
HYDERABAD – Registrant Address Validation
Sunday, November 06, 2016 – 17:00 to 18:15 IST
ICANN57 | Hyderabad, India

UNIDENTIFIED MALE: 06 November, 2016, 17:00 to 18:15, Registrant Address Validation.

JENNIFER GORE: ICANN staff will get started in one minute. Session technically starts in one more minute, so we'll just give everybody another minute but I'm cognizant of the fact that this is the last session of a very long day.

Thanks to everyone for participating. As I mentioned, I know it's the last session of a very long day so I will try to be cognizant of time but make sure that I address any questions that may come up.

I know that there's other sessions right now that are conflicting with this one where there will be quite a bit of registrar participation, so I have offered to host a series of webinars to cover the same materials and to have FAQs in most major time zones post-ICANN 57 when we all get back to our respective homes.

So with that being said, [I am] Howard Lee.

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.

UNIDENTIFIED MALE: Howard Lee's boss.

JENNIFER GORE: So Howard and I are going to put forth the presentation. I am going to speak to it and then, obviously, given the level of detail regarding the research and due diligence that's been taking place amongst the staff members, I'll be leaning on Howard to answer the questions.

Move forward.

So basically, we want to go over across-field validation that's outlined in the 2013 RAA that was signed between the contract party registrars as well as ICANN. We're going to discuss the definition and the proposed purpose of this initiative, talk about the Strawman Proposal at a very high level, discuss a little bit about the vendor selection criteria that staff has undertaken as well as technical submission examples.

Okay. How much closer can I get? Okay.

So the definition or the proposed purpose – sorry – [inaudible] tools to enable the registrar community to perform correctness, check and share greater accuracy of physical address information associated with the registered name holder.

The RAA contract is laid out there. I don't think I necessarily need to read through that, but I'll give everybody a second to refresh themselves with the language that's in the agreement today.

And the proposed benefit is by incorporating the address field accuracy validation tools, registrars and registrants will enhance the credibility of the data contents contained within the WHOIS space by leveraging what's considered a commercially viable tool, but that's not a defined term, that supports address validation hopefully with limited margin of error for name, countries, regions, territories. As a result, there'll be greater engagement with registrants given the feasibility and greater accuracy of the data, we're hoping.

Any questions related to that? Yep?

JEFF ECKHAUS:

Thanks. Can you go back to that slide a sec? I'm just curious on the proposed benefit. Whose language? I know the 2013 RAA, where that language came from, but who wrote the proposed benefit? Is that from the RA or is that an interpretation?

JENNIFER GORE:

That's not an interpretation of the RAA and that's not any contract associated with the RAA. That is a proposed benefit of a

tool set that could be commercially viable if implemented and agreed upon by the Working Group and ICANN staff.

JEFF ECKHAUS: Okay. Yeah, because I think that’s the first time I’ve seen that. I mean, I’m not in the Working Group. Maybe that’s been discussed in the Working Group. But just curious if that was agreed upon, if that’s the proposed benefit of it. Just was curious about how that came about.

JENNIFER GORE: Right. So a lot of the materials that you’re going to see here is what’s in the Strawman Proposal and I don’t believe a lot of those have been reviewed by the Working Group since we’ve just completed it. So you’re going to see some [new] language in there that’s not necessarily, it’s being presented or it’s proposed and you’ll see in the “Next Steps” slide, further in the presentation, that suggests the next steps as far as what should occur between the Working Group and ICANN staff around this initiative. But in no way, shape, or form is that section tied to the RAA.

Yeah. Sorry, Darcy.

DARCY SOUTHWELL: Could you maybe clarify a little bit of the history for everyone because I was on that Working Group and I can't remember the last time we met, but I guarantee you it's been at least a year, probably longer. So maybe give everyone a little update.

JENNIFER GORE: Certainly. So in this particular slide, it shows you the members of the Working Group and then the Wiki page in which this presentation and the Strawman Proposal will be published momentarily.

But to give you some background, there was, from what I understand – this is from my predecessor as well as other ICANN staff members that are not here in the room – there was an agreement between ICANN staff and the registrar [XCOM] in which the Working Group would be placed on hold for a period of one year given all the other initiatives that were taking place. And the year has passed and the community is asking for an update on this initiative that, obviously, is tied to the contract between both parties. So that brings us to present day and time.

Short answer is it's in the contract. Both parties signed it. ICANN staff has a responsibility. So do the registrars. That's not the popular answer though, I'm sure.

Any questions?

So as far as next steps, we'll be sending a Doodle poll out and reaching out, doing some engagement activities to bring awareness to this WHOIS Validation Working Group, seeing if anyone else would like to join it, seeing if those that are currently on it are able to continue on it. So we kindly ask for your participation and please let us know if you'd like to participate on it.

