

COPENHAGEN – GNSO Joint Meeting Registrar Stakeholder Group (RrSG) & Non Commercial Stakeholder Group (NCSG)

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GRAEME BUNTON:

Good morning, everybody. Welcome. Looks like we've got a bit of a quorum now. Thank you everybody for joining us this morning. I'm not sure if this is our meeting or the NCSG's meeting, to be honest. It's ours? Oh, great. Hey, we asked for it. So thank you guys for coming and joining us this morning.

I feel like this is a nice, friendly, gentle way to ease ourselves into a new ICANN meeting. It's not outrageously early. Yes, Michele is already objecting. So we've got a few things on our agenda to talk about, but before that, I think it's always nice to see our colleagues in the NCSG, NCUC and NPOC and chat and make sure that the lines of communication are open.

I think in general, our goals are usually pretty aligned, so it's nice to be able to do this and figure out where we're maybe not aligned and need to talk a bit more but share some ideas and move forward. So I don't think we need to do a room introduction because that's probably not super useful this morning, but maybe we're going to kick it off right up with some

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conversation about the healthy domains from the DNA. Is that right?

TAPANI TARVAINEN: Yes, [inaudible] asked Ed Morris to present that, and he's got to leave halfway the meeting, so let's start with that.

EDWARD MORRIS: So we'll get started. First, thank you for the invitation, Graeme. On council, our two groups work closely together. I would say you're our best friends – if groups had best friends – so it is wonderful to start the meeting amongst friends. There are differences though, and the Healthy Domains Initiative has created concern on the part of lots of folks, including those of us in the Noncommercial Stakeholder Group.

We're concerned that despite stating that civil society was included in some of the proposals that have come out that nobody's reached out to us that we know of and that bucking this downstream, starting to create a copyright UDRP downstream for private individual agreements is a real threat to the ICANN multi-stakeholder model.

If all we're going to be doing at ICANN is setting the floor, I'm not sure there are a lot of us who are going to be here anymore. And

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I'm trying to phrase this not to be an attack but more of a conversation so we can understand better where this is coming from, how it relates to your stakeholder group, and how we can try to work together going forward to alleviate our concerns while allowing you guys to do what you feel you need to do.

GRAEME BUNTON:

Thanks, Ed. Sorry, one sec. There might be a technical hiccup. It sounds like the transcript is not working. Do we have a timeline on how long that might take? Like are we pausing for two minutes or would we have to pause for ten? So we're going to – I saw Michele in the queue. Michele, I haven't forgotten about you. There is room at the table if people at the back want to join us. Ed, if you don't mind, I'm going to get you to recap that again in a couple minutes because probably the transcript is useful.

UNIDENTIFIED MALE:

[inaudible]

GRAEME BUNTON:

Yes. Thank you. So hold on, everyone. We need to get the transcript going. It is the first meeting probably for most of us at this meeting, including staff, so give us three and we'll come back at it.

UNIDENTIFIED FEMALE: Audio test. Are you able to hear us?

GRAEME BUNTON: Sounds like it might be another minute or two. Stephanie, turn off the speaker on your computer. They're still suffering a bit in getting the transcript going, so we're going to give them another minute or two. And if we – we might just plow on ahead. Thank you, Stephanie. We might just carry on.

UNIDENTIFIED FEMALE: [inaudible]

GRAEME BUNTON: Hi, everyone. Sorry, they're still suffering technical difficulties back there on the transcript. This is Graeme for the transcript that doesn't exist, and for everyone who doesn't know me, I'm the Chair of the Registrar Stakeholder Group. Just so you're in the habit, it's a good idea to say your name before you speak, for the transcript, whether it exists or not.

Maybe what we'll do is get Ed to recap what he was just saying about the HDI again, and then I have Michele in the queue, and

then we'll get started and hopefully at some point in here the transcript will kick back in.

EDWARD MORRIS:

Thanks, Graeme. To start with, what I was saying earlier, it is great to be here. We are amongst friends. I personally on council and in other areas consider your group to be the ones we're most closely affiliated with. I've said this publicly at the Noncommercial Party House Intersessional and the other side didn't like that very much. But on most issues, we are aligned.

On the drafting [need] for example for the future of the GNSO, Darcy has been an incredible advocate for common positions we do have. And that's why when the Healthy Domains Initiative, the recent HDI, came up there was concern within our community. We're concerned basically in twofold.

One is the copyright UDRP, the fact that although it said it was developed in a multi-stakeholder manner with participation of civil society, we haven't been able to find civil society groups that were involved at the start. Certainly, we weren't. We were concerned about that. We were concerned about the inhibitions on free speech that this may have by putting this downstream.

And my personal concern is that if we are making these agreements downstream, that we are endangering the entire

ecosystem by which we work here in ICANN. If we're just going to be setting floors here in ICANN, then I'm not sure we're going to have a lot of folks here willing to work on a volunteer basis in the multi-stakeholder model. Because if all you're doing is setting floors that can go beyond downstream, why give your time when in reality what you're doing here has very little value?

So that's the question. And again, I'm trying to phrase it in a very not – there's been a lot of hyperbole about this initiative. I'm trying to phrase it in a way that is not hyperbolic but rather can start a conversation. Thanks.

GRAEME BUNTON:

Thanks, Ed. Not all of us have been involved in HDI. I think it's probably a rather small subset of registrars in general. I think it's probably pretty narrow. Michele, you have some experience there and I saw your hand in the queue, so maybe we'll throw it to you please.

MICHELE NEYLON:

Yes, thanks. The HTI has got absolutely nothing to do with us as a stakeholder group. It is not an ICANN thing, it is not a Registrar Stakeholder Group thing. So really, while – look, we can talk about what issues people may have with various proposals in a

document, but we didn't do it. We didn't generate it. This group of people around the table did not produce that document.

EDWARD MORRIS:

I think what might be confusing some of us or on our side is at the last meeting in India, we noticed the DNA was getting room assignments through you guys.

MICHELE NEYLON:

Okay, the DNA is not the Registrar Stakeholder Group. My company is not a member of the DNA and has no intention of joining the DNA. Most of the registrars sitting at this table are not members of the DNA.

Now, as Graeme said, some of us have been kind of looped into some of the discussions around this, but it's not our baby, if you wish. So while I may have had input into some aspects of some of the discussions around HDI going back like a year ago, I haven't had much to do with those in months and apart from reading the odd email, I don't think I've even replied to ones apart from going, "Huh?" or "Really?" I haven't had much to do with it.

