LOS ANGELES – All Things WHOIS - Now and in the Future
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MARGIE MILAM:	Should we get started? Okay. Before we get started, we've reserved some seats in the front for any GAC members that would like to speak.
	We have a part of the session that will allow GAC members to actually talk about their WHOIS issues, so these two rows up here are for any GAC members.
	So my name is Margie Milam. Good afternoon and welcome to the "All Things WHOIS" session.
	This session was scheduled at the request of the Government Advisory Committee, the GAC, in its London communique.
	Today we will provide you with an overview of the various WHOIS-related activities so that you can learn the status and learn about how they are linked and how you can get involved.
	We will also have a dialogue with members of the GAC so you can hear their concerns about the WHOIS issue.
	We will also talk about the future of WHOIS, and especially the next steps for examining the recommendations of the expert working group that has come up with some recommendations on how to possibly replace WHOIS with a new system.

And then finally, the session will close with an opportunity for all of you to come to the mic and give us some -- any information or raise any concerns that you may have about the WHOIS program.

So on this slide you see the topics we're going to cover. As you can see, there's a lot of information here. We'll reserve questions till the end, although I did mention in the middle of the session we will have an opportunity for GAC members to talk about their specific issues, and hopefully we'll get all through this in the next 90 minutes.

So before we begin, I wanted to give you a little bit of overview of where we are in the WHOIS initiative.

Essentially, in 2012 the ICANN board adopted a two-prong approach for dealing with WHOIS issues as a result of taking a look at the WHOIS review team recommendations, and this two-prong approach kicked off a series of activities, one being to improve the current WHOIS system, and that's what you're going to hear about today with all of the speakers we have here.

But then it also kicked off a separate program to really take a look at the WHOIS issue apart from the current system and to see if there's a way to perhaps redefine the purpose and provision of gTLD data and see if there's possibly a new way to deliver this type of data. And that is the work of the expert working group that was formed to assess the need for any next-generation system, if you will, and identify a possible replacement to the WHOIS system.

And at the end of this session, you'll hear from Susan Kawaguchi at the end of the table and she'll give you the current status of that work.

And so we're going to kick off the session with a presentation from Steven Pedlow. I'm honored to introduce him. He's with the National Opinion Research Council, NORC, at the University of Chicago, and the University of Chicago's NORC has published preliminary findings related to WHOIS accuracy, and Steven will give you an overview of that initiative.

STEVEN PEDLOW: Good afternoon.

My colleagues at NORC and I are excited to be a continuing part of this work because we're very eager to deliver meaningful statistical results to the ICANN community about the accuracy and completeness of WHOIS data.

So here are the goals of the WHOIS accuracy reporting system, or ARS:

To proactively identify inaccurate WHOIS records; to explore the accuracy using automated tools; to forward potentially inaccurate records to registrars for action; and we can publicly report on the resulting actions.

Today we're giving an update on the pilot and some preliminary findings. This pilot started in late August of 2014, so it has been done quite quickly. We apologize that there were no advance materials. We were still analyzing new data on Thursday and Friday of last week.

The pilot involved collaboration among many different companies to examine the syntactical and operational accuracy of email addresses, telephone numbers, and postal addresses.

Syntactical validation assesses whether the syntax is correct. Does it look like a valid email address? Does it look like a valid postal address or telephone number?

Operational validation assesses whether it actually is a valid email, postal address, or telephone number.

A third step not attempted for this pilot is identity validation, which assesses whether it is the valid email, postal address, or telephone number for the named registrant.

In a few slides, I'll show accuracy comparisons between registrars under the 2009 RAA versus registrars under the 2013 RAA, new gTLDs versus prior gTLDs, and between the five geographic regions.

So NORC, my company, was in charge of the sample design, and we chose 100,000 total domains, and we oversampled new gTLDs quite a bit.

New gTLDs contain about 1.4% of all domains, as of August, but we selected 25% from this growing area.

We selected a total of 25,000 domains from 318 new gTLDs that had any domains. That's all of them.

We selected a minimum of 10 domains from each of these gTLDs, and if there were less than 10, we selected all of them for the pilot.

For prior gTLDs, we selected 75,000 domains from 20 prior gTLDs. Here the minimum was 30, and all, of course, if there were less than 30.

Each gTLD is a separate systematic sample. What that means is, we took the list and we found a starting point -- say the third record -- and then we selected every seventh record, say. So we selected Records 3, 10, 17, and so on, for a particular gTLD.

If the file is sorted in any way at all -- and this is something we don't really know -- this guarantees the most representative sample possible.

Vendors didn't necessarily analyze all 100,000 records, which is a very large number, much larger than the similar work that ICANN and NORC have participated in, so we drew two subsamples of 10,000 and 1,000 that were easiest to analyze for some of the vendors.

This table shows that we oversampled by region quite strongly, so that we had sufficient sample sizes to compare the five different regions.

We kept all African domains in the 10,000 sample, and also oversampled the Latin America/Caribbean region.

We also oversampled these two regions in selecting our sample of 1,000.

You can see here the column "Selection Rate" shows you the differential sampling by region.

In selecting the subsamples, we again -- we had control of the file this time, so we sorted the file by new versus prior gTLDs, by the RAA year, by the gTLD, by the registrar, by the country, and finally the place within the zone file.

And again, this is to get the best statistical representation in our sample.

This slide summarizes the scope of the pilot.

NORC selected 100,000 records. These were queried by ICANN and parsed by WISB (phonetic).

StrikeIron examined all 100,000 records for email validation.

DigiCert conducted syntactical phone validation for 10,000 and operational phone validation for 1,000.

Similarly, the Universal Postal Union conducted syntactical postal address validation for the 10,000 subsample and operational postal address validation for the 1,000 subsample.

This slide shows the priorities for the ARS reporting.

New versus prior gTLDs; the 2013 RAA registrars versus the 2009 RAA registrars; specific compliance rates as specified in the RAA; regional comparisons; registrar and gTLD rankings; and trend analyses.

We can't do any trend analyses, obviously, for the pilot, and we did not concentrate on compliance rates for the pilot, but this talk covers the other areas.

This slide summarizes the preliminary findings. However, I'm going to talk about these findings in context of the numbers, so I'm going to pass by this slide.

Before I show results, we are trying to assess accuracy for every domain into five categories.

Today, we will consider no failure, minimal failure, and limited failure as accurate, and substantial failure and failure full failure as -- thank you.

So we consider substantial failure and full failure as inaccurate.

And these definitions, we realize this is a discussion point.

So here are the first slide of results.

This slide shows comparisons between registrars under the 2009 and 2013 RAAs, as well as between new and prior gTLDs.

The leftmost column is the overall numbers, the overall accuracy estimates.

