

**Transcription ICANN Singapore
Registrars Stakeholder Group
Tuesday 10 February 2015
9:00-11:00 SGT
Morning Session, Part I**

Note: The following is the output of transcribing from an audio. Although the transcription is largely accurate, in some cases it is incomplete or inaccurate due to inaudible passages or transcription errors. It is posted as an aid to understanding the proceedings at the meeting, but should not be treated as an authoritative record.

On page: <http://gns0.icann.org/en/calendar/#feb>

Michele Neylon: All right good morning, everybody. We'll start this off. Nice ICANN people down the back if you could do your magic with recordings and all those other things. Okay, thank you.

Good morning, everybody. I'm Michele Neylon. I'm Chair of the Registrar Stakeholder Group. Welcome to our stakeholder group meeting here in Singapore for ICANN 52.

If you are a registrar and you are in the room please free to come up and sit at the table. We still have plenty of space. If you are not a registrar and you're confused please check the timetable.

We have a very busy schedule and hopefully it won't go too far off the rails though the likelihood of it actually staying 100% on time is slim to none so we'll do what we can.

We are providing lunch for you all and it's a working lunch between 12:30 and 1:00. Most of the sessions are open to everybody, members and nonmembers throughout the day, though we do have a couple of sessions today that are closed that are for members only. These are clearly marked on

the schedule and when those sessions come up we will throw nonmembers out politely of course, we won't do it physically.

So we'll start off by just doing a roll call and I'll start with myself and then I'll move to my right. Michele Neylon, Chair of the Registrars. I'm from Blacknight Ireland.

Jennifer Standiford: Jennifer Standiford, Vice Chair. Web.com.

Ollie Hope: Ollie Hope, Treasurer and (Heg).

Mike Zupke: Mike Zupke, ICANN staff.

Kaitlin Tubergen: Kaitlin Tubergen, ICANN staff.

Darcy Southwell: Darcy Southwell, Endurance.

Kelly Peterson: Kelly Peterson, D&C Holdings.

Bob Wygant: Bob Wygant, Web.com.

Graeme Bunton: Graeme Bunton, Tucows.

Man: (Unintelligible).

Neil McPherson: Neil McPherson, (1 and 1).

(Kathy): I'm (Kathy) (unintelligible) Chinese Registrar in Taiwan.

Man: (Unintelligible) from Endurance and Director.

Matt Serlin: Matt Serlin, Mark Monitor.

((Crosstalk))

Peter Larsen: Peter Larsen from Larsen Data.

(Tristan Ertman): (Tristan Ertman) Larsen Data.

Man: (Unintelligible).

Sarah Bakke: Sarah Bakke, GoDaddy.

James Bladel: Hi, James Bladel, GoDaddy and councilor for North American Registrars.

(Rob Vilm): (Rob Vilm) of Momentous.

Jeff Neuman: Jeff Neuman, Com Laude.

Michele Neylon: And just for the record we'd like to welcome Jeff moving over from the Registry side to the Registrar side.

Man: Single handedly raising the IQ in the room.

John Berryhill: Did we get Matt Serlin's vote on whether the Registrars welcome Jeff?

Man: (John), just for the record, I am not currently a voting member so my vote wouldn't count. But thanks for checking.

John Berryhill: John Berryhill, Nominating Committee representative and representing UniRegistrar doing business under license to UniRegistry Cayman Islands.

Volker Greimann: Volker Greimann, Key Systems and your friendly neighborhood GNSO councilor.

Michele Neylon: Thank you. Other registrars in the room, please, there is a microphone there up in the center if you want to say who you are. Any takers? Anyone? Okay so our first speaker today is going to be Xavier Calvez who's ICANN's CFO. I see he's down in the back hiding from us. Xavier, please feel free to come up and sit at the table.

Other administrative matters, I think there may have been a little bit of confusion around members payments. There was some emails sent out so if anybody has any queries or feels that they got an email by accident please do let us know but please don't have a nervous breakdown, it will be resolved.

As I mentioned already, there is a lunch being provided. It's not a box lunch as far as I know is it? It's a buffet in this room. Sorry?

Jennifer Standiford: For members.

Michele Neylon: For members. Just speak at the microphone.

((Crosstalk))

Matt Serlin: Would that be just voting members or can Mark Monitor have lunch?

Jennifer Standiford: We'll see how the morning goes.

((Crosstalk))

Michele Neylon: Just another bit of administrative - yeah - at a couple times throughout the day we will have to change over the remote details. And I forgot to ask actually, is there anybody dialed in on remote? Kaitlin. You don't need to count me twice because I am in there.

Kaitlin Tubergen: Yes, there are a few people tuned in via the room.

Michele Neylon: Okay perfect. As this session is recorded - as these sessions are recorded and transcribed please state your name before you speak so that the scribes know who you are and that we don't end up with things being attributed to the wrong people.

Where is Xavier? Okay, Xavier, would you like to.

Xavier Calvez: Hello? Hello. Good morning. Thank you for the invitation, even though we kind of invited ourselves. And we clearly was...

Michele Neylon: Could you state who you are for the record?

Xavier Calvez: Xavier Calvez, ICANN staff. Michele was gracious enough to try to fit some time in in your session for a few minutes for us so thank you for the solicited invitation and for the time.

We have with Carol Cornell is here with me to allow feedback on the five-year operating plan public comment (unintelligible) closed a few weeks ago, early January and for which the feedback has been - the answers to the public comments have been published three or four days ago.

And I wanted to raise the subject simply to make sure we understand if it's a subject of interest for any of your members and for this committee this morning, otherwise I was going to address another subject that Michele and I had discussed earlier would be of interest to this group. So is the five-year operating plan public comment of interest?

Michele Neylon: Okay let's just give people a second to bear in mind you have the honor and also the problem of being the first person in so people are still kind of digesting coffee and dealing with jet lag so give them a second. On the five-year operating plan does anybody have any questions, queries or comments for Xavier? Or does everybody think that's ICANN finances are absolutely

wonderful and perfect and that they should continue doing what they're doing?

Xavier Calvez: Well finances are a different question; this is the five year operating plan. My next topic was finances.

Michele Neylon: Okay, Volker.

Volker Greimann: Yes, just a question. Volker Greimann speaking. The policy side of ICANN has, in the current budget, only an allocated - has only been allocated 4.4% of the annual budget, i.e. the policy supporting staff, the people that are working on what I consider one of the more important parts of ICANN, i.e. policy developing supporting the GNSO function and other functions within ICANN, i.e. the staff that makes ICANN run and the multistakeholder process possible.

Now 4.4% of the entire budget seems rather low. Is this going to be increased in the course of the five-year plan or are we seeing a further reduction in the importance of that role?

Michele Neylon: Go ahead.

Xavier Calvez: If I may try to give a shot at that answer. One - I don't want to deflect the question but I want to address the facts that you're using - and it's always challenging to be able to have a representation of the budget that is providing an understanding of the purpose.

What I'm trying to say by that is when you look at policy development, 4.4%, this is simply put, David Olive's staff. His team is not the only one that supports the multistakeholder process at ICANN and certainly is not the only one that participates to the policy development at ICANN.

Our challenge in order to help the stakeholders understand better how the resources are organized by purpose is to be able to have multidimensional presentations of the information so that you can read the information about what are the resources about policy development and have a comprehensive understanding of what those resources are.

So the policy support department is simply David Olive's team. Mike, Carol, the legal team, global stakeholder engagement team, the strategic initiative teams all participate to policy development. I may be the only one who doesn't.

So I'm exaggerating a bit to make a point but - and to answer a little bit more specifically your question, in FY '16 we've discussed that last night in the budget working group with the community members the policy department is one that is - that we believe should be receiving a certain amount of priority in growing its resources.

There's a number of policy development processes ahead of us that will be quite demanding as expected and David's team has a preliminary plan to increase a bit for adding bandwidth basically.

Volker Greimann: Thank you, that sounds good. I just would like to add that on the policy making side of ICANN when we participate in a working group, when we do policy, i.e. the part that has been discussed as having volunteer burnout, those are the people that are absolutely essential to making our work possible. Without that part of ICANN staff no policy would get made.

Xavier Calvez: Understood, thank you. (Unintelligible) feedback.

Michele Neylon: Okay thanks. Just - Michele for the record. Just with respect to engaging with yourselves moving forward you mentioned there was a meeting last night. I think it was some kind of group - I think officially I'm in that group. How I

ended up there I'm not 100% sure but that's okay. What's the best way for people to engage with yourselves moving forward on some of these matters?

Xavier Calvez: Thank you. The working group that you're referring to was a first attempt last night to have a relatively small group of interested community members into the budget development process. It was a group that was intended to (unintelligible) 10 were present. And it was an extremely interactive session on going over the main assumptions of the budget. So we've done that for first time.

We designed this group through a couple calls with a number of community members back in November. And we opened up invitations to community members to participate at the end of December. We have been using, for a few years now, and I'm going to explain to you why you've been invited, an email list with anyone's email address who's interested and shown interest in the past on any finance-related matters.

All the chairs of the SOs and ACs and constituencies are automatically in that list, which is why you have received it...

Michele Neylon: Thanks, because I do realize that ICANN staff have an awful habit of adding me to things and I just get email, I'm going what? Where did that come from? No, just to answer the question I have for you is if - while some people may have shown an interest in finance in the past obviously there are people who might wish to show an interest in the future, what is the best way for them to engage with you?

Xavier Calvez: So there is always - my email address is quite well known, unfortunately, so this is a very easy way to reach out to me.

Michele Neylon: So contact you is what you're saying.

Xavier Calvez: Contact me. There is - I just want to say that there is the public comment process on the draft budget that has happened and is happening every year that has, as comprehensively as possible, all the information that is - pertains to the budget and planning process for the next fiscal year. It's a method for public comment process - for public comment, sorry. Towards the end of the spring it will be - I'm trying to make sure I have the right date, I think we have the date of March 18 to publish the draft budget.