So the thing is if you want to talk about discussions and documents and things that you've heard about whatever, that's

fine, but you need to frame that in the terms that you're aware that we as a group didn't produce that. Now, if you want to have a problem with stuff that we have produced, that's fine. We can talk about that.

But I prefer if you spent the time here talking about stuff that we are directly involved with, if that helps.

EDWARD MORRIS:

That's already very helpful, Michele, because when you read certain things that are online and people's reaction to it, they are attributing it to – Phil Corwin for example in ICA is actually attributing it to the larger group of registrars. So that statement alone is very helpful, so thank you.

GRAEME BUNTON:

I saw Stephanie had a question.

STEPHANIE PERRIN:

Yes, thank you. Does your group share or have – I won't say share our concerns because I think probably we're a lot more excited about it than possibly you folks are. From a policy perspective, it's yet another instance where policy may be set by best practice that is developed by a certain number of folks and then imported to ICANN.



You will recall there was an issue I guess it was about a year ago when ICANN Compliance started taking an agreed best practice in one registry agreement and said to the other guys, "This is best practice, why don't you put it in your registry agreements?" And of course, that never went through a policy development process.

So it may be best practice for some stakeholders, but it may not necessarily reflect the concerns of our particular stakeholder group. Now when the group that has come up with this says they consulted civil society, they may very well have consulted civil society, just not the ones who show up at ICANN and are forming part of our stakeholder group and participate in the PDPs. I think that's what we're really talking about.

There may be a civil society organization out there that said, "Oh, this sounds like a great idea," totally innocent of all the arcane details that are involved here. Thanks.

GRAEME BUNTON:

Thanks, Stephanie. Right, so some good points so far. A, that's not a Registrar Stakeholder Group initiative, although there are a subset of registrars involved. What Stephanie just mentioned is important to us too because there's a piece of our contract that if we agree to a – I forget what the actual language is, it's not a

best practice but it's like a code of conduct or something – then it becomes binding.

And so we have been working on our own abuse reporting framework which we need to talk about internally some more, but we're careful about how we pitch that and present that because we don't want to have it become binding on everyone accidentally and then it's policy, and that's not what we're trying to achieve with that goal anyway.

Do other people have thoughts on DNA or HDI, or should we actually now that we've sort of figured out that maybe this isn't the right venue for some more of that conversation, then we'll park that and move on to other stuff? Cool. Great. Okay, thanks, guys.

Next up on our agenda, I think we go back top. Let me see if I can find that. Oh, it's in the room. I could be looking there too. Oh, yes. Overview of RSG, members, internal structure, how do we do internal governance and outreach, etc., is on our agenda. Maybe that is useful.

EDWARD MORRIS:

I can tell you why we're asking the question. Again, ICANN's a wonderful organization and they've created in our structure the NCPH. So we have spent four of the last five years holed up in a

hotel somewhere with the Commercial Stakeholder Group. So as a result of that, we understand in the NCSG how each one of their constituencies work, how their governance model works or doesn't work, but we really had no idea what's going on in the other side of the house.

So I thought it would be useful for us at least to understand how you function, what your membership numbers are like, even how you do outreach or do you do outreach because we're in such different environments in terms of membership potential and possibilities, but also how you govern yourselves.

For example, when there was an opening on council, all of a sudden Darcy showed up, and that's been wonderful. But how did she get there? What is the process of you electing officials? And I thought we were somewhat interested in that, just so we understand how you function a little bit better than we do because we have complete understanding now of the CSG but we don't really know how you guys work, and we thought that might be something we should know. Thanks.

GRAEME BUNTON:

Sure. Thanks, Ed. I'll see if I can cover a lot of that myself. Feel free, others, to jump in for pieces I miss or if you get bored of hearing my voice. There are accredited registrars to ICANN, and

the Registrar Stakeholder Group is a subset of that because not all accredited registrars have joined our group.

There is a fee, \$675 or something a year, for any accredited registrar to join. We have rules about voting membership and not around voting and other stakeholder groups and so with the increased overlap between registrars and registries, we see some tension there. I think our membership is around 100, give or take, which is pretty good. That's quite a bit of registrars. Not all of those are necessarily voting members of the Registrar Stakeholder Group, but it means you have access to our mailing list and internal discussions and resources and things like that.

The bit about how we operate is interesting because we're in the middle of revising our charter. Our charter was I think hilariously complicated. The wording in lots of stuff was confusing and terrible and led to some problematic scenarios in Darcy's ultimate election to the GNSO. But we have a Chair, a Vice Chair, a secretary, and a treasurer that are elected positions. We do that once a year, currently, usually in June. We elect our GNSO councilors as well.

We have some rules around geographic diversity in there. We struggle to fill them, to be quite frank. We had a very unpleasant scenario for our most recent GNSO election, where people were being nominated but were disqualified for office because of the

rules inside of our charter around voting in other houses and/or having something called “access to registry sensitive data,” which no one really knows what that means. So that process is a little bit clunky.

I don't know if Theo wants to weigh in much on the charter revision process, but we're hoping to have a new charter available in June for the Johannesburg meeting to sort of streamline our processes, make them a little bit more clear. And certainly, that will be available to the rest of the community to check out what we've done and if we've made some horrible mistakes.

I would say broadly some of the issues right now for the RSG around membership is we have consolidation problems. Some of the larger registrars keep buying other larger registrars and it reduces our membership. The chuckling in the room is that the company I work for just purchased Enom. And GoDaddy purchased HEG recently, so there's consolidation and as our industry matures, a lot of the bits of that are collapsing into smaller entities.

And then the other big one is that we're seeing a rise in registrars in Asia and China especially, and we're not super well equipped to reach out and welcome them in and make sure that they have avenues for participation fully. So we struggle with that a bit and

we're working with ICANN to find ways to do that better, provide more translation resources there.

But we've recently had a bunch of new registrars join the stakeholder group from China, and that's very encouraging. But we still have work to do to make sure that we can include those viewpoints and provide resources and make sure that functions well.

And then broadly, geographic diversity is problematic. I think there are six ICANN-accredited registrars in Latin America. There are very few. The same for Africa, more or less, so getting membership in basically not North America and Europe is tricky. Go ahead.

SAM LANFRANCO:

This is probably a naïve question. I'm an economist, and I've been looking at concentration ratios in the registrar area. It looks like a duopoly or an oligopoly. But the question is not that, but I'm also in NCSG. In addition to these issues of how you organize yourself and how your charter operates [and that sort of thing], in terms of the substance of things you discuss, what is it that you discuss internally that's not confidential but that would be areas that we on the NCSG side wouldn't catch automatically?

