

**Transcription ICANN London
Inter-Registrar Transfer Policy (IRTP) Part D
Monday 23 June 2014**

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James Bladel: Thanks and good afternoon everyone and I'm also just in the process of pulling up the - let's see the daily schedule so I can log into the Adobe room. But this is the - this is the working session of the - I'm going to say a bunch of alphabet soup here so just bear with me if you're a newcomer.

This is the IRTP Part D PDP working group and what that means is IRTP is inter registrar transfer policy, Part D just as it sounds this is the fourth in a series of working groups to address this policy and make improvements and recommend enhancements.

And PDP is ICANN's policy development process where any new policy or changes to policy that will be contractually binding on contracted parties must follow a PDP in order to legitimately be included on our contract.

So before we get started we should note that the rough agenda for today and I'm sure we'll have a better one here in just a moment is that we will conduct ourselves as though this group has been meeting weekly more or less for slightly over a year.

And we will conduct ourselves according to one of our existing meetings. We're very close to the end of the process so we have some outstanding - you'll see it it's mainly a list where we cover the outstanding items that we have between now and our final report.

And then we would certainly like to allocate some time towards the end of the session where anyone who is maybe just coming into this issue or maybe is more casually following it and says hey, you know, I don't understand why you guys are discussing this issue or hey I have some thoughts on this topic.

We want to give, you know, anyone in the audience an opportunity to weigh in on those issues. So with that and I'm still as I said trying to pull up the actual...

Man: (Unintelligible).

James Bladel: ...thank you.

Man: (Unintelligible).

James Bladel: Well that's kind of a chicken and egg scenario because it is the link to the Adobe connector and I'm going to post it in the Adobe connector.

Woman: Good afternoon James (unintelligible) right now.

James Bladel: Okay I didn't - no, no, no I maybe misunderstood what you were saying so. Okay but before we get started let's get into some preliminaries here. If we could please go around the room with some introductions, name, affiliation then we'll also make sure we allow folks from the audience an opportunity to introduce themselves as well as the folks that may be on the bridge. So if we could start down here please with the gentlemen on the very end.

(Viv Maklo): (Viv Maklo) from real time register.

(Fiel Girds): (Fiel Girds) real time register.

Stephane Van Gelder: Stephane ICANN staff.

Berry Cobb: Berry Cobb with staff.

(Philip Gleiman): (Philip Gleiman) key systems registrar GNSO counselor.

Graeme Bunton: Graeme Bunton Tucows.

(Chris Felling): (Chris Felling) (unintelligible), (Chris Felling) (unintelligible).

Marika Konings: Marika Konings ICANN staff.

James Bladel: So James Bladel GoDaddy and co-chair of the group effectively chair because our other co-chair is no longer co-chairing and registrar and GNSO counselor.

Man: I mean there is - (unintelligible) registrar.

(Gary Arnold): I'm (Gary Arnold) with (HIBOO).

(Bernet Garcia): (Bernet Garcia) (HIBOO).

(Stephan Natner): (Stephan Natner) Internet (X) German registrar.

(Andre Spotez): (Andre Spotez) Deutsche telecom also German registrar.

(Pauline Rajenet): (Pauline Rajenet) (net side) Australia at large advisory committee.

James Bladel: Thanks now let's start with the audience here with you sir.

(Sam Bolkash): (Sam Bolkash) I'm a member of the legal committee association of registrars in the Netherlands.

Woman: (Unintelligible) ICANN staff.

Woman: (Unintelligible) ICANN staff.

Man: (Unintelligible) ICANN compliance staff.

(Sam Rojas): (Sam Rojas) (power) Internet group registrar.

Man: (Unintelligible) expert team.

(Laura Gee): (Laura Gee) legit script and the (Hamilton Reed 11).

Woman: (Unintelligible).

(Mike Murphy): (Mike Murphy) (unintelligible) registrar.

Man: (Unintelligible) registrar.

James Bladel: Okay thanks and anyone on the phone can we give participants on the audio bridge an opportunity to identify?

Angie Graves: Thanks James, Angie Graves here with group incorporated thank you.

James Bladel: Hi Angie.

Barbara Knight: Barbara Knight with VeriSign also representing the stakeholder group or registry stakeholder group.

James Bladel: Hi Barbara, any others? Okay so as per our normal operating procedures does anybody have any updates to their signets of interest that are on file with this working group or posted in the community Wiki? Anything they would like to declare raise your hands.

Okay seeing none we also have a draft agenda that is on the - it looks like it's on the right hand side of the Adobe connect there beginning with a status update of the work.

Does anyone have any other items they'd like to include on the agenda? If not let me know we'll pick those up as we go along. So the two things we wanted to accomplish today was first off just to summarize - actually sorry three things.

The first one would be to summarize where we are as a working group and what remains in front of us between us and the finish line because I think that we - a lot of us are - we want to anxiously bring this effort to a close however we want to make sure that we are doing our due diligence on the issues that - and the charter questions that we've been - you're going to have to hit the mute button whoever just did that, Holly mute button thank you.

The sound is now going to Australia and coming back to London via Holly.

Man: A nice delay.

James Bladel: It is a nice delay at least we know now how big the earth is. Thank you that's good, that's always good for a laugh. Okay so we want to update the remaining items that need to be done.

We want to confirm some of the items that are effectively finished and make sure everyone is comfortable with where we've landed on things like the definitions and use cases.

And then we want to take a look at the remaining outstanding issues that were collected during our public comment period and then open it up for Q&A for anyone that wants to weigh in on these issues that hasn't been a regular participant of the working group but has an interest or a question on those topics.

So with that I believe the update and particularly the update that Lars and I presented to council on Saturday was that the working group had anticipated we would be finishing our work by London.

This did not occur but it did not occur for some very good reasons, encouraging reasons, which is unlike some of the previous other working groups in this area we received very numerous and very healthy comments in the public comment session, which caused us to then go back and reexamine and in some cases reopen the discussions that we've had relative to our charter questions.

I think that's encouraging that's a good thing it means that the - it means that the process is working and that it is taking on board those comments and in fact one of the bits of feedback that we received on Saturday is that this is the way we handled those comments is probably a showcase for how the system is supposed to work.

Not necessarily speedy but thorough and focusing on doing our due diligence. We also took a second and third and fourth and fifth look at our definitions list, which I think a number of us had some substantial modifications that we wanted to see made.