So given the Strawman Proposal, the timeline that's been put forth is just around determining if there is a solution that is considered commercially viable by both the Registrar Working Group and ICANN staff.

And if it is determined that there is a solution that is considered commercially viable, then we'll move forward with the other steps around public comments on applications regarding vendors and provide recruitment on the application review.

And as you can see, based on this timeline, it does not take into consideration the process as far as how registrars will implement the solution and by when. It's only specifically around determining if there is a viable solution, and if so, a vendor criteria to determine a selection.

Any questions related to this slide? I expected to get a lot of questions on this slide. No? All right.

You? Sorry, go ahead.

HOWARD LEE: Yeah. No, there aren't very many questions to this part, but of course, we're all curious to hear what is the next step in the reasoning. That's why the questions are not yet ready.

JENNIFER GORE: The reasoning behind the [straw poll] or the reason why we're having the conversation on this topic? Sorry, could you clarify? Could you clarify what you mean by reasoning?

HOWARD LEE: The thing is when you say we're doing something only to make sure we have a provider, if it is possible to have a provider, what would be the next step if it is actually possible, and you know, then there's a provider but would an obligation follow?

JENNIFER GORE: Right. Thank you. So it's a good segue into the next slide here that outlines the proposal of the summary. And again, the Strawman Proposal is purely a recommendation from ICANN staff to the Registrar Working Group that outlines a due diligence in the process that have taken place amongst staff over the course of the last year while the Working Group was not

active and bringing it up to speed on technical solutions that have changed over the course of the period of time from when it was previously looked at versus current time.

So the plan is for the registrars and ICANN to work together, within this formal group, to see if we can come up with a set of unique requirements and, under each jurisdiction, an applicable law to determine if there is a commercially viable solution.

As you can see here, both parties shall define a mutually agreed-upon ability to determine if there is a viable solution and based on this criteria between the Working Group and ICANN.

Any questions related to that before I go into the next steps if we determine if there's a viable solution? Come on.

DARCY SOUTHWELL: How is this different than what we did last time? What are we trying to accomplish with this Strawman that the Working Group didn't do last time?

JENNIFER GORE: That's a great question. That was prior to my joining ICANN, so I'd have to get to a clear communication on that. I'm not sure and I wasn't a member of that Working Group. If anybody from that Working Group can speak up, I'm not sure a Strawman

Proposal was presented by staff and the vendor criteria was selected and vendors were looked at, at that point in time. Howard, could you speak to that one?

HOWARD LEE:

I was one of the staff members who is on this project. Beginning before this Strawman Proposal, we actually have been holding a few Working Group sections and discussion on those criteria that selecting a vendor and also, trying to figure out if there's any country or territory that cannot be validated in a technically or commercially feasible way that, you know, we can kind of exclude them.

So those were the previous work we have done and some of that we have also, before me, and there was some work also be done by the staff that looking into those potential providers, and the Strawman Proposal is the first that we have that we have something more concrete to present to the Working Group.

DARCY SOUTHWELL:

Not exactly, because we did much of this before, so I think maybe I'm going to stop asking questions for a minute and let you finish because maybe it'll become a little bit more clear and we can come back to it. Thanks.

JENNIFER GORE:

So can you go back? Thanks.

So the intent is to work together with the Working Group and ICANN staff to determine if there is a viable solution. And I know that there's been an extended period of time where the Working Group and staff were not active on this and during that period of time, there has been some consolidation of vendors in the space as well as improvement on regions, territories and countries offering address validation services.

So I have a comparison chart towards the end that we'll walk through, but I know that there's been – we're well aware of the fact that there's been some changes in solutions that are available now that were not necessarily available at the time that the Working Group looked at it.

So if it is determined, ICANN shall propose a vendor application review process based on the established criteria that's mutually agreed upon by the Working Group and staff.

We propose that each registrar shall contract directly with the authorized provider or providers. We're not going to assume that one provider solves or best addresses the needs of each registrar. There might be, or there will potentially be an opportunity to have multiple providers per registrar.

And then the registrar will implement the authorized address validation service and ensure continued compliance with the data retention policy, as well as the WHOIS accuracy spec.

So along the lines of a proposed vendor criteria, as we examined and did due diligence on a select group of vendors, we formulated the address field accuracy validation criteria. This is a proposed criteria – this is not a defined criteria – based on the criteria that was previously used by the Working Group and staff and then looked at the new technologies that have been available since then to come up with what would be the most optimized criteria for vendor selection.

Again, this is just a high-level summary of what’s in the Strawman Proposal.

Any questions? [Tom]?

[TOM]:

Simple question. Do you have an idea of how many countries or territories are not covered by these providers? And I’m assuming if they’re not covered, you would exempt them from the requirement.

So the question is, are you planning to exempt countries from this requirement?