Concentrating on the rightmost two columns, the comparison between prior and new gTLDs, this table shows that email addresses are almost always syntactically accurate.

Significant differences are shown in bold, but none of the significant differences between new and prior gTLDs are more than 3%.

Significant differences that are larger than that are in red. We see here that registrars under the 2009 RAA have more syntactical accuracy than those under the 2013 RAA. However, registrars under the 2013 RAA have more operational accuracy for email addresses.

Under operational, you can see that the "Telephone" line seems to show large differences. Unfortunately, these differences are not statistically significant, and this suggests that 1,000 is too small of a sample size for effective work.

This is the second slide of results and shows comparisons among the five ICANN regions.

Red means the region is significantly lower in accuracy than all other regions. Green means that the region is significantly higher in accuracy than all other regions.

For syntactical telephone numbers, North America is highest and Africa is lowest.

For syntactical postal addresses, Europe and Latin America/Caribbean are highest and Africa is lowest.

And I do want to point out that the two 67.4 numbers are both correct. They just happen to be exactly the same. That's not a typo or error.

For operational and email address -- for operational email addresses, the Asia/Australia/Pacific region is lowest. The small sample sizes again prevent us from saying much about operational telephone comparisons. However, I can tell you that Africa and Asia/Australia/Pacific are significantly lower than North America.

Europe and Latin America/Caribbean, however, are not significantly different with either extreme. That's why I don't have any bold here.

For operational postal addresses, Europe and Latin America/Caribbean have the highest accuracy. There are not significant differences among the other three groups.

Moving on to the gTLD comparison, this slide includes the number -- the sample sizes for the 10 largest gTLDs in our survey.

XYZ is not really larger than BIZ. However, our oversampling of the new gTLDs caused there to be more XYZ domains in our sample than BIZ domains.

You can see that the sample sizes in the 1,000 column are very small except for the very largest gTLDs.

As indicated above, it is possible to rank the gTLDs in registrars. For the pilot, we are not releasing these rankings. We only want, during this presentation, to show what the results might look like.

Here we have ranked the top 10 gTLDs on email accuracy, but we hide their identities.

On the left, we identify them as gTLD A, B, C, and so on.

However, when we rank them on operational email accuracy, you can see that the ranking order does change.

There is an error here. gTLD A should be in fourth place, not first place. 91.62 is accurate.

gTLD B and D are the highest for both lists.

Due to sample size concerns, we do not repeat this slide for telephone numbers or postal address accuracy.

Moving on to registrars, these are the top 10 registrars and how many -- and how many domains we had in each of our samples and subsamples. I'm just going to give you a second to look at this.

Again, the 1,000 column shows small numbers for even the eighth, ninth, and tenth largest registrar.

And this slide shows a ranking of these top 10 registrars for syntactical email accuracy on the left and operational email accuracy on the right.

You can see Registrar J is at the bottom of both lists.

So those are the results we have to share today. During the pilot we learned a few things and there is more work to be done.

Of course definitions are critical. Alternative definitions can result in different estimates. We are reporting here on a syntactical email accuracy definition by RFC requirements, but we realize this is a discussion point.

Also, we would like to combine the scores for email addresses, telephone numbers, and postal addresses into one score. This was not feasible for the pilot due to differential sample sizes and the short time frame.

Also, identity validation was not attempted for the pilot. This will be complex and costly. Details of this operation still need to be worked out for the ARS.

And, finally, sample sizes are very important. The pilot showed that 1,000 is not sufficient for operational validation. Is it 2,000 sufficient? Cost is a big concern for identity validation. What are the cost implications for operational validation? These are the types of things that we will be working on going forward.

And now for the big picture, I'm going to hand it back.

MARGIE MILAM: Thank you, Steven.

So to give you the background on where we're going with this analysis, this slide provides you with the milestones and the timelines going forward for the WHOIS accuracy reporting system. We've obviously published the preliminary findings in Los Angeles, or immediately prior.

After Los Angeles, we will publish a full pilot report. So the NORC folks, Steve and his team, will prepare a full report that will be published for public comment. So that will happen approximately in October. That information will be synthesized, and we'll use that to update the methodology and approaches that are identified in the pilot.

So it's really all up to you to participate in the public comment to let us know whether you think the methodology and approach was right, whether there are things that need to be tweaked as we build out the system.

And then we will make the system go live in phases depending upon the level of validation. We're looking at phase 1 being a detailed analysis of the syntactic validation elements. That would be in February of next year.

Phase 2 would look at the operational elements which are more complex and, as Steven indicated, are more costly and take more time.

And then, finally, the question for the community, for all of you and as we move and build the system out, is do we go to look at the identity validation portion of this?

As we learned early on in the RFP responses, it is expensive, it is costly, and it is very manual. And so that's something that we need to have a

discussion with the community on if we are going to try to take on that type of validation in the reporting system as it goes forward.

And so, finally, as I mentioned, we will publish a full study report. We will seek public comment until the end of the year. And, again, we want to hear feedback on the methodology, the approach, and the design.

The other thing we really are looking for are volunteers from the community, particularly the registrar community, because part of the system, as Steven mentioned, was that there will be a forwarding system that will forward inaccurate records to registrars to follow up. And that will be something that obviously impacts the registrar community as well as others. And so we're looking for volunteers for this working group to determine the best process for doing that.

And with that, we're going to move now to other highlights of WHOIS activities. The first one will be the privacy and proxy accreditation services issues. There's a PDP. And Don Blumenthal, who is the chair of that group, will give you the update on what's going on with the privacy and proxy services accreditation.

DON BLUMENTHAL: I know computers. I don't know microphones.

Appreciate you all being here. I know it's -- we're covering a range of really interesting topics. I have been involved with WHOIS issues since 1998. So it's -- I can't say it has become an old thing, but a lot of issues do circle around.

I'm trying to see who here is in the audience, but I think I could probably put together a meeting of the working group between who is out there and who is up here on the stage.

I don't do remote control well either.

The purpose of the proxy/privacy accreditation group is basically as it sounds, to come up with accreditation standards for proxy/privacy services. Those services have been around for years.

But as of the 2013 RAA, ICANN is putting together an accreditation service for those proxy and privacy providers.

Excuse me.

We were given a long list of issues to look at by the GNSO. And I apologize. I'm probably not going to stick to the slides real well. When I used to teach, I didn't use them. So I'm something of a stream of consciousness type.

We were given a long list of issues to put to -- to examine by the GNSO. We took it upon ourselves to organize them. Generally the groupings are just kind of main issues. I'm not going to go through every preliminary conclusion we've come to. I've got ten minutes to talk about eight months of work, nine months of work.

