
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 16 January 2024 at 16:00 UTC

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JULIE BISLAND:

Good morning, good afternoon, and good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group Call, taking place on Tuesday, the 16th of January, 2024. For today's call, we have apologies from Sarah Wyld (RrSG), Owen Smigelski (RrSG), Zak Muscovitch (BC), and Osvaldo, but I think I just saw Osvaldo join. They have formally assigned Rich Brown (RrSG), Heidi Revels (RrSG), Arinola Akinyemi (BC), as their alternates for this call and for remaining days of absence. As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite emails. Statements of interest must be kept up to date. Does anyone have any updates to share? If so, please raise your hand or speak up now. And Eric, go ahead.

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ERIC ROKOBAUER: Thanks, Julie. Hey, everyone. I have an update. I am with a new registrar member. I've changed companies. I used to report for the Newfold Digital Wholesale Retail Registrar Group. I now work for Squarespace, primarily operating as a retail registrar. So I've updated my SOI. I can drop that in the chat for folks, but still a registrar. Thanks.

JULIE BISLAND: Thank you, Eric. Anyone else? All right. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only. Please remember to state your name before speaking for the transcription. As a reminder, those who take part in the ICANN multi-stakeholder process are to comply with the expected standards of behavior. Thank you. And over to our chair, Roger Carney. Please begin, Roger.

ROGER CARNEY: Great. Thanks, Julie. Welcome, everyone. Just a couple updates before we get started. I think there's only six or seven more meetings for us between now and ICANN 79. And our goal is to get all the change of registrant things wrapped up and maybe even tidy up some loose ends that we had previous. But I think we're in a good spot, and we should be able to hit that before we get to ICANN 79. So I think we're in a good spot. We do have a few touchy things to get onto, definitions and things that we've touched on and moved on and we'll get back to. So we do have a few things that will tie us up for a little bit, but I think we're in a good spot.

The other thing is compliance did get back to us, and they should have the request of Sarah's done sometime this week. We won't hear from them this week, but they're helped to have all that information pulled together this week. So we should hear from them shortly after that, maybe next week or the week after that. So I think that was about it. So I'll open the floor up to anyone, any of the stakeholder groups that want to bring anything forward that they've been talking about or any questions that they have that the group can hopefully help answer. So I'll open the floor up to any stakeholder groups that want to come forward.

Okay, great. I think then we can go ahead and jump into our agenda and do a review of our recommendations and spend hopefully most of the day talking about the definitions and where we want to take that and see if we can get some work around material change and everything associated done today. So I think I'll turn this over to Christian so he can take us through a review of where we are.

CHRISTIAN WHEELER:

Thank you, Roger. Yeah, so we're just going to, before we get in or continue the definitions discussion, staff just wants to kind of briefly go through some of the preliminary recommendations that we went through last call, as we made some updates to those just based on the discussion we had last week. So just to quickly kind of run through these, the first preliminary recommendation that the registrar send a notification to the prior registrant and the new registrant. We just kind of cleaned this up a little bit by kind of adding in those parentheses and making this into two sentences

just for clarity. So nothing really substantial change here, just some kind of punctuation really.

This is all still the same, nothing's changed from here from last time. So the change of registrant notification has to include the domain names, the contact information, the date and time that it was changed, and instructions for how they can take action if the change was invalid or how to initiate a reversal. So again, nothing's changed from there.

1.3, that they may send it via email, SMS, or other secure messaging system. Again, nothing's changed there. For part of the conversation that we had last time, Steph has added 1.4 here, which is clarifying that if the change of registrant involves an update to the registrant name or registrant organization only, then the registrar does not need to send a separate notification to both the prior registrant's email or phone and the new registrant's email and phone. So instead, they must send one notification as listed in the RDDS. So that was based off of a mention that if the contact information isn't actually changing, for instance, if the email address doesn't change, it doesn't make sense that the registrar need to send two notifications to that same email. So this was just kind of stipulating that if that information isn't changing, if it's just name or organization, then they don't need to send two notifications. And there is an asterisk there because this is kind of subject to change based on the definition of change of registrant, which is what we're going to talk about today. So you can kind of just kind of keep this in your head that this item might change based on today's conversation regarding the registrant name or

organization. So we can just kind of keep this in mind and we can revisit this after the definitions, whatever the group comes to.

So I'm going to move on now. Preliminary recommendation two about the 60-day lock, Working Group recommends eliminating the 60-day lock. There was, and it was for there was some preliminary rationale here that the lock doesn't really demonstrate that it prevents domain hijacking or hopping. And instead that the other security recommendations the group has made surrounding the TAC, as well as that 30-day restriction that would follow a registrar transfer, as well as the notification that the group is recommending the preliminary recommendation one. So the group had requested that maybe staff develop a primer just to kind of clarify what those security measures were from Group 1A.

So we did send a primer document to the group on Thursday. There's also a link there in the chat. So I'm not going to go through all this. It should look familiar. But basically it is a recap, as well as the details of those preliminary recommendations from Group 1A, as well as one from Group 2 that clarifies what are those security recommendations that the group has recommended regarding registrar transfers, keeping those secure. So this is just a good document to kind of browse through to kind of refresh your memory on what those security recommendations were. Feel free to share this document with your groups, if you like, with your communities, if they would like to know more about some of this as well, since this is already public information, I believe, from Group 1A recommendations. So this is really just kind of a place to keep the relevant recommendations from Group 1A. There are more, but these are ones really related to security, of keeping that

security up, which is kind of related to the change of registrant. Go back here.