JENNIFER GORE: Yes, we have a list by vendor of countries that are covered. We also have a list by vendor of the margin of error within those countries. We would propose that we look at a commercially viable solution in those areas where the vendor has an acceptable criteria that's been mutually agreed upon by the Working Group and staff, meaning that not all countries and all addresses would be held to this requirement if there is not a viable, commercially reasonable solution to support those areas.

[TOM]: And you're proposing 18 cents [inaudible].

JENNIFER GORE: No, we were not necessarily proposing 18 cents but we're proposing something far less than that, less than, because that's what was originally in the former criteria of the Working Group when they went through this process.

[TOM]: So if you can't find a provider for a particular country at some threshold, call it 10 cents, they're exempt.

JENNIFER GORE: I think it's a little premature to answer that. I think the criteria has to be defined between the Working Group and staff. But I think the intent is to find something within an optimal range that would not deter from implementing a solution.

JEFF ECKHAUS: Thanks. So unless there's some additional vendor selection criteria on the next slide, I see one field that I think is important that's not on there which is sort of – I don't know the right way to put it – either like an SLA or an accuracy rate or something along those lines.

You know, just thinking about, let's say, on [.com] alone, 100+ million registrations, you know, we'd need to have at least something like – I don't know necessarily five nines – but something that's a 90% accuracy rate. Ten percent failure rate is 10 million registrations. That's a huge number. So is that in the criteria as a sort of failure rate or accuracy rate? Because I think that is critical for this versus, you know, the countries and some of the other, and the costs. I think that's probably one of my number one issues when looking at a vendor. Thanks.

HOWARD LEE: Thank you, Jeff. I think, actually, we also all thought of that and I think if we can have Jennifer to finish the slides first, we can

aggregate the questions, like, at the end and actually, you will have a much better overview of what the Strawman Proposal will be and some of those questions might have just been answered during the slides, during the presentation. Thank you.

JENNIFER GORE:

Jeff, that's duly noted and well aware of the importance of SLA.

Can we move forward?

So as we were looking at the sample of providers comparison – again, this is just a sample; this is not something that, at this point, we're recommending – but when we went back this past year and were doing some due diligence, this is based on our research given the previous criteria of the Working Group. That doesn't mean that that criteria isn't subject to change now that we will be moving forward on this review process. So there's a lot of information in this slide. I'll give everyone a second to review it.

[HEATH DIXON]:

If I'm reading the [Melissa] data proposal correctly, for applicable fees, that's \$500,000 set up plus variable fees.

JENNIFER GORE: Yep, from that particular provider, that’s the information that came back in their response.

I apologize for that, ICANN staff.

So again, this is just a comparison of the information that we received back when we were reaching out to providers to determine their solution. So I’m not saying that that is a fee that we would move forward with; I’m just presenting this information as the information which we gathered in return to our response.

[HEATH DIXON]: So is that \$500,000 that ICANN would pay for set up and then the registrars would pay the per fee, the variable fees?

JENNIFER GORE: I think we’re jumping ahead to the point of the Strawman. The point of the Strawman is to determine if there is something that’s commercially reasonable by both parties. And if there is, then we’d have to determine what that solution is and then based on that, there would be analysis of fees and then a determination of the source of paying for the services. But I don’t think we’re at a point where we can determine who was going to fund that.

Is that an answer to your question? Did I answer it?

[HEATH DIXON]:

Well, it sort of answers the question. I guess the follow-up question I was going to ask is that doesn't strike me as commercially reasonable, and so, to put that in the Strawman as an anchor for even a starting point of the discussion seems to me to, I think, be outrageous would be the way I would describe it.

JENNIFER GORE:

I'm, what [we're saying this] information is far from a transparency perspective, the information which we've gathered. I would hope that we would not look at this as an anchor or a starting point related to the fees. We're showing you the information in which we've collected, going through the process and the research and the due diligence to determine what are the options out there at this point in time.

Back to your point around commercially reasonable, I think, again, the Working Group and ICANN staff is going to have to determine what is commercially reasonable and we have, obviously, not reached that point.

[ALEX]: Another question. Just to understand the slide, [inaudible] on the first line, just so I understand correctly, they would validate an address for one cent; however, they would take more than 13 minutes to do so? Am I reading this correctly?

HOWARD LEE: No, actually. They were the fastest. It was like they can receive, so it means they can handle more than 800 queries per second.

[ALEX]: Okay. All right.

VIKRAM TIWATHIA: This is Vikram Tiwathia from COAI. That's a [telecom] association here in India.

So in India, we've got a thing called a unique database for all citizens. But that's because it's a government database. So with this validation of all these CNNIC, possibly the government, Chinese government outfit, what were the others? They're private or government?

JENNIFER GORE: We can provide you on the details of each of the vendors if you'd like and a profile on all of them. This is a roll-up of the vendors

that we looked at and the information that came out of them at a very high level summary.

VIKRAM TIWATHIA: All right. Thank you.