But just to give you an idea of how we've approached questions, we've looked at main issues. One of the fundamental ones is we're the proxy/privacy services accreditation issues group.

One of the early things we decided was we are going to treat proxy and privacy services the same. We are not going to suggest different rules

for the different services. The fact is some handle both. The fact is some regions of the world privacy service isn't a known concept; it is just proxy.

We looked at maintenance of the systems, registration of the services, getting themselves in the system, issues concerning contact, how to contact the service providers.

We're currently looking at relay issues and reveal issues. We've got them broken out into separate sections. But the fact of the matter is, it is very difficult to treat relay, which is a requestor wants to pass information along to -- and I'm going to use the term beneficial registrant. Doesn't necessarily need to know who the registrant is but wants to get information, wants to send an inquiry. What are the processes? What are the procedures for that? What are the obligations of the privacy/proxy service? Do they have to forward the request?

Just to give you an idea, our consensus we're working off is for electronic communications, the answer is yes subject to reasonable -- reasonable business processes. If a privacy/proxy provider clearly is being harassed or the beneficial registrant is being harassed by repeated inquiries, we -- our consensus at this point is to recommend that the relay request not necessarily have to be forwarded each time. Privacy/proxy provider can have reasonable anti-spam measures in place. And if you do that, you may not see everything.

We're also working on reveal. We've taken upon ourselves -- and that's the traditional term. But we've taken upon ourselves to differentiate two types of reveal. There's disclosure -- thank you. I can't read the slides either. The glare up here is brutal. I'm just getting reflections.

We've taken upon it ourselves to take the traditional reveal term and break it out. There's disclosure. All the requester wants -- the requester wants the information, but it doesn't necessarily have to be published in the public WHOIS data system, registration data system. So there is disclosure.

We've also talked about publication. That's where the information will go out into the publicly available systems. We have not yet dealt with termination issues, termination of the privacy system -- provider.

Our discussions have been remarkably -- maybe that's not fair. We have members from the registrar community, the intellectual property community, the NCSG, privacy community. We have members of the registry community. But basically when it comes down to it, we have a member of the registry community. And I think that's part of the reason why I was asked to and why I agreed to chair. We have concerns and interests but we are fundamentally not as affected by any decisions that this group is going to make because these are registrations linked to registrars generally.

We have a pretty good cross-section of people who are concerned about privacy/proxy. Our discussions have been very amicable. We have gone through at a good pace. We set ourselves a very ambitious agenda. And until we get to relay and reveal, we were actually even a little bit ahead. We are not too far behind now. We had a -- we were kind of the guinea pig for a face-to-face working group session on Friday, a pilot project. And that, I think, turned out to be very beneficial in terms of driving us toward some consensus on reveal and relay. So

we are hoping if not to have a draft, certainly be well along with a draft of an initial report by Marrakech.

I don't want to get into all of our consensus. They're on the -- our Wiki, our consensus documents. We haven't posted anything concerning face-to-face yet because a lot of people were not there. We need to run things by them. I will -- I will leave it at that and certainly be happy to take questions about any of our specific issues when we get to Q&A. Thanks.

MARGIE MILAM: And now Jamie Hedlund will give you an update.

JAMIE HEDLUND: Okay. I will be hopefully brief.

So WHOIS -- so registries and registrars obviously have obligations to collect WHOIS information including personally identifiable information like contact names, phone numbers, and email addresses. Registries and registrars obviously operate globally, but there are national laws on privacy. And the WHOIS conflicts with national law procedure was developed to deal with the situation in which a national law or regulation might conflict with a registry or registrar's contractual obligation to collect, display, or distribute this personally identifiable information.

So the GNSO developed a policy in 2005. I think it was adopted by the board in 2006 and implemented in 2008.

And under this procedure, a contracted party comes to ICANN and says, "We have a problem. We need to negotiate around a provision in the contract so that we don't violate national law."

So why are we looking at this process now if it's been around since 2008? Well, it's never been -- it's never been invoked. And in that time, you know, privacy laws around the world have changed. There's also another procedure that's in the new Registry Agreement -- sorry, the RAA, the 2013 RAA that deals with conflicts with data retention laws.

And under that procedure, registrars have successfully come to ICANN and obtained waivers from the obligation to retain certain data for the period of time required by the contract.

We put out a -- we've put out a comment forum over the summer, and we asked whether and how the procedures should be modified, taking into account the concerns registries and registrars have and the different standard or the different trigger for a modification between the data retention waiver and the request for modification of the contract to deal with WHOIS requirements.

And we asked -- we asked a number of questions. We asked specifically is it practical to require that a contracted party already has litigation or a government proceeding initiated against it prior to being able to invoke the WHOIS procedure and whether this trigger should be modified to look more like what we have with the data retention.

With the data retention, you don't have to actually demonstrate that you have litigation or a governmental proceeding against you. You just

have to -- you have to come in with an opinion from a national law firm or a governmental statement that demonstrates that there's a problem.

So we got eight comments over the summer. They were -- probably the most prominent issue addressed was what should the trigger be. And the comments were pretty much equally divided. There were some who said it needed to be modified, that it should be more like the data retention waiver. Others said it should not be weakened, and the fact that it's not been invoked only means that it's worked as it was designed.

So the next steps. Next steps will be either at this meeting or shortly thereafter we will issue a call for volunteers to form an implementation advisory group which will develop recommendations that will then go to the GNSO Council and eventually the board for any potential changes. Thank you.

MARGIE MILAM: The next part of the agenda is to hear concerns that GAC representatives and members have about the various projects underway related to WHOIS. And with that, we've got Heather Dryden, the chair of the GAC, who will make some remarks and call on some of members to share their concerns about the WHOIS issue.

Can you turn on the mic?

HEATHER DRYDEN: Thank you, and good afternoon everyone. So I'm going to make a few initial remarks to try and give you a GAC perspective on some of the challenges. And I do hope that other colleagues here from the GAC are in attendance given our high degree of interest in this set of issues and

that they are here and able to ask questions and raise points in their individual capacities to help complement what I'm going to say.

But, first of all, thank you very much for having this session. As you pointed out, this is something that the GAC had proposed in order to come to grips with all the different issues within this topic that we call WHOIS. And it really is representative of governments really trying to assess what are all the different streams of work and just as importantly how they relate to each other.

And because of the volume, as we see it, of activity and the need to know where to focus our time and energy, this is perhaps interfering or making it challenging for the GAC to actually get into the substance and contribute to the different areas of work.

So we're not quite there yet. This panel is certainly going to help us as we go through each presentation and hear more about each topic.

But I think in the first instance, governments are really looking to have involvement in any policy development process that relates to WHOIS. And knowing that there is an expert working group report coming, that is going to lead to another policy development process while there are current streams of work underway in addition to that. You can see how that might be a challenge from our perspective.