It is going to be, if we go by last year's standards, about an 85 pages document. It's fairly detailed, it's fairly comprehensive. But it's possible for anyone to comment on any part of it. And that would be, I think, an open and relatively comprehensively documented opportunity to engage.

And a more direct interaction can of course be initiated either through - by email, here at the meetings - Carol is here as well - to maybe answer more specific questions. And we have - we have a finance - financials, sorry, page on the Website that also allows to access information. We publish quarterly financial statements every quarter about a month after the end of the quarter.

We have also now the quarterly stakeholder call in which financial information is provided. So that's a number of pieces of information that are being provided but from an interaction standpoint public comment process - these are very structured processes, you know, and direct interaction would be great. And I think James has a question.

Michele Neylon: James.

James Bladel: Thanks. So just a question relative to the planning and budgeting process. And I know that we're going through some changes now, we're adjusting that. I think, you know, I've always appreciated that ICANN published a draft budget for comment, people comment. Sometimes the draft budget changes as a result of those comments, sometimes it doesn't.

I think particularly last year when we saw the projections and the revenue assumptions that were being made for new gTLD registrations, I think registrars in particular were raising their hands and saying, look this is wrong from Day 1. This is off track by a factor of about 10.

And that was part of our comment. I don't think it was - made it into the final draft and then later in the year revenue projections were cut, I believe, the beginning of this year.

So one of the things that I'm interested in in your thoughts because one of the topics under discussion in the accountability program is building in some institutional controls over the budgeting process that put the community back in the driver's seat so that we're not just commenting - throwing comments at a draft budget, instead the budget - the draft budgets are subject to community approval before they can be presented to the Board. And you have thoughts on that? I mean, I'm assuming that maybe you don't like that, I don't know.

Xavier Calvez: So I thought you were raising the subject of last year's example as an example of comments being taken into account so I'm a little bit surprised because this group, as well as many others in exactly the same fashion, have said revenue projections seem very aggressive, assumptions are - seem aggressive generally speaking.

That came out of the budget - the public comment process. These - the feedback was collected from early June to mid-June. And as a result basically of that comment and of course of the fact that when we arrive towards the end of June it's a lot more clear as to what the start of the fiscal year that's coming is going to look like.

The revenue projections embedded into the budget were changed. The budget was - approval by the Board was delayed so that these revenue projections can be changed. The revenue was decreased by \$10 million from

\$114 million to \$104 million. Costs were cut as a result by \$10 million in the budget.

We had calls with the community to present those changes prior to the Board being submitted the updated budget and the updated budget was approved by the Board on September 10 as a result.

So this is not necessarily the way we would want it to happen from a logistical standpoint but this is an example of comments impacting the budget that is approved. Ideally it happens earlier; ideally it doesn't even have to have happen like. If we can still have the time to take into account the comments and revise so that the budget so that it can be approved within the usual timelines. But last year is actually quite a good example of the opposite of the position that you were indicating.

Having said that, to your point earlier, we have always struggled to be able to take the input, translate it into potential changes to the budget, and integrate the - those in the budget and then submit them to Board approval largely because of challenging logistical issues simply because when you get comments on the 15th of June and you try to improve a budget on the 30th of June there's just no time to process them. And we've struggled a lot with that.

It has been a challenge to also provide adequate responses to the public comments. And certainly within that timeframe there is basically no time to turn around to do a thorough analysis of the comment and one that can allow (unintelligible) changing the budget.

So your point is completely valid; it's been a challenge for the organization to do - explicitly address the comments in a fashion that lets us either change them or explain why we wouldn't. And I want to be very clear that this is - we owe the organizations, whether they have provided comments or not, to explain what is the position that is suggested to take - to be taken as a result of the comments. And it has been a challenge.

What we are trying to do about it, last night's working group was an attempt to provide early understanding on, for example, revenue assumptions. Mike, along with Krista and Cyrus, have spent about an hour and 15 minutes going over the preliminary revenue assumptions for FY '16 with the community members present on the number of registries, the timing of delegation, the number of transactions that are billable, not billable, etcetera, etcetera.

So this is an attempt to do that and to try to mitigate the challenge that I was talking about earlier. We have advanced by a month and a half for this year's process coming in front of us, the public comment period so instead of finishing around early June it will finish by - on the 1st of May which should leave us more time to be able to answer the comments, to interact with the Board on what public comments have been received so that the Board has a better understanding and a better ability to guide staff in changes to the budget so that we can have a more comprehensive and transparent response to public comment.

Because the point that you're making, generally speaking, is completely valid. It's been highly challenging to effectively translate comments into direct changes to the budget.

Michele Neylon: James, are you happy with that?

James Bladel: I don't know. I mean, I don't - parts of it - I think the specific question was, are you amenable to modifying your budget and planning process to, you know, I think it's a very short yes or no question as to allow for more community oversight of the final budget; not public comment but actually public approval.

Xavier Calvez: Yes.

Michele Neylon: Okay thanks. And, Kaitlin, are there any comments on remote?

Kaitlin Tubergen: Comment from Chris Pelling and the comment is, "I think we should be concerning ourselves with expenditure."

Michele Neylon: It's a comment so you don't need to react, Xavier, it's quite okay. You can just - for the record Xavier is nodding. Xavier, you had another thing you wanted to speak to us about.

((Crosstalk))

Michele Neylon: Briefly.

Xavier Calvez: Three but...

((Crosstalk))

Xavier Calvez: ...out of the three, it's a subject at Michele and I have discussed very little bit. We - this group and also the Registries have, over the years, expressed concerns and needs for easier payment options of the invoices that ICANN issues, and notably those of you who are not US-based. And you have had interactions in the past years and months on that subject with a number of ICANN staff.

You may be aware that ICANN has launched more formal globalization, an internationalization project at ICANN to try to lower the barrier to either interaction or doing business, etcetera, with ICANN across the world. One of those subjects is to try to enable payment in local currency.

There are a number of relatively challenging legal tacks, obstacles to doing that fully. But we are working on actually finalizing an option of local currency payment that can be offered and taken or not taken, through a relatively simple Website process with an intermitted vendor. And so we are hoping to be able to announce quickly the specific modalities of that happening.

I simply wanted to mention it at this stage and we will provide more details as to the number of currencies offered, those that frankly may not be possible to offer the process and how that can be done quite shortly. So just wanted to mention that subject and know if there's any questions or comments that I can maybe answer on that subject at this stage.

Michele Neylon: Thank you, Xavier. Does anybody have any comments on this? Or any thoughts or any questions or any queries? Kaitlin does or maybe Kaitlin is going to be channeling somebody. One moment, please. Kaitlin.

Kaitlin Tubergen: Question from Chris Pelling. "Many years ago you were adding a CC payment gateway to ICANN's portal. (Komake) mentioned this was in process. This was years ago. Where is it, please?"

Xavier Calvez: So that's part of the solution that I was just referring to. Unfortunately I'm not old enough, I guess, in ICANN to know what (Komake) had mentioned years ago. So this is something that we're going to be - as part of the capability of local currency payment that I had mentioned that this is something that we're going to work on.

The portal for credit card is also going to be something that we're going to try to organize differently simply because there's a number of relatively straightforward security issues that we need to be able to address. And while we have changed banks we have changed merchants to process credit cards over the past year and a half. We need now to be able to reengage the project of the credit card portal. So I will follow up on that over the next few months to try to make sure we have this capability easily enabled. Credit card payments will be possible in the local currency option that I mentioned a little bit earlier.

Michele Neylon: Thank you, Xavier. Anything else for Xavier because I need to move on to the next person. Going once. Going twice. Okay sold. We're moving on. Xavier, thank you. If anybody has any follow up with Xavier and needs his contact

details just please harass me or one of the ExComm. Thank you, Xavier. See you again soon.

Xavier Calvez: Thank you very much.

Michele Neylon: Okay next up we have Mr. Benedict Addis who is self-described as a recovering former law enforcement agent. And I will hand over to Benedict who's going to be talking to us about public safety I believe. Over to you, Benedict.

Benedict Addis: Hello. First of all thank you so much for hearing me out. This is, in the words of Monty Python, something a little bit different or now for something completely different in fact.

How are we doing on those slides, Kaitlin? On the way. Okay, no worries.

Michele Neylon: State your name for the record.

Benedict Addis: No problem. So my name is Benedict Addis. And I am a member of the SSAC here at ICANN. I'm a former law enforcement officer working for the National Crime Agency's National Cybercrime Unit. And I work with Bobby Flame on the 2013 RAA negotiations so I guess sorry about that.

And particularly I guess I'm particularly grateful that you've agreed to see me and give me 20 minutes of your time today to talk about a new project that we've started.

So I left law enforcement after a major cybercrime operation last year that was called in the US Operational Clean Slate and Operation Tovar in the UK. This was the joint operation against game GameOver Zeus and Cryptolocker that happened in last May.

And a lot of learning came out of that which is really what I wanted to talk to you about. And what we're here to talk about is a new registrar, a special function registrar called the Registrar of Last Resort. And the idea of the registrar is to house and purely to house the malicious type of domains that we've seen in these botnet takedowns, the work that we've done on spam, phishing, APT and malware.

So we're not touching content. We're not interested in dealing with intellectual property or trademark infringement but purely somewhere to put domains that have been seen or will be - have been predicted to be involved in malicious activity.

I'd also - I'm going to leave a little chunk at the end to welcome questions because I think this is a seriously contentious issue and I really need your help and feedback on this one with all the brilliant brains and viewpoints in this room.

So I think we've probably got to Slide - where are we - Slide 3 I guess. Yeah, that looks good. So I'm just going to take five minutes to tell you about my current employer. They're called the Shadowserver Foundation. Can I have a quick hands up, who's heard of Shadowserver in this room?