UNIDENTIFIED MALE: This seems to be all proposals whereby each validation has to be submitted, the data sent to a third party, and wait until that third party comes back and then apply and somehow react. Are there any options whereby that third party could simply provide templates that would help the registrar solve the problem itself rather than pay on a transactional basis?

JENNIFER GORE: So further in the slides, we show options as far as the technical implementation that have been presented to us. So we just want to share that information that we've received.

When you refer to a template, do you mean the format of the address per the region or the country or the territory as far as the standardized format that it needs to be received in, or do you refer to getting a collection of all their information and populating it into your system not knowing who the registrant is coming to you?

UNIDENTIFIED MALE: Indeed, the idea would be that rather than offering a service wherein a simple machine has to respond to everybody, let's say it has some data that it uses to do so, so that it could actually license the data, and the registrar might be in a better position to use that than to rely on the service and on its service level and so on.

JENNIFER GORE: So in the proposals that we received from these various vendors, they've offered multiple solutions. We can go through the specifics with you. At this point in time, what we were trying to do is just provide a high level of what was in the Strawman based on the information we've received on all of those RFPs. But given that specific question, we can take that away and come back with you on it.

DARCY SOUTHWELL: So I guess where maybe I'm getting a little off-track here is that this, to me, is far more than a Strawman. You're proposing providers to us. And having been on the Working Group and we interviewed providers, we had conferences with at least three or four – I can't remember exactly – but there's some information here that I find very confusing, especially for a Strawman but

even if it was supposed to be more than that. And maybe, I guess I'm not really understanding what your Strawman proposal is. Are we supposed to be talking about the value of these different providers and where we see conflicts or where we see conflicts linked to Jeff's point about what's missing from the criteria or what is commercially and technically feasible, or is this, we're trying to lay out a plan here?

JENNIFER GORE:

Thanks, Darcy, for the question. So there was two purposes of walking through some of these slides. One, to give you a high level overview of what's contained within the Strawman as far as what's the objective of the Strawman. And we can go back to the "Steps" slide that shows if the Working Group and ICANN staff believe that there is a commercially viable solution out there, what the next steps would be that have been proposed in the Strawman approach.

And then the second objective of the session was to actually just walk you through some of the data that we've collected over the period of the year, given the due diligence that we've taken within ICANN staff related to this requirement that's in the RAA.

We are not in a position where we are specifically stating technical solutions. We are just delivering to you the information

that we've received regarding proposed technical solutions in the next section.

So given the responses we received from the various vendors, there is a file submission process and a batch process in which registrars shall upload a file to [Informatica], for instance – not saying that they're a selected vendor, but in this case this is the material we received back from this particular vendor – to perform address validation services. And it just shows you a mock-up of the address submission, the service output, and the status codes that could come back, and another form of a file upload option with the master batch submission.

LINDSAY BANKS:

I just want to ask, okay, basically then, we're handing over data to a third party. Privacy, handing over customers' data, how are we going to look at handling that because, obviously – can you hear me correctly now?

UNIDENTIFIED MALE:

Yeah.

LINDSAY BANKS:

What about data privacy? That would be my concern because our customers don't know, and particularly, being in Europe, if

we were to pick, like a US company, that's going to cause massive problems under Data Protection Law.

JENNIFER GORE:

So at the beginning of the presentation, again, I feel like we're jumping the gun a little bit on this. So at the beginning of the presentation, we had mentioned there would be multiple vendors given the requirements of each individual registrar. We're not in a position to assume or define what those requirements are of the registrars. That would come from the registrars as well as, obviously, the Working Group. Knowing that privacy is an area of sensitivity for most registrars and in certain regions, you have to apply certain laws. Correct. That would not necessarily apply in other regions.

So we've indentified that as one of the elements that needs to be discussed, but at this point in time, it is just that: an element for discussion.

[HEATH DIXON]:

I think the reason that it feels like we are jumping the gun, as because it feels to you, is it feels like ICANN staff has jumped the gun. As I understood the timeline that was originally presented, the first step is to define the criteria of what we're going to use to determine if something is technically and commercially

feasible. And so questions like data privacy are part of the technically feasible. Questions about the price that we're asking are about the commercially feasible. And so to be putting on the screen not only the proposals that you've received from the vendors that you've already spoken with, but also the actual details of these proposals before the Working Group has even gone through the process of establishing the criteria, which you had defined as a first step, that's why it feels like you all have jumped the gun and why our comments and our questions feel to you like we're jumping it. We're not jumping the gun; we're just reacting to what you provided.

So I guess the concern that I have is that, as Darcy was saying, this isn't a Strawman. This looks like what we would be expecting to see after the process had been completed. And so the cart seems to be way before the horse here. So that, I think, is the concern that you maybe are hearing, is that right now, you guys have jumped ahead of the policymaking process and have kind of delivered the end result.

