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ANDREA GLANDON:

Good morning, good afternoon, and good evening and welcome to the gTLD Registration Data Policy Implementation IRT Meeting held on Wednesday the 24<sup>th</sup> of July 2019 at 17:00 UTC. In the interest of time there will be no role call. Attendance will be taken by the Zoom Room. I would like to remind all participants to please to keep your phones and microphones on mute when not speaking to avoid any background noise. With this, I will turn it over to Dennis Chang. Please begin.

DENNIS CHANG:

Hello everyone, welcome. So, let's just get started looking at our agenda. We're going to introduce a couple of our new IRT members who just joined and then we want to look at our main document where have the scope and terms defined. We received a lot of comments, thank you for that, and we'll go through that. That is sort of our framework for every Recommendation that we're looking at. In the FAQs, 2, 3 and 4 was due for review so we look at some comments there. Recommendation Analysis 5 and on, we're going to try and see if we can get to 10. I know there's a lot of comments, so we will see. We'll do the best we can. Then we'll talk about the next steps in AOB.

Any comments on the agenda? If not, we'll just get started here. So, this is our Policy Implementation Team Roster, IPT & IRT. Second page shows the three new people. So, Brian, Olga, and Sebastien are three new IRT Members and it's our tradition that the new IRT Members introduce themselves. Please introduce yourself and your role and your affiliation. We have Brian on the call?

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ANDREA GLANDON: Dennis, I don't see Brian or Sebastien, but I do see that Olga's on.

DENNIS CHANG: Okay Olga, speak. You have the floor. Go ahead and introduce yourself.

ANDREA GLANDON: Olga, this is Andrea. It looks like your mic is muted.

OLGA YAGUEZ: Can you hear me now?

ANDREA GLANDON: Yes, thank you. Sorry about that. Hi, I'm Olga Yaguez. I manage the Domain Portfolio at eBay and work within the legal team. I've been there roughly ten years, twelve years, and I'm excited about joining this team and collaborating and working together on this very important topic, so thank you.

DENNIS CHANG: Thank you, Olga, and welcome again and you can see who the other team members are on this slide but also, we have a Wiki Page for the IRT you can visit. There's a full list of the IRT members there. And here is the Wiki link. And just so that you know that all new members are required to review all prior meeting material. They're all posted on the IRT Wiki and thank you for doing that. And we have observers, too, just so that you know, and our observers count is 35 as of this moment.

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And IRT Collaboration Document is what we use to do our work and our goal is to be efficient and collaborative as possible and we found that using this Collaborative Documents online is the most effective way and efficient way. So, we will and then... We also have our drive, which is our team drive. That team drive is here, and it contains all the documents that we are looking at today in one location. But if you are looking for something, the other way to look at that is check our references. There's a References tab where we have key documents linked, but most importantly is probably this Task List, Priority Task List. Now it has up to 29 items and today being the 24<sup>th</sup> of July, that IRT should have completed their review up to this point here and this is what we are going to try and review and discuss at this IRT meeting today.

Okay? So, I think the first thing I want to look at is actually the FAQ Page. So, in the FAQ, and you can all join me here on the document itself or you can go ahead and look at it on your Zoom screen, but the IRT was assigned from FAQ Number 1 through Number 6 and only the comment that we have received is Rubens. Rubens wants to add "unless it falls outside of the picket fence." And Jody asked, "What does picket fence mean?", which is what I would expect the public to be asking because it's not a widely used term outside of the Contracted Parties. And Rubens further provides his definition on what the picket fence is, it's on the GNSO Document and all that. But here's what I think. I don't think we should be bringing in a term like a picket fence here because everything we do is in the picket fence by definition anyway, so it's not needed, is what I think. What do you guys think? What does the IRT members think?

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ANDREA GLANDON: Marc Anderson and Beth Bacon have their hands up.

DENNIS CHANG: Yes, go ahead Marc. Marc, you're on.

MARC ANDERSON: Thanks, Dennis. Can you hear me okay?

DENNIS CHANG: Yes.

MARC ANDERSON: Okay, sorry. I had trouble with mute there. I guess first, I'm looking at this and there's kind of some overlap between FAQ Number 1 and FAQ Number 2. They're both on the same topic.

DENNIS CHANG: Oh, Okay.

MARC ANDERSON: And I guess I'm not exactly sure what the purpose of the message between FAQ Number 1 and FAQ Number 2 is. So, I guess I'd like to ask you, sort of, if you could explain what message you're going for. And then, on a separate note, I do want to note that there is a GNSO Counsel ICANN Board Consultation Process going on currently and that

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deals, one of the items is specifically on Recommendation 12. And I get your note in FAQ Number 2 about that your instruction is to implement the Recommendations as approved by the Board, and I respect and appreciate the situation you're in, but given that this Counsel Board Consultation is going on, might it make sense to put Recommendation 12 at the end of the list as far as prioritizing when to discuss things. Sorry two topics there but that's it for me.

DENNIS CHANG:

Any other IRT Members want to comment? Beth, do you want to comment?

BETH BACON:

Thanks Dennis. Hi everyone. I just wanted to comment, I also had put in a comment down on Number 8 more broadly with regards to definitions. I think this is a section that we still need to discuss. While the response says it's a long policy and it's a little bit complex, I would say, I just quickly went through the actual definitions where they appear in the scope, and most of them are not terms of art, they are not new, they are not distinct, they are not anything that is going to confuse anyone who has reason to read a Consensus Policy, so I do think we should scale this back quite a bit because I share that concern with defining terms that have not been previously defined.

In addition, the definitions were not a Recommendation of the EPDP. Certain things are defined, so I think there's a limited number of items that we would need to define. So, I just wanted to flag that as we go

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forward and as we go through the scope and Definitions Section, which I think is on our agenda today.

DENNIS CHANG: Yes, it is.

BETH BACON: Okay, I wanted to flag that and note that maybe we just need to focus on the fact that we might not need as many definitions.

DENNIS CHANG: Okay, we'll look at that. That's next on the agenda. So, let's get back to FAQ. Anybody else have comments on FAQ? So, Marc, addressing this instruction, when you say 'you', I think you mean the Implementation Team as a whole, which includes actually you also, Marc and the whole IRT, right? What is our direction and what is in our charter to implement? And it's clear that we only have authorization to implement what was provided in the Recommendation and was all approved by the Board, and maybe in some cases modified by the Board or not accepted yet by the Board. That's the only thing that we can do. Now I know that there are other things going on outside of this implementation activity and perhaps we should be paying attention to that. We are not asked to pay attention to those things.

