there a factor? Is it purely a time factor that it turns into a second notice? Or is it for a non-response?

MAGUY SERAD: Thank you Alan. So we're going to that slide to share with you. On that slide, on the bottom, also there is a link to the published detailed process. So to answer this question, it is a combination, Alan. When compliance sends a notice or an inquiry, it asks specific questions, and it asks it to be responded to by a specific date.

If there is no response at all, let's take the simplest scenario. There is no response at all, by the end of that day, if there is nothing happening,

the next day, the compliance team will follow up per process and send a follow up which will be a second or a third, to inquiry or notice. It depends what's under way.

Now sometimes what we learn is, if anyone was at the registrar session yesterday, you heard me, my last sentence, please respond to compliance. I sound like Arnold Schwarzenegger, it's not a threat. But it's the better communications we have, the acknowledgement, the response, will keep all of us out of trouble.

So by the fact that you respond, the response can be a variety of things. You address the question and the issue, review it, we get back to you, we close it, we get back to the reporter, we inform them, we close it, and we ask both of you to take a customer satisfaction survey.

The response is halfway. Review it, if you have responded in less time than the date that it is required, within that timeframe, we follow up to that notice. If you respond at that last minute, we follow up with a second notice saying, your response was insufficient, and that's what we need from you still.

We always attach the previous communication so that you are aware. The titles… That's why if you are in doubt, I heard yesterday, in a hallway conversation, we're getting notices. We don't know if it's compliance or someone else. You should… Our notices sound, think, look, feel the same. All the senses possible. So they are very structured.

The title should tell you what phase you're in, what it's about, and who it is coming from. So that process is addressed in that fashion. Now,

the third scenario, you responded, we followed up with you and you say, "I need time to fix this." And we all know when there are new agreements, guys, common sense.

We all need drop out period, unless there is something that's been accounted for in the contract, to allow for that ramp up and implementation. But we do have technical issues that would need to be programmed, or addressed, or in agreement that needs to be modified. What we ask the contracted party to do, we don't tell you then we ask you, how are you going to take either the preventive action or the corrective actions to address it?

And one of the corrective actions may be a plan that needs to be implemented. I need to fix this system, to fix this thing, right? And you come back to us, I'll have it for you in six months from now. We come back and you say, "Why six months? What's the plan? We want milestones." Usually we don't want to go six months unless there is really an extremely situation.

Most of the cases, it's between a couple of weeks to a couple of months. And we ask each contracted party to give us that plan with clear milestones. We don't want to have to tap you on the shoulder every other week or something. Where are you? We put clear milestones that you suggest to us. We don't tell you what the plan is. It's your plan. It's your business.

But you commit to us to a plan, and dates, and measurable milestones. You report to us on those, and we have had amazing success with that. We have people that are in this audience and people with whom we

met yesterday, were perfect examples. They report to us. I have met this milestone, here's first proof, next milestone.

And at the closure they say, "We are full. Thank you very much." When that happens, during that whole period, any and all complaints that we receive on that subject, we put on hold, we inform the reporter, the registrar has been informed, or the registry has been informed and they're working on it.

We'll get back to you by the date you committed to us. So that's where that trust begins. You trust with ICANN, but trust with the outward facing community. So when you report to us you've completed, we get back to everyone. We open the flood gates. If there is any more complaints there, and we put it to the test.

And if it passes, we close it, we move on. If it's not, we follow up with you. So there are different scenarios. It is on a case by case. The cookie cutter here is the process, and the communication. We have to review each case, and understanding. That's why we put that third bullet, fact based decisions.

All contracted parties do not operate the same. It would be easier if they did, easier on everyone. Does that answer your question Alan?

ALAN WOODS: It does, thank you very much Maguy. The second one, I'll dip my toe into the new registry audit program, if possible. We've seen on those slides that you've provided to us, it's the same provisions that from the initial outreach session and everything, can I just ask, as a precursor, is every single one of those items going to be in the individual audit for

the per-TLD or is it the pre-registry as well? I suppose is the second question in there.

Just because we've seen them a few times now. It just seems that you're going specifically at those ones, and you said that today that you have handpicked these particularly high level items within the registry agreement. And are we looking at a full audit of all of them?