Michele. So it's probably a good idea that I introduce you to Shadowserver a little bit. If I could have the next slide please, Kaitlin? And again. So Shadowserver is a security nonprofit. We exist to - we're a group of (unintelligible) first paid employee who (unintelligible) intelligence on malicious activity on the Internet and then share it back to anybody that wants it free of charge.

So we provide that (unintelligible) unlike certain organizations that will charge you to be told you're a victim. We collect information, we compile nightly reports and we provide that back to organizations, institutions and countries.

So we've got - and we'll see a little bit of a dive into the reporting that we do over the next couple of slides.

And again, so that's one of the things that Shadowserver did was provide the (unintelligible) for the large Gameover Zeus (unintelligible) mentioned earlier.

So what do we do? We sit on the largest repository of malware binaries in the world; we're outside of certain institutions that you need retina scans to get into. (Unintelligible) on the largest sort of (unintelligible) repository of malware binaries. We get about a quarter of a million to half a million binaries submitted to us a day and we're sitting on - and these figures are from last year so we're sitting on about 1/3 of a billion unique binaries now.

And we (unintelligible) for threats against individuals, organizations and networks and we provide those (unintelligible) to our customers. So particularly, for example, if you're running a hosting company you might be interested in subscribing to our reports. You can just give us your ranges or your ASNs and we'll provide those reports to you.

We also scan...

Michele Neylon: Sorry, Michele just interrupting you very quickly. How can we give you that? How do we do that? Is it via Website? Do we have to kind of do a secret handshake? I mean, how is that practically handled?

Benedict Addis: Yeah, this is entirely open. Nothing secret (squirrel) about it. And later in the presentation there'll be a Web link to sign up for that. We were running a backlog that was so popular and because we had this out for free, we were running a backlog until about last July so we're about nine months behind in providing these reports.

After a heroic effort by some of my colleagues and volunteers over the weekend we're now back to a couple of months so the queue is a lot shorter at the moment.

We also scan the entire IPv4 space everyday so we've got a bunch of kits. We scan for 20 vulnerable protocols on your networks. And, again, we'll let you know if there's a problem.

The final thing we do is run sinkholes. So we run a bunch of - we own a bunch of domain names. So particularly for botnets when the victim computers are trying to connect to their command and control server, they're trying to phone home in order to reach either steal information from victims or ask for instructions, for example, for a DDoS - to launch a DDoS attack, we run a sinkhole. We take over part of the bad guys' network and that means registering domain names that haven't been registered yet by the bad guys.

We then sit on those. We run a server that replaces part of the malicious network. And we sit and monitor which of the victim machines come asking for instructions or come trying to (unintelligible) information. And, again, that information is broken out. We see, as it shows on the screen, we see 6 million to 10 million unique IPs everyday across 50 to 100 types of malicious activity so botnet, different types of botnets.

And if we can move to the next slide. And this is the gear we're doing it with. So we've got - we're currently sitting on lots of data. I won't go into that detail. And you'll see some pictures in a second. And again.

Michele Neylon: And again.

Benedict Addis: Sorry about the - and again.

((Crosstalk))

Benedict Addis: Speed up a little bit, thank you. So at the moment we're supporting 74 different countries through the national search. So we - in many of those cases we are the sole supplier of victim data to them. So if you ever wonder who does the cleanup after there's a big takedown or after there's a bunch of victims found it comes to us. We break that information up and overnight it goes out to each country. So we provide a kind of World Health Organization function for the Internet, sort of a disease control function.

It's not particularly sexy. We're not catching bad guys but we are keeping victims notified. And because it's nonprofit and nonpolitical we talk to everyone and our idea is that we're elevating the security of the Internet as a whole.

And the link that Michele requested is at the bottom. Now I'm sorry it's such a long link but if you Google for Shadowserver and get reports you'll find the information for your own networks. Anything down to a slash, you know, anything down to a slash 28, 29 we'll give you reports for.

So to give you the second part of my talk, we're here to talk about the registrar of last resort. And the problem that we're all aware of is the vast quantity of malicious domains that are out there and that are being used or used in potential by malicious actors.

And so we've seen a progression from Conficker, which generated a possible 250 domains every day, now bearing in mind that the bad guys didn't register all of those, they only needed to register two or three to get control of their botnets. But they create a list of a possible 250 domains every day. I'm seeing nodding.

Which creates an asymmetry. It means that the bad guys have to - the bad guys only have to get lucky two or three times and the defenders against these botnets have to register all - or have to block all of those registrations

every day in order to prevent the victim computers communicating with the bad guys.

That escalated over time and we've seen that with the subsequent versions of Conficker that they were registering or generating lists of 50,000 possible domains everyday across 112 different TLDs so a huge - a huge span (unintelligible) we all know well the difficulties of addressing gTLDs and ccTLDs. The large number of registrars involved made this almost impossible.

But in fact (unintelligible) did come together in a very ad hoc way to address Conficker. And the same happened with Gameover Zeus and Cryptolocker last year.

So it's all worked - it's all worked on a sort of - on a nice stage so far. It's worked by the seat of our pants and held together with sticky tape and string. So our proposal is to ask you to support a registrar that will formalize some of these issues that we've addressed before in an ad hoc way.

We're aware that registrars don't love dealing with malicious domains. We're aware that registrars are quite good at dealing with malicious domains in their own way. But this is always - this is done without a great deal of transparency and it's done without a great deal of due process which means that - which leaves the doors open for pressure from outside, pressure from law enforcement and in order to act - particularly act quickly on problems.

There's also a bunch of cost involved not just the fees themselves but the cost - the costs in your time in dealing with these issues. In direct cost particularly involve reputational issues. And I'm not just talking about reputation, you know, I think he's a good guy or, you know, she runs a great registrar but actually a lot of security software is scoring domains based on a technical assessment of reputation.

And so we're seeing that actually reputation - even to get a registrant's email delivered is now relying quite a lot on the reputation of that domain. So we hope that - so we're aware that registrars are currently not that keen to be dealing with this volume of work.

Our proposal today is a trusted registrar called the registrar of last resort that will handle some of these issues, to accept - so the domains that have been existing and have been detected to be malicious it can accept as transfers. And I understand that there are some issues around the transfer period if it's less than 60 days since that domain is registered.

For these botnets with large numbers of domain names, thousands, tens of thousands of domain names, there is - obviously we won't be looking at transfers but we'll be talking to registries in order to - we can predict those domain - those domain names and request that the registries register those domains to us and negotiate with them on a registry by registry basis for fee waivers.

And the final part which on my screen has got slightly cut off - is to deal with the renewal of domains and assess them to see if they're still malicious because what we don't want to happen is to be warehousing or stockpiling a whole bunch of domains that aren't useful anymore.

The key here is that all we're going to be doing is a - is acting as a normal registrar. We are just another registrar. We're not determining the badness. We are not owning domain names ourselves. So we're acting like a normal registrar and bound by the same rules and policy and conventions that this community has always been bound by.

We seek to simply proceduralize this process so have the trusted members of the security community report into us, have an advisory committee determine the policy on what we take because badness is such a subjective term. And to then connect those reporters optionally with sinkholers, so people that will

specifically take the data that we see from the sinkholes once these domains have been brought in, and pass that out to the community to improve the security of the entire - of the entire network.

And of course if we were in the process of accrediting at the moment, thanks to - and with some help already for members of the community we'd like to come along to your meetings and become more involved and understand the issues you're struggling with and hopefully take a little bit of that pressure away from you as well as dealing with some of the legal liability that might arise from holding - once a domain is known to be bad we'd like to take and hold that.

The word sort of toxic asset or bad bank has been used sometimes. We sort of put all these things in one place and allow the community to, you know, to carry on doing its job or what it does best and just put these assets in, you know, these bad domain names in one place.

Michele Neylon: You're out of time.

Benedict Addis: Okay. One last - just one more slide? We'll move on...

((Crosstalk))

Benedict Addis: Question.

Michele Neylon: Finish you off, you're done.

Benedict Addis: Okay, thank you very much.

Michele Neylon: Thanks, Benedict. If anybody has any questions for Benedict, we've got like two minutes.

Rob Hall: Yeah, one quick one. Why be a registrar? Wouldn't it be simpler to come to us and say hey, here's a DNS server (unintelligible) shut them down so we can gather all the data we need because you're now getting into the changing transfer policy and, you know, (unintelligible) policy at ICANN that seems rather cumbersome.

If you came to us and said when you shut one of these domains down the data that still goes on is critical to us, put this DNS on it and you'll use that data for good, we might be more inclined. But if you're going to try and tell us transfer domains and whatever inherent value may or may not go with them, I think that's a can of worms you're (unintelligible).

Michele Neylon: The one on the right.

((Crosstalk))

Benedict Addis: Thanks, Rob. It's - we're not just going to be negotiating with ICANN accredited registrars is the answer. And so we feel that in order to go out there and be credible with ccTLDs that we need to be conforming to the policies that an ICANN registrar has and has in place.

Rob Hall: But my point is you get the same affect without having to be a registrar in any accreditation, whether it be CC or ours, and you could have it tomorrow. Like I kind of think it's a novel to say here's a DNS server you can point malicious botnet domains at and it'll help the security community gather more information - I think it's a great idea. But asking to be a registrar and transferring domains and going to CCs, I think you're in for a world of hurt.

Benedict Addis: So the issue about - the specific issue we're trying to address is for this large number of domains that don't exist so undelegated domains. I couldn't - I'd - I might be wrong and this is exactly why we need to talk about this and I'd be delighted to talk offline - but telling you to come - I think coming along and say, look, I've got, you know, 12 domains or 80 domains in the case of

Flame, that I'd like, you know, that I'd like to point to this name server, I think that's reasonable.