We are asked to go as fast as we can in an expedited fashion. And to wait for other things to happen and when they can happen and track those things is probably not the most efficient way for us to work together here on the implementation. So, you're free to, of course,

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bring in new information that could alter the course of our implementation, and if you're suggestion that Recommendation 12 maybe deprioritized and maybe addressed after we address the other Recommendations, because we do have a lot of work to do, I'm no objection to that. We have to get to all of it anyway.

But I do want to make a point that if we start worrying about things that are outside of our scope immediately right now, we could be potentially moving not as efficient as we could. Anyone else have any comments on this? Beth, did you have your hand up? Marc has his hand up. Go ahead.

MARC ANDERSON:

Thanks, Dennis, Marc again. Thanks for addressing that. I think my takeaway is you are open to prioritizing Recommendation 12 later in the list. And I think we should do that. If we try to tackle it now, I think we [inaudible] to do real work.

DENNIS CHANG:

I hear your suggestion. I'd like to hear from others in the IRT. My approach was, as you've seen, go right down the line 1 through 29 in no priority orders to show no preference to any Recommendations. So, that's what we've been trying to do but when it makes sense, we can alter the order in which we address and I'm open to doing Recommendation as a last item, but I did want to make sure that the other members of the IRT do not have any objections to that. Let me hear from you guys. Diane, go ahead.

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DIANE PLAUT: Hi Dennis. I think that Marc's proposal is practical and then ultimately, we're an Implementation Review Team and we're meant to implement what needs to be implemented at the time it's ready to be implemented. And his point is that if in fact, based upon FAQ Number 2, there is still Board Consultation going on, then we're really not at the point where we can practically implement something that isn't ready. So, I think that from a practical standpoint we have to wait on Recommendation Number 12 so that we don't have to go back and work again on that and that we don't do something that in fact isn't right. As much as I appreciate your perspective on following policy and not having so many outside influences effect our work, we also want to be practical.

DENNIS CHANG: Beth, you're up next.

BETH BACON: Thanks Dennis. I agree with Diane and Marc. I think it's a very practical approach. In this case very especially it's an easy choice because we don't actually have a Final Recommendation to have met because of the ongoing consideration. So, yeah, support. I think it's fine. We can do our work any way we want. We're going to get to it eventually.

DENNIS CHANG: Thank you, Beth. But I have to be very, very clear with this. As I said, I'm okay to make Recommendation 12 the last thing we do to implement or address by this team. but please let's not make any confusion that we



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cannot move forward with implementing Recommendation 12 until at such time we get a different direction. We are not asked to wait and if we aren't asked to wait, we cannot make that decision and that's just what I want to make very clear of.

And we'll get to that decision point at the end when we're all done with Rec 29 and Rec 12 is the only one that's left, we can talk about this again. But I just want everybody to be clear, if that time comes and we still haven't heard anything, we must proceed with implementation. And at that time if the IRT Members object to that, then we have a process of resolving that also. So, is there someone else who wants to speak? Susan, go ahead.

SUSAN KAWAGUCHI: Thank you Dennis. Can you hear me?

DENNIS CHANG: Yes, I can.

SUSAN KAWAGUCHI: Okay, just making sure I have unmuted everything. So, I am not in disagreement in delaying working on 12 because we don't know the outcome of the Board and the GNSO discussion, but I would just propose a little bit of a variation to delaying this all the way to the end. If the Board and GNSO comes to terms and have addition information for us prior to us getting through all the Recs, considering this is an important Recommendation, if we're only on Rec 20 I would say then we should, as soon as we get addition information and direction, that

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we should then go back to 12. And not wait all the way to the end after 29.

DENNIS CHANG: Okay, that's a different... Go ahead Beth. You're up next.

BETH BACON: Thanks. Susan, I think that also sounds very practical. I was also going to just add one thing. If we get to a point where we're getting towards the end and we haven't heard or we want to do it now, do we want to reach out and just give folks a nudge saying, "We need this input. We cannot implement something that isn't complete.", for lack of a better term. So, we should keep on our radar as a group that when we're getting closer and if we haven't heard, we need to do those nudges.

DENNIS CHANG: Okay. Anyone else? Okay, so I captured a note here. I think you can all see my comment, right? So, let's do that and that's fine. And going back to the comment Number 6... Oh, before I leave this, Marc, did this answer your question? Is this okay with you? Let me go back to Marc. Oh, Amr has his hands up. Let me have Amr talk first. Go ahead, Amr.

AMR ELSADR: Thanks Dennis, this is Amr. I would also add one more thing here, or just one more thought on this topic. The GNSO Council is finalizing a response to the ICANN Board on Recommendation 12 right now so at some point within the next few weeks I presume that the Council will

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send this response. And if we're all sharing these thoughts on coming to agreement on what to do with Recommendation 12 now, what to do if we don't hear back from the Board by the time we finish our work on all the Recommendations, what happens if we hear back from them halfway through our work, these are all great thoughts. I don't think I disagree with any of the thoughts I've heard today.

But it might be worthwhile to share what we're thinking with the GNSO Council as well and hopefully they would also relay this to the ICANN Board and that way we're all on the same page, the IRT, the GNSO Council, as well as the ICANN Board, just so that there are no surprises further down the line when events unfold, so to speak. Thank you.

DENNIS CHANG:

Thanks, Amr. The danger with that scenario, as I see, is then the IRT gets into what I would consider as a Policy Development work instead of strictly restricting our work to implementation only work. And that would be redundant to the GNSO, of course, and the Board are having a discussion. I don't think IRT has a part in that conversation so I would rather not have us discuss it, what it could be, and what's better, and what we all think that it should be in the first place, that conversation should not be had in the IRT.

So, I think my proposal is going back to Marc and Susan's proposal that we postpone Rec 12 for now, and if and when we hear back from the Board -- and it has to be the Board, not the GNSO Council, right, you all agree with that. -- and then at that time, we can always go back to Rec 12 and address it then. Then it'll be clear for everyone what we need to

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implement. So, I'm going to call Mark. Mark, go ahead. You have your hands up.

MARK SVANCAREK:

Hi, Mark Svancarek. My interpretation of what Amr said was maybe a little different than your interpretation, and what he's saying in the chat is more in line with what I thought. Mainly that we should let the Council know, clearly, this is what's happening in our process. We are thinking that we will put this part of the process... If it were creating a dependency, we being clear to them about the dependency. Not focusing on the policy generation at all, but just being very, very clear, here are our concerns and here are the practical steps we are taking to mitigate those concerns relative to this Rec or anything else that we're...