And I think we're all now in a place where we can say that we're happy with the definitions list. We have a couple of items remaining specifically the addressing the role of the registry in - as the first level dispute, the necessity of FOA's and the third one was - thank you the change from the statute of limitations from 6 months to 12 months in order to file a dispute.

Those three issues are still open and we need to determine whether or not our original recommendations as contained in the initial report still stand or need to be modified or addressed to incorporate those changes that we saw during public comment.

So maybe we can start up by talking about our list of definitions and noting that this has been proposed as final on our working list and I believe we have not received any - we - our last comment on this was from Kristine Dorrain.

Okay so let's take a quick look at her updates because I mean I think we're very close to just closing this off and saying that our definitional terms are closed and there is no way I can read that from here Lars.

Okay I think I got something here. Yes perfect, so really this is not an edit but on a comment and it's with regard to supplemental rules. Supplemental rules I mean those rules adopted by the registry operator in case of first level disputes as said right below.

And the - I'm sorry I skipped one here, there previous comment it looks like Kristine has tacked on a comment to the definition of respondent. Suggest that we not imply a two-party dispute discussions have indicated - that indicates a multi-party (hops) there may be more than one party, the registrar record needs to be a party so that they can implement the decision to transfer.

Gaining registrar at the fraudulent transfer needs to be part of your provided FOA et cetera. So I think that that is an important item to take note. I think that this to some extent is covered by the use of the word or.

We could certainly more explicitly cover this by saying and or and I think that would address - Holly's shaking your head is that overkill, are we...

Holly Raiche: Seems like overkill.

James Bladel: ...it's overkill okay.

Holly Raiche: Sorry just...

James Bladel: Holly said off microphone she thinks that might be overkill. Anyone else have any strong feeling or just - I think this is a good point to notice as something certainly we discussed at length so I think that if it's not explicitly captured in this definition it's certainly what we intended so let's just make sure we're all comfortable that it's covered.

Okay and then moving to the second one the registry operator indicates the first level disputes. Certainly this would be struck or stricken from the definition if indeed our final recommendation is to remove the registry layer this becomes a depreciated piece of language that we can just throw it overboard.

And I believe that was it so pending the decision of what to do with that little blurb about registries can we as a group say that we have completed our definitional work on this PDP, everybody - we can put this one to bed finally?

Okay, no more zombie definitions everyone thank you very much for your help and working through that. Okay there is one other support document I thought and Lars you may not have it queued up I didn't even know if you brought it with you to London.

Do you remember we were going through a number of use cases as well and I think that that was also intended to be an appendix or an annex to the report. We haven't looked at it in a long time so I don't mean to spring it on this group here.

But I think that it's important to note that if we have made any significant changes between the initial report and the final report to this annex, you know, we should make sure that everyone has had a chance to sign off on those.

So I seem to recall that we went through this, you know, at a fairly high level or a fairly low level of I guess high level detail and made some fairly significant changes.

In fact one of the biggest issues was if you take a look at number - I believe it was - there was one of the items there that was covering disputes between parties, number eight I believe.

We rolled up a number of these scenarios into number eight so I think this document at one point was much larger so.

Lars Hoffman: (Unintelligible) yes I mean I'm happy to put up the red line version of this, so this is the part that we discussed and rolled into eight, this is the clean version after the group discussions.

James Bladel: So really I think that we've given this particular annex a number of passes through the working group. I think it is incumbent upon us as members to take a look at this and make sure that we are all still fine with the latest and greatest versions that cleaned up all of the edits.

So if we could please I don't believe we're meeting next Monday, we're meeting the Monday following so if you could between now and then take one last look and if you spot anything that you want to change raise it at our last and final meeting.

Otherwise we will consider silence to be acceptance and agreement, go ahead Lars.

Lars Hoffman: Yes this is Lars, I will send around a red line version and this version if you want both of them to the list - the list today or tomorrow but in time before the next meeting. So you should have it in your inbox.

James Bladel: Thanks Lars I think that will help and certainly recognize that folks probably won't be able to have eyes on that until they're on the flight home or trained home or car home or pony home or however they got here.

But just - I think just wanted to make sure and emphasize that we've spent quite a bit of time on these two supporting documents. We determined that they were important enough to include in our report so let's make sure we got them right but we don't want to leave them open indefinitely.

And then that brings us to the main body of the report and the outstanding issues that we have there. So I don't know if we still have - I look at Lars he's going to - he's furiously working to pull up all the different documents. Can we go to the comment review tool here?

He's very quick, he's not as quick from those guys from Ghana but he's pretty quick.

Man: Or those guys from Portugal.

James Bladel: I saw that we tied, we're not even supposed to be here and we're winning. Just think how far you've sunk now you're arguing with an American about soccer that's pretty low.

Man: Who was CMBA player of the year last season?

James Bladel: I don't know, I have no idea probably a Canadian right Graeme? Okay, seriously I don't know.

((Crosstalk))

James Bladel: Well we're killing time until Lars can pull up the document and here it is thank you very much Lars. He could not resist the troll effort he just couldn't let that one - had to swing at that pitch so another sports analogy.

Angie Graves: This is Angie Graves, while we're in hold mode.

James Bladel: Go ahead Angie.

Angie Graves: I had to put the call on hold for a minute I'm not sure if (unintelligible).

James Bladel: I could barely hear you Angie I'm sorry could you repeat that?

Angie Graves: My (unintelligible).

James Bladel: I'm sorry Angie your audio is so garbled is it possible you could put it into the chat?

Angie Graves: Will do.

James Bladel: Okay we heard those two words thank you very much Angie. I think it - we'll just wait for her comment to come in chat because we've having some audio difficulties.

So it looks like we're starting off - which page are we on there Lars? Okay so if we could direct folks to page 5 in the document. I believe everyone has scroll control and we are looking now at which comment number please?

Recommendation 7, comment number 15 is that correct?

Man: Yes so recommendation 7 is that we recommend that the - no sorry.

James Bladel: Yes I was...

Man: Incorrect.

James Bladel: ...that's okay you're...

Man: Recommendation 9 page (6).

James Bladel: Thank you that's more familiar so recommendation 9, this is the recommendation from the working group that the registry level of the dispute be eliminated and that all disputes now be directed to - well really let's be honest there are two mechanisms for dispute.

There still remains the informal mechanism where registrars work together to reverse an invalid transfer if they can agree. This is more dealing - this comment that this issue is now dealing with the formal dispute the TDRP the one that we've determined has - occurs very rarely.

And typically in cases where the two registrars do not agree whether or not a transfer was valid or conducted according to the policy. So what we're saying in this in our recommendation in general is that that needs to - all of those needs to be handled by the current third-party dispute provider.