JENNIFER GORE:

Thanks, Heath, for that comment. Again, I just want to reiterate there's a fine line between being transparent and sharing the information from you as far as what staff has done to prepare to reignite or reengage with the Working Group – correct? – and to

be in a position where we're prepared to be able to engage from an intelligent perspective with the Working Group.

When the Working Group took a period of time for a pause, there was some concerns around whether or not there was a commercially viable solution. And over the period of time, with the change in technologies and solutions that are available, what we're just showing on these slides is just that, that there has been a change. That doesn't... We're not certainly suggesting or imposing that ICANN staff has defined or assumed that the solution would be implemented. We are just trying to educate you and be transparent on the information which we've collected regarding service options.

UNIDENTIFIED MALE:

I must say I find there is value in looking at these examples even if it's just to actually identify things that we would have to dismiss because we have illustrations of what could be done and the avenues where we might say, "Okay, maybe something that is not being offered is actually possible as we can possibly [inaudible] from these examples."

Of course, we're going to find many things, many no-gos in there, but let's say unless we look at an array of things that are available, we're not going to find a good solution. So I think it's

probably a good idea to look at these and then thing a little bit, maybe come up with a response a little bit later.

JENNIFER GORE: Absolutely. And again, we put in proposed dates within the Strawman for a period of review and reengagement within the Working Group to review the Strawman as well and then have reached a period of time in which we can define and possibly reach an agreement if there is a commercially reasonable solution or solutions available and acceptable to both parties.

DARCY SOUTHWELL: So you've said a few times that things have changed since the Working Group looked at this. Can you maybe highlight at least the top couple of what's changed with the vendors that we looked at before versus today?

JENNIFER GORE: Absolutely. Sure.

TOM IACOBUCCI: Darcy, we went back and looked at all of the vendors you looked at for the Working Group originally back when this process started in 2013-2014. Since then, in particular, Informatica acquired Strike Iron which is one of the individual vendors you

had looked at as a possible solution, so made that change. That was a change in the industry.

In addition to that, the S-42 and some of the other postal requirements – I can pull them up and give them to you afterwards – but have then been implemented and adopted throughout Europe and other areas, so there continues to be changes in the regions [for] their postal standards. So those are some of the things that continue to go forward towards postal standardization. So those are some of the things we have identified and kept tabs on as what’s going on in the world out there.

DARCY SOUTHWELL:

So on the Working Group, one of our big concerns were certain areas which we often like to refer to in this community as under-served regions. And I don’t know, maybe those standards have been implemented in those places but there were a lot of them and most of the larger registrars and even smaller registrars service those areas. And that was a huge challenge for us. And I think it also presents a huge challenge for ICANN because we’re trying to improve the access and availability within those under-served communities.

And if we can’t do that, we’re actually creating a barrier to registrations in addition to providing a really complicated

process. And so, it will be interested to see – and I’m sure, I’m assuming, I guess, the Working Group is going to resume here shortly to look at what those changes are and how those under-served regions have maybe been improved.

TOM IACOBUCCI:

Yes, Darcy, and we will provide that with the Working Group once the process is going in and giving you more information as to which countries that have changes, what have gone on, things like that. Again, it is an evolving process.

And just to that note, for instance, some of the companies, they do as many as 200, sorry, as many as 600 updates a year to their systems by going out to all of those regions and getting those authoritative postal databases from those various regions and bringing them into these companies. So it is a perpetual, evolving process and we understand that.

JENNIFER GORE:

Just ping me if there’s any other questions. There’s a lot of people in the room, so I’m trying to make sure we get everyone.

Can we proceed to the next slide?

So this is just another example of file submission. Again, this is just purely representative on the due diligence that we have

taken to understand how the market and the service providers have changed since we originally looked at them. This is an example of essentially iterative or real-time submission with an invalid response that provides an alternative correction option.

Tom?

THOMAS BARRETT:

Hi, Jennifer. So I have two questions. This might be a good screen for it.

So first question is, do you allow your customer the opportunity to reject the correction and say, “I’m right; stick with what I gave you”? Do you envision that as valid under the policy?

JENNIFER GORE:

Again, the Working Group and ICANN staff will have to reach an agreement on it. We envision to provide an optimal solution or set of solutions based on the registrar or all registrar requirements.

But I see it, if I could take a moment and align it to WHOIS accuracy today and the policy, registrars provide the registrant the opportunity to come back with supporting data that says that this information is actually accurate when a compliance request goes out. And I would foresee we possibly would

consider that as an option amongst the Working Group and ICANN staff as a potential proposed solution.

So I'm not saying that we wouldn't allow the registrant to come back and say, "Yes, it's actually really St and not the word 'street' spelled out." But again –

THOMAS BARRETT:

I actually have the opposite problem, personally. I live on Red Gate Lane, and a lot of websites change that to Ln which is, according to them the proper format. It's not, obviously, how my street is spelled. So I don't want to be Red Gate Ln. And certainly, mail reaches me just fine.