DENNIS CHANG:

I see. Thank you for that clarification, Mark. I am reading Emr's chat here too and it's very helpful. So, number one, this again has to be very clear, we are not authorized to create dependency that doesn't exist and then, right now if you go by the direction from the Board, we were not asked to have a dependency so we must continue to implement. I think in principle, this may just work itself out. If it's a matter of a couple of weeks than we may hear from them and we'll all be clear on what to do. So, let's close this discussion now and move on to the next item.

So, IRT and Implementation Team, we'll suspend discussion on Rec 12 at the moment and we'll continue. And the Number 6, this is a picket fence. So, I didn't hear anybody comment on the picket fence, but it really makes me uncomfortable to bring in another term on the picket

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fence. As I told you, this FAQ page that we are creating now will be posted in the IRT Page and remain there throughout our Policy Implementation, and even after, for other people who wish to look at it and get their questions answered. So, I'm going to propose that we delete this, we not accept this addition of the picket fence. Does anyone object to my proposal?

BETH BACON: Dennis, I have a...

DENNIS CHANG: Go ahead, Susan?

BETH BACON: No, it's Beth.

DENNIS CHANG: Oh, Beth, okay. Continue on. Go ahead.

BETH BACON: I'll take it as a compliment. Susan always sounds so great, always says the right things. So, I don't necessarily object to changing the way that this is answered and taking out the direct picket fence comment. However, I do take some issue with the phrasing. I mean it says, "The Registry Operator is signing in an agreement with ICANN Oracle superseded conflicting provision in the agreement." So how come the agreement superseded that in the [inaudible] agreement? So, I just

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think this is not a clear response so maybe we just flag this to maybe take another pass at it altogether and maybe that'll get rid of the picket fence comment. Is that... I find this very...

DENNIS CHANG: That's fine. Do you want to try making a suggested comment, but you know how I feel about the picket fence now? Now, next person is Susan.

SUSAN KAWAGUCHI: I agree with you, Dennis, that I would prefer to leave out the reference to the picket fence. I've had way too many conversations and discussions about what it really means, so clarity is key. But I also agree with Beth that the language here is not quite clear. It's funny how you read these things and when I'm reviewing it, I'm like, "Okay, that makes sense." And then later you go back and go, "Wait, what does it really say?" So, I look forward to Beth's revision and I'll give some thought to it, too, if that's helpful.

DENNIS CHANG: Okay. Thank you.

SUSAN KAWAGUCHI: But I would say let's remove the picket fence.

DENNIS CHANG: Thank you. Appreciate. Let's see, who else? Is anybody else online? And I see on the chat that we should probably, since Rubens... If Rubens was here, he could go back to the Council and tell them that the IRT is

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suspending, electing that discussion. Hello? Someone wants to speak? No? But I will tell Rubens to go ahead and advise them on the basis of that new request. The IRT is requesting that, at least let them know, and that's probably a good thing to do as a IRT Liaison and maybe that is part of that duty. So, we'll do that, okay? And action is for Beth and maybe Susan and anybody else to see if we can reword things on Number 6 so that we can avoid using the picket fence here.

And 7 and 8 are not due yet but since 8 addresses definition and we're going to go through definitions in the main document right now, so let's do that. Okay, we are here in our Policy Document. So, what we have so far in this main Policy Document is scope and Definition, right? You see that. And then it's our intention, the design of the document is that we're going to have the Effective Date here and then we're going to have Collection, Transfer, Publication and keep adding the requirements here, right?

So, I have to reload. Something went wrong. Okay, so the first comment that we have is from Rubens. Now, Rubens is adding a phrase, "When providing Registrar Services for gTLDs Domains". Now I know why he wants to add all this. But if you look at the words, first if it says, "All gTLD Registry Operators," so that's clear. It's the gTLD Registry Operator not the gTLD, and then it says, "All ICANN-accredited Registrars", so that again makes it clear that we're only talking about Registrars that are accredited by the ICANN.

So, I think that already sufficiently covers. So, when we start adding things like Registrar Services, then you start asking what about the Registry Services? And Registrar Services here seems like a term that we

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now need to define. So, my proposal here is to not add this. So, I'd like to reject this addition. I want to hear from others on the IRT. What do you think?

BETH BACON: This is Beth.

DENNIS CHANG: Go ahead, Beth.

BETH BACON: No, sorry, Amr go for it.

DENNIS CHANG: Amr go ahead.

AMR ELSADR: Thanks Dennis and thanks Beth. My impression is that Rubens' added this language because he was concerned that the scope of the policy language, we're developing might be suggesting that the scope also includes how ICANN accredits its Registrars, would need to provide services for ccTLD Registry Operators. So, obviously we all know that this is not the case but the language he added here just helps to make that clear. I have no objection to it staying in there if...

DENNIS CHANG: Do you have an objection to remove it?



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AMR ELSADR: No, not really. No, can't say that I do.

DENNIS CHANG: Okay, so I'd like to hear...

AMR ELSADR: If we would like to keep it and define what Registrar Services are, you know...

DENNIS CHANG: Oh, no, I don't think we want to get into that. That sounds like a lengthy discussion that is not within our scope of implementing the policy. Beth, go ahead. Why don't you speak, what do you think?

BETH BACON: Amr, I think that he made an excellent and correct point, but I don't think that we should remove it until we clarify with Rubens that that's what he meant and that we've satisfied his concerns.

DENNIS CHANG: Okay.

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BETH BACON: I'm neither offended by its presence nor it's absence. But I think that we [inaudible] Rubens', just flag it and be like, does this clarify your concern?

DENNIS CHANG: Okay. I guess then we'll just keep it until Rubens has a chance to join the IRT Team next time. It's not an urgent thing. Okay, now here we go Beth. We would like to discuss this section and I'm going to involve your comment because we are discussing it and then I see another... Afia said... What is this? Oh, okay, now Luc, "What about RAA?" Where am I? "Section 1.2 is too vague." Okay. "RAA is in scope", addressing Luc. And Margie is suggesting that we have to start specifying the sections of the RAA, which I don't think belongs in this group. There is a part of implementation detail and implementation that we have to do but I don't think it's a scope section material. So that's what I think. What do you guys think? Okay, Beth, go ahead Beth.

BETH BACON: So shockingly my hand is up because I made a comment. So, I apologize in advance for this. But in general, I don't think we need this section. There are very few policies, Consensus Policies, that even have a scope or definition.