Recommendation 3, this is one that was a big topic from last time. This was, you might recall, about due diligence. So the crossed out one was about they'll use the five calendar day period for TAC issuance to ensure due diligence that the TAC request is requested or authorized by the registered name holder. There was some feelings that due diligence is a little squishy, for lack of a better term. And so the group was kind of talking about different ways to maybe clarify due diligence, make that a little bit more solid. You know, the group said that they'd think about that. So we're happy to hear if you have any, if you've given any thought to how to better clarify due diligence in a way that is maybe more easy to follow for either the registrars or for compliance. But you know, staff has made a recommendation here to kind of help clarify that due diligence. There's one way to do that, is that, and I'll just read it. When a TAC request occurs within 30 calendar days or 720 hours of a completed change of registrant, the registrar must at a minimum send the notification of TAC issuance as described in group 1A recommendation three to the prior registrant as listed in the registration data immediately prior to the change of registrant. For avoidance of doubt, registrar must also send the notification of TAC issuance to the registered name holder as outlined in recommendation three. So this is essentially saying that instead of saying due diligence, it is basically putting that the notification of TAC issuance, if it is within 30 days of a change of registrant, that notification of the TAC issuance would also go to the prior registrant, whatever that was. And if you need a refresher of what that previous recommendation was referring to

the notification of TAC issuance, it would include the domain name and explanation that the TAC is enabling a transfer to another registrar. It's showing the date and the time, showing instructions on how to take action or invalidate the TAC. So those instructions would then also go to the prior registrant. And then this last line is that if it hasn't been issued via another method of communication, that communication would also include the TAC. That may or may not be something that the group wants to include within that. If you do want to go forward with this recommendation as far as due diligence goes. But I'll pause there just to kind of get the group's thoughts on what they think about that as far as a more methodical means of going through due diligence rather than leaving it kind of open for interpretation. So happy to get the group's thoughts on that. I'll leave that to you, Roger.

ROGER CARNEY: Thanks, Christian. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. So, is the suggested recommendation, let me read this out loud. Maybe I understand it better. When a TAC request occurs within 30 calendar days, when there was a completed change of registrant, the registrar must at a minimum send a notification of the TAC issuance to the prior registrant. I don't think that is very handy. Let's roll with that. Let's go with that scenario. I mean, there has been a change of ownership for whatever reason. There has been a sale or somebody else owns the domain name now. And now that person does a TAC request. And then within 30 days or 720 hours, we send a notification to the

prior registrant. And what can the prior registrant do then? Block the transfer or what are we trying to achieve? I assume some elevated level of security, which I'm completely missing. But I think it's only going to cause issues down the line, provided if the former registrant can do something in this process here, which I'm not clear about, because it's not on the screen. Thanks.

ROGER CARNEY: Great, thanks, Theo. Yeah, that's really good input on the other scenarios of why the registrar and information changes. So, Rich, please go ahead.

RICH BROWN: Hi, everybody. I have to agree with Theo on this. I believe both these processes, while there is connection between the two, they should remain separate. For example, we don't want things like what Theo mentioned coming up, like I own a domain, I sell the domain, so I change the registrant, a COR occurs. Remember in the COR, notices are sent. So if it's invalid, that's taken care of at that time. Now we're talking about attack requests that comes later, and now we're sending a tack to the previous contact, or we're including them in the TAC communications when they're no longer a part of it. I just think both should remain separate. Thank you.

ROGER CARNEY: Thanks, Rich. Jody, please go ahead.

JODY KOLKER: Thanks, Roger. This is Jody for the record. So I like the idea, but I don't know that we can actually implement this. If it is a transfer, let's say that's happened in 30 days, if it is a, when I say transfer, I mean transfer between two registrars, there's probably a change of registrant, and that the current registrar is not going to know that. The only way that a current registrar knows that there was a change of registrant or can contact, I guess I should say the previous registrant, is if the domain stays within that registrar's control. So I think if this is to be implemented, we'd still have to put some requirements around it. Like for instance, the registrar knows that there was a change of registrant, and they can actually contact the old registrant. For example, if it was a transfer between registrars, that the current registrar wouldn't know what the previous registrant was. Thanks.

ROGER CARNEY: Great. Thanks, Jody. Okay. Any other comments on this? Okay. So Theo, please go ahead.

THEO GEURTS: Yeah, and basically, if we are talking about, in the scenario of domain name theft this can be easily bypassed. I just updated the domain name with two other different owners, which I made up, and the original owner will never see this TAC issuance notification. So you can work around this fairly quickly. Thanks.

ROGER CARNEY: Great, thanks, Theo. Jothan, please go ahead.

JOTHAN FRAKES: Yes, thank you. The thing I mentioned earlier about ERRP or EDDP, some registrars actually change the registrant as part of the disposal or expiry process in order to handle the domain name within their processes. And so we'd want to probably leave room in this, if we were to leave it as is, for there to be exceptions or for this to be operating within the contractual agreement with the registrant. Thank you. I'm glad to explain that if anybody needs me to explain it, but I'm trying to be concise.

ROGER CARNEY: Thanks, Jothan. Okay, I think that what we're hearing here is this issue here is probably a little more maybe operationally not effective and actually maybe not even needed. So we'll take that input and take a look at it. Steinar, please go ahead.

STEINAR GROTTEROD: Yeah, hi, this is Steinar for the record. I just need some clearance here. The TAC issuance, whatever it's been pronounced, that notification, does that also include the TAC in details? Because if so, if there is a change of registrant and this has been taking place within the 30 calendar days and you give notice to an old registrant about a TAC that is the key of transferring that domain name, you can either stop it or transfer it and take back your domain name, that particular domain name. Maybe I'm totally misunderstood here. So I hope some clarification. Thank you.

ROGER CARNEY: Great, thanks Steinar. Any comments there for anyone on that? Okay, thanks Christian. Go ahead.

CHRISTIAN WHEELER: Yeah, so we actually thought about this idea that if the TAC was included in that communication, it could possibly be used by the prior registrant to defraud them. So we actually had kind of a continuance onto this. We were just kind of holding off to see what the group thought of the first kind of three. But right now the notification would include, I think the most critical part of that notification that would hypothetically go to the prior registrant is instructions on how to take action. Essentially allowing another means for the individual, if there was an improper change of registrant, to catch that and say within that time that before the TAC is used, to contact the registrar and say, hey, actually, this wasn't me. However, including the TAC in that communication probably should not be in that notification to the prior registrant as the important piece for them would be that those instructions for how to take action, not the actual TAC itself. So if the group did want to go through with number three, which it sounds like it's not really sold on, which is totally fine, the notification would not include the TAC. It would include those instructions and kind of clarify what's going on, why they're receiving that notification, but that TAC wouldn't be part of it. And then this 3.2 is really just kind of a clarification that they would need to, the group would need to retain what the prior registrant was for those 30 days in order to send them a notification. And that is kind of related to the registration data policy too, which has other implications with that as well. So just wanted to highlight that, that, yeah, the TAC

probably shouldn't be part of that notification, but the instructions are relevant.

ROGER CARNEY: Great. Thanks, Christian. Rick, please go ahead.