There are the things that you wrestle with that we should probably know about because we should be wrestling with them too.

GRAEME BUNTON:

Thank you. I saw Michele's hand in the queue. I don't think there's too much that we wrestle with internally, and probably there's not too much that's wildly confidential that is not already on your radar. WHOIS related stuff, privacy and proxy obviously, and I've worked with many of you inside of that working group. Certainly cross-field validation. If that's not on your radar now, it should be because I think that will be deeply concerning. Michele?

MICHELE NEYLON:

Thanks. Just trying to help Graeme by giving his voice a break from time to time. As Graeme said, the Registrar Stakeholder Group, to become a member, you have to be an ICANN-accredited registrar. You can't become a member just because you feel like it or want to become a registrar or have a vague passing interest in domains or anything like that.

So the members are quite diverse. You've got everything from registrars that essentially have like one, maybe two full time staff through to massive companies that have thousands and

thousands of staff across multiple business units and maybe they have ten people in domains, or you have the GoDaddies, the Web.coms who are very big.

The kind of things we discuss internally within the Registrar Stakeholder Group apart from the ICANN policies is operationalizing those ICANN policies or dealing with the challenges around those kind of things. For us in the European Union, some of us have been trying to discuss things with ICANN like getting them to bill us in euro because paying them in dollars is a pain in the rear.

Here's a practical stupid problem: ICANN will spend something like \$50 sending me an invoice for \$20 which will cost me \$100 to pay. That's just plain stupid. This other thing, it's just trying to translate these things into our day-to-day business. We can't discuss things around pricing and that kind of thing because that would be – we're falling into kind of competition areas which isn't allowed, but there are things like, say, data escrow.

Again, for a lot of us, we're not too comfortable with the fact that we have to use Iron Mountain. Yes, we can use somebody else, but we would have to pay extra where Iron Mountain is paid for as part of the fees we pay ICANN. There are probably other things, but there's nothing I've said so far that's anywhere close to being confidential. It's all pretty much public.



GRAEME BUNTON: Thank you, Michele. I see Stephanie in the queue. Before we go to her, you raise a good point that I didn't quite cover when you talk about oligopoly inside the Registrar Stakeholder Group, and it's a point that Michele was raising. Yes, the top five or ten registrars are very big in comparison to many of the others, but many of the others aren't big intentionally. They have very different business models. They're brand protection, they're corporate registrars, things like that.

So we all work together, a membership equals one vote, it doesn't matter whether you're GoDaddy or Tucows or you're Ascio or someone small, Blacknight, one of the marginal sized registrars.

EDWARD MORRIS: Teeny-weeny. We're 256th in new TLDs and about 260th in standard gTLDs.

GRAEME BUNTON: Rounding errors to many of us.

EDWARD MORRIS: Vertically challenged Canadians being allowed to speak at microphones always amuses me.

GRAEME BUNTON: Yes. And even then, most of the people who sell domain names, selling domain names is not their primary business. That's not how they make money. They make money through other things, so it's often not a primary interest for that business. So you do need to take all of that context in place when you're looking at membership inside the RSG. Stephanie?

STEPHANIE PERRIN: Thanks. I have basically two questions. Number one is kind of a big one, and it follows on, on what we've been discussing about this whole size issue and the global nature. I watched Greg Shatan yesterday at the CCWG on Accountability talking about jurisdiction. Now, this is a large and complex problem, but again, you guys are intrinsically operating globally, right? Michele probably can sell me a .ca by now, I don't know. No? Don't like us, huh? Okay.

My point is ICANN has not adjusted. Not just in the stupid things like insisting on dealing in U.S. dollars and insisting on Iron Mountain, but on a whole host of other things that we're going to need, certainly for the privacy stuff we need some localization

or we need some recognition that data is not all going to go to various points. Some sort of cloud control, in other words.

When is the time that we could start talking about that beyond the vague generalities that we're talking about in Work Stream 2? Am I being unkind, or no? We've got some specific problems. Maybe we start with the U.S. dollars issue. For god's sake, it bothers me that every time I get my puny little per diem check I get a whole bit siphoned off. That's not necessary nowadays. They could pay me in, I don't care, anything.

But we're not down to brass tacks. If ICANN is global, it should be operating globally, right? Anyway, I'll just leave it at that. I don't want to talk forever. I've got another bunch too.

GRAEME BUNTON:

Thank you, Stephanie. Does anyone have a response to Stephanie? Theo, please.

THEO GEURTS:

That is a problem within ICANN, and we're not going to solve it as long as there are fundamental rights within the United Nations like Article 12. The right of privacy is not accepted within this community, and if there are several stakeholder groups fighting against it, then we have a long road ahead of us. That is

a reality, and I'm not sure if we're ever going to solve that.  
Thanks.

GRAEME BUNTON: Thank you, optimistic Theo.

STEPHANIE PERRIN: Yes, we can all go home now.

GRAEME BUNTON: So you said you had some more questions. We should maybe look at our – we've got I think still 50 minutes left. It's an hour and a half long session. I'm not seeing any other hands around the room, so maybe we can tackle some if you've got more to share, Stephanie, and then we can go back and look at our agenda. Well, and it's privacy concerns on there, RDS conflicts with thick WHOIS privacy and proxy.

STEPHANIE PERRIN: Yes.

GRAEME BUNTON: So somehow I suspect those overlap with the questions you have.

STEPHANIE PERRIN: Indeed, that is why I held myself back and said I can wait for the next item on the agenda.

GRAEME BUNTON: Fire it up, Stephanie. I think if you've got questions or want to start off a conversation, then go for it.

TAPANI TARVAINEN: If I may intervene here, yes, let's move on. That's actually the biggest thing we have on the agenda is all this privacy related stuff, and Stephanie is prepped for that.

STEPHANIE PERRIN: Okay. I think everybody knows by now that a group of data commissioners – but I'm just going to read it out for anybody who's operating remotely and doesn't know this – are actually coming to ICANN invited by the Council of Europe. They're coming basically on Monday. I don't have the precise, up to the minute agenda. We're waiting for an update from Peter Kimpian of the Council of Europe who should be here by now but he hasn't been spotted yet. Sophie Kwasny is also going to be here.