That the registries would not longer need to support this function, that given the number of registries now coming on line the opportunities for this process to become inconsistently applied are, you know, approaching 100%.

And I think the concern, well we have a couple of comments here, one coming from the registry stakeholder group that they in effect I believe supported the recommendation and agree that they could be removed from this function.

And then there was another comment from (Arthur) who by the way has joined us so hello (Arthur) so thank you for coming, another comment from (Arthur) addressing the issues about the fees.

And I think that opened a broader conversation about the economic impact of this, which should not be disregarded because initiating this transfer dispute

with a registry has traditionally been I don't want to say free but fairly low cost while initiating with third-party (dispute) provider is not.

However as we've noted it's very, very rarely used at all. So the scope of the - while the impact may be high on an individual case or an incident occurrence and a basis the scope is not very broad.

So (Arthur) if you don't mind if I could put you on the spot for just a moment and you could walk us through your particular concerns about eliminating or opine on your thoughts with regard to this about eliminating the registry level dispute.

And do you agree with the working group recommendation, do you not support this recommendation?

(Arthur): Okay, I was not aware that the registry offers dispute service at a lower cost. I was of the impression that disputes would always cost the third-party panel fee.

In general though due to the low number of occurrences of these transferred disputes I would recommend that the registry or ICANN funds these costs as much as possible because it's otherwise preventive of fighting for the registered name holder interests.

In other words if you charge the registrar a fee then the registrar will charge the registered name holder if he - unless the domain name is very valuable and is very important many registered name holders in my humble opinion give up or have already given up under the current policy and lack of transparency.

Now in particular the I believe there was a Twitter account that was lost by somebody with a very beautiful Twitter account name. He was informed in

fact by GoDaddy but that doesn't really matter that sorry you're not the registered name holder anymore so we cannot help you.

More or less bumping into a registrant policy or lack thereof rather than the inter registrar transfer policy or possible improvements therein. So about the fees and about the disputes themselves I think they should indeed be done by either the registry or ICANN or a third-party panel.

It doesn't really matter that much as long as they are done consistently and I would encourage the fees to be as low as possible so that we can protect the interests of all registered name holders not just those who are economically strong enough to pay up.

James Bladel: Okay thank you (Arthur). I want to see if we have anyone in the queue but before we do I just want to emphasize for clarity that that particular incident with the Twitter account was a social engineering expert and completely unrelated to the transfer...

(Arthur): Exactly, exactly.

James Bladel: ...policy it was someone who had gained access to a customer account that should not have had it. So I just wanted to get that clarified. I don't know that any of this would have helped that particular case at all.

(Arthur): I agree.

James Bladel: And I think that we do recognize that we don't want to create undue burdens or barriers to accessing dispute resources for our registrants who have been victimized by any kind of a fraudulent transfer.

However the other side of it is also and I'm noting that Kristine is not here but I think that she might recognize that there are - there is quite a bit of investigative and judicial type work that's done on the part of the dispute

providers to resolve and make decisions on these issues as well and so it's - certainly it's a balancing act.

What about the rest of the group do we have any other thoughts on the fee structure and certainly would love to hear opinions that might support or (theory) or counter-opinions or - everyone is checking their email it's good WiFi in here.

Yes not in the rooms? No - she is fantastic. Kristine do you have any way of weighing in via audio? I have a very rudimentary - Berry you can tell him I'm here. No mike access okay.

You know, I mean maybe I can just step out and weigh in as a, you know, I don't think that those concerns are invalid. I think they are legitimate but I think that, you know, when creating policies like this that are going to affect the whole ecosystem it's always going to be a balancing act.

I think there is a danger that someone somewhere at some future date will be prevented from accessing or slowed perhaps from accessing a dispute resource.

And then the question is turned around so how much of a burden should we put on the rest of the industry to prevent against the possibility of that scenario and I think that's the balancing act that we're trying to achieve.

What helped me solidify my position was the headcount the fact that this is happening even in very, very large TLD's at a rate of, you know, maybe Barbara can give me some actual numbers but a very low rate.

And other gTLD's have - that have been in existence for many years have not seen this palsy in (voting) at all and yet they are maintaining, trained and support resources continuously just in case they ever receive one.

So, you know, my position is that we got it right but that we should acknowledge that concern in our report and that it's something that we certainly should be open to monitoring and revising as a community if we feel that it has become an endemic problem.

And that ICANN starts, you know, compliance or staff starts to receive or registrars for that matter starts to receive numerous complaints that they are being shut out of dispute resources because of the price.

But I'm really looking for, you know, this is not a James and (Arthur) conversation anyone, anyone else be willing to weigh in on this? Graeme sure.

Graeme Bunton: Just to agree with you James I think Tucows has seen one in 15 years. They're extremely rare for us so it seems like that's - we've achieved there at what I agree with you is a reasonable balance.

Yes and as long as we're willing to keep that sort of option open for future discussion then I feel like we're pretty solid. Sorry that was Graeme Bunton for the transcript.

James Bladel: Thanks Graeme and I also want to say it's not necessarily true that a registrar would pass those fees along to a customer. If they believe that they were at fault or they believe that they wanted to do this as a matter of keeping the account, keeping the customer happy it's certainly something that they could absorb on their own.

So, you know, it's possible that they could - (Arthur) wants to input, go ahead.

(Arthur): Definitely, I must admit that the presence of the fees does encourage outreach between registrars by which I think the majority of cases that, you know, would otherwise go through a dispute procedure can be solved before ever going there.

So it's also an incentive for registrars to continue to outreach and continue to work together. That said from the perspective of a registered name holder they have no idea that option exists, what the costs are and why they should carry the burden of cost.

It's difficult to explain to a customer who pays \$10 a year that they now have to pay \$1000 to get their domain name back because of the third-party resolution. I don't know if VeriSign is cheaper than that.

Just these concerns that I've added to the IRTP working group as well as other issues mainly stem from the perspective of the registered name holder, which I think is not being adhered or addressed directly or specifically enough by the current policy.

So besides just the fee itself it's more to do with how do you communicate the option, options that are there right now to affect the (unintelligible) franchise registered name holders to begin with.

So they are - even we keep the fees we should still communicate the options to the relevant registered name holders or to all of them more clearly as part of the IRTP policy.

James Bladel: Thank you (Arthur), so we do now have Kristine on the line, on the telephone bridge so we definitely would before we move on maybe give her an opportunity to weigh in if she would like.