RICK WILHELM: Thanks. I was kind of waiting to stick my hand in the air for someone else to say this, but no one did. So Rick Wilhelm, registries for the transcript. The registrar should not, according to the RFC, the TAC should not be retained by the generator. It should just be sent to the person who's getting it and not retained. And so the registrar should not be having that thing hanging around. And so yeah, that sending that TAC around, they shouldn't even have it to be able to send it around and that sort of thing. So I mean, it's kind of odd that this would come up here because really, I think that handling of the TAC should be covered somewhere where we talk about the TAC and it should say that it should be sent to the requester and nowhere else. And so this 3.1, if it would be included, should seem redundant. And I think if there was any for—maybe we need to look at where we talk about the TAC being generated, beef up that language and make sure that it's not used anywhere else so that we don't have to have messages everywhere else about how the TAC request, how some messages shouldn't contain a TAC. Thank you.

ROGER CARNEY: Great. Thanks, Rick. Yeah, and obviously, I call it kind of a transient. The registrar is not going to store that TAC, only for

communication as the TAC is being sent out. So you're right. No one should be storing that TAC besides the registry having it. And the only time the registrar would ever have it was in that communication to the registrar. So Steinar, please go ahead.

STEINAR GROTTEROD: Yeah, hi. This is Steinar for the record. First of all, thank you, Christian and Rick, for the clarification. That was extremely useful. But my reading here is that, but it is maybe wrong of me, having my At-Large hat on, but this is something that is, if there has been a change of registrar and it's been, everything is OK, but there is no evidence of improper change of registrant, then there shouldn't be some sort of a communication line to a prior registrant for this kind of cases. This is something that should go straight into the process of the transfer and the TAC process and so on and so on. But if there is some sort of evidence of improper change of registrant, maybe then there should be some sort of additional actions to be taken. How that is formulated in the policy, honestly, no idea. But if we state it as it is now, there has to be a communication that is, to my understanding, a waste of time and could be a security risk. So thank you.

ROGER CARNEY: Great, thanks Steinar. Rich, please go ahead.

RICH BROWN: I just want to add and agree with Steinar on that. First of all, the core process as we are currently working on it, the prior registrant gets notified of the change at that time. Then 30 days later, we're

sending another, "Hey, they're doing something with the domain. Just want to let you know, even though you already agreed that you're not part of the domain anymore, but hey." One, you have now informed another party that's not part of the transfer or anything that a transfer is going to occur, giving room for them to maybe social engineer. Or just say they don't like the person, they can call up the registrar, start complaining. There's a lot you can do to mess with the transfer. Also, I mean, throughout all of this, we've been trying to reduce notifications, even though we are all in favor of notifying customers. I will say this is kind of a secondary, not connected notification. That's not even necessary, in my opinion. So just wanted to fill you all in on that one. Anyway, back to you, Roger.

ROGER CARNEY: Great. Thanks, Rich. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. And Rich had some good points, especially when we are talking about reducing notifications, which I think is very, very important. I mean, as registrars, we can somewhat relate to certain registries overflowing you with notifications all over. And then at a certain point, you don't read them anymore. And it was an important one, and you completely missed it. And now you have big problems. And we see that not only on the registrar or registry level. We see that on all levels. I mean, the moment we keep getting email from a certain party, and it is not important, we're going to sort of ignore that. So there is an important one. Then we just missed it. And that is a problem. And I'm all for, and

besides sending email becomes harder and harder. The more notifications you send, the more emails you send. I mean, you get blacklisted if you're not just very, very careful nowadays. And basically, I do get the sort of idea like, okay, we've got to loop in the previous registrant, the old registrant for security reasons. But you only have a limited time frame where the registrant can actually maybe do something. But that would sort of describe a process that the previous registrant can actually do something because if you notify him, he must be able to do something. I mean, if he can't do anything, then such a notification becomes useless. I mean, what are you going to do? Call the police, spin up a lawsuit. There is no time for you to do that if you can't do anything within that small time frame. Secondly, if you go sort of describe all these processes, and this is going to be all public record if you put something in a policy, the registrar must be able to understand it, registrants. So everybody needs to understand this. And that comes to the point when you are in the business of domain name theft, and that is not a very large pool of people are doing that. But if you are such a criminal, you just read the policy and you go like, okay, what do I need to do? Well, the best thing to do is to not mess with changing the registrant data. That's a bad thing. So let's stay away from there and see if I can do it without changing anything. If I do need to do it, for whatever reasons, I need to do it two times because then I'm in control of the previous registrants which are made up, and there will be notifications sent to the previous registrant, which I mentioned earlier. So thanks.

ROGER CARNEY: Great. Thanks. Okay. Any other comments on this? As Christian alluded to, I mean, it sounds like the working group doesn't have any support for this. So again, we'll take a look at that and we can move on. So Jothan, please go ahead.

JOTHAN FRAKES: Yeah, thank you. I mentioned this in the chat, but what if we put a preamble to this that said, unless otherwise defined in the agreement between the registrant and the registrar, would that help some of the things that we're running into as far as where we're tangled? I'm not a lawyer. I'm not necessarily asking for legal advice, but I want it to be considered. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. Any comments on that from anyone? Okay. I think we've had a good discussion on this, and I will turn this back over to Christian to take us on to the next item.

CHRISTIAN WHEELER: Thank you, Roger. Yeah, so it doesn't sound like the group is really thinking about this one, per se. So what I might suggest is continue to think about if there is some kind of due diligence or if rather than sending something to the prior registrant, if there's something more that the registrar should do when there is cases of a transfer, keep thinking about that in the meantime. In the meantime, we'll just move back into our definitions discussion where we kind of left off last time. So just as a refresher now we do have the change of registrant and material change current definitions here if you need a refresher. But essentially it's a

change of registrant and some material change to the registrant's name, organization, or email address. So should that change? Are we talking about a change of registrant here as far as maybe keeping it separate? You know, change of registrant is really just a change of contact information that's covered elsewhere. And what we're talking about here is really a change of control. And if we are talking about a change of control, then what does that mean exactly? Is that a change of the anchor contact method? You know, and just we need to define that. Is that something that should be left up to the registrar? What is the anchor contact method that they use? Should that just be the email address? Should a change of control be a change of email? And the name and organization fields are really incidental. So I'll leave it for you, Roger, for the group to kind of think about how should this policy evolve if change of registrant isn't really fit for purpose. What about change of control? So I'll leave it to you guys.