DENNIS CHANG: Oh, you mean this whole section?

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BETH BACON:

The whole thing. So, I do think that it's completely appropriate to say, as most other Consensus Policies do, this Consensus Policy concerns the gTLD Registration Data. And I'm not saying that none of the Consensus Policies have purposes, I know that some do, but I think this is overkill. I think it's causing more problems than it's solving here.

So, I would propose that we change this to a purpose, and we pair this way down. I think a lot of it is redundant as to restating what we already know, things that are in our contract, like where it says, "which policies and which language will control" that's already in the RA and the RRA, we already know how that works. The section 1.2 and then 1.3 are basically contradictory here. It's like, "This will control but also remember all of the requirements of your contract still exist." That's all stuff that we already have in our contract. We already know how that works. So, I don't think we need it. And I'm just going to throw that out there to talk about to see how people feel about that.

And I also took a stab, I did not go through and edit, happy to do this, I'm happy to go through and do an edit so that people can consider it and we can come back to it, I also went through and actually took a stab at getting rid of the definitions I don't think we need, just per the discussion that we had previously. So, I'm just going to leave that there for a minute and let people yell at me.

DENNIS CHANG:

They're not going to yell at you. So, go ahead, I think Sarah is agreeing with you I think, and Amr because I see them in the chat. And Ben, Ben wants to speak. Go ahead Ben.

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BENEDICT ADDIS: How are you doing?

DENNIS CHANG: Alright, Ben.

BENEDICT ADDIS: Long time listener, first time caller. So, Beth, I guess I just want to understand how you'd manage, and I think generally getting rid of verbiage is a good thing, so I support your efforts, but I just wanted to know how you'd propose to manage the conflicts with floor stuff, I guess you'd call it conflict of policy here. And you mentioned there was something existing in the contracts of At-Large, just wondering if you could elaborate on that please.

BETH BACON: Hey, Benedict. Nice to hear you. So, can you highlight in the... I'm sorry I'm looking at Dennis's screen. What am I talking about? If there are parts, lets go through and see which ones we might need. But the ICANN Contracts also cannot require us to conflict with, to break a law, so we can't do things that conflict with jurisdictional law so if that's the concern, that's how that's handled so it is in the contract. If I'm incorrect...

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BENEDICT ADDIS: No, I meant with other policy. Sorry I was speaking glibly but I meant where there's a conflict between the policy and...

BETH BACON: So, where there's a conflict between this policy and another policy I would say that that is one of the Recommendations we already have, which is for GNSO and a part of the community to go through and review those policies and make sure to amend them to make sure they don't conflict with it. So, I don't think its this policy's job.

So, we could say in language, I don't know if we need it here or if we could find another place for it, and just reflect the tenant of that Recommendation where that policy work is ongoing, this would control for a policy, a Consensus Policy, but I think that we need to be careful about restating what's already in the contract. And I also think that it's a little bit redundant, also, if you walk down the line of saying, if the Consensus Policy controls then this Consensus Policy is clearly the newest, it is the most recent amendment to a contract, I used [inaudible] voice there for amendment, so therefore it would control. If there's going to be confusion, then we could think of a way to clarify that, but I can keep that in mind while I go through and take a stab at rewriting some of this if that gives you comfort.

DENNIS CHANG: It would give me comfort. Go ahead, Ben.

BETH BACON: Well, if it gives Dennis comfort then I will do it.

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DENNIS CHANG: Matthew. You want to talk?

MATTHEW CROSSMAN: Hey, this Matthew. Can you hear me okay?

DENNIS CHANG: Yes.

MATTHEW CROSSMAN: Great. So, I don't disagree with Beth's idea. I think it's interesting to explore. I think the easier and simpler we can make this, probably the better for all of us. I do think that maybe there's a step that we need to take before we make that decision about removing some of these scope elements which is, especially when it comes to our agreement, I think it would be helpful to know, or to at least flag and take an inventory of, where in our existing agreements are there clauses that would potentially be superseded by this policy.

Because I do worry that if there are a lot of clauses or obligations that are going to be changed by this policy and we don't call that out specifically in the scope document, then that's going to lead to a lot of confusion going forward. But if it's not going to be significant, if there aren't a lot of things that are going to need to be changed, maybe we can completely simplify this. So, I guess my ask would be is that something that the IPT Team could do, to take that inventory of the RA and RRA and just flag even where it's clear it may be superseded, where

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it might be superseded, and then we could have that document and use that to help try and guide some of this discussion.

DENNIS CHANG: Thank you Beth and Matthew. Go ahead, Beth.

BETH BACON: Hi, so, Matt I agree. I do think that that's important, we need the clarity. And I think that's something that Contracted Parties would do with ICANN, maybe bilaterally, if that's something that would be helpful informationally. I don't know where that would live in a Consensus Policy, but this can't be the first time this has happened where Consensus Policy has changed or superseded something in an agreement so maybe we can ask ICANN if they can go through and take a look at, when this is done, take a look at what that inventory is and also how we've handled that in the past. I just think a lot of this is stuff that we do as a matter of course that already exists and I think it's just confusing to repeat it.

DENNIS CHANG: Go ahead, Susan.

SUSAN KAWAGUCHI: I also am all for not having language that is too lengthy and if there's a way to maintain clarity and shorten the language, I'm all for that. I'm not sure I'm capable of that though, so would like to wait to see if there are revisions, then I mean we would need to discuss those. But there

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was a session in Marrakech on getting community input, Keith ran that, Keith Drazek, on all the different policies that could possibly be impacted that we should be looking at. So, I think that list has already been started and the work has begun. I'm not sure who's doing that exactly, I don't know if it's GNSO Council or obviously Staff helps with everything, I don't know that there's a Working Group on that. So, we could use that information in that presentation that Keith did in Marrakech to help guide us a little bit.

DENNIS CHANG:

Thank you, Susan. Anyone else? So, I think the point that I'm taking away is that, and I think everybody would agree, that we want this policy document to be as brief as possible and just take out anything that is not really needed. So just look at it like this, this is our initial draft and so it's far easier later to take things out then try to insert things later. So, think of it as kind of a baseline language which we can reword or combine or even remove.

I do believe that Scope Section 1.0 does serve a purpose and we should probably keep it because later on we don't want to run into something that we have to sort of force it into a later section like Requirements and stuff like that. This is looked upon as a macro-level section that applies to all the subsequent sections. So, for now, let's keep it but see if you have any specific proposals like for even removal of each section and why we don't need it. That's what we'd like to hear from you.