But my second question is if we do automatically change the information, is there any sense of whether or not we should tell our customer that we changed their address? Do we have to notify them in any way?

JENNIFER GORE:

So within the Strawman Proposal, we have outlined options for communication to the registrant for review and we encourage and look forward to feedback on that information. But again, that's a question that I believe we're getting a little ahead of ourselves on it. But I foresee us having ongoing conversations within the Working Group and ICANN staff related to all of these

conversations and reviewing all of these scenarios to figure out what's the most optimal solution for the registrars and ICANN staff.

So I'm not saying that we're not building a perimeter as far as what's acceptable and what's not acceptable. We are positioning the material here as far as what's available. And then the next step would be engagement with the Working Group and the community, obviously, as a whole too. Or not community as a whole because this is a contract between the registrars and ICANN, but with the registrars go further define each of those scenarios.

HOWARD LEE:

Just on Jennifer's note, just some background information that, from our research. Some of the providers we've been looking at, they provide a different level of services, like some will do address validation, some will do address correction and they can give the suggestions like what [Werner] was asking for. And some actually support the [wide-listing] feature that, you know, the user identified that's a valid address they can add to their database, which is like Tom just say, they actually supports the revolving of the updating of their database. So that's just some background information for you. Yeah.

JODY KOLKER: What I'm curious about is when we have an incorrect address, are we suspending the domain like we would for an e-mail and a phone number? I mean, what's... You're looking at me and laughing.

JENNIFER GORE: So these are all great scenarios that are being presented. However, I feel like a broken record. I believe that this is the purpose of the Working Group to move forward to determine what would be the outcome if the address is incorrect and what actions do need to be taken. I understand that you're referring to the WHOIS accuracy and the ten-day, or I'm sorry, the 15-day period for suspension. That could be a possible option. But again, that's not being considered until the Working Group and ICANN staff determines if there is a commercially reasonable solution and then identifies each one of those scenarios based upon the outcome of the address submission and potential correction material received.

JODY KOLKER: So if I'm hearing you right, first we have to determine if it's commercially feasible, right? If we can't get over that hump, then this kind of all goes away. Is that right? I'm just being honest.

JENNIFER GORE: So, Jody, the next step we want to take in the process is engagement with the Working Group to determine together if there is a commercially reasonable solution. If there is not, then I think all of the scenarios that we're talking about today may not be an issue. But the intent is that we work with the Working Group to determine if there is a commercially reasonable solution. That doesn't mean that the same rules will be applied in areas where there's not a commercially reasonable solution. So the intent is that we work together to determine if there is a commercially reasonable solution. But there may not be a commercially reasonable solution in every part of the world.

[HEATH DIXON]: I arrived a few minutes late so you may have already answered this question, but when will we receive the Strawman and is it going to be provided to the community or only to the Working Group?

JENNIFER GORE: So the Strawman Proposal will be provided to the Working Group, and it has been posted to the meeting as well as the Wiki page.

HOWARD LEE: It's on the ICANN Wiki page.

JENNIFER GORE: Okay. I could give you that. It's in the presentation but I can also e-mail it to the Working Group, as well as to the Registrar Stakeholder Group through Graham.

DARCY SOUTHWELL: Can you post that in the Adobe room right now?

UNIDENTIFIED MALE: Yeah, give me just a second. Jennifer, we do have two remote questions. They're from the same individual, [Grayman], and they basically ask, I think, you know, you may have already covered these, I think, but let me dip on them further, expand upon them further, excuse me. [Grayman] asked, "Who is expected to pay for this?" and the second question is, "If a registrar is working in multiple countries, will they be expected to engage with multiple providers?"

JENNIFER GORE: Appreciate the set of two questions. To address the first question regarding operating expenses and source of funds, that would be determined, again, between the engagement of ICANN staff and the Working Group.

And to answer the second question, we have to formulate the criteria and the requirements for registrars, also taking into consideration registrars that operate multiple countries. And foreseeing that one vendor would not be feasible for all, we would recommend to the Working Group the opportunity to explore all possible vendors based upon a criteria selection.

So we had quite a bit of questions. This is the Q&A session. Please feel free to, Jeff?

JEFF ECKHAUS:

Thanks. So when I had brought up the part about a failure rate or, you know, accuracy rate, I was told wait until the end of the slides, then it will be brought up. And I haven't seen that so I wanted to make sure that that point is sort of noted that when looking at criteria of vendors, that either, as I said, either the failure rate, SLA, whatever that is, that that is one of the criteria that's looked at because, to me, that's one of the most important parts of being commercially reasonable. So it still wasn't on that list so I want to make sure that that is added, as I may not be in the Working Group, so just to note that now for members who may be. Thanks.