ROGER CARNEY:

Great. Thanks, Christian. Yeah, and this is kind of one of the things we've touched on before and a few times in that we need to get resolved as to this ties into the material change idea as well. So I think that all this comes together and we need to get resolution around it so that we can move forward with our recommendations on this either to stay where we are or to update them as we see necessary. And I think that this is the important part, is we need to get this nailed down and again, this ties to that material change, I think a little bit and we'll get to that as well. But nail that down so that we can move forward and we know what is

triggering everything if something is being triggered. So Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. So a decade ago when we sort of created all of this, when it came to the material change back then, back then our mindset was this is a good idea and this is going to prevent a lot of misery in the world. But you know, we are now a decade further and we sort of already got on the record from the larger registrars that this material change thing isn't really the thing that solved the issue. I mean, again, if you don't change anything of the data, you can still move the domain name and when it's at the other registrar, you can do whatever and the registrant, the real registrant will never know. But so when I'm talking about this and when I'm looking at this, I'm going like, okay, the only thing that is actually very important here and the rest is not that important is the email address. I think if that changes, that should trigger notification because that sort of can assume a little bit of a control on the domain name itself, where the TAC is being sent. And I think that is relevant. All the other stuff like, is there a change of ownership or is there a change of control? I mean, we never really know if there is a real change of ownership. I mean, it could be a third party, a lawyer company, a legal company acting as the first primary contact and it could be a completely different entity behind it, which we will never see. So that is not that very important. I think the email address that is, call it material. I think that is important. And the rest let's comply with the GDPR and make sure that we don't run afoul with that. Thanks.

ROGER CARNEY: Great. Thanks, Theo. And great input. That's kind of what we're looking for is to narrow this down and identify where that is. So I will say that Theo got the first word and he threw it down. So others that have opinions, things that maybe to add on to maybe something different thought, maybe it's not email. Again, this is where we want to get, is to a spot where we can identify what this change is and when it matters. So any thoughts from anyone else? Jody, please go ahead.

JODY KOLKER: Thanks Roger. This is Jody again for the record. So I like half agree with Theo on this. You know, a change of control, if you change the email address, we've seen hackers take control of the domain name by doing that. I'm curious from other registrars if they've seen, if they think that if the registrant name or the registrant organization changes, could that be an attack vector by the hacker to now say, well, yeah, I didn't change my email address because I can't get to that email anymore or something like that. And you know, here is the information that I have for the new registrant that I entered. See I have control of the account. So now I can change the registrant. So now that domain name should be mine. So just send it over to this account and take over. I'm just bringing it up as a conversation or to see if any other registrars agree with that or not. Thanks.

ROGER CARNEY: Thanks Jody. It looks like we got some conversation. So Theo, please go ahead.

THEO GEURTS:

Yeah. So Jody, in the scenario that you pointed out, sure, that can happen. And that is definitely an attack vector. I think we sort of got to separate on how, where we actually are going with this. I mean, if there is a change of email address, which is important, I agree there, but then we send a notification. This is happening. Do you want to make that happen? No, we only send a notification. This has happened. The email address has been changed and maybe other data that we can refer to that like this has changed also, and that has changed also. We can put it in a notification and that should be the trigger point for the registrant to either do something or not do something. If it's okay, then it's okay. And the majority of the changes are legit. So you've got to be really careful if we sort of move into a direction like the rest of the changes is that, could that be an attack vector? I think if we go down that road, that doesn't make a lot of sense to me because data changes a lot of times. And when we talking about the GDPR, let me dive in a little bit there. You know, it's sort of like how when the registrant signs up, they want to register domain name, they select a domain name, they open up an account and they easily enter that information and that little part there, easily, is very important. Because that is sort of how the GDPR sort of makes that balance like, how far can you go when the registrant needs to change his data? I mean, if it was already a nightmare to sign up and you had to go through hundreds of security checks to even open an account and you had to wait days for the account to open, yes, then it makes sense that if there is a change on the data that you have all the security measures in place and it can't be that easy. But if you allow somebody to register domain name without any

barriers and you're later going to put on all these kind of barriers, then you might have an issue with the GDPR. And that is why I'm saying like, keep everything out of it because I don't think there's going to be a real attack vector. And even if it is, then you're talking about massive amounts of attack vectors maybe appearing every day. So that's why I'm saying material change only applies to the email address. Thanks.

ROGER CARNEY: Thanks, Theo. Appreciate that. Any other comments on that? Rich, please go ahead.

RICH BROWN: I don't really want to talk about much of the debate that just happened because I pretty much am wondering why we need to change the name. We were talking about change of registrant information, quite literally. The change of control gives a new meaning. Who controls the domain? The reseller, the registrant, all of that stuff. Primary contact method. Come on. We're getting rid of WHOIS details. It's going to be a registrant. You could just call it change of WHOIS, but now we're in trouble with other policy issues conflicting. I'm just not a fan overall of this policy reaching into other areas of the already defined WHOIS verification systems and whatnot that are already in place via other things. Also, I think it's pedantic to just have to change the name when it already works. Anyway, thank you much.

ROGER CARNEY: Thanks, Rich. Any other comments from anyone on this? Any other suggestions of anything? Theo is the one that threw out the email address being probably the big change. Is there any other thoughts or anything on that? Again, maybe dropping into the last bullet here, is material change still relevant? Are we saying basically that an email change is the only thing that's fairly relevant and that needs to be, I don't know, we'll say heightened in anything being done for it? Okay. Theo threw that out and it doesn't sound like there's much opposition to it, but looking at the second bullet here, Christian mentioned, is it really up to the registrar to determine change of control? It sounds like when, and maybe Theo can jump on and maybe go into it more, but change of control is still a decision by the registrar, whereas an email change is still maybe slightly different than that and that still triggers some forward thinking about what happens. Or are we saying change of control is, and again, I don't think this is what Theo is saying, but change of control is when an email changes. Theo, please go ahead.

THEO GEURTS: So should registrars determine for themselves whether information constitutes a change of control? So I think that's going to be totally depending on the business model, on the registrants, but who are your customers, etc. And also, yeah, basically it boils down to the business model all in itself. I mean, there will be brand registrars who will be very cautious and vigilant. I sort of assume, I mean, I don't work for one, so I have no idea how it works there, but I can imagine when it comes to big brands, very important domain names, there's all kinds of processes and controls in

place. But for a wholesale registrar, speaking for myself in this case, I don't have a direct relationship with the registrant. They are not paying me directly. I have not much information to go on, so I don't even know who is in control there. I need to rely mostly on the reseller doing the right thing. And so far that has been working out really, really great. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Prudence, please go ahead.