If I came to you and said, look we've got 49,996 domain names daily on Conficker D and I'd like you to register them. And by the way you've got to negotiate with ICANN on, you know, under the fee waiver policy and I'd like you to do this for me. And by the way, there's no money in it. I think that's a bit of an ask. I'd feel cheeky asking that. I don't know if anybody would like to volunteer for that job.

James Bladel: Yeah, so, you know, I sort of agree with Rob but generally I don't care if you guys become a registrar is that's what you want to do. But I would say, look, there's a couple of issues or points or reactions.

One is that you've got a bigger problem with the transfer policy perhaps than you're aware of; it's not just the 60 day lock, it's that these names first have to be (unintelligible) and the registrant has to be, you know, changed before they can be transferred because registrants, as long as it's in place, have rights against blocking those transfers so there's a step happening before that. It doesn't matter if you're a registrar or reseller or whatever you are, that's not listed on your process that needs to be addressed.

I wouldn't go down the road of asking for relief on fees. I think you're much more likely to get some traction if you go to registries and ICANN and ask them for in-kind donations to your cause or organization that offsets those fees. And it doesn't ruffle feathers in this room because, you know, if then you later on down the road put out any kind of security services or other sorts of things that start to maybe look a little too much like actual commercial products I think that, you know, that's going to definitely, you know, things are going to get dicey fairly quickly.

And then just the final point about Flame, you know, you might have better success if you use your law enforcement contacts to talk to the governments who wrote it.

Rob Hall: One final suggestion if I can. Sorry, I'll be quick. You have this list of domains, what if you publish it to us? We'd like to know that if we're registering a domain for someone that's on that list it's probably credit card fraud to us and a headache for us.

So that might be a service for registries and registrars of - I don't care how many they are, just make an interface to it that we can check if it's on that list before because you won't get all registrars but I think trying to register all those domains, like 49,000 a day is - you're going to kill yourself. You'd be better to try to prevent the registration across whatever platform.

James Bladel: And do they have to be registered for this to work? Could they be on a reserve list? I'm just trying to explore, they have to be registered so you can sinkhole them, is that the goal?

Benedict Addis: So they don't have to be all registered and so we need, again, just to be clear we're only brokering access between registrants and sinkhole - so sinkhole reporting; we're not sinkholing ourselves.

James Bladel: Okay.

Benedict Addis: As I understand it, no, for example, for Gameover Zeus, 1000 brought into existence, you only needed a couple of domain names to be able to sinkhole.

James Bladel: And are you scanning these for trademarks and generic terms or are they just random strings or...

((Crosstalk))

James Bladel: Yeah, so they're just - they're mostly random, right? They're just alphanumeric junk?

Michele Neylon: Mr. Serlin, I believe, had a question or a comment or something.

Matt Serlin: Yeah, thanks, Michele. No, sorry, Matt Serlin, Mark Monitor. I was just going to piggyback on what James said. And I think what might be another option is to work with the registries to blackhole them at the registry level so that they don't even need to be registered, the registry just - and I think that some of the registries have done that in the past with Conficker if I recall.

So they don't even need to be registered, the registry just, like James said, puts them either on a reserve list or just, you know, kills them at that level so no one has to register them and then work with ICANN to get, you know, all that stuff so.

Benedict Addis: To be clear, one of the reasons we're creating this registrar is because at the moment you're actually right, there is - there has been, you know, ad hoc efforts at registries to address this. What we're seeing at the moment is a raised condition among for profit companies to meet up to race to the bottom to register - to find and register malicious domain names.

What we're trying to do is make sure that - is to systematically make those unavailable to everyone and then simply make the data available to the security community.

To address the - I think, James, you had a question that wasn't answered?

Michele Neylon: We don't have time.

Benedict Addis: Okay.

Michele Neylon: Sorry. Okay, look, I - we have to close this session.

Benedict Addis: Offer to take it offline...

((Crosstalk))

Michele Neylon: Yeah, if anybody wants to follow up directly with Benedict he's here all week I believe?

Benedict Addis: (Unintelligible).

Michele Neylon: And I have your contact details anyway. Okay moving on to the next - yes - Mr. Mike Zupke from ICANN staff is going to enthrall us with all sorts of interesting things. Mr. Zupke.

Mike Zupke: Thank you, Michele. Who's got the slides? Where did Kaitlin go? Jennifer. So the topic today is the review of the Whois accuracy program specification to the 2013 RAA.

As I'm sure everybody in this room knows, there are a bunch of requirements in that specification for registrars to do things such as validate registration data and verify either the email address or telephone number of registrants and account holders.

And one of the provisions of that specification says ICANN should conduct a review of the spec in consultation with the Registrar Stakeholder Group about a year after the first 2013 RAA is signed, which by that measure we're a little bit behind. However, as you know, the transition addendum to the RAA made that specification not effective until January of 2014. So we're about a year in in terms of experience with that specification.

So we sort of informally launched this process by talking to the Registrar Stakeholder Group ExComm back in December a little bit kind of floating some of our thinking and getting a little bit of preliminary feedback but we're

to the point where we've got a little bit more sort of, you know, pen to paper work here that when we get the slides you'll be able to take a look at the process that we're sort of envisioning.

And so I can kind of give you the oral walk-through of that anyway. So what we're sort of thinking is - and what the specification says is that this is between ICANN and the Registrar Stakeholder Group, this review. And when you read it literally it says it's a review, and in my mind that means we look at it and gives us some output to think about. And as part of the discussions that I've had with, you know, Michele and others on the ExComm, the question is raised well, you know, how do effect change as a result of this review?

And so, you know, finally I got a little bit more information. It's taken some research. And, you know, as you might not be surprised the answer is not 100% entirely clear on the surface from the RAA's text because there are different ways that the agreement can be modified.

So what we're sort of thinking in terms of process is we - ICANN staff and you, the Registrar Stakeholder Group, sort of take some time, come up with your wish list of things that you'd like to see changed, whatever input or feedback you've got. We'll sort of do that at the same time.

And we'll also, in order to, you know, make this a really transparent process, launch a public comment period so people in the community who have feedback about the workings of this can also provide input into how the Whois accuracy program specification might be impacting other stakeholders.

So we post all this. We come together at the end of that comment period, stakeholder group, staff, public comments is all sort of brought together. We sort of discuss it, hash it out and put together sort of our thoughts about what we think the plan is going forward in terms of what substantive changes should be made. So we have some document that looks sort of like a roadmap.

And so is where the question of how do we effect change kind of comes in. And so the way I'm sort of envisioning this is there's going to be probably a bucket of ideas or changes that, you know, registrar, staff, the community we all sort of say, yeah, that's kind of obvious. You know, this is something we should do. So these are things that we can probably, assuming that the Registrar Stakeholder Group has a mechanism to formally agree with ICANN, then we can just agree and we can modify the spec based on that agreement.

So we're sort of thinking this is for the noncontroversial stuff, the noncontentious stuff that we're all in agreement we can just agree, we modify the spec. To the extent there are things that we think should be changed - and I'm on slide - the last slide. So to the extent that we think that there are things that maybe require more stakeholder input we can either invoke the formal RAA amendment process that's in the agreement or we might refer this to the GNSO for PDP work.

And there may be some things where we say, you know, yeah, that's just never going to happen or we think this isn't the appropriate venue or whatever so there may be some things where we put it - and what you see in the lower right box here we say this is something that we'll put out for another day or we'll agree to abandon.

So that's sort of the idea...

Michele Neylon: Sorry, Mike, could you please slow down?

Mike Zupke: Sorry.

Michele Neylon: You are going way...

Mike Zupke: There's no scribes yelling at me.

Michele Neylon: Okay well I'm yelling at you.

Mike Zupke: Got it.

Michele Neylon: Please slow down because this is actually quite a big topic for us...

Mike Zupke: Yeah.

Michele Neylon: And speeding through it doesn't help because it's just going to keep coming back until we actually manage to discuss it properly so calm, slow.

Mike Zupke: Thank you.

Michele Neylon: I think because this is quite a contentious subject and it's one where there is definitely a difference of interpretation between what you guys think this - the clause in the contract means and what we think that clause in the contract means...

Mike Zupke: Which clause?

Michele Neylon: Specifically the line that says, "Shall be reviewed by ICANN in consultation with the Registrar Stakeholder Group."

Mike Zupke: What part do we disagree on?

Michele Neylon: Well that's what I want to see if people have any input on.

Mike Zupke: So if we can go back one slide it's the process slide. There we go. So as I was saying, you know, there's different ways that we think this can be implemented and this is the process that we're sort of envisioning. So where we were on here was the - sort of the - between the third and the fourth box.

So we kind of come up with what we think is the roadmap for how the different ideas can be implemented.

We post that for public comment, again, just to make sure that we're, you know, really including people in this discussion in a way that we're not excluding, you know, feedback from relevant stakeholders. And then this final box is what I was talking about how there are the four quadrants that will actually be able to make change.

So in some cases staff will agree with the stakeholder group and will say, hey, great, we'll do this.

((Crosstalk))

Michele Neylon: ...the difference - this is Michele speaking for the record - it's just that the contract does not specify anything about third parties. The contract specifies, "Terms and conditions specification shall be reviewed by ICANN in consultation with the Registrar Stakeholder Group." It does not say in consultation with the entire globe or with the planet.

Mike Zupke: Right. So if you were not in this room you would probably be angry if we took that approach.

Michele Neylon: And that's my problem, why?

Mike Zupke: Well because I answered everybody. So, you know, I understand what you're saying and, you know, it's not that everybody is going to be sitting at the table necessarily. However, we do think this needs to be an open process and we do want to make sure that we're taking into account all stakeholders inputs.

James Bladel: Open process. Help me with that.

Mike Zupke: Transparency.

James Bladel: We're going to publish our notes and records and discussions and meeting or are we going to push it out for public comment or - help me understand what open process looks like in practical terms. Everybody gets a seat the table. Is it ICANN's positions are derived from what the community says and then that becomes what you are advocating for?