YAN AGRANONIK: Yeah. The answer is yes, we're going to be looking at each individual item. By item, you mean the article in the, yes. The only thing that I want to add to that, it does not necessarily mean that in R5, you're going to be asked for the documentation for each individual one. Because for some of these items, we can get the documentation, or files, or whatever, ourselves, because you're already providing it.

Also, if you see that we are asking for something related to the article, but you already provided it during, let's say, delegation, or registration, or onboarding. You can just say, it has been provided already, not applicable, you know, this is how it was provided, this was the date, that's it.

ALAN WOODS: Absolutely. I'll hold off on the rest of them, just more direct. Thank you.

JOHN [HORT]:   Hi. Thanks Maguy. Thanks to the rest of you. I'll introduce myself first and then I have three compliments and also three suggestions. My

name is John [Hort]. I'm the president of Legit Script. We work with a number of registrars around the world to monitor rouge Internet pharmacies, websites selling like Vicodin without a prescription, counterfeit drugs, that sort of thing.

And the first thing that I want to say is, you know, I think sometimes the registrar community unfairly gets a bad rap. I think there is a real success story here. Our observation has been that by and large, the vast majority of registrars want to do the right thing, do the right thing, and don't want illegal activity on their platform.

And I think that's a credit, in large part, to ICANN compliance as well as to the community as a whole. I think there is a few specific things that you have done that have really helped with that. I really, on our part, appreciate the guidance you provided. I think to registrars saying, "Look, you know, there is nothing in the RAA that would support the argument that you can't act without a court order."

So thank you for that consistent clarification. And I think also, the question of jurisdiction has been important. Obviously, bad actors on the Internet often want to pick a domain name registrar in a jurisdiction where they are not, so that they can avoid hopefully law enforcement.

And so I think your clarification to our registrars has also been very helpful and [inaudible] loss, so thank you. And then the third thing, is I've seen on many occasions, I think, your staff has really bent over backwards to be communicative to us. So thank you for that.

I also wanted to offer hopefully some constructive suggestions. And maybe they've already been considered unworkable. We, as you know

unfortunately, have had to submit a few complaints over the years. And I wonder if you might be able to consider some sort of a ticketing system.

So that for example, folks could create an account to see where that complaint is. I know that sometimes the complaint gets resolved maybe within a matter of days. I know that sometimes it can go on perhaps even months. And I know that during an informal process, it's designed so that the complaint is not going to necessarily understand everything that is going on.

But it might be helpful, nevertheless, just to be able to see that it's in progress. And I say that with the background there, because of the content of our complaints, sometimes we need to submit attachments that's not currently possible through the website. And a few cases, I think, maybe it got blocked by the spam filters.

So having some sort of a log in process with a ticketing process, would I think, perhaps be very helpful and maybe improve transparency a little bit. That's the first thing. The second thing, we've heard this from many of the registrars we work with. We know that there are many people who submit complaints to registrars and about registrars for the wrong reasons.

It could be anti-competitive. The abuse emails and [inaudible] records, I think, are getting spammed a lot unfortunately. And we see a wide variety, we even get them since we work on behalf of registrars, some complaints are very well founded. Some unfortunately are not. And I wonder if it might be possible through the process over the next year or

two, to provide some guidance to the larger community about what constitutes a valid complaint.

Not trying to stifle anybody's ability to bring up an issue to a registrar. But I think there is a big difference, including in the obligation to respond appropriately in the language of 3.18, versus a complaint on the one hand just says, "Hey, this domain name is being used for bad purposes and I find it objectionable."

Verses one that says, "Here is the applicable law. Here are the statutes that are being violated. Here is the screenshot evidence." In my mind, those two kinds of complaints are very different and give rise, I think, to sort of a different interpretation of what responding appropriately would be.

And that's my third point and probably the biggest one. Obviously that phrase, respond appropriately, in section 3.18.1, is somewhat vague. It's not defined anywhere else in the RAA. I suspect we're going to see a lot of discussion about that over the next few years.