PRUDENCE MALINKI: Hi, thanks, Roger. Prudence for the record. That's so funny, Theo, that you jumped in like that. Just to, Theo, you literally were kind of echoing what I just put into the chat that I just wanted to raise. It is so important to recognize that there are different registrars with completely different business models. And whilst I can understand where Theo is coming from with regards to the relevance and importance of the email address being the kind of significant movement for the change of control, me as a corporate registrar, we don't just focus on email. The change of registrant does really kind of incorporate the ownership details. So when we're looking at the name and organization, that is actually quite significant from a corporate perspective as well. So I did want to interject with that. And Theo has a really salient point. The different business models will have different kind of mechanisms, but also different levels of importance with regards to the different elements as well. So I just want to add that there. Thanks.

ROGER CARNEY:

Right. Thanks, Prudence. Okay. Any other comments here? I think we're fairly clear here that the change of control is going to be left up as Theo has described and others have described. [inaudible] change of control is something that's sometimes very easy to tell. And sometimes you don't really know until after the fact. So it's not like something you can take care of in line or prior to that happening. But I think one of the things getting back to is the anchor method. Is the anchor method, does it make sense that it is email? And is that something that when that changes, are there some actions that need to occur or is there anything that has to be done at all? If someone changes the name, is there anything that has to happen? And again, a name change could be as simple as a typo that didn't work out or someone that changes their name for whatever reason. And again, as Theo pointed out and others, that's not necessarily a change of control. It's just maybe they've updated their or changed their name for whatever reason they have. So maybe that's not even a change of control. So I think that the change of control, I think that we're separating that out and saying that that's something that's going to have to be handled by the registrar. And again, the reasoning behind that is you don't always know if it's a change of control prior or even right after a change. It may be some time after that before you even know if it is or not. So I think separating that's a good idea. But getting back to the anchor method, if an email does change, are we saying where there should be some actions and what are those actions that we're saying should occur to make that happen? You know, again, with today's material change thing, when one of those things happens, there's a process that has to be followed in order for anything else to occur. So if we're saying email is an anchor

and that changes, what actions are we saying follow that? So I'll leave that to the group. Any thoughts on that? Rich, please go ahead.

RICH BROWN:

Since nobody's saying anything on this, I just want to help you out with the sentence there. I lost my train of thought. Whoops, I really lost my train of thought there. Oh, yeah. I think we should just keep it the same as we had it previously with the three items, with the name, organization, email. There's really been no debate on that until recently. All respect to Theo on that. But it's also most systems and whatnot are already set for this. So it's kind of a point of why are we making things harder than they should be? My main point behind all of this is the whole COR discussion incorporates two realms of policy that sometimes I think shouldn't really be applied in our current conversation. For example, WHOIS information is governed by RAA and other contracts on checking validity and what have you. We are dealing with the transfer policy. So our primary point is, since transfers rely on sending a TAC to the proper registrant, we have this COR in there just so that there is a means when that information is potentially compromised there is a means for somebody to rectify that situation. I think that's about as far as we need to go here. So I just want to let you all know that that's where I'm coming from. I think just we've got to keep something separate. Otherwise, we're going to get into a world of rewriting a lot of the WHOIS, which I don't even want to begin. Thank you. Back to you, Roger.

ROGER CARNEY: Great. Thanks, Rich. Okay. Maybe we can take this into the next part, Christian, because I think we have a couple more slides. And again, I think all this kind of deals together with that material change and what is control and everything. So I think we've kind of decided separating change of control. And that sounds like it's a registrar discretion on what that means. But maybe I'll turn this back to Christian so he can take us into a little more in-depth discussion on the material change stuff. So Christian, please go ahead.

CHRISTIAN WHEELER: Thank you, Roger. Yes, as far as material change goes, it is really just how it is currently with the name, organization or email address. And I will say, too, that this conversation as far as it being not really fit for purpose came a while ago as far as also talking about the implementation of that 60-day lock, the frustrations associated with that. So someone updated their email address in order to help transfer their domain name. Now suddenly having changed their email, now it's locked and they can't do that. However, since then, the conversation has kind of evolved so that the lock isn't there anymore. And it's now kind of been reduced more to just notifications, notifying them and providing instructions for how to take action if that recent change of registrant or change of control was not authorized. So maybe it's still fit for purpose in that case, if people feel that the name, organization and email address, if those are still things that should trigger that notification, keeping in mind that the lock is gone. And yeah, maybe change of control is something else that gets separated from it. But it's kind of sounding like people aren't

really—that there's not really a problem with notifying someone if there's a change of name or organization, rather than if there's just a change of email address. But that is kind of where the conversation is now, as far as should material change change, do we need to change this definition. So I mean, does anybody feel that that material change needs to change as far as the relation to either change of control or change of registrant? Now that it's been really just reduced to a notification, notifying the prior registrant, rather than imposing a lock. I think it's still kind of up in the air.

ROGER CARNEY:

Great. Okay, thanks, Christian. Yeah. And I think that that's a good lead in because it's, okay, material change, set up for, in today's world, a lock mostly, and the working group's recommending that that not occur, but that a notification is set. So to Christian's point, does any one of these still trigger that notification? And likewise, does that notification go to the—the name and stuff, it seems simple enough for the those changes, but if the email's changed, does that go to the prior email or the basically the current email in the registration directory service? Or does it go to both the old one and the new one? So maybe that's even a question left open. And it sounded like obviously no TAC notification or anything like that we were talking about. But here just a registrant change. And again, name or organization sounds simple enough, because it's going to go to the same email address. So there wouldn't be two notices. But if the email changes, should there be two notifications, one to the prior and one to the current. So I think that that's something left to be

decided as well. And as Christian said, is this where the group is really? This is confirmation time. We're getting rid of the lock. Does the material change still need to exist? Is it still fit for purpose for notifications? It sounds like it is, but leave it to the group to make that decision. And you know, the last point is if the email is changing, do those notifications go to the prior and current or prior and new one. So thoughts on those? Theo, please go ahead.