Importantly, the European Data Protection Supervisor Giovanni Buttarelli is coming. The Vice Chair of the Article 29 working group who is the Dutch Data Protection Commissioner – and I can't remember his name offhand, apologies – and the UN Special Rapporteur for Privacy who was appointed I guess about a year and a half ago, something like that. Cannataci is his name, he's coming.

They were going to bring the Uruguayan Data Commissioner to get a different perspective from the South American Data Protection Commissioners because there's lots of data protection law in South America. There's always an allegation that this problem is only a European one, but there are, last count, 110 data protection laws that are not all in Europe, obviously.

So unfortunately, the Uruguayan guy is not coming, and I don't know whether they've been able to find a replacement. Also, last minute, the Data Protection Supervisor for INTERPOL whose name is Caroline Goemans is coming only for Monday. She's interesting, and I bloody well forgot to bring it, I'm sorry, but I have the latest guidebook for all of their Data Protection Officers within INTERPOL.

And that's interesting because, of course, there's quite a bit of debate in the RDS working group about law enforcement and

the need to have public access and the need to have anonymous access, and some of these things are specified in their guidebook which I can't find a link to online yet, but I haven't quite frankly done all the research and maybe she'll be able to help us out with that.

I'd like to encourage anybody and everybody to come to the various meetings. I know at NCSG we've managed to get that teed up for Tuesday with whoever's left. It will not be Giovanni Buttarelli, who's leaving on Monday. But the session is Monday afternoon and it should be well worth attending even if all of these speakers are not getting a whole lot of time to speak, but they will respond to questions from the microphone.

So that was my first intervention. I just wanted to plug that and make sure everybody knew and that it's kind of important. We haven't had an open dialog with actual, very senior level people in the data protection community for many years. I believe it goes back as far as 2004 or 2005. So certainly in recent years, they haven't come. Buttarelli actually came way back when he was Italian DPA, sometime around 2004, and Mr. [Rodotà] was the Italian previous DPA. He was the head of the Article 29 group.

So it's not like these people have not intervened and have not sent things over the years. ICANN has just basically ignored them. Thanks. That's a personal view, of course.

GRAEME BUNTON: Thank you, Stephanie. Sam?

SAM LANFRANCO: Again, I sort of come off the wall I guess on some of these. At the same time, the list that Stephanie has given is almost what I would call the group who are looking at best practices, at least from their perspective best practices. At the same time, about a third of the world's population in two countries now is coming under national regimes that have their own internal practices, and it's as though we don't think about that. I mean, 35% of the world lives in China and India, and there are regimes being developed there that will impact on what we're doing, but I don't see the dialog.

GRAEME BUNTON: Thank you. I think some of this is extremely important for our European registrars, where they're very concerned about data protection and how they store data and who has access to it because of local law. Probably less so for North America. Hm? Yes, sure.



DARCY SOUTHWELL: Especially with the new GDPR, I think North Americans are going to have to really change their view on that, so it's going to become a big issue.

GRAEME BUNTON: Right. A perfectly reasonable thing to say. It is probably about to become a bigger issue for us. And I don't have a sense yet from registrar colleagues outside of Europe and North America, but maybe Pam's sitting there, she could weigh in, have some thoughts on that. No? Okay. But it's certainly something that we're discussing and care a lot of about inside the Registrar Stakeholder Group.

Iron Mountain was mentioned earlier as well and how we store data and who ICANN is contracting with to store data, how long we keep it. Those things are very important to us. Maybe that's a dialog we should be having a bit broader with the rest of the community.

MICHELE NEYLON: Thanks. A couple of things. First off, ICANN still does not have a Privacy Officer of any kind.

STEPHANIE PERRIN: Or a policy for that person to enforce.

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MICHELE NEYLON:

I knew you were going to say that, Stephanie, so I didn't have to. Even in a company the size of mine, which Graeme keeps on reminding me is really small – thanks Graeme, at least I can see over the steering wheel – it's best practice for any company in Europe to have at least one employee whose role is to act as the data protection/data privacy point of contact.

ICANN as an organization has over 300 staff at this point across multiple jurisdictions and acts as data controller for thousands of registrars, thousands of registries and mandates policies via contract around quite a large amount of personally identifiable information, yet they don't have a Privacy Officer. And when this has been raised with them, they seem to stick their heads in the sand and not want to address it, yet they seem to be perfectly happy to go off and shove people in offices in various weird parts of the world for no particularly good reason.

For a lot of the Europeans, we find a little bit odd that ICANN's main point of contact for most of us is actually outside the European Union, so in order for us to be complaint with the requests to deal with various queries that we might get about domains and our clients, we then have to transfer the data to actually answer the query outside of the European Union.

Now, of course, we could say no, but again, if I'm making 50 cents on a domain name registration and it costs me 300 euro per hour to fight this legally, come on, be practical. So there are a lot of issues there, and I don't see them resolving a lot of them in the short to medium term.

GRAEME BUNTON: Thanks, Michele.

UNIDENTIFIED MALE: I shouldn't say this, but Michele, there's now a Complaints Officer.

MICHELE NEYLON: And?

STEPHANIE PERRIN: I wanted to respond to Sam's intervention about, when are we going to start having a dialog with India and China? From a data protection perspective, that dialog is taking place or it could be taking place. Obviously, it takes two to tango. There is not just the Article 29 working group now, the Article 29 being of course the Data Protection Supervisors in Europe.

There is an international conference that is all set up. I can send anybody the link if they want it. I can also bore them with a big long list taken from – what's his name? The guy in Australia. Asian Data Privacy. If you google Asian Data Privacy, you will find the name of this law prof who I've known for 30 years and now can't remember his name. That's life, eh? Anyway, there are lots of laws. There is an international conference. I believe last year it was held in Morocco. There's a new Moroccan Data Protection Commissioner.

So that dialog takes place through those working groups and through the International Working Group on Data Protection and Telecommunications, which is the sort of geeky group that looks at geeky issues in data protection. That's not coming to ICANN. ICANN is still viewing this as a California-EU fight in my view. I think it's carrying on the great tradition that ICANN was born in 1998, that was the year the directive came into effect.

They were still fighting, they were still pushing back on European states to not implement in order to make the directive fail, so this is a long-standing fight. But the world has carried on, and I think it would be great if we could facilitate a better dialog.