I wanted to encourage you to consider whether there is some way to provide a little bit more transparency in the informal resolution process, and to briefly explain why we have seen many, many cases, for example, when a domain name registrar, when we have said, "Hey, this is rogue Internet pharmacy, selling fake drugs," whatever it might be.

Contacts the registrant, the registrant says, "No, I'm totally legal and here is my pharmacy license." Well, the pharmacy license is forged. It's falsified. But if the complainer doesn't have the opportunity then to sort of understand if the complaint is closed, by ICANN compliance, why

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that was, and to respond and say, "Wait a minute. The system was gamed here."

We need to be able to provide some more information. I would argue that in that case, the system didn't work perhaps as well it could have. So with that as background, I would like you to, I would suggest that you consider perhaps, adding some transparency, at least a little bit to the informal process, if possible.

And then I actually wanted to raise, and then finally I'll stop, a question. I know that a lot of law enforcement… We work with Interpol and a number of agencies around the world, has read 3.18.2 as being law enforcement from anywhere, and then as only the, to use the exact language, I guess I should pull it up.

The other similar authorities are the only things that need to be designated from time to time by the national or the territorial government of the jurisdiction where the registrar is located or maintains an office. What was the process for determining that law enforcement or consumer protection also had to be from within that jurisdiction?

Because it seems at best a little bit vague to me. Is that pretty clearly supported in the equivalent of the legislative history in the GNSO documents and so forth? Or is that still open to discussion?

MAGUY SERAD: Okay. Thank you John. No, no, no problem. I've noted them. I will address the first three and ask Jennifer to take the last one. So the first one was about a ticket system where you have access to the complaint

for status, for…   There is a bigger picture that is being put together, what we call an enterprise solution.

Not sure if you had an opportunity to be at a forum well [Ashwin], our CIO talked about it. Sorry. They are in the process of putting together a portal. Compliance will become part of that in due time. We're still in the planning stage.   And the objective is for, not just to push information but also to allow people to come in for information.

If you're the owner of a ticket, that's a long term vision, but we need to be on that platform, the current platform does not allow us to do that. And we want to make sure that we follow the enterprise solution. The second one about unfounded complaints, we will take that.

I will go back to the transcript, you shared a lot of ideas in there. I can't write as fast as you spoke. And then with that, I'm going to let Jennifer address that last one.

JENNIFER SCOTT: Thanks for your question. Unfortunately, I'm not familiar with the so-called legislative history of 3.18.2, but I do know the contract and its provisions was the culmination of community input, stakeholders, registrars, you know, public comments and what not. So I know the contract has to be broad enough to cover a range of different scenarios.

And I'm sure, you know, that's why it is written the way it is, and to address any confusion over the law enforcement jurisdiction.   You know, there is the back up of 3.18.1, which would still obligate registrars that have to investigate reports no matter where or who coming from.

They're just going to be handled slightly differently.

MAGUY SERAD: [Selene], can you please read us the question.

[SELENE]:   Thank you Maguy. So we have questions from our remote participants. The first question from Jim [inaudible]. He says, "Does compliance only act upon a complaint made by a third party, or do you act independently based upon seeing reports of possible contract violations in media, blogs, and [inaudible]? Example, some registries not responding to [C DAP] in a timely manner, or failing to make the zone file available [inaudible] report.

Is that enough for you to act? Or does someone need to file a complaint?"

VICTOR OPPENHEIMER: Thank you. Victor Oppenheimer for the record. Good question. The short answer is that compliance both generate notices or inquiries to contracted parties based on just the examples mentioned, social media, blogs, or our own system, monitoring systems, and as well as accepting, of course, complaints from external users.

And then regarding to the centralizing zone data service, we acknowledge that, as I mentioned before, that some registry operators are taking, or that were getting complaints about registry operators not responding on a timely fashion. When I started the compliance update, I said that we are bound by the contract, and unfortunately the contract

is silent on the time that regarding the timeliness of a response by a registry operator for a request of a zone file.

What we are advising or would like to encourage registry operators to do, is to be open and transparent, and establish a policy on, you know, timeliness and publish it, and please adhere to that policy. So at least the end user have a reasonable expectation of when that they are going to get replaced.