JENNIFER GORE:

Absolutely, Jeff. We've noted that.

UNIDENTIFIED MALE: I have a particular worry about the situation of resellers and resellers of resellers and resellers of resellers of resellers who actually count for a big part of the market. Now, say, if this is handled indirectly, they will somehow have to be informed that, you know, on the tier above them, which again, have the tier above them, something has happened to the address somehow, you know, not acceptable. So it might be very difficult for their situation.

And the second worry, which actually compounds the first, is that we might have a great number of false negatives, you know, addresses that actually objected against by the system that actually fully correct and the system comes back with the wrong correction. And this might be unevenly distributed so that some registrars, some resellers, disproportionately have a burden of dealing with this because of certain language, because of a certain... So we need to think of how we would handle that kind of problem. [If you] make a test and it works fine in one country, it might not with the other.

JENNIFER GORE: Thank you for that question. I think all of those scenarios are realistic and as we are engaged with the Working Group, we need to consider each one of those challenges and determine

how we would address it if both parties determine that there are commercially reasonable solutions out there in the market.

UNIDENTIFIED MALE: Sorry, I came to another thing that I forgot to ask. In the case of the Trademark Clearinghouse, we have a service. And actually, that service was associated with some kind of proof of having checked. There was a number. You know, there was an exchange between the systems. Is this contemplated in this fashion, that any address would somehow to have an internally and number that proves that this has been checked? There is a kind of, we can know that this is a validated address or not.

JENNIFER GORE: I feel like a broken record. Once the criteria is mutually agreed upon, if there is a commercially reasonable solution, the implementation around that solution would be agreed upon, and I would suppose that that would be looked at as an option. Not stating here that it will, but it more than likely will come up amongst the Working Group and ICANN staff as a representation of checking with a third party to validate information today.

So can you just recall the time period for the review of the Strawman Proposal for me?

TOM IACOBUCCI: Yes. The proposal is on the 14th of November, we would provide the Strawman to the Working Group and they would review it through until December. I'm sorry. We start on the 17th of November. We would make it available and they would review it until the 17th of December.

JENNIFER GORE: So essentially, the Strawman Proposal is available now. So that review period will go through the 17th. And we will be offering up opportunities to host a Q&A session for those interested in that Strawman, I'm sorry, the specific registrars interested in the Strawman Proposal and be sending out a Doodle poll post that period to the Working Group to reengage with them. Are there any other questions?

[HEATH DIXON]: So I'm sorry, I don't understand the timeline. So the Strawman is being provided. And then by December 17th, the Working Group needs to complete its... Help me understand what are the next steps.

JENNIFER GORE: So from the period of November 17th to December 17th is the review period of the Strawman. And post-December 17th, a Doodle poll will be sent out to the Working Group to determine

the best time to meet and reengage with the Working Group and ICANN staff. So the review period, November 17th to December 17th of the Strawman Proposal, we offer up the opportunity to review that proposal with any registrars, including Working Group members, and then reengagement with the Working Group on a regular set of meeting basis will occur post the review.

If you'd like to modify that, we can do that. If you just don't want to start meeting right away, we can do that too. Just please feel free to provide me, or provide us staff, with feedback.

DARCY SOUTHWELL:

I don't know if it looks like it, but I feel like the look on your face, Heath. So I think what you're essentially saying is you're going to send this out to the Working Group to give them time to review and prepare before meetings start. Is that what you're trying to say?

JENNIFER GORE:

Yeah. We wanted to provide the Working Group and the registrars an opportunity to review the proposal before we reengage with the Working Group. That is correct.

If the Working Group would prefer to reengage sooner than that, we can modify our schedule for that as well. So all feedback is welcome. Please.

VIKRAM TIWATHIA:

So forgive me for my ignorance, because this is my first ICANN meeting, but WHOIS, at least for us as Indian [telcos] and ISP providers is a big regulatory compliance requirement. And one of the good things is that the government is now mandated. You could get a new SIM with a fingerprint and the database populated online from the, it's called the [inaudible] number, unique identity. So that does both POI – that's proof of identity – as well as proof of address.

So here I notice is only proof of address, or does it also include proof of identity?

JENNIFER GORE:

First of all, welcome to ICANN and the conference, and we appreciate you participating in the session.

This particular initiative is directly tied to the contract between the registrars and ICANN staff. So there is specific language in there around address validation and it says there's an example in the WHOIS specification that outlines, is this street in this town, is this town in this city, is this city in this state, is this state

in that country or territory? So there's a specific example of that. Obviously, it's different outside of, for instance, North America. But that's a part of the initiative of the Working Group and ICANN staff to work through each one of those scenarios to determine what's feasible.