So having said all that, the GAC does believe that its principles from 2007 are still relevant, and so we hope that this can continue to inform and guide continuous efforts in this area.

But what we're really looking for is more of a roadmap now that we have an overview of the different areas of activity but something that

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gets us to what's happening when and gives us a better sense of the timing of different activities.

And until that's addressed, I mean, the GAC will continue to be preoccupied with sorting out the different processes and not coming to comment on the substance.

But as I say, we do have work, we do advice that we've provided previously, including the principles of 2007, and we consider those to still be relevant.

So I will leave this here and perhaps at the end, if there's time for questions and comments, then GAC members will assist me in raising some particular points in relation to each topic.

Thank you.

MARGIE MILAM: Thank you. So we'll save it to the end for any GAC members to provide their specific concern, Heather? Is that what you're suggesting is the best way to proceed?

Okay. Great.

So now we're moving to the part of the agenda -- thank you very much for those comments. I think as staff, we'll see how we might be able to develop a time line and roadmap so that we can provide more clarity on how all these initiatives are linked, and that certainly sounds like a very solid recommendation. We'll take that back.

This part of the session now is to give you really brief updates on some of the other initiatives related to WHOIS, starting with thick WHOIS, and with that, we have Francisco Arias.

FRANCISCO ARIAS: Thank you, Margie.

Hello, everyone. I'm Francisco Arias, the director of technical services within the global domains division.

So let's start with a brief update on the thick WHOIS policy implementation.

This is a policy that was adopted by GNSO -- I'm sorry. The board adopted the GNSO policy recommendation earlier this year, and it has a few items included there.

First, it is recommending a transition from thin to thick WHOIS for three TLDs that are the only ones that are using the thin model. The thin model being the one in which only a subset of the registration data is returned by the WHOIS from the registry, that subset being the technical parameters and a few other items but does not include the contacts related to the domain name.

The other part of the recommendation is to have a consistent labeling and display of the WHOIS output for all the gTLDs. This implies modifications to the WHOIS output for all gTLDs, legacy and new, to account for the new format which is slightly different to the one for gTLDs and also the inclusion of a couple of extra fields that are included in the 2013 RAA but not in the gTLD WHOIS specification.

There is currently work underway. Staff is working with the implementation review team that is formed by community members. The implementation plan is being developed. Another important element of the policy recommendations is -- or the PDP recommendations is to have a legal review of the issues associated with this transition from thin to thick WHOIS, and that legal review is expected to be finalized by the end of November this year.

So the implementation work next steps is to finalize and deploy a community outreach plan. The idea here will be to let the registrants know, all the community know, what is coming, and of course discuss the implementation details with the affected parties, the registries and registrars that have to effect the changes in their systems.

And here it's important the community involvement. All registries and registrars should be aware of this since, as I said before, this not only affects VeriSign and the registrars that work with VeriSign for those three TLDs, but also affects every single registry and registrar.

So interested parties can be involved in the implementation review team, and we have a session dedicated to this topic on this Thursday. You can see the time is at 8:30 this Thursday.

And yet after this session, we have a session on the next topic, which I'm going to give you also a brief of that.

This is the RDAP protocol.

This protocol -- RDAP is the -- intended to be the replacement of the WHOIS protocol. This new protocol that is in the final stages of

development in the IETF provides benefits that the current WHOIS protocol, the Port 43 as it's called by many people, does not offer.

Among them we have internationalization, meaning you have the ability with this new protocol to have the registration data in any language or script that you may want. If you want to do that in Port 43, you are going to get unexpected results, at best.

It also provides for a standardized query, responses, and error messages, allowing for simple implementation of clients.

The people that are consuming the information will have an easier time by using this new protocol.

It also allows for extensibility, meaning it allows for registries and registrars to include new fields, if they want to. So the protocol comes with a set of fields predefined, but it allows for the addition of any other field that is required by policy.

In that sense, we could say that the protocol is policy-agnostic. It allows the registry or registrar or the policymaker to define what would be included in that protocol and the protocol does not dictate what comes inside, what is served to the user.

It allows, among other things, for having distributed sources, meaning if you have a thin registry, for example, in which the information -- you have a subset of the information in the registry but all the information in the registrar, you can offer that redirection in the protocol.

It also allows for differentiated access, meaning you have -- you can offer authenticated access, for example, to some users, provide another

level of access to unauthenticated users, and you can offer different outputs depending on that -- the credentials that are provided by the user.

It also allows for searchability, which is one of the things that some registrars are implementing.

A bit of history on the replacement of WHOIS.

This was recommended by SSAC back in 2011.

There was an advisory calling for the development of a roadmap to offer a replacement of the WHOIS protocol. There was a board resolution later adopting the resolution and directing staff to produce a roadmap on this regard, which we did with community input and it was published on June 2012.

In parallel, an effort was started in the IETF and a working group was created in 2012. This is a working group that is developing the RDAP protocol and is expected to finalize the work in the next few months.

Also, we started conversations with the registries and some legacy TLDs adopted provisions in their contracts. Namely, most of the big ones: com, org, biz, info, name. It's also included -- this provision is also included in the new TLD registry agreement and the 2013 RAA.

And finally on this topic, we are currently exploring with the community where there is any room for potential synchronization of the implementation of RDAP and the thick WHOIS policy implementation, given that the time lines for both things seems to be closely aligned. Thank you.

MARGIE MILAM: Thank you, Francisco.

And before we move into the compliance activities, we do have two GAC members that would like to speak. They have time constraints, unfortunately, so they can't stay till the end and we're going to give them the floor. Thank you.

Can you turn on the microphone, please? The roaming one, please?

Microphone, please.

SUZANNE RADELL: There we go. Thank you very much. Good afternoon, everybody. Suzanne Radell with the United States.

I want to thank the panel and obviously Margie. I mean, I'm truly in awe of what you managed to pull off. It's an enormous amount of information that you are sharing with us.

But in that regard, I would have to echo what the GAC chair did sort of suggest is that, quite honestly, we're trying to figure out a roadmap.

I think of it -- and this is not meant to be pejorative, but to me it's like there's this ginormous WHOIS puzzle and there are all these different pieces. And quite candidly, it's a bit of a challenge to try to understand how all of the pieces fit together and how we are meant to understand them, because our goal at the end of the day is to contribute what we can.

I think GAC members take their responsibilities very seriously to be able to contribute to policy development processes, and this is an issue -- obviously anything related to WHOIS I think it's probably well understood is of very high interest to all of us.