[SELENE]:   Thank you Victor. And the next question from Michael Flemming with Brights Consulting. He says, "I do not believe this has been addressed by ICANN yet, and it's still likely in the planning stages. But I would like to ask in regards to compliance, check for specification 13 for dot [brenz].

I briefly touch on this during Singapore, and I was told that ICANN is currently looking at the application process for specification 13. However, now we have a process, an application submitted. I've been told that ICANN a rough nine weeks, public comment period included, to check this. Does the compliance department deal in this review of the application?

If so, briefly, how does compliance check this and is there any hope of a shortened timeframe it takes to review the application? So in the future, how would compliance go about checking compliance with a specification 13? [Inaudible] of a shorter timeframe it takes to review an application. Also in the future, sorry. I mention it relates to the report that ICANN requires within the contents of this specification.

If not, would you please tell me who I may direct this question to? Thank you.

VICTOR OPPENHEIMER: Thank you Michael. Victor Oppenheimer again. [Selene], can you go to slide 40 please?   In the meantime, your first question is, does compliance department deal in the review of the, I guess, specification 13 application? And the answer is no. There is a clear demarcation or separation between what the GDD department does in terms of new gTLD applications, or requests for exemptions of the code of conduct, and these kind of requests.

Meaning requests to, you know, grant the specification 13. So no, compliance is not involved in that compliance check. What Maguy alluded to earlier is that compliance checks on new gTLD applications in the things that if you have a vertical integrator for example, vertically integrated applicants, then we would check on the affiliations of that applicant, both on the registrar side and if any TLDs have been delegated that are affiliated to that applicant, we will check on that.

But not for specification 13. And then if you look at slide 40, this relates to your question on how compliance would go about checking compliance with spec 13. So you can see the last item on slide 40, it's addressing your question. Specification 13, is part of the new TLD plan, and we, the objective is to confirm that only the registry operator, its affiliates, or trademark licenses register domain names and control the DNS records. Thank you.

MAGUY SERAD: Thank you. We can take one, I'm sorry. We have two questions, Alan Greenberg and then one more question before we close. In the meantime, [Selene] can you please…

ALAN GREENBERG: Thank you. Alan Greenberg speaking. Victor made a very interesting comment a moment ago and mentioned social media. The United States Center for Disease Control recently announced that they're now using social media particularly restaurant reviews on travel sites, to detect food poisoning outbreaks that were previously undetected and not recognized.

And I'm wondering to what extent, it would be interesting, perhaps not today, but to understand to what extent you actually monitor social media to try to understand some of the problems that are users are having that they put on Facebook or Twitter, but never get to put an ICANN report on.

MAGUY SERAD: We can look into that and follow up later. Thank you Alan. Next.

YASMINE: Thanks Maguy. Yasmine [inaudible] for the record from dot [inaudible] registry. I do have a question regarding the registry agreement audits. Now, we did submit feedback during the outreach segments that you conducted in May. Can you shed any light into what feedback exactly was incorporated into the final plan? I'm specifically interested in the

15 day response timeframe, because that was something a number of registries pointed out.

And yeah, the point really was that it's quite difficult to commit to a 15 day timeframe, a response timeframe, without having any clarity regarding the scope of the audit.

YAN AGRANONIK: We actually follow the procedure that, I mean you can see that, it's not actually 15 days, you get a first notice. You have 15 business days, which is technically almost three weeks of regular time, plus so if you don't respond by that time, you have another notice. Notice two, which will give you additional time. And then if you don't respond to that or respond with partial documentation, you have another notice which gives you additional time.

So technically speaking, you have three notices which would give you considerably more time than 15 business days. Even then, if you, let's say hypothetically, provide 75% of the information by the end of notice three, we're going to audit now. We go into audit phase. So we have another month of an audit.

So then we issue the audit report that says, "Hey, we reviewed your documentation.   We found the following deficiencies, initial deficiencies." So in the end the process starts again. You have another 15 days, another five business days, and another five business days to resolve it. So that should be reasonable.

So it's no way you have only 15 days. Does that answer the question?

YASMINE: Yes it does. And thank you. What else has been amended as per the
                                    feedback from the, in the final plan?   Because the initial plan was
                                    presented to the registries in May, and you saw our feedback. And you
                                    mention in the slides that the final plan is now being…

                                    That the plan is now being finalized in accordance with the feedback
                                    that was received. So can you shed any light as to what exactly has
                                    been amended please?