And like 1.2 is a good example where Margie is actually suggesting the opposite of adding things into this scope document which I am saying



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that I am against that idea. So, we'll have to get to a point where we feel comfortable with the scope statement and by now it's got five sections and I guess 1.2 is rather wordy but we'd like to see if we can reduce this to a smaller set, I think is the main idea here. Is there any more, let's see, specific comments on 1.3. Jody had a comment relevant to 9.2. I don't see any proposal here. ICANN be able to skirt any privacy law. No, ICANN cannot do that either. Is Jody here? Any comments on this 1.3?

JODY KOLKER: I am here.

DENNIS CHANG: Oh, hi Jody.

JODY KOLKER: All I was curious about if there was any concerns here that ICANN can skirt any privacy laws basically by requesting information. And if not...

DENNIS CHANG: Okay, then we can just resolve it. We have no concerns there. Thank you, Jody. Let's do 1.4. 1.4 is... Agreed with Luc. Yes, this is an item that we are having an ongoing discussion on. Right now, the word that we're using is Data Processing Term, thank you Beth. I think you kind of invented those.

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BETH BACON: Don't blame that on me. That was Dan.

DENNIS CHANG: Was it? Well, I heard it from you first. So, what we will do is, we haven't defined, actually agreed on, what this document is but we will have a document and Luc is asking the question, "Will there be an addendum to RA or RRA or will there be an addendum to policy?" These all have to be really worked out, right, and that's part of our job. So, for now it's a good question and we'll have to work that out. As part of our policy implementation we will definitely address this in the future but the point of 1.4 in the scope is to let everyone know there is going to be a separate document that addresses this Data Protection Agreement.

1.5, no comments there. So, let's go to Definitions. So, I have taken this comment earlier and I've already deleted a couple and proposing deleting 2.4 and 2.8. You can see that my proposal is to delete. So, let me first, let's just go down the line, I guess. 2.1 is just a standard Key Word definition. We want to use this in a standard way. 2.2, no comment. 2.3, no comment. 2.4, okay. So, before we get into discussion, do you have objections for us to just delete it and then therefore, we can avoid the discussion. Does anybody feel strongly that we have to keep this? Beth?

BETH BACON: Thanks, Dennis. So, this is not necessarily a comment on Luc's comment. But I will note I did put in an overarching comment about not needing a lot of these definitions so I'm all for deleting, but I didn't have time to go in and mark the ones that I thought maybe we could get rid of. So, do

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you want me to do that after this call and then we can just do this all again next time [inaudible].

DENNIS CHANG: I was hoping that we can delete 2.4 now so you wouldn't even have to.

BETH BACON: We're going to delete a lot more than 2.4, Dennis.

DENNIS CHANG: I know. That's fine.

BETH BACON: Okay.

DENNIS CHANG: I don't mind. But 2.4 and 2.8 just came up as a couple of obvious ones that I can get rid of to make this process simpler. So, if there's no objection on this call I'm going to delete it, and Isabelle is carefully documenting this end of the log. Oh, let me make sure that you guys are all seeing this, right? Resolve Comment, you all see this? So, there are all the result comments are here. Did I hear yes from Isabelle? Okay. So, what I'm going to do is then delete it. Let's see, why did I do that. This it? Yes, this is it. Okay? It's gone. And then the next item is 2.5 and Jody is commenting, "personal data defined in another document that we can..." Sounds like there's a phrase adding such as personal data is [inaudible]. So personal data defined. I think the answer is yes, right,

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there are other documents. Should there be a phrase added that says personal data?

BETH BACON: Can I get a que?

DENNIS CHANG: Yeah, go ahead.

BETH BACON: So, my question is, this is one of things I think we can actually just delete. I don't think we need to define it because it is defined elsewhere but it's also not one that's in our Recommendation or that's created by a Recommendation so I think we can probably just... we don't need to know what to define the personal data as if we're just following the policy that tells us which data to use.

DENNIS CHANG: That proposal is deletion. Jody what do you think?

JODY KOLKER: I'm fine with deleting it.

DENNIS CHANG: Okay, Jody agrees. Okay, so for now let's just leave it like that for other IRT members to chime in and we'll move on to the next one. There's a comment on this. Amr go ahead.

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AMR ELSADR:

I'm all for deleting 2.5. I think that would be a good idea. If we do keep it, I think we need to do more work on it, but I think that would be unfortunate. But, personal data in general is not only associated with a natural person in data protection laws. So, data protection laws [inaudible] the personal data of a natural person than a legal person. So how we want to use that, I don't think we want to get into that right now so I do support delete and just giving folks a heads up on some of the complications that might come up if we do keep it. So, thanks.

DENNIS CHANG:

Okay, that's a good point. So, if we do keep it, we'll have to work on it. I think that's the idea and I agree with you. 2.7, I just added a few words to cover the different usage of the word, so I don't think there's an issue here so I'm just going to accept this also to make it clean. And 2.8, deletion proposed. Anyone object? Can you see it? You can see it right? Yeah. 2.8. No hands up, no objection. Okay, it's going to be gone as soon as I can find it. Okay, it's gone. Thank you.

And then 2.9 we have a comment from Jody. Oh, this is, yeah... I said that this is going to be coming up on Rec 18 so let's talk about it when Rec 18 comes up. I think the last time I looked at it, it had something to do with that. And 2.14, I guess I added a few changes here, data with the data elements to make it more clear and that's done. And then I added some language to point you to the Section 4 which is the data collection. Matthew had a comment on this, I think. The final report's a bit more precise here than implementation items. I think that was what

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I was trying to address. Do you agree, and I agree, do you guys agree with the revised definition? And Afia agrees so I think we're good here.

BETH BACON: I have a question, Dennis.

DENNIS CHANG: Go ahead.

BETH BACON: Everyone's surprised I have a question. So, and Matt, I'm glad you're on the call because maybe you can answer this for me. I feel like Matt's question was less about making the definition live there and more about do we need the definition here since it's already described and defined in Section 4, the Registration Data. Sorry guys, I can't talk today. I don't actually think we need this because it's already in Section 4 and I think that's one of the confusing things about the definition section is it's already in there.

DENNIS CHANG: The Section 4 uses the words, but I don't know whether we have defined it. Section 4 of course is the collection, that's what you're referring to, and we're going to get to that.

BETH BACON: And Registration Data, do we want to define it because we have the aggregate minimum data set that is an actual defined set of data for this

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policy. And then using Registration Data, I think that it's a term that's used all over creation in ICANN. I just don't know that we need to define it but I'm willing to be told no.