Mike Zupke: Thanks, James. So you know, part of this is, you know, it's not entirely clear what feedback we're going to get. And so to a certain extent that's going to dictate the process. In general the way I'm thinking this will probably play out is we're going to have these different types of inputs, some from registrars, some from staff, some from people in the community.

And so I think ICANN staff and the Registrar Stakeholder Group sort of take this, we compile all of the inputs and we sort of say, you know, here's how we think - to the extent that we can agree - here's how we think these should be addressed meaning what process we should follow in that document we would publish for input and then be able to act on that with the input on our process also.

Yeah, go ahead, Rob.

Rob Hall: I see this more as following the same path that a full negotiation would take which is you sit down with us before publishing anything and say what do you think? Gather our opinion, see what we can agree on and then publish the result for public comment like we did with the RAA.

I also kind of disagree with your last slide which is obtain the agreement of this SG. That's not what's required under the contract, I don't believe. There's actually a whole specification of how the votes are taken and what's required and it includes all registrars, not just this stakeholder group. So I want to be careful with your slides and your public comments so that, you know, we

have built into the contract ways to change it rapidly where we both agree and it applies to everybody as soon as a certain threshold is met.

So, you know, I would caution you on going public with your thoughts too early. I would rather see a negotiated change where we both agree published for public comment. I don't have a problem with publishing what we're about to change for public comment; I do have a problem with involving the public too early in the process.

Because we saw what happened last time we did that in the RAA and it tied up our RAA negotiations for six or seven months and it wasn't until we finally got, you know, a smaller group together that we actually got somewhere.

Mike Zupke: Thanks, Rob. Your point is well taken.

Michele Neylon: Volker.

Mike Zupke: So there was one thing I did want to respond to though. So the specification itself says that registrars agree to abide by this spec as it exists or as it is amended based on agreement between ICANN and the Registrar Stakeholder Group. So there is actually sort of this additional process to amending this particular part of the RAA where this Registrar Stakeholder Group can agree with ICANN to make changes and then it will become binding on registrars.

Rob Hall: I stand corrected.

Michele Neylon: Volker.

Volker Greimann: Yes. This worries me as well because this was not the way that we agreed to this when we negotiated the RAA. And the review process and our discussions with the ICANN staff during the time that we negotiated it was very specific as looking at the problems that the specific implementation was

bringing to the marketplace, to the registrars and fixing those problems. That was what the review process was about. This was not about getting the community to the table and adding a wish list. Because if you want a wish list this is how you get a wish list.

Michele Neylon: Thank you, Volker. Anybody else on this? Okay I think we've effectively ruined Mike's morning for him.

Man: Michele, I have a question. So where do we go from here? So we voiced our concerns about how you're articulating the process here. We don't agree with you. Is this now - are we heading down the railroad here that we are starting to see more and more frequently or what do you do with our comments here, Mike, for somebody like myself. Tell me what's next?

Mike Zupke: Thanks. That's - so that's a good question. And so, I mean, this is the challenge is that I, you know, I heard from you and I heard from (Rob), I disagree with the process. So I think there may be, you know, we've got what like 20 minutes to talk about this right now.

Maybe we need to sort of formalize the idea that staff has right now and let the stakeholder group mull over it maybe by email or however you guys want to discuss it and give us your feedback in a more formal way and we can sort of go from there. Because I don't necessarily want to take, you know, two comments that I heard and say okay well we'll change the process. That's not to say that, you know, everybody in the room doesn't agree but I also don't want to act based on just that so maybe...

((Crosstalk))

Michele Neylon: Okay.

Mike Zupke: I guess what I'm saying is if there's a way for the stakeholders to sort of speak in unison then that would be good.

Michele Neylon: All right just a couple of things. First off, hold one. Please state your name before speaking because there are remote participants and you're going to completely upset the scribes.

Also, just a point of information, Mike and I have had conversations around this and one of the things, I mean, I personally thought that, you know, this is - it says Registrar Stakeholder Group and ICANN, it did not say Registrar Stakeholder Group and every man and his dog.

And the way - I'm not - the way I read it was okay this was opening up a particular thing in a particular fashion. Mike didn't exactly agree and said he would check with ICANN legal. I'm not sure what happened there. Did you get a response from ICANN legal?

Mike Zupke: So I think the answer to your question is what you see in the first - the upper left box there.

Michele Neylon: Okay.

Mike Zupke: So your comment to me was - as I recall, can't we - the stakeholder group and ICANN just agree to make changes and update and the answer is yes. However, you know, you can imagine as staff we're going to agree to change if we think that it's - if those are the changes that are appropriate to agree in that - through that channel in other words.

Michele Neylon: Yeah, okay because that's basically the conversation I had was, you know, I'm reading this as stakeholder group has issues. We want to change these things within that entire section of the contract. And we engage in a dialogue with ICANN and ICANN in this instance being ICANN the corporation.

And then I didn't hear anything for two or three months which is why I didn't say anything to you all; it wasn't that I was hiding anything, he hadn't actually

given me an answer. So the answer now is mixed. I'm actually confused, Mike. I actually don't fully understand whether you're saying to me that ICANN legal agrees with that interpretation or has a completely different interpretation. I'm sorry, I'm confused. Jeff.

Jeff Neuman: Thanks, Jeff Neuman. Just on - this is a common issue, actually not just with registrars but also with the registries. It has to do with, you know, unilaterally interpreting a contract. And I think, you know, you basically said that well ICANN staff will go in a room and see how we feel about your comments and then come out with something new.

Actually that's not the way a contract works. Contract works where we both get into a room together, discuss the process and agree on it. If we can't agree on it we go to arbitration. That's the way contracts need to be respected. So I take your point that there's a couple comments here and then you'll go back into a room and discuss it with ICANN.

And frankly, Michele, you said that Mike was going to go back to ICANN legal. Actually, I don't really care what ICANN legal says. Right? That's one party to a contract. And it's interesting to know but if we feel a certain way, whatever it is that we feel, as the contract and if ICANN disagrees then it just goes to dispute resolution. It's not the ICANN way that controls. So let's - I'm sure we'll talk about how we feel about it. And then actually we'll come back to ICANN and we'll let you know how we feel.

Mike Zupke: Thanks, Jeff. So it's Mike again. You know, with all respect I think what you said is the opposite of what I said. I said - I heard some comments, I'd like to try to memorialize this, send it to the stakeholder group and get a more formal statement so I'm not just acting on what I heard from two people.

I want to have agreement with the stakeholder group in terms of what the process should be. It's not that I'm saying I'm disregarding, you know, what

(Rob) and (Bob) said, it's that I want to make sure that they're speaking for the entire group if we're going to act on their comments.

Michele Neylon: Okay, does anybody else have any other comments on this particular topic? We can eat a little into the break. We have a break scheduled at 10:15 to 10:30 but we can keep going if needed. Kaitlin, go ahead.

Kaitlin Tubergen: Question from (Joyce Linn). "Does ICANN enlist public comments on all the agreements with the contracted parties?"

Mike Zupke: So, I mean, in general, you know, the philosophy is to have public comment - I don't know the answer to that question because I wasn't involved in registry agreements. But, you know, in terms of negotiating the RAA of course we had lots of public comment rounds in that.

James Bladel: You know, I've always wanted to see the UDRP providers' comments - or contracts. I know they must exist but - they don't exist.

Michele Neylon: There are none. This has been another kind of debate.

James Bladel: We also talked about Iron Mountain's contracts.

John Berryhill: Yeah, there are no...

Michele Neylon: Please state your name for the record.

John Berryhill: I'm sorry, John Berryhill. There are no compliance obligations incumbent on UDRP providers and ICANN will not provide the Iron Mountain contract.

Mike Zupke: So Mike again. We can provide a redacted version of the Iron Mountain contract and, you know, redact anything that's confidential, that's fine.

Michele Neylon: So if you - Michele speaking for the record - if it's redacted how much contract will be left?

Mike Zupke: I think that the only sensitive stuff is mostly pricing details.

Volker Greimann: And how can we get a version - a redacted version for the next version of the RAA if we ever decide to update it? So how can we get the same treatment for our contract?

Mike Zupke: I'm sorry, I don't follow.

Michele Neylon: That is Volker Greimann speaking for the record since he's forgotten his own name.

Volker Greimann: Thank you, Michele. Volker Greimann speaking again. Well if Iron Mountain gets a special treatment for their contract why don't we? If - I mean, we have the option of renegotiating the contract how do we get such a confidentiality clause in for the next iteration.

Mike Zupke: I have a feeling that was mostly a rhetorical question. But, you know, what in your agreement is sensitive to you? What in your RAA do you think that you don't want the community to know about?

Volker Greimann: I will come back to you on that once the time for renegotiation comes.

Michele Neylon: Okay. Mr. Hall.

Rob Hall: Rob Hall, Momentous. I have a quick little suggestion if I may, Mr. Chair. Mike, you seem to be playing a bit of divide and conquer. Bob and I are of one opinion and everybody else might be something else. Can we just do a straw poll? How many people here side with Mike or how many people side with Bob and I? Just so he's not going to back to ICANN saying two people said this.

Michele Neylon: Okay so the question is: How many people agree with Bob and Rob?

James Bladel: Let's state the positions, not the names, if we would please?

Michele Neylon: Okay...

((Crosstalk))

Rob Hall: How many people agree with the position ICANN is taking on this?

James Bladel: Which is that...

Rob Hall: Sorry, which is that as per their slide they're going to come up with an opinion, go public with it, seek public advice then sit down and try and negotiate. How many people think that's a great process? Okay, how many people think...

((Crosstalk))

Michele Neylon: Hold on a second. For the record nobody in the room in Singapore raised their hand, smiled or did anything to indicate that they were supportive of that.