MAGUY SERAD: So because of the time restrictions, I committed to finishing on
                                    schedule. [Selene], go to slide 42 please. But what I want to point to
                                    Yasmine, I hope you can join us tomorrow at the registry session. But
                                    for the audience, out of fairness and transparency, to Yasmine's
                                    question. We received some feedback and some of it required clarity.

                                    And it was obvious we need to clarify our FAQ regarding the timeline,
                                    which Yan just spoke to. And there is a slide in here and it will also talk
                                    to it tomorrow, where there was a misunderstanding, and anticipation
                                    of only 15 versus the full cycle, and it was a process to get to a full audit.
                                    So we clarified that one.

                                    There was some clarification scope and some of the most important
                                    clarification, but mostly it was a request, was we had informed the
                                    registry operators that we were planning on initiating the new registry
                                    audit in early July. We were requested to please give us time because
                                    many of us would be at the ICANN meeting.

So that was something we said okay. We looked at the timeline. We took down from internal staff and KPMG's effort to review the audit. And we are able to give you that additional two weeks that was requested. So there will be a pre-audit notification going out early July to everyone saying, like Yan said earlier, the audit is coming, the audit is coming, it's just a heads up.

But then 15 days from there, an official request for information, audit notification will go out to the sampled or selected TLDs. So with that, I would like to, if you have any further questions, we'll take them tomorrow. I want to thank everyone around this room and on our conference, on Adobe line, who joined us. In front of you on the screen, we have put down ICANN compliance email address.

Please do not hesitate to send any questions you have for us there. And before I close, I already, one more question guys. He's been very collaborative.

RAY FACET: Well thank you Maguy. This is Ray Facet. Speaking from the registry operator's perspective, I want to give a little bit of experience of what we've actually been through ourselves with compliance. We've been a registry operator for TLD since 2005, but we just launched a new one that went into the root in April.

Second week of April. And I can tell you within the first three weeks of going into the root, we got a non-compliance notice with our registry agreement. At first, I was a little put out by it. We didn't even have a registration in the zone. But as I then begin to actually, you know,

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respond to it, and answer it, I discovered, darn it they were right. There was something here we needed to be doing, and they were pointing it out, and they were correct.

Since then, we've still, we just now launched in sunrise, still no registrations in the zone. Registrars are just getting onboard. And since then, we've gotten two or three other non-compliance notices on various issues. And each one is legitimate. There are things that we needed to be doing.

So, I've raised this because these are all minor little infractions, if you will. But on the one hand, you know, we're learning. At first, I've come 180 degrees. At first I was a little put out by it. Now, I have found it to actually being very helpful. I've got a lot going on in what we're doing. We've got a number of TLDs. We've got a lot of things going on.

Now I'm at a point where I feel, well if I miss something, Maguy's team is going to catch it for me. So I hate to, you know, lean on you that way, but I'm just trying to explain the 180 degree turnaround. I want to take a moment here as well, if Jonathon and Constance happen to be listening, they're the ones that actually send me these notices. And very professional folks. They've been very helpful to me.

I want to share this experience. And to the question of, you know, whether Maguy was going to be ready, Maguy's team was going to be ready at the time of TLD launching, from my experience, absolutely. They're catching the minor, littlest of things, but nonetheless, they're legitimate things and they have to be covered.

And so I wanted to get on the record here to the question that, was the team prepared at the time? If they're catching these little things, I certainly have confidence that the systems that were put in place by Maguy's time in time for the launch of the TLDs, and I compliment you on that.

MAGUY SERAD: Thank you Ray. That was a very pleasant surprise. We don't receive many of those. But I would to take Ray's thank you and send it to the amazing compliance team that I have the pleasure and honor to work with globally. Wherever you are, wherever you're listening, thank you very much.

But I also want to extend the same thank you to Mike [inaudible] and Christa's teams and everyone else within ICANN staff who supports us. Thank you everyone again for joining us. Have a great rest of week and see you soon.

[END OF TRANSCRIPTION]