I would point out that one of the other recommendations is for ICANN to maintain a Web site where we registrars can link to and direct concerns, registrar concerns, registered name holders to timely and current information on their options and the fees associated.

So hopefully that part of your comment will be addressed by another recommendation that those resources be created and that registrars be obligated to link to them but for right now we'll go to Kristine.

Kristine Dorrain: Hi yes this is Kristine can you hear me?

James Bladel: Loud and clear.

Kristine Dorrain: Great thanks, okay so this is Kristine from National Arbitration forum and thanks for the dial out I appreciate it. I popped in kind of late. So yes with respect to the fees those of you have been on the weekly calls know that this has sort of been something that I've popped up, you know, I raised several times because the, you know, we want to be sensitive to the fact that we know the registries are charging less.

But what we're bringing to the table of course is, you know, experienced licensed attorney's who, you know, have to review the case file, you know, it take several hours to do the review and several, you know, and then draft a written decision that gets published online because that's the new recommendation that it will be published online.

Excuse me, and they're doing this for a flat rate of roughly \$800 and so the - and I won't say a flat rate they get a percentage of what we collect but for a single domain name it's \$800. And so the thing of it is is really thinking, you know, from the perspective of we have to hire an attorney to do this.

So one of the things that we've haven't gotten into is a group that I think we need to eventually or at least make a recommendation that there's an implementation team around, which is other alternatives such as the provider has - retains a specialist who handles all of these cases, which would mean there wouldn't be a rotation amongst panelists.

There would probably just be the same one or two people who would get all the TDRP cases. Again once you get somebody with a certain amount of volume they get a certain comfort level with the types of disputes there are and that sort of thing.

So I think as a group and a community there are a few options with respect to how the fees could be structured in a way that would be a little bit, you know, less harsh for the parties at play, you know, parties in the disputes.

But I really am sensitive to the fact that, you know, the amount that we're able to do this process for is not similar to what the registries are able to do it for currently. And so I think there does have to be a serious discussion about where any funding differences could be made up or whatnot.

So that we make sure to continue to provide the quality product and that consistency that everyone is looking for.

James Bladel: Thank you Kristine, appreciate your perspectives on this and I think that, you know, to your - you had a point in there regarding - I'm sorry I'm drawing a blank it was in the middle part there regarding - I'm stuck on where you ended but can you help me?

Kristine Dorrain: Were you thinking about the part where I talked about the different options such as having a specialist or...

James Bladel: No it was right before that sorry, I was writing notes and then I asked Marika how much time we had and I lost track of my train of thought. So I'll apologize for doing too many things at once it's not your fault it's my fault.

So but you had made a comment there I think about - it was right before talking about having a dedicated panelist that is specific or a specialist that is specific to this issue, it's not rotated around.

And I think that there was a comment that relates to another one of our recommendations. Okay we'll come back to it. So this is, you know, this is kind of where we're landing here I think is that, you know, a recognition or an acknowledgement that this could be a problem in the future but that the scope and the scale is so small that it's something that we should keep an eye on but not necessarily unbalance the recommendation.

I'd like to propose as a way forward that we maintain our original recommendation as it is however note the concern that was raised by (Arthur). And I think, you know, I think Mikey raised this topic as well before the part about the fee differential.

And just to understand that it could become a barrier and that it is something that we should keep an eye on and perhaps address as a community or through ICANN staff.

The bit about recommending to Kristine's point about recommending that providers maintain a specialist that deals only with transfer disputes. I don't think that that's a bad idea at all.

I don't know that it can be baked into a requirement for a dispute provider at this point but it's certainly something that we could include in a - in our recommendations that would be adopted for them - by them on a, you know, on a best practice level.

So I would just - I don't know any thoughts anyone like to disagree with that approach, build on that, add to it, amend it, modify it? (Arthur) go ahead.

(Arthur): Well no the - it might still be a possibility in the future of course that it - that the fee may become preventative. But we already know what the fee is, \$800 or \$1000.

If there are so - if there is such a low number of cases per year then what is \$40,000 to ICANN per year. In other words is it not something we should pick

up the bill as a community as an insurance for if your house burns down and you're the victim of a hacker attack your domain is transferred away.

But the community base for your legal costs because you're involving a lawyer and all kind of offline mechanisms to enforce online ownership for the right to a domain name because you never owned a domain name. But to protect somebody's rights the price for protecting that given the number of low cases is actually quite - it's low enough to just do that to just pay that as a community.

While at the same time requiring registrar outreaching, at the same time, you know, enforcing that we should always try to solve it between ourselves first. So although, you know, for specific charter questions of the IRTPD it may be that for now we keep the fees as is because of the arguments that have already been made by the group.

But strictly speaking from the registered name holder perspective we're not changing it and the domain names that are not interesting enough will not be defended or will not be - that those name holders will not pay the fee and neither will the registrars because why would I keep a customer with one domain name and pay \$1000 for him and I will earn that back on that particular customer after 100 years of renewals but the customer will probably be dead before I make a profit.

James Bladel: Actually I - so we can move on then I think because Lars had asked to be in the queue but I just want to emphasize, you know, one customer can tweak a bad experience and cost you 100 customers in, you know, through social media.

So I don't want to assume that just because the registrar is incurring a fee that they won't, you know, absorb that in the name of good customer service. It certainly is possible that they would, it is very dependent upon - it is very

situational and that's why I think we have to be careful when we make, you know, broad policy implementations.

Lars Hoffman: Not everybody is a GoDaddy that would protect their reputation that way so I'm just speaking from - perhaps for the majority of the smaller registrars I would feel - and the resellers in particular.

I can guarantee you that resellers will not fund the transfer dispute cost in particular looking at the cases that have been made at all on the transfer disputes.

They have all been filed by major registrars like all the transfer disputes that I've seen that are on file all of them have been made by the large incumbents.

Now that's not to play the blame game at all. But simply that if you want to protect the registered name, also for the resellers as well, I would encourage still and maintain the position that the fees need to be lifted while at the same time encouraging outreach and enforcing a dialogue before allowing a free dispute.

James Bladel: Okay, so Marika, you wanted to go next.

Marika Konings: This is Marika. Maybe just a suggestion because I know you all don't want to talk about it, but presumably at some point we'll do a review, I guess again, of how certain changes are working.

And one thing in the relation to the TDRP may be that, and instead of making any changes now, but just know this as an item and possibly conduct a survey at the time and basically ask registrars, "Why are you using the TDRP or why aren't you?" And (BBC) is indeed the cost of prohibitive factor, and in that point of time, maybe further explore.