Rob Hall: How many people support what I think Bob and I and Jeff have alluded to which is the registrars and ICANN sit down in a closed room, see where there's commonality and start a discussion about this as per the existing contract? Hands?

Michele Neylon: For the record that's most of the registrars in the room.

Rob Hall: So, Mike, I think you've got your marching orders here.

James Bladel: Not Mark Monitor.

((Crosstalk))

Matt Serlin: This is Matt Serlin from Mark Monitor, I just want to point out I am not a voting member and henceforth did not participate in said straw poll for the record.
Thank you.

Rob Hall: So, Mike, I think your next step - you can go back and tell ICANN that we're willing to sit down with you and start a discussion on this and we'll form a group to do that I guess. But it's, you know, you're sending us something formal and I think it's probably a waste of time; let's just get going and sit down and start discussing.

Mike Zupke: Thanks, Rob.

Bob Wygant: And Bob Wygant with Web.com. We're going to be talking to the Board about this this afternoon as well. It's the same issue that Jeff brought up with the Registry Stakeholder Group has talked to ICANN about with unilateral contract interpretation.

It's the four corners test; the contract is governed under US law. I mean, not everybody is lawyers here but the reality is there has to be agreement between the parties. If there's not agreement then we go to arbitration or some other means to determine what the contract amendment process is. It's that simple.

What we - what's I think is causing concern amongst this group is that it appears from what you're articulating that you will bring everybody else, every other stakeholder into our negotiation. And that's not what the contract says. So we'll talk more about it this afternoon just so the Board's aware of it. I'm assuming they already are.

But - and we'll be drafting a more formal letter to the Board outlining our position on this topic. But we're - you just know where we're coming from here and we need to get, I think, your legal department involved with us and take it from there.

Michele Neylon: Thanks. It's Michele for the record. Just for members in the room or remotely, the chair of the ICANN Board contacted the quote unquote community leaders about 10 days ago asking us to come to a meeting with the ICANN Board on Sunday morning.

Most of us were able to attend that meeting so it was the chair of the BC, the new president of the IPC, the chair of the Registries, myself, I think the chair of the NCUC and the chair of the NCSG and there may have been one or two others.

And the question that we've been asked was by the ICANN Board was what were they doing right? What were they doing right? What were they doing wrong? What should they be doing? What should they stop doing?

And if you recall I did ask you all on the list about this probably about 10 days ago. And I got some feedback from several of you. I wasn't able to go through every single item that was given to me but we did end up having a conversation with them briefly about the unilateral interpretation of contracts because another stakeholder group raised the issue of compliance which of course was an interesting segue into issues that registrars and registries have been having with contractual compliance due to perceived unilateral interpretation. So we were able to go into that a little bit.

The unilateral interpretation was also an issue that was raised in our meeting with the Registries, Registrars and NTAG ExComm with the GDD staff on Sunday evening - I mean, there were other topics as well but that one was one which did come up. I think they are aware, yes. And we can continue to raise this until things change.

Okay as per the schedule we have a break until 10:30 local time.

Mike Zupke: Michele?

Michele Neylon: Sorry, yes Mike.

Mike Zupke: So I want to make sure that I'm clear on the feedback that I got. Can I ask one more question?

Michele Neylon: Please.

Mike Zupke: Okay. Can you go back one slide please, Kaitlin? So what I think I heard from registrars is that in this process what the objection to is in Box 2, the part where we're starting off with a public comment period. So if we omit that we say we're going to start off just ICANN staff and the Registrar Stakeholder Group. About how much time does the stakeholder group probably need to kind of come up with its wish list of changes?

Michele Neylon: This is Michele who obviously hasn't had a chance for anybody to consult with him or give him any input so, James, go, give me some...

James Bladel: We're just talking about the spec, right? Not the whole RAA?

Mike Zupke: Correct.

Michele Neylon: Just the Whois spec.

James Bladel: I don't know, two, three weeks. Max.

Mike Zupke: Okay.

Michele Neylon: I mean, we've already been discussing some of the issues around this already so...

James Bladel: Yeah, we just need to collect and refine and make sure we've got, you know, some consensus around them. And if there's any divided opinion on this group then we either bridge those or throw it overboard and we'll go.

Mike Zupke: Okay. So, I mean, it sounds like this isn't a big deal to accommodate what you're suggesting, right. So...

James Bladel: I'm saying we want it badly enough and to keep it moving that we're willing to forgo the creation of like, you know, heavy lift type processes and procedures and we just want to just kind of expedite this and keep it moving.

Mike Zupke: Great, thank you. Sorry. I appreciate the extra moment.

Michele Neylon: Okay so we are breaking until 10:30 local time. Please try to be back in the room punctually if you can. The next session after the 10:30 break is with Margie Milam talking about Whois and Whois validation and all the thing so...

Volker Greimann: That's going to be a fun one.

Michele Neylon: Volker, be nice. Thanks, everyone. See you back here at 10:30.

Good morning, Michele Neylon for the record. Nathalie, is the recording running? It is, perfect. Thank you. Okay moving on we welcome Margie Milam from ICANN's Strategic - what is it again?

Margie Milam: Strategic Initiatives Department.

Michele Neylon: Thank you. From ICANN's Strategic Initiatives Department. So Margie is going to be talking to us about Whois things. And please remember as

previously stated several times, state your name because the scribes get confused otherwise. Margie, over to you.

Margie Milam: Thank you, everyone. I have a few colleagues here at the table with me because some of these issues we're working on are cross-departmental and so we have Maguy Serad and next to us from the Compliance Team. We also have Russ - Russ, are you in the back there? Say hello. From the GDD team and he's working on some of the operational aspects of the accuracy reporting system that I'll talk about.

All right, next slide please. So just to kind of bring you up to speed as to where we are, we have been implementing the Whois recommendations from the first Whois review team back in 2012. And that's essentially what's been framing a lot of the work that's been done over the last few years.

Essentially we've been working on a two-track path, one path being improving the current system, and that's what I'm going to talk to you about today. The other track is the Expert Working Group to think about what might be the replacement for Whois in the future.

Just to kind of put it in context, the next Whois review team is supposed to be kicked off this year. So it'll be interesting to see the timing of that and particularly because some of the implementation activities are going to be continuing and it won't be completed this year. It's a longer term process to get some of this work done. Next slide, please.

So I don't know how many of you were in the All Things Whois session yesterday. Anyone - put their hands up so I can get a sense for - okay. Essentially one of the concerns we've heard from the community is that there's so much Whois activity going on that it's hard to keep track of it. And the GAC in their communiqué from the Los Angeles meeting asked us to put together a Whois roadmap.

And so in our All Things Whois session yesterday Jamie Hedlund walked through the Whois roadmap. And these materials are on, you know, are in the session's pages so you can really get a sense for what's out there and how you can provide input.

Next slide, please. So this is essentially what it looks like. I'm not going to go into any of this detail but you can just see there's a lot of activity. It's anything from policy development, which many of you are involved with, to implementation related activities to try to improve the current Whois system.

And what Jamie did when he compiled this with - coordinated with all the various staff members is to try to highlight where input is, you know, needed from the community. So as you take a look at these materials at your leisure the things that are highlighted in green are where input, particularly from the Registrar Stakeholder Group that is probably mostly affected by this stuff, will be, you know, obviously solicited and needed to help influence how some of these activities turn out.

Next slide please. And again, I'm not going to go through the details but this just shows you the depth of the activities underway to help improve the current system.

Next slide. So what I really wanted to talk to you today about is the status of the accuracy reporting system. This is a system that is one of the - that came out of the recommendations from the Whois review team back in 2012. Next slide please.

And essentially what we're trying to do now is take what we did from the pilot, and we talked about this at our last session, and really try to operationalize it so that we can build out a system that provides reports on the accuracy of Whois and so that we are able to track over time, you know, whether accuracy rates are improving or whether some of the policy changes are actually causing, you know, having an impact on accuracy levels.

And so the system is being built out to try to proactively identify Whois records using the automated tools. And in the pilot we worked with various service providers to come up with - to - analyzing the different aspects of the Whois record.

And then part of that - and this is the part where obviously this affects you guys the most is forwarding those records for actions. So to the extent that there are records identified as inaccurate part of the process will be to engage with the registrars affected by it to see if, you know, they need to be followed upon. And then it'll be reporting throughout this process.

Michele Neylon: Bob, go ahead.

Bob Wygant: Bob Wygant, Web.com. If you could go back to that slide please?

Margie Milam: Sure.

Bob Wygant: So the - it's the third bullet that I think provides at least me quite a bit of angst. So when you talk about forwarding potentially inaccurate records to the registrars for action, so let's say you go through our, you know, 10 plus million domain names under management and you find 500,000 zip codes that are incorrect, are you then going to back up a truck and say here are 500,000 records, have at it?

I mean, how do you expect a registrar to fix the inaccuracies - I mean, I know the ICANN compliance group has, what, several hundred people in it or it feels that way sometimes. The average registrar does not.

And so I'm getting feedback from my compliance group, even with the little automated tool that was done this summer, the pilot study where - and they've notified us, for example, that Network Solutions and Register.com combined might, let's say, have 500 records that need to be cleaned up.

They're concerned that those 500 complaints are going to show up on their doorstep on Day 1 and ICANN compliance is going to say, well you got 15 days.

So can you talk a little bit about - and maybe it hasn't been determined what we're going to do yet with this but that line item there - and I would assume the rest of the registrars in this room would have the same concern of how exactly is that going to work? Thank you.

Michele Neylon: And I've - just hold on one second - and I have a queue forming. I think Volker is going to speak to the same thing so if you just let him go then you can react to both. Thanks.

Volker Greimann: Yes. This also goes directly contrary to what ICANN and the registrars had agreed when we put the specifications into the RAA when we agreed to those. We had specifically agreed that there would be no retroactive checking of the backlogs unless there was a transfer or inaccurate Whois so - that we are - became of in the normal course of business, i.e. either a report or a bounced email.