So I only wanted to reinforce that what we actually need some help with is not -- in addition to the detailed information that you are very graciously sharing, we need to understand time lines and interrelationships, so that we can target our attention more productively. I think at the moment, we're a little bit at sea, if you will.

But I did want to return, if you would put up with that, to the WHOIS conflicts with national privacy law presentation. Thank you for that.

I did want to reinforce that despite the fact that only eight comments were submitted -- and we are very grateful that our colleagues from the EU Commission submitted comments, so there is one sort of -- more of a GAC member perspective -- it should not be understood as a lack of interest. It was literally a, you know, lack of time, perhaps, to be able to contribute.

And we definitely want to participate in whatever next steps there are.

So I'll put out there, in the interest of full disclosure, I flagged this issue yesterday during a GAC/GNSO exchange, and there is a GAC/GNSO consultation group that has been created to implement an ATRT recommendation to facilitate GAC engagement in a PDP, and I threw out a suggestion that I'd like to leave here because it would be helpful to get people's reactions subsequently.

That when, in fact, there is an issue that goes to the GNSO that has in its very title "WHOIS conflicts with national law," that that could be seen as a bit of a trigger that automatically we would all want to collaborate from the outset in the identification of the issues and the development of an issues report.

So it's a suggestion made just by one GAC member. I think I probably do have some support in the GAC room that this is one we -- you can tell just from the title. It's obvious. We wish to be involved. Thank you.

JAMIE HEDLUND: Thank you, Suzanne. And I will say just one thing quickly, which is that when we put this out for public comment, we said we -- depending on the comments received, we would either proceed to make recommendations to the GNSO Council or we would do an I -- an IAG, and in part because of the interest in the community that's not reflected in the number of comments, we went the IAG route and would very much welcome heavy GAC involvement in the IAG.

PETTER NETTLEFOLD: Thanks. Petter Nettlefold from the Australian government echoing comments from the U.S. and from the GAC chair.

Certainly from my perspective, one thing I'd be very interested to see and have a discussion on sometime is how -- as Suzanne said, how all these pieces fit together, what is the strategy guiding all this work.

So for those who may recall, I participated as the GAC chair's delegate in the 2010/'11 WHOIS review team, so from my mind, that's probably the

last time that there was a substantive review and some broad guidance given and the board responded positively to many of the recommendations from that review.

So that's still the lens that I view this -- much of this strategically from.

So when I hear accuracy updates, that's extremely welcome. That's one thing we were very keen to see.

I'm -- one of the things that we were struggling with at the time was that we only had one snapshot of accuracy, which was the NORC study. Now there's another pilot-type study using slightly different definitions, it seems. So it appears that on those two studies, that we won't be able to get a time series or type analysis, is it improving or not.

So one of the things I understand is that you'll be looking at potentially changing those definitions or moving that pilot forward to continue.

I trust one thing that you will consider is stability of definitions so that those results can be compared through time so we can see whether initiatives that are taken had some effect or not and so on.

But it's really useful to see the analysis broken down by different types of RAA and so on. I think that's a positive move. But I think what -- one thing we faced in the review -- the WHOIS review team was, you know, no definitional study is going to be perfect. You know, people are going to pull apart whatever your methodology is, whatever your definitions are, but there's some -- so long as you've had a good go at it, sticking with them so that you can compare across time I think is a really worthwhile goal. So I'll dive into that little bit of detail.

But just to give a couple of details of how the big picture -- from my mind, with that sort of 2010/'11 review in mind, and since then there's been the expert working group which is obviously pending sort of further work, it's not clear -- it's -- I guess I have a question about all these different work streams and how much they're contingent about what comes out of the expert working group and whether that's all being factored in.

So the expert working group made privacy proxy recommendations and there's a privacy proxy stream of work going ahead. Again, very welcome. Great to see that positive progress is being made there.

But how do they fit -- I assume that the working group is taking account of these expert working group recommendations which are still pending board consideration, but, you know, it seems like a little bit of an elephant in the room that might be sort of hit from the side and knocked off direction, but I -- from that point of view, I'd just -- what I would really welcome is how does it all fit together.

And from a GAC point of view, as Suzanne said, what we're really looking for are, are there any key points or junctures where the GAC should be really targeting its resources. Is there a point coming up strategically where the GAC should focus on.

As our chair said, we gave some principles in 2007. We participated actively in the 2010/'11 review. You know, where's the next big thing that we should be focusing on from a GAC point of view? That's the sort of analysis I think which would be really useful.

BRUCE TONKIN: Hi, Petter. It's Bruce Tonkin. I'm a member of the ICANN board and I spent about 15 years on WHOIS and I can actually thread all those pieces together.

And I -- I can see your problem, clearly, but I think what you're seeing is a mixture here of implementation of policies that have already been approved, you're seeing some measurements of the outcomes of those policies, and you're seeing some discussions of new policy development work.

So three quite different things.

If we go back -- what I think you're looking for is an anchor point where -- and I think the anchor point -- the easiest one to use for you at the moment is the output of the WHOIS review team.

So the WHOIS review team had a set of recommendations, and a number of these initiatives resulted from those recommendations.

So for example, one of the things the board said is that when looking at accuracy, we -- we can actually do some samples of accuracy measurement, and we can refer the outcome of those accuracy measurements to registrars to rectify.

So that was one of the things that we put in our response to that WHOIS report, and this is a report on that work.

So this is reporting on the work that's been done on that front.

The EWG work was actually initiated out of that WHOIS review team report, because the board said, "Yep, the WHOIS review team has reviewed what the current policies and the current systems is. We

recognize that the current system is not adequate." So we commissioned an expert group to come up with a proposal for a new system.

For that proposal to be converted into policy, it needs to go to the GNSO. The GAC would then need to participate in that policy development process to turn that into a new policy.

And so the board has basically set up a small working group of a few board members to meet with a few GNSO members to work out what's the best way of taking that expert working group and building it into a policy development process.

And once that's clear, then we can go to the GAC and say, "This is the policy development process. This is where you should be involved in that new policy."

So I think what we could probably do, Margie, is probably reference it all back to almost like a scorecard on the WHOIS review team and say, "This initiative flows from Recommendation, you know, Number XYZ. This is -- EWG came out of that board-directed activity as a result of that particular recommendation in that WHOIS review team report." And then "Here's the policy activity and this is where we need the GAC input."

And definitely we need to be clear to the GAC to be able to say, "Here's policy work. We want your input on this, but a lot of the stuff here is for your information so at least you can understand the results of what's been implemented so far."

So I hope that helps a little bit. I recognize it needs a framework, but just understand there's stuff that you kicked off, you're a member of that team, they're doing it and they're showing you what they've done and there's stuff here, they're saying, "This needs policy development work. Privacy proxy is an example of that. That is an active policy activity." And the work from the EWG definitely flows into that policy activity on that specific topic.