One of the reasons the Council of Europe is interested in this is the Council of Europe have revised Convention 108, and if somebody else doesn't ask questions I'm going to bore you all to

death with privacy stuff until your eyes roll back in their sockets. But convention 108 has been updated, the Council of Europe is trying to get everybody to sign on to that as they would the cybercrime treaty, and those of us who were around in government when the cybercrime treaty was hatched said, "Why don't you instead of saying whereas there's all this human rights stuff, why don't you make people sign on to Convention 108 if they're going to sign on to the cybercrime treaty?"

That would have solved some of our law enforcement issues right there because it's binding and you have to bring into place in your jurisdiction the law that enables that commitment. However, so I'm sure the Council of Europe folks will talk about the merits of signing on to Convention 108 when they're here, but that instrument is open to everybody and they have been trying to facilitate an international dialog, and anybody can go and participate.

GRAEME BUNTON:

Thanks, Stephanie. It seems to me – David, was that you getting yourself in the queue, or is that just stretching? That was queue? Okay. So it feels to me like we do have lots of common ground, especially on privacy stuff. And while we know already that you guys are already allies on many of that, we need to do a better

job perhaps of reaching out, communicating, and working together to push some positions forward.

Maybe these meetings are part of that process, but let's try and make sure that we have those conversations and that we can work together to solve some of these data privacy issues. David?

DAVID CAKE:

I just wanted to agree with what Michele said about that ICANN does not have a Privacy Officer and it's kind of staggering. One of the problems I think that we always have with privacy issues is ICANN it seems is kind of almost willfully ignorant of a lot of the details. They don't want to have a Privacy Officer, then they might have to do what they said, kind of thing. And we always have these dialogs which are really lacking in obvious knowledge from the ICANN side.

I think one of the things that may well be worth doing is through our respective Board member contacts and things, really start going, "Why is it that ICANN does not have this institutional knowledge?" We're doing pretty well in terms of institutional knowledge about privacy in the community. There are plenty of us here who know a lot about it. Not particularly including myself compared to Stephanie and people who have to deal with it day to day in the registrars and so on. And yet ICANN does

not apparently seem to want to have that knowledge, let alone have it.

It really should be something. I've been banging on about it for a few years and got sort of encouraging nods from the then CEO, and that was about it. "Oh, yes, that sounds like a good idea," and nothing was ever done. ICANN remains kind of lacking, and perhaps we could work on – that would be one thing we could coordinate a little bit on. Rather than tackling this fight by fight, let's try to improve the institution.

GRAEME BUNTON:

Sure. Thanks, David. I've got Stephanie and then Michele. And then we're hearing a lot from the same people. We need to get a little more diversity of opinion from the room, so maybe we can find some places where we do have some tension and disagreement between us. I'm not sure what those are off the top of my head, but that might spice things up a little. And we'll look at the rest of the agenda too. Stephanie?

STEPHANIE PERRIN:

And you read my mind, Graeme. I would note that Graeme used to invite me to come and visit Tucows, but then when I started talking about how, "Well, if ICANN wasn't going to listen to reason, i.e., the nuanced dialog on data protection, we would

have to start a global campaign a la Max Schrems and sue their ass off." And I haven't been invited over since.

The reality is – and this came up yet again. I won't bore you all with crumbs from the RDS struggle, but somebody said the other day, "Well, if the Data Commissioners have been saying this, why haven't they taken any enforcement action?" Well, it's because the whole gestalt in enforcing data protection, they do depend on reasoned dialog and when they tell you you're breaking the law, they expect you to pay attention. They don't expect you to wait until you're served with court papers.

Now, life is different in the intellectual property community. It's, "See you in court" and time stamping who used it first and whether you can get away with trademarking a color, which I find staggering. But anyway, it's a different type of legal apparatus, and if the only thing that is going to get ICANN to listen – because this has gone on for so long – is a whole pile of wildcat complaints, unfortunately, a lot of those complaints up until recent times might have arrived on the doors of the hapless registrars, which is why yours truly hasn't launched such a campaign, and I could.

It would resolve differently in each different jurisdiction. You might have some jurisdictions actually finding in favor of ICANN's approach. That's the luck of the draw, but normally in



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these things, you sort out which jurisdiction you're going to file in and it better be the best one. And until recently, Austria has been a really good one. Ireland is getting a lot of the traffic lately, but things that go to the Court of Europe of course wind up with good opinions these days.

But there are other jurisdictions where we're getting good opinions, including sadly for Tucows Canada. Supreme Court's been very good on privacy lately. Australia has not. That's the kind of eventuality we're heading towards, and that is not what the multi-stakeholder model was set up to produce. So the fact that we might have to do this, I'm not willing to put in more than six years of hard, pro bono labor in this place banging my head on a wall to fight this.

So the clock is ticking, we're less than two years left as far as I'm concerned. And then if you can't get anywhere in the multi-stakeholder model, you have to go back to the court system. And that's the way the cookie crumbles. So I think we have an incentive to work together and figure out how we can actually get this dialog to work. Thanks.

GRAEME BUNTON:

Thanks, Stephanie. Any follow-ups from that? Michele, right, sorry, you were in the queue.

MICHELE NEYLON:

Thanks, Graeme. I think we agree on a lot of things here around various aspects of privacy and how that impacts our operations. So maybe the takeaway from some of this is instead of working or trying to work together on specific little battles that maybe we look at raising up one significant one. For example, pushing ICANN to have a dedicated Privacy Officer or whatever that actual job title would end up being.

From the registrar side, we were assured repeatedly by ICANN staff that there would be a clear, simple process for us to be able to get waivers around the data retention as we're obliged to handle in the 2013 RAA. My company was the first one to request the aforementioned waiver, yet it took us the better part of two years to get it, and the only reason we got it was because I think the following ICANN meeting was being held in Dublin and I was making a personal thing of embarrassing them about this.

Other European registrars around the table I know have dealt with this. Theo I think got it eventually. Did you? You got it? How long did it take you, Theo?

THEO GEURTS:

[2.5 years].

MICHELE NEYLON: So for the record, two and a half years to get a waiver. I don't know whether One.com or Larson Data or any of the others around the table managed to get it, but any registrar you speak to, none of us got it in under a year, and most seem to have been two plus years.

GRAEME BUNTON: Thanks, Michele. I see Theo in the queue.

THEO GEURTS: And to pile on to this a little bit more, there are still registrars out there who haven't got it and they're in the process for four years now. So it's pretty sad to be talking about this and it's 2017 and there are still registrars out there who haven't gotten a waiver yet.

GRAEME BUNTON: That's crazy. Theo, do you know if that's ICANN dragging its feet, or is that registrars not being smart about how they check their boxes and jump through the process? A combination of both?