There was explicit agreement on the fact that ICANN would not check all the backlog of existing, preexisting domain names and that the specifications would only apply to, A, new registrations; B, transfers; C, bounces where - emails where we received bounces; and, D, the reports that we received.

So this seems to be a violation of the spirit of the agreement that we had when we discussed the RAA and when we came to an agreement there.

Michele Neylon: And for the record that, as he again has forgotten his name, that was Volker Greimann. Jennifer then James.

Jennifer Standiford: Jennifer Standiford, Web.com. The thing that concerns me about this slide is going from the first bullet point to the third bullet point where it says

"Identify inaccurate Whois records." First question is - or comment is what's considered inaccurate?

And then it goes quickly from inaccurate to potentially inaccurate so it feels like we're moving the goal post here. So I'm concerned about the interpretation of the approach and how it's quickly moving from whatever the defined term is from - for inaccurate to quickly to potentially inaccurate. Thank you.

Michele Neylon: Mr. Bladel.

James Bladel: Hi, James Bladel speaking for the record. And much as I am a fan of piling on ICANN compliance and ICANN, it's kind of my favorite sport, I'm going to have to disagree with Volker. Not that what you said was wrong but you're comingling two separate issues.

One is that the - yes, the Whois accuracy program specification was a go-forward obligation on registrars. We had no obligations going backwards. But this accuracy reporting system was a quality control check that I know was discussed outside of the RAA and was going to use the existing invalid Whois reporting and correction services that are already in 2009 RAA, 2013 RAA that was in there already.

I think we need to work with you. You can't give us an Excel spreadsheet Friday and four o'clock and go home and expect it to be finished Monday morning when you come into work; that's, you know, I hear some choice words about that when that happens and it has happened, Maguy, you know, maybe not recently but that was the MO for quite a while. You know, here's all your invalid Whois, get them fixed by Monday.

So just to be clear, I don't think that that's exactly how it was. I think we're talking about two separate systems here. I want to see this done intelligently and I would like to understand from a pilot program what is the goal for a

production program? You know, I'm hearing that you're grabbing a certain statistically meaningful sample and that you're then using that to measure the accuracy of Whois as a whole.

I think there's some pivot points that you're going to need to understand like thick versus thin, age, registrar geographic location. I mean, there's so many different ways you can slice and dice that data to determine whether or not accuracy is an issue. And I think that there is a standard - to Jen's question, there is a standard for accuracy that was established by the Whois review team back in Costa Rica in 2012 that accuracy is not perfection; accuracy is contactability.

So if you look at a domain name contact and it says St period instead of Street that is sufficient for the standard. So I would hope that you're using some, you know, some human review elements here to review these and not just programmatically determine that they're inaccurate. Thanks.

Michele Neylon: Okay. I'm going to give ICANN staff a chance to respond. Margie.

Margie Milam: Yeah, James, I agree with you. This system came out of the Board action related to the Whois review team so in a sense a separate system. And part of what we're trying to get at and operationalizing it is to receive comments especially obviously from the registrars during the public comment period that we have open. These are the things we need to know.

We're not going to go - we're not intending to go through every single registration, that's not the goal here. We're trying to use statistically significant sample sizes. And what that means, you know, depends upon how far - how deep you want to go in the analysis.

In the pilot study we looked at 100,000 email addresses. And then we looked at 10,000 telephone - 10,000 telephone and postal addresses from a syntactic perspective. In other words, was the format correct? So we - in the

pilot - to answer Jennifer's question is, you know, how did you determine accuracy?

We looked at it from a syntactic point of view. In other words, does it mean the specifications that are in the RAA, you know, is it in the format S42 format of the UPU. Is the email meet the RFC, you know, does it have a dot and the at sign, all of that. So that's the syntax.

And then we also looked at the operational aspects, does it work? In other words, is the - if it's an email address is the email address - does the domain name exist? Can you, you know, they add the service that we used, we used Strike Iron which is a provider of email related technology.

They actually interrogated the email server to see if it actually existed. So we were trying to look at it from that reachability perspective, you know, does it work? And that is where we stopped in the pilot. We just looked at syntax and operational aspects; we did not try identity because we just really honestly couldn't figure out how to do that and it seems too complex.

And for those of you who were in the session yesterday there's clearly no support in the community for, you know, going in that direction. So the pilot certainly did not go that way.

Maguy is going to be addressing the compliance issues separately so we can talk about that separately. I mean, there were a lot of questions. Next slide please.

Man: Hello - sorry, to (unintelligible). I was sort of in the queue but you didn't notice me.

Michele Neylon: Are we going to make it like this all day?

Man: Yeah, shut up.

Michele Neylon: Okay.

Man: Can you go back a slide because I just wanted to...

((Crosstalk))

Man: ...reiterate the point that Jen made because I'm not sure how it's being picked up. The difference for us as registrars between inaccurate Whois records and potentially inaccurate Whois records is huge.

And I guess that's just the point - what I'd like to see is really defined language because where we've had issues before with possibly how we interpret reasonable or how we assumed the agreement on interpreting reasonable was and then how other departments interpret reasonable affect us very much. So I would like to just - when this gets further really focus on that wording because the difference between 1 and 3 is massive. Thank you.

Margie Milam: And the other thing I forgot to mention it was in my timeline that I showed you that little graph is that we intend to create an advisory - an implementation advisory group to work with registrars on the procedures for forwarding the information to you because we understand that in this case there's, you know, depending upon the sample size, as chosen, it could be a large number of records we're dealing with.

And so that's not something that's being done in a vacuum; it's something that we've got it on a roadmap to work with registrars to really understand what that process is and make sure that it works.

Next slide, please. So, as I mentioned, we did this pilot study with NORC and we really wanted to test the methodology because we worked with these various vendors to look at, like I mentioned, email addresses, telephone numbers and postal addresses. But we wanted to make sure that you could

actually use these automated systems and come up with some, you know, some reasonable results.

And essentially - I'm not going to go into the findings because we did that in the prior sessions but we did find a correlation between increased accuracy rates for registrars that were under the new agreement particularly as it relates to email addresses which makes sense since, as part of your processes you're now starting to, you know, get that - verify email addresses. And then Maguy is going to talk to the compliance-related pilot that's currently underway.

As I mentioned, the public comment is open until February 28 so this is really something that you all, you know, we very much appreciate the input we receive from the registrar community on how to tweak the methodology as we build the system out because the methodology and the approach is not - is in the design phase at the moment, it's not final in any way. And that's what that public comment period is designed to do to really get your input on how we should tweak it.

Next slide, please. So this is the timeline for this project. We're currently, as I mentioned in the public comment phase. And then when it gets rolled out through the GDD team they're going to start in phases with the first phase trying to kick off in the middle of the year related to just looking at the syntax, in other words, is the email in the right format? Does the telephone have the right number of digits? You know, is the postal address meet the standard?

And then later in the year they're going to build it out to look at the operational aspects. Is it an operational email? Is it a real telephone number? Is it a deliverable postal address? And so that's the plan.

And then Phase 3, if there was any discussion of identity it would be discussed at a later point. And then to the extent that systems need to be upgraded that would happen in Phase 3.

Michele Neylon: Sorry, Margie. Michele for the record and then I've got Tom and then Bob. I see a line there, and I also saw it on the slides for the session yesterday, which I wasn't able to attend, which is like a massive red flag to a bull, this identity validation. Why is that even on there?

Margie Milam: The reason that was on there is there's been requests from the GAC to explore it. And so at this point we're exploring it. There's no commitment to do it but we've, you know, they asked for analysis on this particular aspect of looking at the system.

Michele Neylon: Sorry and just explore means what exactly? I mean, based on the fact that under European law, under Irish law, under many laws, the very concept of this is completely illegal. Okay I've got a queue forming so I've got Tom, Tom Keller, Bob then Volker and James.

Tom Keller: Yeah, Tom speaking. Will you ever give us any kind of an access to that system technically-wise? I mean, one of the issues we always have that we can absolutely not check what you're doing there. So I think a lot of us registrars are just take the system, implement it and then do all the checks against that and we would have absolutely no problem.

But the problem that we always find our - after registration, after the fact that's putting us in a position where we are put into an - (in) compliance status basically which is very hard to get out of it because you tell us certain things around and then we have to sit down and figure out what the heck it is. So if you have - if you put all that money in there it would be greatly appreciated if you could leverage on that.

Margie Milam: Okay. And Russ is back there taking notes, as I mentioned, he works in the GDD team and essentially building it out. So he'll take that back and consider it.

Michele Neylon: Okay, Bob then Volker.

Bob Wygant: Sure. Bob Wygant, Web.com. And it's really dovetailing into what Thomas Keller said on the syntax exactly when you tell us that something is not formatted correctly then we have to get with our teams and understand, you know, what formatting changes need to be made.

And I'm assuming that's not requiring contacting the registered name holder, that's just fixing, you know, the database. Is that a correct understanding that you're not asking us when there's a - for example, if you say, hey, the phone number is not formatted the correctly because you don't have a plus in the country code in front of it, that's not requiring us to reach out to every R&H, it's just basically would have to do a database cleanse. Is that a correct understanding?

Margie Milam: I don't really know, honestly because it depends on what the issue is. If it's something that's correctable I don't know how you, you know, that's really a question for Maguy how that's typically dealt with.

Bob Wygant: That's fair enough. And maybe what Tom is saying is that they have the database that's running through and identifying these issues, if we could get - leverage that technology that might be - give me the answer I'm looking for.

Michele Neylon: Volker.

Volker Greimann: Yes, this is Volker Greimann speaking. Thank you.

Michele Neylon: Hold on, one second everybody. Volker has remembered his name. Please continue.