VIKRAM TIWATHIA:

So the reason why I asked this is because I don't know if there's an input from the GAC to this group, because at least from the Indian government, I know that we get a lot of pushback on indentifying and validating the WHOIS and there are already discussions out there. So if this review proposal is going to address that, we will be really happy. But if that leaves it open, then again, from the Indian government, at least, there would be some concerns they'll raise as to what is, you know, how this validation is being done.

JENNIFER GORE:

Thank you for that question. This contract is specifically between ICANN and the registrars and it's been executed. So there are other initiatives going on around WHOIS in which the GAC does have a tremendous amount of participation and input. This particular initiative is between ICANN and the registrars.

UNIDENTIFIED MALE: Just to be sure that I understand correctly the terminology, actually, with respect to the question that's in the Indian context, when we say, "address validation," we only mean that the address is a viable address. We don't mean that any particular person is available there or resides there or anything.

And we don't prove anything beyond the fact that this is an address. Maybe this goes by degrees. It could be a [inaudible] place to have a hut or a tent, but so this would actually be, in some cases, a thing to judge in certain contexts, whether this is a viable address or not.

But on the other hand, it doesn't mean that it is accurate. You could say to somebody who just selected an address, fine, it looks actually like a good address. And indeed, what I've seen in the past [inaudible] phishing or really bad behavior. They had perfect addresses, absolutely perfect addresses. So, I mean, you certainly couldn't complain about the address being credible to the extreme.

So the question is also [inaudible] do the whole thing, are we actually making a step forward or are we just helping the bad guys hide themselves better between perfectly credible addresses?

JENNIFER GORE: When you referred to doing the whole thing, can you elaborate on that? Do you mean the hearing to the language that's currently in your agreement?

UNIDENTIFIED MALE: Well, if there are specific reference to cases. You know, I was looking in a given TLD and new TLD phone, you know, quite a bit of bad, bad domains, fraudulent in many ways, fake pharmacies and that kind of things.

And then the registrant had an address which is absolutely credible. The place existed. The postal code existed. The house number existed. Then there was a name there. Of course, I don't think that was the name of a person. Nobody would want to be associated with fake pharmacies. But let's say, as far as the address was concerned, there was certainly no clue that anything be wrong.

So if, actually, the registrar already helps filter out all the mistakes a bad guy might make, you know, in putting a credible address there, which of course, is fake but it is credible, then actually, you might help the bad guys rather than prevent their bad action.

JENNIFER GORE: And I'm not sure that you had a follow-up question or perhaps, I addressed it.

The example which I provided was the exact sample that is in the language. How the process will occur, if it is determined that we do move forward together between the Working Group and ICANN staff, I think your scenario that you provided is relevant and we will address it. We've taken note of it and we will discuss it amongst the Working Group and ICANN staff. So I'm just acknowledging what you're saying. Darcy? Sorry. Thanks.

UNIDENTIFIED MALE: I just have a question. We are talking about Working Group, Working Group, Working Group. I just want to get a clarification here. Are we talking about the Registrar WHOIS Validation Working Group from 2013?

JENNIFER GORE: So we are specifically talking about the Working Group associated to this initiative and we are welcoming new participants, volunteers from the registrar group and all registrars, obviously, all registrars that are contracted with ICANN.

THOMAS BARRETT: Hi. So can you explain a little bit about how you envision this unfolding? For example, do you envision someone coming up with a test set of data representing addresses for every known country and then presenting that to a vendor and seeing what the results look like when they come back? Or have you already done this? Has this been done yet? Have you tested some vendors already?

JENNIFER GORE: Tom, we have not taken any additional steps outside of collected information from vendors as far as what services are in the marketplace today. And we did not intend to proceed with those next steps. We do have a framework, as far as items that we'd like to cover with the Working Group or propose to cover for the Working Group, and within that framework, we have that listed.

It's not a formal framework. We'll be happy to formalize it and provide it. The plan was to provide a proposed framework when the Working Group reengages. So we have not performed any testing. I think all testing scenarios... Well, I'm sorry. We, as part of the Working Group and ICANN staff, should put forward a proposal of testing scenarios as part of the initiative in the review process.

HOWARD LEE: Just on Jennifer's note, just some background information. During our research that for the providers, when they're validating their address, they usually coming into, by the feedback, coming into two forms. One is majorly numeric-based like a score, like 80, or 60 or 90, a score. And some, you come back with a code. Like there's two [carrier] codes like telling you whether it's good or bad, or if it's bad, then where it's bad. Like say the zip code and city doesn't match, then they have a specific code that can identify that. So just some background information.

JENNIFER GORE: Howard, thanks for the additional information, but just to clarify, the due diligence and the research stopped at the collection of tools that are available in the market.

Any other questions? You can sign up with me or you can go to the Wiki page or we have an e-mail address that I will make sure gets sent to the Registrar Stakeholder Group to sign up to participate.

Thanks, everyone. You can stop the recording.

[END OF TRANSCRIPTION]