And I think at that point, hopefully as well the IRTPC question may be addressed and the other aspects of dispute have been identified. And maybe it's a combination at that point where you review existing mechanisms and actually also have some questions.

Is that maybe the cost of this prohibitive or are there other elements that are perceived not to be working? So (unintelligible).

James Bladel: So I guess I'm not clear. This feedback from registrars would be sought before, as part of the implementation of this PDP, or as part of a review once the implementation of this PDP has gone live for a while?

Marika Konings: Yes, this is Marika. I think more the second latter.

James Bladel: Okay.

Marika Konings: And again, and maybe something as well to take together with the work you're foreseeing on doing one's IRTP Part C is implemented and (registered) case studies noting that there are some, you know. At that stage, you will know whether more work needs to be done in relation to dispute resolution mechanisms or management, if not everything is covered. And that maybe then taken as part of that or part of a future review.

James Bladel: Thanks. Lars, you're up next.

Lars Hoffman: Yes, this is Lars.

I would have to go back through the transcripts. So I believe that might be at the time - we discussed this with - the fee issue was discussed within the group if I recall correctly. And obviously the problem is on the one hand side, fees can prove prohibitive. But having somebody to help absorb the costs (unintelligible) can encourage (scrumptious) action.

And then that's the other side of the same argument. That all of a sudden, you have a lot of transfers that are legitimate but they are workers who provide it because the registry level is no longer there. You know, the costs will go up considerably and the number of cases might go up considerably too because for ICANN or whoever else might cover it if it's no longer the registrars who are actually launching the procedure in the first place.

So it's something the group discussed. I'm just saying that as a reminder.

Man 3: I concur with what Marika says and perhaps a slight fee should still be in place to prevent abuse similar to the (AGP) that you (unintelligible) - up to 10%, right. I don't know.

James Bladel: Thanks. Yes, and I think we all know when something is reduced to free, what happens to it.

So I have Volker in the queue next and then I wanted to kind of - anyone else want to weight in on this subject because we are getting to a point where we can wind down and then open up for questions.

But we also have a couple of other topics that we wanted to open up. I don't know if time allows. We have the room; I just don't want to assume that we have the people.

So Volker, go ahead.

Volker Greimann: Yes, you made the point exactly; when it becomes free then it becomes something of a game that people might play to see if they can get an advantage out of the system lottery so-to-speak.

We've discussed this at length during the working group, these questions, and we found that it is on the one hand, very problematic to have a party pay that has no interest in this proceeding because they will not cause any

proceedings to proceed in the future or the process to stay as unused as it is today.

So what we should do is to find a process that is actually more used than the process today but making it free or making it pay a little bit of our registrars per se, might be the right way to go. Because either way, it would not solve the problem that we are seeking to solve here.

James Bladel: Thank you Volker.

So gathering all this feedback, I think where we can land it that, you know, to acknowledge in our initial recommendation, to acknowledge that this could become an issue, the fee differential, to propose that we monitor this issue and that it become part of any sort of follow-up review, to ensure that the fee differences are not becoming a barrier to registered name holders who are accessing the policy, or a barrier to registrars, to Volker's point, from an initiating the policy on behalf of their registrant customers.

And it so, if it's determined, then we should examine some sort of a model where ICANN is reimbursing, partially or fully, those disputes that are successfully reversed. And I think that would prohibit some of the frivolous stuff that we're talking about as well.

And I'm thinking - and Lars, I know I'm kind of putting it on to you to go back to the transcript here, but I think that should capture all the different points and concerns while leaving our recommendation mostly intact.

We'll move on from there. I'm not able to think and chew bubble gum at the same time.

So no problem. Holly is excusing herself for another meeting. Thank you for coming Holly.

Okay, so let's talk about, you know, do we at least give a window or an opportunity here for the folks who don't normally participate in the working group to weigh in on these subjects if they choose? Any of the subjects really, not just the one that we were addressing previously.

You know, before we move on to our next issue which is, I believe, was either the OA issue or the other one.

So does anyone - I can't see behind me. Does anyone in the room here have a question and want to get into the queue? Someone here, we'll start with you, and then anyone in the back? Please, there's extra seats at the table; don't feel like, you know, this is a place of privilege. You know, it's like Thanksgiving; you're all welcome here, come on up and sit down.

(Bene Garcia): (Bene Garcia).

I'm curious what drives - well what's driving the fees? In the discussion I'm tracking, they seem to be a little malleable but they also seem to be quite hefty. And I'm wondering is that just a function of some sort of standard or is there some sort of mechanics involved? What drives those?

James Bladel: So I should probably let Kristine field that question. And I think she did touch on it a little bit. But the fact that an independent dispute provider has to higher panelists or specialists to review and investigate and make a determination, and in some cases these are, you know, experts in this field or folks who are, you know, trained in arbitration or disputes or former judges or something of that nature, are usually hired and retained for this purpose.

But Kristine, do you want to weigh in on this?

Kristine Dorrain: Yes James, this is Kristine from National Arbitration Forum for the transcript.

Yes, you hit it on the head James. So the fee that we charge is \$1300 for a single member or a single domain dispute. And two-thirds of that goes to the panelists who consider the cases. They are a licensed attorney with at least 15 years of legal experience and specialized experience in Internet domain names and trademarks and that sort of thing.

I know trademarks are not specifically relevant to the TDRP, but we use our UDRP panelists, so that's why I reference that.

They, you know, review the case file and write a decision just like you would get, you know, from a traditional arbitration or a court case. And then, you know, send on the order.

The remainder of the fee is used for processing for our staff and our legal counsel. So it's pretty involved here, so every case is looked at by internal legal counsel, case coordinators, and then of course, decisions are made by the independent expert panelists. So that's why the fees are what they are.

The fees haven't gone up in probably close to ten years, maybe eight years. So they are kind of rock bottom for the process as is.

I made a suggestion in the Chat that, you know, I'm loving this discussion. I would love it if we could schedule some time in one of our future calls to just brainstorm implementation like options.

You know, I throw up the idea of having a dedicated panelist, maybe that's not the right answer; I don't know. But I think there are things that we could do to think about streamlining the costs to make it more user friendly and cost friendly.

But when you are, you know, when you want the expert, unfortunately that comes with the expert price tag as well.

James Bladel: Thank you Kristine. Does that address you're question?

Okay, excellent. And thanks for that comprehensive response.