Volker Greimann: Just one question. You said this is a GAC request to explore it. Is that it? Is that the entire justification for doing this? Is there a Board resolution? Is there a PDP process behind this? Is there a community demand for it? Because if

it's only a GAC request to do this then I ask myself since when does the GAC have the authority to initiate staff action in itself?

Michele Neylon: Thank you, Volker. And now James.

James Bladel: So just building on that, I think you've explored it and I think you presented it to the community yesterday and I think you heard your message that, you know, pretty much everyone in the room said this was very not only, you know, questionably feasible but even dangerous, illegal and almost reprehensible waters for ICANN to wade into as far as establishing and managing identities on the online sense.

So, you know, I think that the bar (unintelligible) fairly high. The community feedback on this seemed to be very cohesive and strongly opposed to the idea of identity validation. And I think that whether it's coming from the GAC or whether it's coming from the ALAC or whether it's coming from SSAC or whether we put forth an idea, please, you know, raise the bar when one small narrow interest group, you know, is driving the boat for the rest of us. Thanks.

Michele Neylon: Thank you, James. (Unintelligible) but they sat down and please go ahead. And please identify yourselves because...

Russ Weinstein: Hi, this is Russ Weinstein from ICANN for the record. I didn't catch your name but, Bob, I did catch both your guys' comments and as Margie said I'm helping to operationalize the Whois accuracy reporting system. We did the pilot (unintelligible) now we're trying to figure out, how do we make it an ongoing project?

And certainly heard the request for transparency into what the criteria is, how it's being evaluated, and I think that's our challenge in the next probably two to three months here is to really nail down what that criteria is for each and every field and probably get your guys feedback on that to make sure we're

calibrated correctly on what's contractually obligated, what does the term accurate really mean?

So I look forward to working together with you guys to make sure that this is accomplishing what it's intended to accomplish which is improving the overall credibility of the Whois data.

Michele Neylon: Okay, thank you. Michele. I'm putting myself in the queue. So, Margie, how do I get this identity validation thing completely off Phase 3 and so I never have to see it ever again?

Margie Milam: We're obviously going to take back notes from the session we had and the message was loud and clear in the session yesterday. In your public comment responses I assume you're going - I mean, I hope you're going to have that - make that abundantly clear.

((Crosstalk))

Michele Neylon: Well, I mean, I'll put it to you this way. I mean, if you want our governments to write to you, again, stating that they've got issues with this, fine. But, I mean, just simply why does ICANN staff bring it - take it upon itself to throw these things in here when there was no policy asking for it to go there? I mean, the fact that the GAC may have had bad coffee in the morning doesn't mean that you have to actually spend time, money, energy and effort on something.

Margie Milam: So I think we're running out of time. So let's move to the compliance slides because I think you have a lot of questions related to compliance. It might be - just skip - this is all available for you and it's all background as to how we got here. Here we go. And I'll hand it over to Maguy.

Maguy Serad: Good morning, everyone. Maguy Serad, Contractual Compliance. So first I want to thank Bob for the vote of confidence. We do not have over 100 staff

but it shows a sign of efficiency if we're able to keep up with everything that's going on in the world.

I do want to assure you, as Margie mentioned at the beginning, this pilot is off of a Board directive based on the Whois review team recommendation. Compliance is in this pilot, like all of us. So what we are in the process of doing, the records that were identified will be tagged with Whois ARS. So we're able to identify the source of the data to help us work with the contracted party on addressing any and all issues that come from it. Like we have today we tag bulk data, bulk Whois.

So this is a new initiative (unintelligible) assure each and every one of you is the following. Even though we are receiving this through the NORC study we are not taking it for granted that it's all valid. We will run it through the system like we run all of the Whois inaccuracies today. If it is - again, the data was collected I think back in October if I recall. Right, Margie? Right.

So many of those domain names may not be valid, maybe suspended, may have changed. We will sort through all the initial records and it will be sent through the process and, no, it will not be sent via trucks; we don't have those truckloads.

Because we give it the eye check in addition to the automation validation. So staff will be kind of sending it slowly and gradually. We don't know how - how many. But what we are committed to doing is for the registrars that we have seen have over 50 records that were identified we're giving you a heads up via an email and we're copying Mike Zupke as your liaison team so that there's awareness of the volume.

But it doesn't necessarily mean we're sending you all of it at one time. We will be sending it once the eye check has done after the validation. We are collecting every data - every comment we receive so please talk to us. Do not ignore those compliance notices that were sent. Talk to us if you've identified

issues. If you have identified concerns. We have the ability to work with you and put a compliance notice on hold if there is an issue of interpretation or a challenge, like we always do in any area.

What we're doing at the end we're collecting the feedback not just from our process of the complaint processing but also our own feedback from the compliance staff because we are also going to be impacted. We're going to give our feedback to the pilot leadership team. Here are compliance's findings; here are compliance's stats. We were given X records. Y were correct. Z had these issues. It caused staffing, it caused this, it caused that.

We're going to collect what we call a generic statistical data without saying Bob said this or James said that in a complaint. But statistically what is the data? What are the concerns? And we're going to feed those to the pilot team because we are also impacted by the bigger picture or the long term picture of this initiative. And we want to make sure it's going to be a positive effort like it was intended when it was first put in place.

So the emails have been sent out for those who have what we call a volume records. And the notices will start going in a slow manner. We give priority always to what we call external complaints because it's about the outside world first versus a pilot. So we give priority to the external complaints and then we will process the others gradually like we have done in the past.

Yes, you may receive notices on Friday. That's how we are able to maintain the workload and the level of effort going on. But may I remind you all whether you receive it on Friday or Saturday or on Monday, I appreciate the passion you have within your teams, believe me. The team is just as passionate in the compliance team, that's why they work on the weekends to be able to kind of stay abreast some of the areas.

But you are not obligated to respond on Friday. And I know I've heard it, you are passionate, you see it, you panic, you want to respond. But please keep

in mind there is a timeline for those, the 15, the 5, the 5. If there is a need for additional time or a hold let us know. Okay?

Michele Neylon: Okay I've got a couple of questions from people in the room and also I can see the registries are joining us. For those of you from the registries please do come in, make yourselves comfortable. There is space up at the table.

So I'll go with Jeff Eckhaus and then Bob. Sorry, Volker was first. Sorry, he's going to punch me under the table. Volker, then Jeff.

Volker Greimann: Yes, just one question. You know best how many reports you're currently sending from outside reports to each registrar. And as registrars also expect that kind of volume and have staffed themselves accordingly, please consider not to send all of these in bulk but spread them out so that each registrar may get a little more than they used to get but not like tenfold in one week. So we can keep up and can keep to the deadlines that are in place.

Also consider as this seems to be an automated reporting system, or data collection system that if you receive in the first couple of weeks, months, whatever, very high feedback that a lot of (unintelligible) are in this reporting system, are reported by this reporting system that you instead of continuing to send out the reports - inaccuracies, that you go back and improve on your own side the quality of the reports if that would indeed occur.

And finally, while you might send them out on Friday, it would still be appreciated to delay clicking send on that email until Monday. It doesn't cost you anything. You can prepare those emails on Friday as much as you want, just click send on Monday. That makes our job a lot easier.

Michele Neylon: Okay, thanks. I'm going to put two people in the queue and then I'm closing this out because we're running over and the registries are standing in the back of the room. Guys, please do come forward and sit. Jeff and then Bob.

Jeff Eckhaus: Thanks. Jeff Eckhaus from eNom and Name.com and a bunch of other registrars. So the issue I'm sort of confused between the two conversations and what Margie had said and what Maguy had said.

So on one hand I see it as a pilot system, public comment is still open. We're still going to figure out what it is and how it works. And, you know, there's 18 days left for public comments and we're still - and sort of we're still trying to figure out.

But then on the other hand, we receive notifications for a few of our registrars saying you have X number of domain names that contain inaccurate emails in your Whois. These are now going to be part of the compliance process meaning what is it the 15-5-5 which to me means if we don't respond we could be in breach.

So what I'm trying to figure out is if this is a pilot system and we're looking for a feedback look then why are these notifications are going to be part of the compliance process that we have our specific deadlines and timelines to respond to? Shouldn't they be in a separate piece, in a separate method for us to respond and to give you feedback on it versus the standard process where if we don't respond in this time we could receive a breach notice?

I just think, unless these are separate systems and it's not part of the whole pilot system so maybe - I don't know if other registrars have received it. I don't know how many have, maybe I was just lucky.

But, you know, I think it's confusing and it doesn't - the email I received from compliance does not seem like this is part of a pilot system where we're trying to find out information and figure out a best method, it's just telling me you're going to have X number of email addresses that need to be validated and they're part of the compliance process and you need to fix them. Thanks.

Michele Neylon: Bob.

Bob Wygant: Thanks. Just quickly - Bob Wygant, Web.com. So it's really what Volker was getting towards is you have 23, 24, 30 people on compliance staff that can review these complaints a lot faster than my team can address the issue.

So instead of saying, "hey can you just send us a reasonable amount over our normal volume," if you would actually say, "hey, we're not going to send you more than 10% or 15% or 20% more than your daily volume." If you could actually publish what exactly you're going to send us from a volume perspective so that our resources can be planned accordingly.

Because your version of a reasonable amount is certainly probably not my version of a reasonable amount and that would just be to dovetail onto what Volker was saying. Thank you.

Michele Neylon: All right, thanks everyone. Thank you to Maguy and Margie. I suppose I'll let you, go on.

Maguy Serad: Thank you. I have captured Volker, Jeff and Bob's feedback. And I will regroup with the three of you for an update about how we can approach this and maybe provide an update to Michele on our approach, is that agreed?

Michele Neylon: Yeah, and I think, Maguy, I think it could be helpful if you can share it in such a fashion that I can share it with all of our members so that we all know what's going on. Thanks.

END