So if you want to input on proxy privacy, you should input on that policy development process. That is the insertion point for the GAC because that will become policy on privacy -- what is it? Proxy privacy or whatever it's called?

BRUCE TONKIN: Thank you, David.

That needs an acronym. I can't cope unless you can turn it into an acronym. Thank you.

So I hope that helps a little bit, but I agree with you. We need a bit of a framework.

PETTER NETTLEFOLD: Thanks, Bruce. That's the beauty of one of these sessions. Somebody already always knows all of the answers so that's very welcome. I just have one more and I apologize I don't know this already. But is there another WHOIS review team coming up and is the board factoring that into its consideration of the expert working group? Because one of the things we grappled with in the WHOIS review team is that we were

limited to reviewing -- I forget the exact wording now but it was the effectiveness of current policies or existing policies.

So there's a big sort of policy change potentially in the mix from that expert working group and I'm just wondering if the board is considering how it's going to deal with initiating the second WHOIS review team while that expert working group stuff is still out there.

BRUCE TONKIN: Well, I think basically there have been new policies since that WHOIS review team did its work, including the thick WHOIS policy, so I think at any point in time, the charter of that group is to review the effectiveness of the existing policies. Policies have changed, plus the implementation of some of the policies have changed, so I think you can review that, but recognize that, you know, they -- policy development processes happen independent of review teams, essentially. Yeah. But obviously the review team needs to take into account that. That makes sense. Yeah, it's empowering.

PETTER NETTLEFOLD: All right. Cheers.

MARGIE MILAM: Thank you very much.

I think Steve Sheng wanted to add something and Don as well.

STEVE SHENG: Thank you, Margie.

In the SSAC report, SAC051, the SSAC proposed a taxonomy to look at WHOIS because the word "WHOIS" is often an overloaded term. So the terminology that the SSAC proposed is to separate three aspects. One is the domain name registration data; that is, the data submitted and displayed.

The other aspect is to look at the registration data access protocol, currently the WHOIS protocol.

And the third aspect is the directory service which applies certain policy uses who use the protocol to display the information.

For each of these areas, there could be policies applied and concerns. There is an initiative in each of these areas. So one way is to categorize the initiative in these areas to have a clear understanding. Thanks.

DON BLUMENTHAL: Just to respond to the one thing that Petter mentioned, it is a puzzle. But the WHOIS, those of us who -- Brian Cute, the executive director of PIR, suggests my epitaph is going to be "WHOIS was his life."

There is a relatively small group of us who really work on these constantly. And we are aware of the other efforts. It can be confusing. But we generally know what's going on with other efforts before and concurrent.

With respect to the WHOIS privacy and proxy issues, we have a number of EWG members on the -- on our working group who remind us, if you look at the EWG report, it even finished -- the appendix that deals with privacy/proxy says -- it dealt with high-level issues that had to be

fleshed out by the group that was required by the RAA. So it may look like there are different groups careening in different directions; but, in fact, we are aware of what we all do and communicate and keep in mind the work of the other efforts.

MARGIE MILAM: Thank you very much for that. And now we'll move onto the compliance update. Owen?

OWEN SMIGELSKI: Thanks, Margie. So I'm going to give you an update here on WHOIS-related activities for contractual compliance over the past year. WHOIS inaccuracy and related WHOIS complaints represent about -- on any given month about 70% of the complaints -- the informal complaints that contractual compliance receives. So there is quite a bit of volume in there.

Since -- over the past year, there have been changes to WHOIS inaccuracy complaints mostly involving the 2013 RAA with the verification and validation requirements that are in that. Additionally, there is the WHOIS format as well as the WHOIS SLA items which were not in the previous 2009 version of the RAA.

Additionally, compliance has implemented WHOIS closure codes, taking a look at those, and modified them for community reporting. And compliance now reports on those at the ICANN meetings.

An initiative that we launched this year was a WHOIS QR, or quality review process, to periodically check on continued compliance by

registrars for domains that are suspended to address a WHOIS inaccuracy complaint, and there will be more on that later.

Additionally, compliance removed for those of you who have submitted a WHOIS inaccuracy complaint, there used to be a requirement that the reporter would have to confirm via email that their complaint was indeed filed -- or filed by them. That was removed which increased the processing time by -- excuse me, removed five business days from the processing time.

Additionally, compliance is now publishing a monthly compliance dashboard, the URL is there. And that includes additional details, including complaint volume on there.

Here is a -- the top five closure reasons for WHOIS inaccuracy and WHOIS format complaints since June of 2014. It is only the top five. It is not all of them because, otherwise, we get a very busy-looking chart. You can see a very large number of the WHOIS inaccuracy complaints, 42%, are addressed by the registrar suspending or canceling domain and removing it from the roots. Additionally, for the WHOIS format complaints, the most -- the largest volume of those are resolved by the registrar correcting the format when it does appear to be a proper issue.

This is something that compliance started this past year, and it looks back -- this is the data from January 2014 through June 2014. It looks at all WHOIS inaccuracy complaints that were closed because the domain was either suspended or canceled and compliance went back to look to see whether or not those domains were still suspended, which as you can see is 81% of those domains. Another 10% were deleted. And the

others were either transferred out, the WHOIS data was not changed, or the data was changed.

And for those, all the registrars did demonstrate continued compliance on that.

This is showing -- reporting a little bit on the WHOIS turnaround time for compliance staff. You can also see it's the average turnaround time for when a ticket is opened as well as the average turnaround time in yellow from when the complaint is opened until the complaint is closed.

You can see some variations there in those turnaround times, which generally reflect the cyclical nature of our complaints. Some months there's more; some months there's less. And staff processing time adjusts accordingly.

We also put the date when the 2013 RAA was effective in there. But we have not been able to really see any demonstrative effect from that implementation date on the WHOIS complaint volume.

Final chart here is just trying to take a comparison between the 2001, 2009, and 2013 RAA registrars and the complaint volume for them. It's difficult to draw any conclusions that there are more complaints for, say, 2013 versus 2009 registrars. There are, indeed, a higher volume for the 2009 proportionally. But the -- just because a registrar signs a 2013 RAA doesn't mean immediately that all WHOIS data is cleared up. There's no -- those verification and validation triggers may not be invoked yet. So there is some lag time in that, and you can also see that there is, you know, quite a bit of WHOIS format complaints that have gone up as well, too.

Steve?

STEVE SHENG: Thank you. I'll provide a quick update on internationalized registration data, what we call IRD. These are registration data in the language other than English and encoded in a form other than US-ASCII.