Anyone behind me raising their hands wanting to get into the queue? I can't really - okay. Any other comments from anyone else at the table?

Okay, so let's move then to - let's just quick do a quick time check. It's 2:33.

Angie Graves: James?

James Bladel: Yes.

Angie Graves: For the queue, can someone let me in the room please? (Unintelligible).

James Bladel: Is that Angie?

Angie Graves: Angie, yes.

James Bladel: I think she wants - are you not able to enter the Adobe Room?

Angie Graves: Correct.

James Bladel: Okay, make sure that - it's a different Adobe Room than the one that we use on our weekly calls Angie. You would have to go to the ICANN London schedule and the link is there. And if we could maybe have someone post it to the mailing list or send it to Angie directly; we'll try and expedite getting you that link. But it's a different Adobe Room tied to this physical room.

It's in the invite that you received today, and we just found out it does not have audio support. So that's why we had to call Kristine.

All right. So the next issue we discuss - let's hold the FOA issue. What was the third one Lars? The 6 to 12 months. Yes thanks; the statute of limitations.

And so here's the introduction, very quickly, is that from the time of an invalid transfer, you have currently six months to initiate a dispute. This group, as part of our initial report, has recommended extending that to 12 months.

The thinking behind it, the justification, was that in six months time it may not be sufficient for a registrant to even know that their domain name has been transferred, if it's not something that they are monitoring on a regular basis.

However, by extending the time period to 12 months, then it should be able to get their attention in one of two ways. One is that the renewal notifications would not be received and that would get their attention when they go to renew the domain name assuming it's on an annual basis, which is common but not necessarily universal.

And then secondly, that if the required ICANN, who is data reminder policy notifications, asking them to update their Whois data would not arrive.

So just laying this out here, this hopefully would get their attention, that their domain name no longer belongs to them; it has been transferred. And give them ample time to initiate the dispute if it is in fact been illegitimately transferred.

I would point out that these are absences of communication, so it's much harder to pin down than an actual, you know, discreet email address being received. It's more like something didn't happen that you were expecting as opposed to something happening to get your attention as a registrant.

I don't know that we had any other concerns raised. Perhaps there was some concern that extending this from 6 to 12 months might open a larger window for any disputed secondary market transactions so that any buying and

selling or a domain name, if those transactions were to go south or result in some sort of disagreement, that someone might file a dispute. You know, I don't know if that's a legitimate concern or not, but it's something that frequently comes up when we discuss this topic.

The working group recommended that we make this extension. And I'm not sure. We received a few comments on this, correct Lars? Yes, okay, thank you. And it's Recommendation Number 5, thank you. And so going back to - yes.

Just to, you know, address these, I think that we, you know, as a working group, we determined that there really was no immediate action required at this time. But we certainly wanted to give everyone one last chance to weigh in on this topic and see if there were any amendments or modifications proposed to the working group.

So any comments or thoughts on this? Lars?

Lars Hoffman: Yes and even to reiterate maybe also why you would like to six months because there were comments by Thomas Rickert and by the (unintelligible) like especially the ones that want to have it extended to 12. Just to point obviously that.

James Bladel: Yes, thanks. I think Thomas Rickert actually made that comment in the Singapore Meeting either during the Council update, that even 12 months was not going to be sufficient. Was that correct? He wanted it extended...

Lars Hoffman: No, it's 12 months and he provided then something in writing which is here, comment number 11.

James Bladel: Okay, so Comment 11. Can we summarize here that he was - an additional three months; yes. So he was actually asking for 15 months; yes. And we were saying that we acknowledged his point on this but noted that, you know,

in between the balance between a 15 month extension and a 6 month extension, that 12 months seemed to be a reasonable compromise to address all of the concerns at hand. And then we had a comment from Staff on this as well.

So I think that, you know, I don't - I haven't seen a lot of traffic on this either in the last couple of meetings or on the list. I think that we are probably good with the 12 months.

If we need to expend the language of our justifications associated with this recommendation in our final report to acknowledge the concerns that were raised in the public comment, then we can certainly do so. But I think that our original recommendation that we can go forward with that.

(Bene)?

(Bene Garcia): (Bene Garcia).

Do you have data on the cadence of disputing? So you say, "Okay, well six months wasn't good enough." A year, is there data that shows what that curve looks like?

James Bladel: I think we did pull some basic data, but the sample size was incredibly small and really didn't - I don't think that we - it didn't support the idea that they were all happening in the first week and neither did it support the idea that everyone was running out of time in five months and 28 days. So I think that...

(Bene Garcia): This was a question I asked in the general policy meeting they did for new members. When you're setting up a policy, do you ever put a switch in for review of that policy based on a change in the data?

James Bladel: Based on a change in data, no. And I would say that that effort is just now getting underway in its infancy.

Berry, maybe you could speak to the data and metrics working group that's...

((Crosstalk))

Berry Cobb: Yes, this is Berry for the record.

So I think despite the Data and Metrics for Policymaking Working Group, we're internally making a much more concerted effort to ensure that once a consensus policy is implemented, it's part of the implementation framework, that we will start monitoring that policy through the contractual compliance function.

And like Marika noted earlier, you know, this is a fairly extensive change. And not that I'm wishing that there's a whole bunch of volume in regards to TDRP, but that is something that we'll take a look at. And if we do see that the 12 months, whether it's working or whether it's not, I believe that we will be reporting back to the community on how that was implemented and watch it.

And certainly if anything is out of character, we would report that back to the Council to have it be deliberated on.

James Bladel: and just to expand on that, I think that a lot of the participants on this working group are registries and registrars, would like to see most policymaking trend in that direction. So not only are they triggered, any kind of a review triggered by data, but that data is used to substantiate the actual problem that we're looking to solve and to - and I'm being careful here - to validate the solutions that are being proposed. And that the cure is not going to be worse than the disease.

Because I think that, you know, when we deal with very very large numbers within ICANN framework, it's easy to say, you know, I saw this happen 100 times, therefore it must be a terrible problem and we need an industry-wide policy. Whereas a service provider, you know, we can say we've seen this transaction happen over a million times a month without a problem. So 100 bad instances really is not even, you know, a rounding error.

So I think putting things into perspective and making sure that the solutions match the scope of the problem is something that I think that the service providers could certainly get behind that effort.

But unfortunately with this particular issue, you're dealing with a subset of a couple of dozen incidences over a decade. It is hard to draw any - yes, to draw any conclusions at all that six months is either not enough time or 12 months is too much time. It's really a matter of just adding a layer of protection that we think should be there without burdening everyone else.