DENNIS CHANG: We won't go into define it if everybody has common understanding what it was, but I noted that people did not have common understanding. I know we use this term a lot and it seems to mean different things to different people. For example, Registration Data to a lot of people means just any and all data that is associated with Registration. But we're trying to limit what those data elements are here with this definition. So, I want to hear from you. Go ahead and let me know who wants to speak up on this.

MATTHEW CROSSMAN: Hey Dennis, it's Matt.

DENNIS CHANG: Hi Matt.

MATTHEW CROSSMAN: Hey. So, I'll just throw it out there. I think it is something we can talk about whether we need to define it all, but if we do decide to define, I guess I just want to ask why we wouldn't just follow the language that's in the EPDP Final Report. I think that Recommendation sort of directs exactly what Registration Data should mean, so I think let's have that conversation about whether we define it at all, but if we do define it, I

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would probably prefer if we just stick to the definition that's in the Final Report.

DENNIS CHANG: That's what we would try to do.

BETH BACON: I agree. My question is do we need to define it here since it's in the report and we use it later in the policy, do we need the definition in the definitions section, but if we do decide we want it then yes, I agree we should use the one that's in the report.

DENNIS CHANG: Okay. Diane?

DIANE PLAUT: I think we should definitely define it. I think that's the important thing about having this team, is that Policy Implementation means that you're implementing something that has the capability of being read by anyone who is outside of the context of the EPDP or someone who isn't reading the Final Report and someone who needs to look at this with a fresh eye and everything is about definitions. If we're having a Definition Section, we need to define this basic term because this is just essential to the whole follow through with what's provided in the policy. So certainly, from a lawyer's perspective but from an average reader's perspective as well.



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DENNIS CHANG: Thank you Diane. Susan?

SUSAN KAWAGUCHI: I agree with Diane and especially since what we all knew as Registration Data, which was never completely clear anyway, there's been a lot of debates on that, and now that's changing, what Registration Data is collected and what that means to register a domain name, so I would say that we should define it and do our darnedest to make it clear, which is difficult.

DENNIS CHANG: Amr, go ahead.

AMR ELSADR: Thanks, Dennis. Amr. I'm actually not very sure that defining Registration Data is an implementation issue. Like Susan just said, this has been debated in the past and it's been debated in a Policy Development's context. So, I'm not entirely confident that if Registration Data's going to be defined that the IRT or the IPT are the right groups to actually tackle this. This might be something that needs to be subject to actual Policy Developments.

But as far our work is concerned, I think the EPDP Team was very specific in what data elements were applicable to each of the Recommendations, which we're going to basically translate into Consensus Policy language or draft Consensus Policy language. So, in

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this definition we say the Registration Data means the data elements and then goes on to explain what data elements are being referred to. I think in our language and the work that we're doing, we can be specific enough to refer to the actual data elements without the need to define Registration Data in a generic sense anyway. So, I think this might be an easier way for us to deal with this and it hopefully should be a very clear from a contractual language perspective as well. Thank you.

DENNIS CHANG:

Thank you. So, for Matthew, your comment about why don't we just use the definition that came from the EDPD Final Report, the words that you see here was the attempt to do exactly what you just said. But one that we couldn't do is start referring to the NXD of the Final Report and we shouldn't do that. We should not report to things from the Policy Document to a Final Report so that they have to go there to find out what the policy is.

So, what we attempted to do is reference the section in this policy, which is Section 4, to define that. So, I hear you. We may need it, maybe it's better without it, but for now let's keep it and when we complete our Policy Document and we see all the sections spelled out in full, maybe we can come back and look at this again.

Okay, so Susan had written something a little more descriptive here in the chat. I'm trying to get to it. Everybody has access to the chat so why don't you go ahead and read that, and we'll copy this chat and post it on the Wiki for your reference later, too.

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SUSAN KAWAGUCHI: That's just from the glossary from the report is all and I'm sure you did read that before, but I was just putting it in there.

DENNIS CHANG: Oh, thank you. Yes, appreciate it.

SUSAN KAWAGUCHI: Just thought it might be helpful for other people to see it is all.

DENNIS CHANG: Okay. Thank you. And I don't see any other comments on the Definitions so we will give you another opportunity to go through it later and suggest more deletions or rewording and feel free to do that of course. This will be our final main document that we'll have to live with, and all this Section 3, 4, 5, 6 and so on will be merged from the document that we're going to look at right now. And let's go there right now.

And we're in the IRT Recommendation 5 Analysis. Okay, Ben. Okay, thank you. So, on 5, let's see if we can get through this quickly. And I've said that Sarah had a suggestion to change the word 'and' with "as" and I have no objections. We were trying to make it a little more clear, but we can go stick with the Policy Recommendation language. Any objections to accepting Sarah's proposal here? I don't hear anything. So, I don't think it's a big deal so I'm going to go ahead and accept it. Thank you, Sarah. Appreciate it. That's done.

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And then this one. 5.8. So, 'permit', the word 'permit' wasn't quite, people wasn't quite liking the 'permit'. So, we looked at 'support', we looked at 'offer', and we are ending up here with 'enable' to be maybe more descriptive of what a Registrar has to do. Any objections with the word enable? Okay, Marc Anderson has a hand up. Go ahead Marc.

MARC ANDERSON:

Hey, Dennis, thanks. Marc Anderson. I don't want to sound like a broken record here. I made this point I think on the last two calls but 5.8, the intent is it's required for a Registrar to support these fields but optional for the Registrar to provide the data for those fields. I mean, I don't think that materially changes the language you're using, but I think the language you've got here is potentially confusing. It's required for a Registrar to support these fields but optional for the Registrar to provide the data for these fields. And I don't think that's a material change but hopefully that helps clarify the intent of those.

DENNIS CHANG:

Yeah, the word 'support' was problematic because in the past, it was subject to so much different interpretation of how Registrars are supporting. That's why we are staying away from the word 'support', but I think I like the second part of what you said. So, Registrar must enable the RNH to provide the final data element, that is one part of the Recommendation, that is the requirement. And if provided by the RNH, the Registrar must collect the following data and so, if provided then RNH. So that I think that makes sense. RNH is not required to provide it. So, if you don't have any strong objections let's adapt 'enable' for now

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and I'm anxious to get this section, at least Rec 5, merged into the main document which will be our first one to get there and the next one is the 5.8. Jody, go ahead.

JODY KOLKER: I just have a question for Marc. I'm not quite understanding what he's saying.

DENNIS CHANG: Go ahead, Marc.