Now, my colleague Francisco already mentioned that in the current WHOIS protocol in RFC-3912, the protocol itself has not been internationalized. So in order to support internationalized registration data, the protocol needs to be -- the underlying protocol needs to be updated, and there is already work in the IETF in that area.

However, that is a necessary condition but not a sufficient condition. There's still areas you need to determine what data elements need to be internationalized, right? And in this area, there are three activities to address this issue.

The first activity is a GNSO PDP on translation and transliteration of contact information. So currently all the registration data -- most of the registration data are in US-ASCII. As we're moving to a more internationalized format, a question arises whether it is desirable to translate or transliterate this information into a single common language or single common script. And if it is desirable, who should decide to bear the burden of undertaking that? So that's the core issues that the GNSO PDP is tackling.

In addition, the PDP working group also considered related questions such as what are the benefits of transformation, that is translation or transliteration, in light of the potential costs? And should the

transformation be mandatory for all gTLDs? Should transformation be mandatory for all registrants or only those based in certain countries? So those are the issues that the PDP working group is tackling. It is a very difficult problem.

The development is the PDP working group have received feedback from SOs, ACs, and SGs, and also in particular the GAC -- some members of the GAC who are also on the working group and provided feedback.

The working group aims to have an initial report published shortly after ICANN 51 with the final report published for ICANN 52.

So the other area of the IRD-related activity is a WHOIS review team, IRD expert working group, that is chartered to develop requirements for internationalized registration data and produce a data model that matches the requirement.

So this effort is somewhat broader to that GNSO PDP. The GNSO PDP focused specifically on the contact information and whether to translate or transliterate.

Now, the WHOIS data, there are other technical and transactional data in the -- as part of the registration data, and internationalized requirements need to be considered in those areas. That is the task of this working group.

The working group already published an interim report. It will release its final report shortly after ICANN 51, so in the November time frame.

To inform both efforts, ICANN has as part of the requests from the WHOIS review team to conduct a study to document current practices

and transformation possibilities for internationalized registration data. That is, trying to provide some data and hard evidence.

You look into practices of handling the internationalized registration data not only by registries and registrars but also looking to other industries, electronic merchants and online services, as this is not a new problem.

And, also, conduct an experiment assessing the accuracy of various transformation tools for the internationalized registration data.

The final report of this study will be published later this month in October/November time frame. The key findings are no responding registrar or registries that we surveyed is currently transforming the registrant data.

Provisioning and querying protocols are lacking either support or deployment for internationalized registration data.

And, finally, none of the tools tested is providing a high level of accuracy and consistency in its transformation of the internationalized registration data. So those are the findings of the study. The study itself will be published later this month. So thank you.

MARGIE MILAM: We can skip these slides.

We'll give Susan an opportunity to talk about the Expert Working Group. Materials will be posted on the session, but we're a bit running out of time and I want to make sure we cover the Expert Working Group information.

So we'll pass it on to Susan Kawaguchi.

SUSAN KAWAGUCHI: So the EWG. The EWG was formed -- the first meeting was February 2013, and it was a diverse group, lots of different expertise and experience all involved in WHOIS.

We discussed the issues frankly and participated individually and sought compromise. And we had a lot of hard conversations. We initially thought, oh, maybe we could get through very high-level recommendations in three to four months. And then it was maybe Buenos Aires. And finally delivered the report in London.

So we were working together to find an answer to the ICANN board's question: Is there an alternative to today's WHOIS to better serve the global Internet community? And I think we did find an answer to that. The final report --

>>   Speak into the mic.

SUSAN KAWAGUCHI: See if I can pull this up a little bit. Is that better?

In the final report, I think we struck a balance between accuracy, access, privacy, and accountability. It's hard to weigh one area over another, but I think a lot of hard conversations, we were able to do that.

Collects, validates and discloses gTLD data for permissible purposes only and safeguarded through a new paradigm of purpose-driven gated access.

So now we delivered that report at the London meeting to the board, they're considering how to move forward and how to develop the PDP process.

A collaboration group was gathered to explore how to best structure the PDP, and the first meeting for that group is on Wednesday. It's a -- it's GNSO council members and the board.

But we still need everyone's -- everyone's input, and we need your ideas. There's 180 recommendations. I think we got a lot of them right; but they, I'm sure, could be tweaked. And as things evolve, we need to make those changes.

So there is an email address here that we -- any sort of ideas about the PDP structure, we welcome that.

And you can provide feedback and work on those PDPs as they are rolled out. So everybody's encouraged.

So this is the timeline. As you can see, you know, initially in November 2012, the board started thinking about after the WHOIS review team delivered the report and they thought about what should go next.

And it takes us all the way down to, you know, now. And the GNSO Council will be important in making the next decisions on how we move forward.

So if you have -- want more information, here's several different resources. And this is -- this slide deck is on the ICANN Web site. And I'm done.

MARGIE MILAM: Great. Thank you very much, Susan.

And now we open the mic, the floor to comments from anyone. Can you turn the microphone on, please, on the floor? Thank you.

The one in the center aisle, please.

KATHY KLEIMAN: My name is Kathy Kleiman. I'm with the Non-commercial Stakeholders Group, and I was also on the WHOIS review team.

And so I'm going to actually ask a question to the audience because you have heard so much interesting things going on. And the question is that there really is a question. The EWG report, the Expert Working Group report, was really a sea change.

There's a lot of work going on from the WHOIS review team recommendations, an enormous amount of work on validation and verification as you heard, proxy/privacy accommodation, thick WHOIS so that all the .COM data which has been distributed across the registrars now comes into the registry. Enormous amount of time and energy.

So the question is kind of: Do you stay with the one you love, or hate, or do you go to somebody new? And the Expert Working Group brings

together a huge number of its own questions: Centralized databases, access, how we do all of this, prevalidation. Do we have to show identification before the first time we can register a domain name? Do you have to go to your local post office to show your identification? Enormous issues of speech and freedom of expression, human rights that may have yet to be explored.

I share that with you, that we seem to have two parallel tracks. And at some point, we are going to have to decide which one we want to go on. Thank you.

[Applause]

ELLIOT NOSS:

Looks like we will all be holding the microphone. Elliot Noss from Tucows. I wanted to speak mostly to Owen and the compliance efforts that are going on. One of the great concerns that we at Tucows have, we get to watch sort of the actually dealing with the WHOIS inaccuracy reports.

And there is a real struggle going on. If I ask my compliance people -- and I did in advance of coming down here -- you know, what portion of your work in relation to WHOIS accuracy is what I would call productive work, in other words, work that's really going towards shutting down domains that are at issue, they would describe it as a very small portion of their inaccuracy work.

And that's, you know, I think, primarily because as we saw in the data that's described, there is a focus on volume and turnaround. It is almost as if a customer service organization was trying to solve for the number

of calls they were handling as opposed to the quality and impact of dealing with those customer service issues.