So okay, any other thoughts on this comment? Just to remind folks that we are now 14 minutes over. Yes? I can't see. Who has - Kristine.

Okay, go ahead Kristine.

Kristine Dorrain: Oh hi, thanks. This is Kristine from National Arbitration Forum.

So I just wanted to make an antidotal observation which is that the few handfuls of disputes we've seen, which I think is six, have been pretty quick. And I wanted to tie this back only because I think it ties into the pricing because obviously we are higher priced than the registry or we're an appeal level for the registry at this point.

So the few cases we've seen where people who thought that domain name was very valuable, I believe they noticed a loss or experienced the loss more of the neck, pretty quickly, and you know, didn't really wait. You know, they

wanted something to happen or something did happen. They brought the dispute to the registry, it came to us, you know, they were willing to pay the fees.

So I think there's a little bit of - and there's two levels in play here and I think we talked about it when we talked about fees. And I think it was (Arthur) who said something to that. You know, maybe the fees, you know, weigh in also and that is the TDRP would almost be more of a mechanism, you know, kind of a quick, get my domain name back mechanism for the more valuable names. And might be, you know, overlooked for the less valuable names. Just an antidotal thought.

James Bladel: Thank you Kristine and I think that your antidotes are helpful in the absence of data just because of the position that your company occupies.

So just to note that we are 15 minutes past the close the meeting. We gained and lost working group member Chris Chaplow; thanks Chris and thanks for coming.

And we have the room as Marika indicated. We could probably keep the room to the top of the hour but I certainly don't want to presume and maybe a little longer. But I don't want to presume that everyone's schedule supports that. So if you need to leave, you know, certainly don't feel like you're being impolite.

So the final issue that we had on our final report, and it comes from some comments that were submitted by Arthur who has joined us here in London as well as Rob Golding. Is that right? Yes, Rob Golding from a registrar.

And Rob is not here. I thought he was based here. I thought we were going to see Rob. But Rob's not here with us today.

And this is regards to the continued necessity of the FOA. And the working group's initial recommendation is that the FOA should be preserved. That it is, you know, for the majority of transfers, it is just an extra box to be checked or an extra step, it can cause problems or confusions if the customer doesn't quite understand what to do with an FOA.

However, in the event that we are trying to address a transfer problem, a dispute - and I'm not talking about formal disputes that go all the way to Kristine's organization. I'm talking about just inter-registrar disputes which are much more frequent than the small numbers that we're talking about for TDRP. That those forms of authorization are in fact essential; the only audit trail that's established between registrars.

So I think that we had a very fruitful discussion, a very healthy discussion on this on our last call on this issue. I think that we have generally arrived that the idea that the FOA is still essential. It is noteworthy that it can cause confusion and perhaps this ICANN resource for disputes and for transfer information might help. You know, at least provide some avenues for customers to educate and for registrars to help educate their registrants.

But in general, I don't know that that we've moved much, if at all, from our original recommendation.

So wanted to put this on the table for further discussion today. We can give it at least another 15/20 minutes discussion on top of the, you know, hours that we've invested and weeks that we've invested into this topic. But certainly want to give everyone an opportunity to weigh in on this one one more time so that we can be sure that we are comprehensively accounting for all the use in our report.

So any other folks or even the folks in the audience - or does anyone have any questions, first of all, what we're - okay. All right, any other thoughts on this?

(Arthur)?

(Arthur): Yes, I'd definitely like to clarify my position on FOA as it has changed a bit from moving it completely to changing it to a non-blocking form of administration, a form of confirmation.

In other words, I agree that an email to the original registered name holder in particular is useful for tracking who the original name holder was. And I'm complaining now, especially for the inter-registrar disputes, not the official disputes agree, because we have experience with that. And (unintelligible) make use of the emails.

However, the mentioning of you saying an extra step is particularly problematic because each extra step that you ask a registered name holder or a customer or anyone on earth to take, will drop your conversion. So the more steps you ask, the less conversion you get on a successful transfer.

In other words, because you introduce, and in my opinion, three steps, so maybe even a fourth step process for transfers, when you compare them to ccTLD transfers, because you add all these extra steps, you are encouraging registered name holders with a legitimate desire to transfer their domain away from a registrar, to give up that endeavor and to stay with the losing registrar.

My recommendation to the group with respect to FOA emails is to maintain them but not in a blocking away. In other words, please change them to a form of confirmation after the registrar transfer has taken place to the original holder. And make it easier should there be a dispute afterwards, that it makes it easier for the registered name holder to contact their registrar or indeed the gaining registrar.

And at the same time, reducing the dependability of successful transfer on the accuracy of the email address in Whois. Because in many cases, the email address in the Whois is either too old or it's from the losing registrar, it's not from the registered name holder. It's from a reseller.

The email is so problematic in many cases where the legitimate, or at least the paying entity for the domain name, wishes to change their supplier, in other words, to choose a new registrar. And this extra step should not be blocking. It should be taken, but it should not be blocking in my opinion because it limits the process and drops conversion and limits migration of domains. And it's anti-competitive or becoming already an anti-competitive step in my opinion.

James Bladel: Okay thank you (Arthur) and thank you for clarifying the difference between your position now and the position that was submitted in the public comment. I think that's good and we'll make sure to update that.

Volker?

Volker Greimann: First of all, personally on a personal level on a technical implementation level, I agree with (Arthur). The form of authorization is a pain; it limits conversion and it's a problem to migrate large domain and portfolios especially.

However, it is at this time the only way to actually contact the domain owner because the (off-code) may be also handled by a lot of in-between parties that may not be the domain owner. So for presentation of the (off-code) alone is not evidence that the domain holder wants to transfer the domain name.

Furthermore, as registrars, we are under the 2013 Registration Agreement already required to perform validation of the email address. The form of authorization that we send out takes the place of that validation because it already fulfills the requirement of that validation.

When you transfer a domain name in, you have to make sure that the email is correct. If you own a domain name that has incorrect Whois data, i.e. an incorrect email address, then you must fix that email address before you transfer the domain name out. It's as simple as that; that's a validation requirement that we already have.

And we tied that to the form of authorization for the transfer. So actually, you don't have to send out two emails, you just have to send out one. And that takes both functions.

James Bladel: Okay, thank you Volker.

I put myself in the queue, but I saw (Arthur) jump forward. Did you want to respond quickly?

(Arthur): Yes, quickly about not being the real registered name holder, I think that the exchange of the authorization code between the acting entity and the gaining registrar is sufficient proof of the registered name holder desire to transfer their domain name.