THEO GEURTS:

No, I can't speak for this registrar because I'm definitely not working for them. My point of view is it is just the non-acceptance of ICANN's point of view just dragging this out, and this is in terms of ICANN not willing to recognize that specific law in that country, and that is the whole problem. We had similar issues back with our data retention waiver request.

At a point there was no dialog anymore because we were going like, "These are the sections of the law and we have to comply with it, and the requests you are making as ICANN, we can't comply with it." And this was back in 2013, somewhere in November. We stopped talking to each other because there was zero progress. And after six months, suddenly ICANN came back to us to [those] registrars, this was a collective process.

And after six months, suddenly ICANN came back like, "If you're going to change this text and this and this and this," and our lawyers looked at it and we got some progress again. And it was dialog again, but we were going, "No, we are not going to sign off on this data retention waiver that you're offering us." And it took quite a long time and still going on.

GRAEME BUNTON:

Thanks, Theo. Alright. Sam, right? I've got Sam and then Michele in the queue.

SAM LANFRANCO: You would think that this data retention issue would be part of the DNA of ICANN, that when it came up it would be like a cat seeing a fox and going, "We have to do something right now or we're going to get eaten." ICANN doesn't respond that way, so I see no other way than saying, "Okay, it needs an officer responsible for this" just to have a lightning rod, a place where you can just keep pounding away and saying, "Okay, this is where the aggravation takes place until you respond, and until you respond systemically, not one at a time and intermittently."

GRAEME BUNTON: Thanks, Sam. I've got Michele and then Stephanie. Just for fun, I'll put this out there. It seems pretty clear that people are interested in a Privacy Officer in ICANN. I think a lot of us wince a little bit about generating new officer positions inside of ICANN that are extremely expensive and cost essentially our users more money to fund these things and increases the bureaucracy within the organization. So it's probably something to think about as we go down that road, but perhaps there is alignment here where it's something you want to push for. Michele and then Stephanie, and then I'd love more people.

MICHELE NEYLON:

Thanks. The underlying issue here is based on the kind of experiences a lot of us have had as registrars trying to deal with ICANN around this, but also in a lot of the ongoing discussions like the RDS PDP, the ThickWHOIS, RDAP, etc. There is a lack of understanding of how privacy works. There is a lack of willingness to understand us. There's also a – how can I put it? There seems to be almost as if it's something that they just find to be bothersome to them and they don't want to understand it.

Our experience around the waiver process was incredibly frustrating because they just didn't understand how privacy legislation is written and refused to understand, so we ended up in a position where we had to go back to our external legal counsel and go, "Right, this is what they're saying, this is how they're doing this. What can we give them as an answer that is legally okay, just to kind of get it through the stupid hoops that they've put into place, in the way?"

And the reason why so many people get blocked on that is because ICANN will come back to you with some response that leaves your lawyer scratching his head going, "Who is this idiot? What on Earth are they asking us? It makes no sense."

GRAEME BUNTON: Thanks, Michele. I'm going to skip Stephanie and go right to Tapani.

TAPANI TARVAINEN: Just a brief comment on the Privacy Officer issue. I find it rather startling because in Europe, it's basically if you're a company of a certain size, you must have a Privacy Officer. At least in Finland, I think it comes from EU directive at the moment. And below a certain size, then it has to be part time. If you're big enough, it has to be basically a full time person for that.

And ICANN is definitely big enough that it should have one. Despite that it will cost something, it may end up saving money in the long run in having less of this unnecessary time wasted trying to find out who's doing what, wasting it. So I think we should make an effort to push for ICANN to have a Privacy Officer, like just make a campaign. Whenever you meet Göran or a Board member, ask, "Why doesn't ICANN have a Privacy Officer yet?" Just get it done, try to.

GRAEME BUNTON: I feel like that's something we can work towards. Stephanie?

STEPHANIE PERRIN: Thanks very much. I think that requirement to have a Privacy Officer originated in Germany, actually. They had a requirement within companies, and it spread. And it's good. I would just strongly urge us to be very careful about who appoints that privacy officer and how they select it and how independent that person is. It's under the "be careful what you ask for" category because ICANN at present would pick what we call a privacy goalie. In other words, somebody who would deflect all of the privacy advocates' requests.

Life is tough enough, I don't need some much higher in authority than me guy sitting in the office directed by the Board saying, "Well that's absolute you know what. You don't have to listen to her because we're fine and we're all legal." As it is, the legal opinions that have come out of ICANN Legal on privacy are not useful. They won't help you out in court. They're there to defend the existing status quo. So I'm not optimistic that we would have an independently appointed person. We'd have someone picked, and it's going to be somebody who toes the party line.

That brings up the broader question about appointments. I haven't checked on this new Complaints Officer, but I've heard quite a lot of grumbling that, how independent is that person? And I think these officers have to be independent. ICANN is basically replacing as a multi-stakeholder organization a



governmental process. And in governments, there are ways of having independent parliamentary officers that are not under the justice department's thumb or the treasury department's thumb. I don't think ICANN has developed that. We certainly don't – I can't think of an example, and for the Privacy Officer, it better be independent. Thanks.

GRAEME BUNTON: Thank you, Stephanie. I've got Darcy in the queue. Darcy?

DARCY SOUTHWELL: Thanks. I think in line with all of that, I think the other challenge is even if they did go out and find someone who is very independent and served as a true Privacy Officer, they're going to meet a lot of resistance because this is a fundamental shift in thinking for ICANN in general. We talked about this a little bit yesterday, I was talking with some folks, and it's funny, we all come from different communities and we have all seen the same thing. There's a fundamental shift in the totality of the thinking that has to happen, and one Privacy Officer – even if they're very focused on that global privacy concept – is not going to make that shift happen on its own.

GRAEME BUNTON: Thank you, Darcy. I think there's some pretty good agreement around the room on pushing forward that sort of thing. And with the Privacy Officer – the Complaints Officer by the way is Krista Papac who was GDD staff. She is not as far as I know – I don't know how they've structured that role within the ICANN corporate, but she's pretty integrated in the rest – or at least has been in the rest of ICANN operations, at least for contracted parties.

We've got about 20 minutes left. I think we've sort of beaten that topic around quite a bit. Michele's got his hand up again. Can you do it in ten seconds?

MICHELE NEYLON: I can try. I was just going to say is there something that the NCSG wants us to know about, since we've been the ones doing all the talking? Which isn't privacy related, preferably.