THEO GEURTS:

Sure, this will come not as a surprise, I guess. But you know, when we're talking about one notification or two notifications basically, I think the question is, and it boils down to the following. One notification should be sent to the current email address. That makes a lot of sense in my mind. That is one that's changing. So the current person with the email address should be notified, it's going to be changed, or it has changed in this case. Sending a notification to whatever the new email address is, that doesn't sound very logical to me. Maybe let me rephrase this. If somebody can tell me the added value on why that is important, that the new email address should also be notified, maybe then I have some logic and go like, okay, I haven't thought of that. But currently, my thinking is it doesn't add anything. But you know, if somebody in the group has, okay, you got it wrong, Theo, because this and this and this and this, okay, great. I would love that input. Thanks.

ROGER CARNEY:

Great, thanks, Theo. And again, I think sending it to the prior, sending it to the new one. Obviously, there's a good chance

they're updating it because the old prior email doesn't even work, doesn't exist anymore. So sending it to the new one could mean that, yes. Yeah, I got rid of that email. It doesn't work anymore. So now it's new. So yes, this is correct. And I think the reverse way there, the prior one, it does provide that one possible link of, hey, no, I didn't do anything. And it starts a process. So I think that's probably the two. And I'm sure there's many other reasons others have. So I'll leave it open to the group. Anyone?

CHRISTIAN WHEELER:

I have a situation, I think. I think one of the benefits to sending a notification to the new email would be, for instance, if maybe the person had a typo in it in the new email. So if it got sent to someone else. So I don't know, like if they missed off a letter or something like that or a number in their email, and then that email goes to someone else. So it's an email that they don't have actually have access to. That individual would get a notification saying, hey, you just changed your email for your domain name. And they would think, what? I don't own a domain name. What is this? And there would be instructions for saying, if this was not you or if this was incorrect, please contact this number or please respond by this way. So that's a situation where I can kind of see there being possibly a benefit to sending it, if anything, just for the notification to the new email kind of just being a confirmation that, yep, this change has happened and that they could point to that. But I think that maybe if it did get sent to someone by mistake, that person then could possibly take action just to notify them that, oh, yeah, this actually isn't me. That's one situation.

ROGER CARNEY: Great, thanks, Christian. Any other thoughts on that? Okay, so I'm not hearing any disagreement here, but it sounds like material change is still fit for purpose of a notification. So I think material change is still useful for that notification if a name or organization changes. So that makes sense that notification is sent just to confirm. And maybe they updated it and they updated it wrong, they get a notice. Oh, yeah, that's wrong. So they come back in, whatever they can confirm it or update it. And the email address, it sounds like that there's reasons for sending to the prior and current. So it sounds like if that is the one that changes that, then notification should be sent to both. Okay, great. I think that that's good that we made progress there. Christian, are there any other questions on this that we need covered?

CHRISTIAN WHEELER: Well, I would just say it doesn't sound like there's really much of a need to change the current change of registrant policy as it's currently defined as far as like it's a material change to name, organization or email. Definitely sounds like emails is most important, but name and organization is also used. I think where change of control also kind of entered the conversation beyond just the confusion of like, well, if I just change my phone number, if I just change my email, it's not really changing who the registrant is. It's just changing who controls it. There's also the idea of changing the account holder being someone that has authority to make changes, that change of control. If it is up to the registrar to determine what is a change of control, they could loop in their account holder or something like that if it is left open to that. So I would just ask maybe that if, is there any information on here that

needs to be expanded? You know, is there any other reason that a prior registrant should be notified that something has changed beyond the name, organization or email address? And if there is an additional item that they should be notified about, does that belong under change of registrant or possibly change of control? So I would just kind of throw that out there.

ROGER CARNEY: Great. Thanks, Christian. Jothan, please go ahead.

JOTHAN FRAKES: Yeah. And this is more just an observation, but I keep bringing up we need to leave room for an unless otherwise specified in the agreement between the registrar, potentially registrar, reseller and the registrant for some of these changes. That's one observation. The other observation here is for three and four, we're up against some changes elsewhere in the ICANNosphere and outside the ICANNosphere where there are some consequences to a change of the organization or even adding an organization where that infers that you're now a legal person. So it would affect how things are displayed or have other changes. So I don't know if we factor that into our thinking here as well. I don't even know if we want to go into the actual account at the registrar. I do think that that is a change of control, but that gets a lot more complex, especially when you're dealing with multiple layers of reseller at those registrars who have a reseller system. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. Yeah. And a few of the things, obviously, that you mentioned are covered under contract and policy. So a lot of those things still have to occur. As you just mentioned, if you change from first name, last name to an organization, that actually makes a difference in the structure and it's changes from and to a legal entity. Again, I think there's other policies that handle that and other contract points to handle that. So but Theo, please go ahead.

THEO GEURTS: Yeah, thanks. And Jothan is correct. I mean, if you want to delve into the complexity of changing control panels, registrant accounts, I mean, you can go there, but please add another 50 meetings to whatever we need to do, because that's going to be very complex. Going back to Christian's point, do we need to expand on this? And I think we need to do this. And what I'm going to explain now has been a gaping hole for a decade now. And I'm actually surprised nobody brought it up till this point. But the TAC can be sent to several secure things like SMS. If you as a registrar doing that and you send the TAC through SMS, which is a secure mechanism or whatever, then if we are talking about a material change, then the phone number is maybe what we should maybe expand on, because there's zero, there's nothing that restricts within the policy to change the telephone number. So if you are in the business of stealing domain names, you want to go to the registrar that sends the TAC or the authorization code through SMS, because you can easily change that one to yourself without triggering any of the policies here. So that is maybe something we should think about, because registrars who do that

really didn't think that could be an attack vector, because it wasn't covered by the policy. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Jothan, please go ahead.

JOTHAN FRAKES: Yeah, thank you. And it's a little bit of follow up, but having to do with the 1, 2, 3, 4 down below, we're coming up on a place where there's going to be some requirements to kind of clean up the WHOIS a little bit and or at least the registrant data. I can tell you that we have decades of legacy in the registrant name and organization to potentially get tidied up for those of us who are going to address that, where a registrant transferring a domain from one registrar to another may have had that registrar through automation or programmatically put their registration into the organization name. So they may have John Smith in the organization name and in the registrant name. They may want to just remove that or they may want to change it now that there are consequences to how that field is treated. And so there's pieces of this that are non-material that would come up as material based off of changes elsewhere in ICANN policy. And so we, I don't know, I think there's some care here. I also agree with Theo that there's a multiple means of attack coming. Presumption would be that reachability might be important for whatever means that registrar uses to communicate the TAC, but that's difficult to define because there are multiple means. Thank you.