And the reason I think that is because in many cases, in many ICANN policies, there is no consideration for a resellers at all. We all talk about the registered name holder and the importance of contacting the registered name holder, but if you are not given the email address of the registered name holder, which the policy requires, but let's say that you're not getting it, then no matter how many emails you send, you're still not contacting the real registered name holder.

Now the exchange of the authorization code is not done haphazardly. It's not done easily. You know, you have to do some effort to get an authorization code, and you have to do some effort to submit an authorization code. And that alone is already enough of a burden, enough steps, to check a transfer.

Indeed, many ccTLDs registries limit themselves to just the authorization code. So why on earth are gTLD transfers not only adding an extra burden in a form of an email, that it's not just informative, but it's blocking.

And as well, having a client transfer prohibitive status in the Whois, that also has to be put to the status okay. So the gTLD transfer process adds two extra steps that are a burden, that are not effective, that do not additionally confirm the wish of the registered name holder to transfer which is already covered by the authorization code as evidenced by the other ccTLD transfer policies. And in short, it remains an extra step.

James Bladel: Okay, thanks. I think we're clear on that.

I want to go to Volker and then Chris, and then I will put myself in the queue. And then I want to bring it in for landing.

So Volker?

Volker Greimann: Just to reiterate, looking at the requirements of the RAA to verify the contact data, it is not actually an extra step. It can be combined with the step that you have to take validating the email address before the transfer a domain name of the new registrant.

So yes, it is an extra step when you consider only the transfer. But when you also consider the verification obligation under the RAA, it's not.

James Bladel: Thank you Volker. Chris?

Chris: (Unintelligible) the point (Arthur) made. The APP code or transfer (unintelligible) or whatever you wish to call it, could easily be contained from any way with a number of hacking ways from a registrar's database.

So having an extra part of confirmation or albeit yes, you could fake the registry email address to confirm all that or an email address - sorry - to confirm it, is one point.

The ccTLD that (Arthur) made the point of, they are still in control of it and a registrant can generally talk to a ccTLD provider whereas they cannot talk to a gTLD provider.

James Bladel: Thanks Chris and I think that's an important distinction.

I put myself in the queue just to weigh in on this topic. I'm a perspective of a registrar.

I think that when we looked at this, the idea of eliminating an FOA from our perspective was considered to be really a non-starter. It's really a critical piece of verifying that the transfer was - confirming was the wish of the registered name holder.

To (Arthur's) point about, well let's convert this from a required prerequisite confirmation to I think more of an after-the-fact notification so that we increase the conversion rate of transfers, I think that that's something that, you know, I'd like to gather some data on that and understand what the impact of something like that would be.

Off hand, I'm a little skeptical. I think that would definitely increase the successful transfer rate. But I also believe that that would increase the transfer reversal rate because, you know, the one-layer safeguard would be removed. And if we're dealing with very large numbers, it only takes a very small percentage of failures to trigger a large number of disputes. So I would want to take a look at that and understand exactly where we're going.

I think, from speaking with our internal teams, we're much more comfortable with some sort of a two-factor confirmation of transfers. And right now, the

industry is using the FOA as that second factor. Now if it's not what we want or if we want to change it then we should at some point, but I think that, you know, that's something that warrants a little bit more study. So we can come back to this topic, and I'll try to gather some data and we can come back to this topic on our next thing.

I was trying to wind this us but we'll give (Bene) the last word and then we'll bring it in for a landing because we're at the top of the hour. Go ahead (Bene).

(Bene Garcia): So this might work, this might be interesting for large people. But like we have a very large customer base that is small businesses and those cats do not look at their emails. They don't answer their emails, they don't - we literally have to get them on the phone to talk to them.

And so if this is counting on someone to check an email to make something happen, you're setting yourself up for creating a problem that didn't exist.

(Arthur): Yes.

James Bladel: I'm not sure I followed that. So you're setting yourself up to...

((Crosstalk))

James Bladel: The registrant is setting themselves up?

(Bene Garcia): If you're setting a process in place that requires someone to have an email or respond to an email, there's no one there; there's no one home. They're not looking at their email.

((Crosstalk))

James Bladel: Okay, well you know, I guess I know that that is common but I also know that this has been part of the transfer policy now going on 15 years. And it's been added to recently by ICANN's requirements that we, you know, validate not only on an annual basis and send out an annual Whois data reminder email, but also validate that the email is alive and someone is monitoring it as part of the new RAA validation.

So my point is just that, you know, I think that the message from an industry perspective, whether registrars are doing this, it's coming from ICANN, is that if you want to be a registrant in this industry, you have to have an email address that you check for even the most basic functions like using your domain name, registering a new one, or keeping your Whois data up-to-date on an annual basis.

I would love to see all email communications between us and registrars go away unless the ones that we choose. But I just, you know, we're pretty deeply invested in this idea I think as an industry that we have to have a way of...

(Bene Garcia): Well we actually have data on how often somebody sees an email. And it's not high.

James Bladel: Totally agree and understand. But it think that while the rest of the world maybe moving to, for example, SMS as a second factor, this industry is doubling down on email communication. Hey, we just got rid of faxes a couple of years ago as well.

So I do note that we are out at the top of the hour.

I'm sorry, (Bene), can you restate your affiliation you were saying as a large service provider?

(Bene Garcia): I'm with (Hiboo). We have - what would you say - (unintelligible), over 600,000 domains at this point.

James Bladel: And that's a registrar...

(Bene Garcia): As a reseller.

James Bladel: Reseller.

(Bene Garcia): And so those are small businesses in two countries, just those numbers, not counting the Spanish ones or the South American ones we do. It's just UK and the US.

James Bladel: Okay, thank you. Okay, well I did want to say a semi-thanks to everyone, the regular working group participants as well as the new folks that have joined us here in London and contributed to our discussions.

Our next meeting...

(Arthur): I would like to respond to what Volker and the other people said, that they were lying. There are just factual inaccuracies here. Please.

James Bladel: Hold on. We've given you I think ample opportunity to weigh in. And I would encourage you to join our next meeting which is going to be not this coming Monday after ICANN, but two weeks from today, will be at 15 UTC. And I think that we've certainly valued everyone's contributions here including the public comment and in this forum.

And if you want to continue this discussion, I would encourage you to join the working group by submitting your Statement of Interest and becoming a member of the working group.

I know we're almost at the end, but we certainly could use some additional help. But we're going to close up now. Thanks.

END