GRAEME BUNTON: Stephanie?

STEPHANIE PERRIN: I am not a one trick pony, Michele. We recently had an intersessional in Iceland. Sadly, I had to tune in via remote, but that was an attempt for the Noncontracted Party House to have

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a little kumbaya moment. And I'm wondering how you people feel about GNSO restructuring because this is clearly on the agenda of our colleagues in the commercial side of the house, and there is another GNSO review coming up in a few years. We're all enjoying the ALAC one right now on the noncommercial side of the house and taking valuable lessons from it, but looming behind the next GNSO review is the restructuring that our colleagues are going to want to push again.

GRAEME BUNTON:

Thanks, Stephanie. I might throw that more onto Darcy who participates in that, but I think broadly we have pretty deep concerns about GNSO restructuring because we have contracts with ICANN and between us and the registries. Within the structure of the GNSO, we have some power to control what becomes part of our contracts or not, and that's super important to us. And obviously, opening that up for change has deep, fundamental, existential risks. Darcy?

DARCY SOUTHWELL:

Thanks. Yes, during the implementation, the drafting Bylaws group that's been working – and we're meeting later this week – there was a huge push from the CSG to restructure. Whether it's restructuring the total GNSO or restructuring how the council

operates was a hot topic. I think it's concerning for so many reasons. For us obviously as a contracted party, that's a critical problem for us.

I don't know how much farther that conversation went in the intersessional, so it would be interesting maybe to hear a little bit more about that as far as detail. But I know it's starting to swirl it feels like, and we need to be on top of that.

STEPHANIE PERRIN: Just in order not for me to talk again, maybe we should have a little chat and discuss what's going on.

GRAEME BUNTON: Let's do Tapani and then Sam.

TAPANI TARVAINEN: Yes, just about the intersessional, we did not actually talk all that much about the restructuring. Meeting about that with the CSG in Hyderabad where some – let's say the initiative there was basically buried rather – well, let's put it more or less perhaps a bit embarrassing to the certain CSG people proposing that, so it has not been – nothing concrete in the open about that is going on at the moment, but there are back currents that maybe having something. Nothing in the open that I know, but I know

that some people still want it and may come up with some new proposals at some point. But in the intersessional, nothing concrete about that took place.

SAM LANFRANCO:

Okay, I'll share with you something that's mainly from my end of NCSG, NPOC, and that's that all of this sort of as members of NCSG, we basically represent the interests of the noncommercial stakeholders. We don't represent the noncommercial stakeholders because that's a huge population out there, organizations on my side. And they are completely in the dark as to what we're doing.

And the kind of outreach and education that goes on now is completely – well, it's well-meaning and inadequate. It can't all be mounted from here anyhow, but what is mounted from here pretty much is poorly constructed in terms of the reality of the civil society, NGO, not for profit community groups that exist in most of the world, in particular in the developing areas of the world. So how this multi-stakeholder model on the NCSG side, those legs on the stool are very thin and very fragile.

And as Internet governance becomes really important, ICANN meets in Hyderabad and Kashmir is closed down. The Indian government has closed down the Internet and the cell phones

except for the government cell phones to Kashmir while we were there, and we can't say a thing about this. And the groups that are there are going – they're waving their hands, we can't hear them.

So there's this whole massive portion of the multi-stakeholder community that basically isn't here, except for a handful of people who address the issues of that community but can't in any real way represent the community. That's a concern on our side, and with a GNSO review and so forth, if Michele feels on the margins sometimes, Michele looks like Mount Everest from where we are.

GRAEME BUNTON: Thank you. That's an interesting context. Anyone else on the queue on this topic? No? Okay. Oh, Stephanie. Stephanie?

STEPHANIE PERRIN: And I'm sorry I'm talking so much. How come Michele never has to apologize for talking so much?

GRAEME BUNTON: He did.

STEPHANIE PERRIN: Did he? But that was gratuitous. Anyway, on the subject of what's coming in a potential discussion of restructuring, as Tapani said, there's nothing on the surface but it goes underground like buried barrels of mercury. It's leaking out somewhere. And my own view is very much like yours. Not only are our interests rather closely allied to the guys who actually deal with customers, but I don't feel the pointy end of any of the policy stuff or the costs hitting the commercial folks as much as they're going to hit the end users and the contracted parties.

So all of the things that I want in privacy are going to cost money. I'm very well aware of that, and I'd like to know who's going to pay. And when I hear IP guys say, "Well, why haven't the data protection guys enforced?" Well, it's not that particular guy who's accessing the data who's going to be dragged into court to pay millions of euros to fight supreme court cases.

So I think there is an alliance there. There is a very grave risk because the noncommercial folks are fundamentally divided in what we conceive of as our role here in ICANN. Like for me, what Sam has just described is being done at WSIS, and I'm not really sure I'd rather see more effort go into WSIS and get some more money for that than import it into ICANN because I see ICANN as the hard work of policy development in this area and a lot of the

outreach we do does not bring people who are either equipped, ready, or able to do the hard work of policy development.

And increasing the outreach doesn't help us. It increases the risk because a lot of the folks who aren't aware of the deep politics can be seduced by travel kibble, seats and money, and that's going to topple the balance that is currently in place at the GNSO. So I guess that's a pretty blunt statement, but you guys ought to care about what happens in our side of the house deeply. Thanks.

GRAEME BUNTON:

Thanks, and that's a good reminder, Stephanie, to make sure we do that. Was that you wanting in the queue again, Sam?

SAM LANFRANCO:

Yes. I just want to add the issue in terms of our constituencies is not going to be solved within ICANN. We're having to do that work on the outside. So I just wanted to make it clear that along with Stephanie, I don't think we should import that task into ICANN. ICANN does a little bit of it, does it very badly, but it's another elephant in another room. It's a big elephant, and it's one that has to be addressed elsewhere.



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GRAEME BUNTON: Sure. Thank you, and I think that's perhaps a problem that registrars don't appreciate quite so much because for the most part the people who are active in our space are members of our constituency. There are certainly – I think there are some 2,000-odd accredited registrars, but the actual meaningfully separate registrars is probably around a couple hundred. Michele?

MICHELE NEYLON: Just actually on that, the members of the Registrar Stakeholder Group account for something like 90% of domain registrations globally or something like that because you have most of the biggest registrars are members. So between GoDaddy and Tucows – because now Tucows are like ridiculously big, which means that Graeme has much bigger budget, be buying us all beers later. Thanks, Graeme. Between two or three of those companies, they control the bulk of domain registrations. There are one or two registrars who are quite big who aren't members, but they're in the minority.