ROGER CARNEY: Great. Thanks. And maybe I'll throw this back. Okay. Theo's up next. Theo, please go ahead.

THEO GEURTS: Yeah. So going back when we were talking about these typographical corrections back in the day, could have been me that sort of made it as a person being responsible for this because back then my argument was like, we need to make sure that everything remains in an automated way. So that we can detect typographical incorrections that we can easily allow them to be corrected without any interference. But you know, it's 10 years later and we still haven't figured that one out. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Well, and again, I think talking about material change and the specifics here, the actions that came from the material change were dramatically different or were proposing them to be dramatically different from notification and locking of the account or the domain for 60 days versus a notification. Does typographical even matter? Because to Theo's point about phone number, should any of the data just automatically generate a notification? You know, what's the harm in that? You know, if a phone number is the only thing that changes, should a notification be sent? If the address changes, should a notification be sent? You know, any one of those things, again the action here we're proposing just to be a notification versus a lock. Should any change, a registrant change of contact information generate a notification and make it simple? And it's not material change. It's not anything. It's just any times the contact

data of the registrant changes, a notification is set. Thoughts on that? Theo, please go ahead.

THEO GEURTS:

And I'll go back to my previous point. So I'm going to change it up a little bit. You know, still, what is the goal you want to achieve here? And in my opinion, the more notifications you send, the less important they become. And with inevitable results, people no longer pay attention. Furthermore, if you look at most of the email servers, the more notifications you send, the bigger it ends up in the spam. And you know, that is where criminals make use of. They know that and it's really easy to figure out if a registrar notifications will end up in the spam. I mean, you just need to sign up at one and register one domain name. You can actually lay out perfectly like, okay, they are sending emails every day and you can watch it in your Gmail account or Outlook or whatever. You know, as soon as registrar starts sending those notifications, mostly commercial, within two days, it goes to the spam and nobody pays attention anymore. So that's the problem with sending too much notification, too much messages. The real important stuff will no longer stick out. Thanks.

ROGER CARNEY:

Great. Thanks, and that's very true. And I think that anyone that deals with customers, and I'm not just talking about domains in any way, that's a fact that more notifications just dilute what is important. And it's one of those fine lines where a registrant change, the registrant should know that an email will follow. But again, I don't know. And again, I did try to incorporate maybe the

phone number idea throughout as well as when that changes, that could be fairly important as well. And it could be another different vector. But again, I think when a registrant comes in, changes data, expecting an email or getting an email shouldn't be unexpected. So I don't know that that goes against what you were saying, Theo. And I completely agree with the more emails typically is an issue. So just something to think about. Jody, please go ahead.

JODY KOLKER:

Thanks, Roger. You know, as I hear Theo talk, and we debate all of this, I guess what I'm wondering is, should all of these emails that we plan on sending out, should they all be a should instead of a must? And then it's basically up to the registrar to decide whether they want to do this to send out these emails or not. It seems to me we might be trying to boil the ocean here to try to stop every hacker out there and explain what we're all doing. As someone has already pointed out, if you do this, this, and this, well, we're just going to tell the hacker how they can change things. Or maybe this should be a registrar choice where they can choose whether it could be part of a security product to say, yeah, we will track anytime there's a change, we will send you an email. You know, here's how much you're going to pay for that per year or something like that. I guess I'm curious, are we doing this for the community? If we are, we need somebody from the community to step up and say, hey, protect us more. I don't know, just my thoughts. Thanks.

ROGER CARNEY: Great. Thanks, Jody. I assume you're suggesting a must to a may there and not a should. Should is somewhat different.

JODY KOLKER: Yeah, you're right. A may.

ROGER CARNEY: Okay. Thanks, Jody. Steinar, please go ahead.

STEINAR GROTTOROD: Yeah. Hi, Steinar for the Record. If I recall correctly, I think I kind of addressed a problem a year ago when we first touched this material change that it was a nightmare for the general domain name holder that you normally do some sort of update based on investigation before you transfer to a new registrar. What we have agreed upon now is that there will be no lock. And so in my view and maybe hopefully also in the At-Large view is that the number of notifications is of minor even though because it doesn't stop what you're planning to do. I do understand that the number of emails being sent out may trigger to be blocked by the different spam systems, etc. But I think I would like to say, no offense to the registrar, is that you have a lot of communication that you are required to do. You have the WHOIS data reminder policy that you have to do from all your domain name, getting that out once a year, etc. You have to tune your system to at a minimum risk to be blocked by the spam. So there is work to be done there and I don't really like the argument that we will not send notices because we then may be blocked by the spam systems. But also having to say I really like the may send notices instead of must send notices

because in general I think this should be in the hand on the control and the business model to the registrars. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. And I completely agree with Steinar there and the points that Jody made. Those are good ones. I mean, let's go back to the phone number example there. I mean, if the phone number would be changed for a domain name that's on our accreditation, that is not important. We don't send any SMS or a TAC through SMS. We don't communicate through SMS. So that's not an attack vector there. Furthermore, the email address, which I still find important, we could make a decision that we don't send a notification if that happens because we don't send a TAC through the email address. So you could have all these changes here or sort of all these determinations on where a registrar goes like, where can I be exploited, like on the phone number? I mean, if you send a TAC through SMS, now that's something you need to address because that is a risk there. So yes, I do like the suggestions earlier on from the previous speakers very much. Thanks.

ROGER CARNEY: Great. Thanks, Theo. And I would say looking at it, the only big change from a must to a may is that it's no longer enforceable. Compliance can't hold anybody to any of those because it's a choice. And again, I'm not saying that's good or bad. I'm just

saying that that is a difference changing it from must to may. So Theo, please go ahead.

THEO GEURTS: Yeah, really quick on that one, because that is an interesting point you make, the enforceability for ICANN compliance. The question which springs to my mind is, did ICANN compliance really need to sort of go to the registrar and go like, OK, you haven't done any of this and now you need to do it? Has that happened in the past? Because if that's the case and it's still going rampant, I can imagine that when the policy became live that ICANN compliance sent a couple of notifications, you're not doing it right. This is a new policy. You haven't been paying attention. That I can imagine. But you know, if there are still issues going on in 2024, yeah, that's a data point. That's something we should look at. And if there's no data point, there's no issue. Thanks.