JODY KOLKER: I guess my question is, Marc, is that you say it's optional for the Registrar. The Registrar must provide a way to get the data but it's optional for the Registrar to provide. Provide to who or where or what, I guess is what I'm asking. Sounds like the sentence cutting off to provide, to provide where?

MARC ANDERSON: Hey Jody, it's Marc. Yeah, so these are all fields that are optional for the Registrant to provide, right? Organization Name Servers, whether you have DNS Sec or not, what the Name Server IP Addresses are, those are all optional for the Registrant, but they're not optional for the Registrar's. And I think that's basically what this requirement is getting at. And part of the very fun conversation about what optional means in terms of Registration Data elements. So, I think these are... The

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Registrar has to collect these but they're optional for the Registrar to provide.

I think the, like I said, I don't think I'm trying to come up with the meaning of the language in 5.8. I just find it kind of awkward the way it's written right now. Like where it says, the Registrar must collect them, I don't know how you can enable them but not collect them, right, so that just kind of is confusing to me.

DENNIS CHANG:

Yeah, to provide language is not... let me see, who was up, Sarah is asking a question. The conversation is getting more confusing than what I am looking at the language here. There's two requirements for the Registrar and it is a requirement the Registrar must enable the RNH, in other words give them the opportunity to provide this data, right, and if provided by the RNH, we should note that it's optional, they don't have to, the Registrar must collect the following data, so that's the requirement and I think it's okay. Any other... Sarah has a comment, go ahead.

SARAH WYLD:

Hi, thank you. We have Section 5.3 is very similar and if the language in 5.8 is difficult, I wonder if 5.3 is more clear and we could use that in 5.8 as well.

DENNIS CHANG:

Okay, let me look at that and see if we can reword it. I think the intent of the requirement, I think we all agree, maybe it's just the wording.

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Marc finds it confusing and Jody's comments are maybe supporting that confusion, the fact that it's confusing. And 5.3 you think is a good, clear way so maybe I need to add another sentence or something. So, let me take a look at that and work on that a little more. 5.8, okay. This particular sentence, I proposed deletion. And what I'm saying is that Sarah... Okay, you are here Sarah, so let me see, hold on. Beth has her hand up. Go ahead, Beth, did you want to say something about the prior topic. Go ahead.

BETH BACON:

Sure. So, I don't want to disagree with anything that was agreed upon. I think it helps clarify the language, but I want to... I still read through this and I was pretty involved in the EPDP and writing it and when I read this, I'm still a little bit confused. And I mean it's the nature of it, I understand that, but I do think I remember Marc had sent around to the list perhaps the idea of using a chart. I mean it's a chart in the EPDP Recommendation.

I just want to throw it out there, is that a possible solution that would be very clear and easy to read even if we want to have all of this written out in pros, I'll call it, do we have an addendum or something that says, "Also here's a chart that reflects the text." Is that something would be helpful or not helpful at all. It's just a question. I'm not advocating, I'm not suggesting. Just a question.

DENNIS CHANG:

Oh, okay, good suggestion actually. There you have it.

BETH BACON: Oh, how pretty. Yeah, do you folks think that it would be helpful and more clear to folks, especially I mean we wrote this darn thing and it's confusing.

DENNIS CHANG: We are going to. So, the idea here is that we are going to provide this data matrix elements matrix as a reference document to the policy when we're all done. Let me make sure that our template on this is still there. Yeah, we'll have to add that link here somewhere as a... So, let me make sure I do that and so that is the intent. We're going to offer this sort of an exhaustive list of sixty items on every transaction from collection, transfer, and publication throughout the various transactions. So that is part of the plan.

BETH BACON: I think that chart is really helpful, and I think it's great, but my other question is why can't the chart reflect the policy? Why can't we just not use this many words, and that's my question and noodle on it and we can think about it. I do think that chart is fantastic and clear but I'm thinking about people who haven't been interval involved in this.

DENNIS CHANG: Yeah, so am I. We're all... Okay, so we have let me see, any more comments. Roger likes the language in 5.3. Oh, so 5.3. Was it 5.3? Sorry. Thank you. Okay. And then are we ready to move on to this paragraph? Okay, so Sarah made a comment and she asked where this came from

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and I replied, and Sarah says that's good. She agrees with my proposal to take it out of the language and add a note, right, implementation note, which I have done. So, if everybody agrees with that or no objection, I'm just going to go ahead and accept this and move on. So, I'm going to delete it from there and add it to here. But before I add both of them let me see. 5.3. Oh, Matthew. I want to address 5.9, Section 5.9.

Matthew added this comment on the whole policy language, and again I'm troubled by adding policy language that addresses basically a contractual relationship between Registry Operator and Registrar, right. So, any others? So, my proposal is maybe we go ahead and adopt the language but we put in the implementation note instead of a policy language so what do you think about that Matthew? You have comments?

MATTHEW CROSSMAN: Sure. Yes, let me just make two points on this.

DENNIS CHANG: Okay.

MATTHEW CROSSMAN: So, first, I guess I don't agree that this is something that's solely between the Registry and the Registrar. Because we're not talking about specific content or requirements of an agreement between the parties. We're just affirmatively stating that this type of data may, not must, but may be included in a Registration Policy. And I do think ICANN does

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have a relationship with Registration Policies already. If you look at, say Spec 11, there's some language in there about establishing, publishing, adhering to clear Registration Policies. So, I don't think this provision is inconsistent with that or more onerous than what's already included in our Registry Agreement.

But then secondly, and maybe more importantly, I think if we take this out of the policy and put it into an implementation note and we're saying that this doesn't belong in the policy language, I think we have a problem because conceptionally we're saying that something that's listed in the EPDP Recommendation as an ICANN Purpose is actually outside the scope of the Policy. And I think given our conversation before about potentially referring back to something like this as the definition of Registration Data, that creates some ambiguity and an issue about what is and is not Registration Data even though this is specifically called out in purpose 7 and in Rec 5 in the data table. So, that doesn't feel right to me but I'm happy to hear other views on this.

DENNIS CHANG:

Yeah, let's hear some other views on this. Anybody else have comments on this?

BETH BACON:

This is Beth. I don't have a comment right now, but I do think it's a really interesting point and I simply don't want to comment because I want to think about it. Can we keep this flagged as not resolved?