GRAEME BUNTON: Thanks, Michele. Just a reminder that I'm in policy, not in sales.

UNIDENTIFIED FEMALE: [inaudible]

MICHELE NEYLON:                   What about this thing about Canadians being nice?

GRAEME BUNTON:               Not in that way. Nice doesn't sign my expense checks. Right, eight minutes left. I think we've had some good discussion. Very briefly, there is again a subset of registrars that are deeply concerned about privacy and proxy. I know there are a number of members from your house inside that IRT. There is a working session this afternoon in that IRT for those involved, if I'm correct. I'm pretty sure. And we're already conflicted all over the place, so there will be people in that and there won't be.

And I'm not sure we have the time now for this discussion, but both of our houses should be aware that the Public Safety Working Group is working on a framework. I'm not even sure what the mechanism is going to be for integrating that framework inside the IRT. If it comes out and it feels like policy, then it should have been done inside the PDP, not the IRT. So there are going to be some serious questions coming inside that IRT, how to accommodate what the public safety and GAC are up to and their concerns.

So I want to put that on everybody's radar that that's happening. If you care about privacy and proxy, it might be

interesting to attend that session. But let's make sure that we are working together where we are aligned, and there's not actually uniform alignment on this issue in registrars, but I think there is a fair amount of common ground. Stephanie?

STEPHANIE PERRIN:

Sorry to talk again, but I think I'm kind of alone in having signed up for the PPSI implementation. And I notice that it's frequently in conflict with other groups I'm on like council and the RDS PDP, which quite frankly I feel I can't miss a meeting and I think I've only missed one. So if there's something, if that thing surfaces, I will have deep concerns. I've been screaming about doing policy and the implementation, and I realize that we had a compromise we had to come up with at the last minute, and kudos to you guys for negotiating it.

But how the heck do we incorporate a policy decision and an implementation in a way that works? So I'm waiting for that submarine to surface, and if I'm not there at the meeting, you're there, please call me, reach out because I can probably skip an RDS meeting. It would feel good for a change. Thanks.

GRAEME BUNTON:

My understanding is that RDS meetings are infinite.

STEPHANIE PERRIN: Yes, and painful.

GRAEME BUNTON: So probably you can skip one or two. Do we have Any Other Business? We've got about five minutes left. I see Michele's hand. I feel like we're hearing lots from – does anybody else have stuff they want to weigh in on? No? Michele, please.

MICHELE NEYLON: Graeme, you did mention this very briefly earlier on, but I don't think it was picked up on, the cross-field validation. For the NCSG, you guys really need to be aware of this. Do I need to explain? I probably need to explain this. Okay. So there is a [set] of contractual clause within the 2013 contract which are conditional on a couple of things, so they're not currently active.

Essentially, this is a bit of a compromise language because there was no way we would have agreed to this when we were negotiating that contract, but there was no way that ICANN would let us have a contract without including it. And essentially, this is all around moving towards using the WHOIS in some ways as a kind of way of verifying people's identities. I'm

sorry, I'm going full black helicopter by the way, just so we're clear.

The cross-field validation stuff would be the idea that you would check to see that the town exists in the country, that the street exists in the town, that the number of the building exists on the street. Which is all fine and dandy in a kind of, "I can't think of any reason why this is a bad thing" sort of way, except for the fact that nobody has a database with this information. Nobody, and I mean that. There is not a single entity out there that has a comprehensive database that covers all of this. And secondly, the cost of actually doing this.

For example, I live in what would be considered a first world country, you may have heard of us. And for me to actually verify with my own bloody government that I have the right to vote in the next election, I have an online tool I can use, but because of the way they record my address, I can never validate that I have a vote. Yet I always get one, which I find hilarious.

Putting in your address for delivery information, you have no way of knowing what way they have recorded the address, and that's for a first world country. When it goes to developing countries, developing economies, then it becomes a total and utter mess. And I won't even mention countries where there's more than one script.

GRAEME BUNTON: Thanks, Michele. Yes, it's a good point that the cross-field is going to impact developing world much harder than Europe and North America for the most part. And we would be excluding people from essentially registering domain names and that would be super bad. We should have tackled this topic a long time ago. We have two minutes left and I saw a bunch of hands. I think I saw one from Pam and we haven't heard from her yet. So let's hear.

PAM LITTLE: Hi everyone. My name is Pam Little. I am here representing Alibaba as a registrar for the first time. And obviously, thank you, I'm new to the group and new to these sessions, so I'm here on learning mode and listening mode. We hope to be able to contribute to the discussion in a much more meaningful way in the future, especially on privacy, data protection. Obviously, Alibaba is becoming a global operation and these topics and issues will impact our business, our operations in a great deal. So we are very interested in those topics and will be engaged in the discussion going forward.

That wasn't the point of my raising the hand. Was about the cross-field data validation. I was just wondering because I

wasn't around in 2013 when this 2013 RAA came out. Just trying to understand the rationale for having to validate a postal address in the digital age when we hardly use snail mail anymore. I'd just like to understand that because we -

MICHELE NEYLON: We don't know the rationale either. You're asking the wrong people.

GRAEME BUNTON: My understanding is it came from law enforcement. I will say very briefly because we're just about out of time that there seems to be a conflation amongst many that the data in WHOIS, the registrant information is somehow also transactional information, that the people who pay for or purchase the domain are necessarily the information that goes into WHOIS. And that is not the case. And I'm speaking personally here. As Tucows, that's not the case all the time.

So we need to be very careful as people say, "Look, Amazon and Google and whoever can verify who's transacting." Well, that's not the point. We're not talking about transactions. We're talking about WHOIS data. They're very different things.

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I saw other hands, but it's now 10:30 and people have other places to be. First, I will say we had asked for Chinese translation of this session as part of that reaching out and having more interaction there, and that hasn't happened, so we'll see if we can get a translation of the transcript.

I see Tapani one last thing, but thank you guys for joining us very much today. I think that was some very good discussion. Hopefully, we'll do more of this in the future. Tapani?

TAPANI TARVAINEN:

Thank you. I just wanted to say thank you for inviting us. This has been useful, I think, and we should try to make this a tradition. Keep doing this. So maybe in Johannesburg again. Thank you.

GRAEME BUNTON:

Yes, please. Thank you. Alright, thank you everybody for coming. We'll end the session now.

**[END OF TRANSCRIPTION]**