ROGER CARNEY: Great. Thanks, Theo. OK, any other comments here? Steinar, please go ahead.

STEINAR GROTTEROD: Just a short comment to the chat here. With my At-Large hat on, I'm really in favor of keeping a policy, same policy for all the registrars. I will not agree to, or maybe not agree to, a policy that makes it up to the registrar whether they should implement some sort of agreement with a lock when there is a material change or whatever definition we put into that one. I would like to have the same policy or there will be no lock, but they can be the registrar's

own internal routine based on their business model what sort of notification should be triggered based on what sort of update has been executed. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. OK, any other comments here? OK, I think we've got about eight minutes, nine minutes left. Christian, you want to take us on from here?

CHRISTIAN WHEELER: Sure. Yeah, so, and I would also just kind of ask as well regarding the notifications. I mean, if it is reduced, if the security measures for a change of registrant are reduced to notification and there's talk about making those notifications kind of a "may" send those notifications to the prior registrant depending on the registration data, is there certain registration data like the email address, just as an example, where they have to send that notification? And then maybe other items like the phone number or the name where the registrar may send that? So, I mean, is the group envisioning a separation between certain fields of information where they would have to send a notification? Or is this moving to a "they may send a notification," in which case it's possible registrars don't send anything at all because it's optional for them to? So, I'll just kind of throw that out there maybe as a point of clarification as far as what direction the group is going with this definition. Because the next item is going into the privacy proxy charter questions, which we'll go into next time, in which case this is kind of talking about exceptions to the rule as far as what would be considered a change of registrant or a change of control. How to consider

where the privacy proxy and designated agent kind of fits in to those changes that would trigger notifications. But is the group envisioning that this would be a "may" for all types of registration data or a "must" for some and a "may" for others? So, I'll just kind of ask that and then we could probably go into the charter questions next time at the top of the next call.

ROGER CARNEY:

Great. Thanks, Christian. And good call out on the material change. You know, is there a difference, again, a different action depending on what has changed? And again, it's something we need to narrow down, nail down and decide. But any thoughts from anyone on those? Theo, please go ahead.

THEO GEURTS:

Always. So we need to understand. So, if we go for a "may", that solves a whole lot of problems we already encountered in the past. So, the entire debate, if we go for a "may", then the entire debate about privacy proxy providers is gone. We don't need another 90 minutes to spend on it. And the designated agent, that problem is also gone. And let's be clear here, the designated agent, back in the day when we sort of came up with that designated agent, that was to ensure that a very complicated policy wouldn't kill off an entire business model. I mean, that's why it's there. And people have been criticizing it. But back in the day, that was the only thing we sort of had back then to move along the policy. I mean, that was the escape hatch, so to speak. So, if we go for a "may", then those problems are gone and we don't have to spend any time on it. And going back to Rich's comment, like, is

there going to be anything left? I hope not. I mean, I thought it was a horrible policy back in the day. And I think the notifications, that is a good—doing the notifications is going to be up to the registrar, depending on the business model, the threat level, risk assessments. That's where the registrar can excel and make the lives for registrants better. Thanks.

ROGER CARNEY:

Great. Thanks. Any other comments? I've seen a few in chat saying if this does change to a "may", is there really anything left or anything to say about change of registrant? And I think it's valid questions to ask. You know, if we remove the lock, material change is optional for registrars designated agent, as Theo just described, kind of goes away with that. So, is there anything left in change of registrant? Or are we suggesting that the change of registrant just be removed, section two of the current policy is not needed? Is that what everybody's saying? And again, I'll hold up staff to say, "Well, we're forgetting about this one piece of section two or not." And obviously that's important. But I guess the question's out there and we can discuss it. We've got a few minutes here today, but definitely something to think about and take back to your stakeholder groups and seriously talk to them about if it doesn't exist, what does that mean? And is that something you can support or not? So, Theo, please go ahead.

THEO GEURTS:

Yeah. And if people are going back to their stakeholder groups or ACs or supporting organizations, if this policy, change of registrar policy really did anything, then I would actually be arguing to keep

it. But that's not the case. I mean, it doesn't, it's a partial additional security. It's not even there. I would be far more worried about registrants not enabling multi-factor authentication, two-factor authentication, because that is still a big, big struggle. And there's logical reasons for it. I mean, there's people who don't have a phone maybe. I mean, you can come up with different explanations why people are not turning that on. But it is your biggest line of defense when it comes to domain name theft. And that is something I would really love to see other stakeholder groups who are sort of close to the registrants or the internet users sort of push for that security, security, security. Let's move there. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Rich, please go ahead.

RICH BROWN: Hi, Rich Brown for the record. Figured I should clarify some things. One, I'm an alternate. So I'm not suggesting that we make this change. I think it should be thought about. I will say that at the beginning of this whole COR policy when we started talking about it, there was an entire camp of people, me being one, who just want to get rid of the policy, but at the same time wanted to discuss and see if it's keepable, if that's a word, etc. And I think with all of our discussions, we're reaching a point where maybe it's not necessary. Like we've defined everything and maybe it's not necessary, but maybe it is. Maybe somebody has a reason for it we haven't thought of. But I just wanted to clarify my statement in

chat since I probably won't get another chance on that one as well. But, yeah, that's all I wanted to say. Thank you.

ROGER CARNEY:

Great. Thanks, Rich. Okay. We have one minute left. I think this is a great stopping point. And, again, I think this idea, obviously think about it yourselves, but also take back to your stakeholder groups and have that discussion, you know. Again, if it goes away, what is missing? You know, is there something that we're just not seeing that we're missing? And it would be great to hear from. And, again, I think that obviously there's some support for it, so let's talk about it and let's make sure everybody's aware of what we're talking about so that if it is something that we recommend and we don't hear six months from now, hey, we never told this. So it's something to take back and talk to your stakeholder groups about. It's a big change if that happens. But, again, I think Christian kind of highlighted what we're going to talk about next week, the privacy proxy specific charter questions that we have. I know people have mentioned that we don't want to dig deep into it, but we do have some charter questions that we need answered, and we can do that in the frame of this. But, again, great discussion today. I think we made great progress in seeing where we're going. So I think, again, six or seven more weeks, I think we're in good shape for ICANN 79 and to move forward here. So I appreciate everybody's time, and we'll talk to everybody next week. Thanks, everybody.

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