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DENNIS CHANG:

Okay, I won't resolve it and I ask you to go ahead and... Okay, Amr says that it's overruled. This all outside of scope of EPDP. Yeah. Okay. So immediately no comment so I'm going to have to leave it like this for now to give you a chance to look over it and mull over it a little more then. Go ahead and let's go to IRT Rec 7 and 8. Let's see. Let's just start here. So, 6.2, Let's see. So, we have Marc wanted to split this out. I didn't see that in the Recommendation, and I think Marc wrote a lengthy email on this topic pointing to the Board Score Card and also the input table from Registry Stakeholder Group, I believe, to the EPDP Team.

So, couple of things I noted there. The Board Score Card clearly says that EPDP Team in Phase 2, I believe. Let me make sure that Marc said it, right. We have our analysis here and one thing that we did was we copied over the Board Action here and it says that the full request of EPDP Phase 2 Team considered whether the suggested correction contained in the Registry Stakeholder Group comment should reflect. So that is an EPDP Phase 2 Teams job, so we are not authorized to talk about that.

And then the wanting to split out, and I see Marc's logic because I read the Registry Stakeholder Groups input to that, but I don't think that we can go by the input to the EPDP Team, but we have to go by what the Team had ultimately agreed upon and passed as a consensus policy. So, let me stop here and I see that Marc had a comment, Sarah had a comment, Roger had a comment, and Susan had a comment on the document. So, let's start with somebody. Marc, do you want to speak first on this or Sarah, Roger, Susan, you're free to speak up here. Marc, go ahead.

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MARC ANDERSON: Hi, Dennis. This is Marc. I guess I'll refer you to page 43 and 44 of the Recommendations, page 45 as well. I see you're pulling it up there.

DENNIS CHANG: Yeah, 40, okay we're getting there. Did you say page 43? This one?

MARK SVANCAREK: 44.

DENNIS CHANG: The table?

MARK SVANCAREK: Yeah, the table there is color-coded. If you scroll down to the top of page 45, it clearly lists required and optional. I think the Board comments and I think the table submitted by the Registry Stakeholder Group further clarify this, but I mean this table in Recommendation 7 is very clear as far as the transfer logic. The fields that are required are in green and the fields that are optional are in yellow. I don't know what else to say beyond that.

DENNIS CHANG: Okay. Anyone else have comments?

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SUSAN KAWAGUCHI: This is Susan. So, I wasn't quite following this and maybe I'm confusing issues but when we were discussing the Registrar or the Registered Name holder has the option to provide and the Registrar must enable that to provide those contact fields, then when you come over here, it doesn't make sense to me that the Registrar would not transfer to the Registry everything that they have collected or everything that the Registrant has provided for the Registration Data.

So, it's the continuity of all of these, of how it, you know, if the Registrant is insisting, take this data element, and the Registrar is required, let's enable that or whatever term we want to decide on, the collection of that, then that makes sense that it would then carry over to what the Registrar sends to the Registry. So, I think that's my confusion, but I seem to be very confused with this part of the report anyhow.

DENNIS CHANG: Marc is next, go ahead. Did you want to talk again, Marc, or Emr and Theo next.

MARC ANDERSON: Thanks, sorry, I was mute button challenged there. I'll just also add, I'll copy this into chat as well, I'll just also note the Board Resolution itself is pretty clear on this. It says, "Whereas the Recommendation at Recommendation 7 state that data elements collected and generated must be transferred from the Registrar to the Registry provided appropriate legal basis exists and a Data Processing Agreement is in place and that transfer is optional for contact information." And here

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that applies to the Registrant and Tech information, so I think that's also clearly supported in the Board Resolution.

DENNIS CHANG: Go ahead, Amr.

AMR ELSADR: Thanks, Dennis. This is Amr. Yeah, I completely agree with what Marc just said, especially in his second comment. What this thing wishes, this here, the conditions that make this optional versus transfer are the ones that are in the Recommendation, in the Board Resolution. But also wanted to point out that the color-coding in this Recommendation is referring to different conditions than that were in other Recommendations. So here we're discussing transfer logic. The color-coding is not referring to what is optional to collect and optional to enable as in the other Recommendation. So, this Recommendation, the transition of data from a Registrar to a Registry is required only if these certain conditions are met and only applicable to the data elements where the color-coding indicates they are applicable to. That's my understanding of the Recommendation thank you.

DENNIS CHANG: Yes, that was ours. Theo go ahead.

THEO GEURTS: Yeah, thanks Dennis. And I agree with Marc. I mean, maybe I am going to specify it a little bit more. I mean, the collection doesn't actually

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warrant the transfer and without a legal basis, that is going to very difficult, especially when you look at Chapter 5 of the GPR and talking about cross data transfers among Borders, that is just very problematic. And we just cannot automatically assume that if it is collected it can be transferred. That rule is over. That used to be in the past and we need to think forward here. Thanks.

DENNIS CHANG:

Thank you. Any other comment? So, the way I have read this Recommendation and, of course, the Board Score Card is that, I think the intention was that if the Register already has the data and everything on here from here to... Oh, it's numbered, we have to renumber this, and we will. There are 17 data elements here, so to me it was clear that the intention of the policy was that if the Registrar have collected or generated, and then 'if' the optional particles to 'if' collected or 'if' generated, I think that's the word the optional part goes, you know, noted by yellow, but once you have it, I think the intention was that Registrar must transfer it and that was a clear requirement the way I saw it.

So, I'm sorry. I've lost track of the time. I'm very sorry. 11:32 already. This is going to be a lengthy discussion I can see because there's opposing views and we have to now get back to the real essence or the real intention of the Recommendation because this is a big deal on whether the requirement for the 17 data elements or is it 10 data elements and do, we strictly by the yellow color ones or do we have to do something else. So, I'm going to now suggest that we break from this

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unless Theo wants to speak. Okay let's go listen to Theo, Marc, and Sarah, since you guys have your hands up. Go ahead.

THEO GEURTS: No, I'm good for we can pick this up later. It's an interesting topic. Thanks.

DENNIS CHANG: Yeah, it's an interesting one. This is a substantive discussion. Okay, go ahead Marc.

MARC ANDERSON: I'll do the same. I'll drop my hand and we can continue this discussion later.

DENNIS CHANG: Thank you everyone. Yes, and there's some other ones that you may look through. I think some of them you probably would agree like I've agreed with some of this here like adding elements so if you can look through it and if you agree with some of those changes just note that on the document and that'll speed up the progress. With that, I will have to close this session and I thank you all and we're talking again in our next scheduled meeting.

ANDREA GLANDON: Thank you. That concludes today's conference. Please remember to disconnect all lines and have a wonderful rest of your day.



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**[END OF TRANSCRIPTION]**