And so we're getting -- and this is not my first time talking about this, so what we're getting is perhaps good volume and turnaround; but what we're not getting at all is good quality. And it is not simply the case that the more inaccuracies we clean up that automatically we are getting benefits out of that because a lot of times, you know, we saw a significant number of suspended domains. Those domains will simply be because of people who are unsophisticated about the process.

We are seeing turnaround and time spent after we get a registrant to clean up data, which is simply inadvertently wrong, where they have to go back and clean up a fax address -- or a fax number, things that are trivial.

And, you know, even in the volume that we saw up there, you know, 32% of the complaints were either somebody complaining about their own domain name -- I don't even know what that means -- or a duplicate complaint. So there's, you know, struggles just in that process.

And so, you know, I address that in this room because what we have is probably the broadest collection that you could have at ICANN of people who are interested in this subject matter.

And the second is to really strongly urge moving towards two things.

The first is much more visibility in the process for registrars who are the ones who are trying to resolve these issues, and overwhelmingly that's a good-faith effort at resolution.

And so by that, I mean let -- if people want to make WHOIS inaccuracy complaints, there should be transparency around that. We should be able to know and see who that is, to see how the system is being used.

And the second is standardization or a move towards a common set of standards, you know, across registrars in terms of the way that we're dealing with these complaints.

There's a lot of work that's going on in some of Bertrand de la Chapelle's work around Internet jurisdiction where there's really interesting frameworks being developed that I think might be able to be applied here to great effect.

And so, you know, I want to put all of that out and really, really urge for change in our ability as registrars to access the source of these complaints, with the goal of cutting down simply complaint and resolution for complaint and resolution's sake, to allow for more work and time and effort to be spent on the things that are really causing problems. Thank you.

[Applause]

HOLLY RAICHE: Holly Raiche. And I've got sort of a much minor -- more minor point than Kathy was making.

In terms of the statistics -- and it's something that Petter picked up -- when we have -- if we ever finish the privacy proxy working group, which I'm sure we will, it will solve a couple of problems.

Number one, it's in conjunction with the 2013 requirements in terms of accuracy; but number two, one of the problems of accuracy always seemed to be that people were trying to hide and didn't know how to do it and didn't necessarily know the process, the price, the terms and conditions, all those sorts of things that the specification that was part of the 2013 RAA now has and will have to be in the specification as it's finally developed.

So I think that is going to impact on accuracy, it's going to impact on the people who would like to access a privacy proxy service now can do it perhaps with more comfort, so you wind up with an interesting comparison of what do the different statistics mean. And I think that's going to make a very sort of interesting and difficult question when you're trying to evaluate EWG, privacy proxy, do you move, do you not move, in terms of what the statistics are.

Thank you.

KIRAN MALANCHARUVIL: Hi. Kiran Malancharuvil from MarkMonitor. Thank you for this very informative presentation.

I would like to ask that when we look at issues of registrant rights, which are very important, that we also examine the issue of registrant responsibilities.

For us at MarkMonitor and for our clients, for example, one issue relating to registrant responsibilities is whether or not, when you're making commercial use of a Web site, if it's appropriate to avail yourself

of privacy proxy services under various national and international laws and norms.

So when we -- it sounds like we're on the cusp of looking at a lot of these legal issues with the privacy proxy services accreditation issues working group, which I'm on, and with the board group examining the EWG report.

So I would just ask broadly when we are examining these legal issues, that we not only look at the very important piece about data privacy and registrant privacy, but also the responsibility that registrants have under the laws that protect commercial interests as well. Thank you.

BENEDICT ADDIS: Hello. Benedict Addis, SSAC, formerly on the law enforcement team that negotiated some of the requests under the 2013 RAA.

I think the first thing to say is how much we welcome Steven's work and NORC's work on this really thorough academic review. So thank you. I think that's -- I think -- I don't think anybody's said that yet, so well done.

But there's one little thing we wanted to say we were discussing in the audience, which is to ask that you keep the metrics for email address and postal address and telephone numbers separate, if that's possible.

I think you mentioned that you were thinking about combining them, and I think we feel that those are quite separate and it would be good to keep those separate, separately measured.

STEVEN PEDLOW: Yes. Yes. Right now -- thank you.

Those metrics are completely separate right now, and as I mentioned, we do have a goal of making one score that combines them for a domain, and that's something that we'll work on in the future, and if you have thoughts about that process, we'd love to hear them.

MICHELE NEYLON: Thanks. Michele Neylon from Blacknight. I was on the EWG, as some of you know, and I'm currently chair of the registrars but speaking more in my personal capacity.

One of the things I'm seeing with a lot of this -- and I think Kathy touched on this as well from a slightly different angle -- there seems to be a helluva lot of duplication. There are a lot of different efforts around WHOIS that seem to be kind of running almost slap-bang into each other, and I think that really ICANN needs to step back, take a breath, and try and work out which ones are going to come first, because why on earth would anybody want to transition com and net from thin to thick if, further down the line -- by "further down the line," maybe -- it might be a year, two years, three years -- some of the recommendations from the EWG might be implemented? Now, I'm not saying that the EWG recommendations will be implemented, but if that's on the table, why on earth would VeriSign and the registrars and everybody else do that but then have to be redone again? I mean, that just seems completely counterintuitive.

I mean, some of the other things around -- around WHOIS validation that ICANN seems to be doing off on one side and yet it doesn't seem to

be feeding into some of the requests that are being put on contracted parties and our clients again seems to be duplicative at some levels, or maybe just, I don't know, ill-focused. Thanks.

[Applause]

STEPHANIE PERRIN: Hi. My name is Stephanie Perrin, and I too was on the EWG and I just wanted to pick up on a point that Don Blumenthal made.

He said that -- in fact, that folks that had been engaged in WHOIS for a long time -- and you have my deepest sympathy, Don -- really understood all the pieces that were working together. And I just want to put in a word for the newbies. It took me at least six months to figure out the basics of all the different things, like what was going on in the thick WHOIS and what was going on over here and all the old verification reports. And some on the group would say that I never did figure it out.

But my point is, I think ICANN has a responsibility to draw that map that the United States asked for so that new people and all the people we're reaching out to globally can actually figure this out in a timely manner so they can make intelligent input. That's my plea to you.

MARGIE MILAM: Thank you, Stephanie.

And thank you, everyone, for participating in this session on WHOIS. Particularly thank you to the GAC for suggesting this. I think it was a very informative session and I appreciate all of our presenters being

able to provide the information and we look forward to continued dialogue with you on these issues in the future. Thank you.

[Applause]

[END OF TRANSCRIPT]