DENNIS CHANG:    Hello everyone, this is Dennis Chang.  We are here for our gTLD Registration Data Policy Implementation IRT Meeting, this is Session #10 on the 2nd of October, 2019.  We will take attendance, I guess Isabelle, are you taking the attendance for us?  Is there anyone who is on the phone only?  Please identify yourself right now.  So no one is on the phone only, so we'll just take attendance using the Zoom participant list.  So, let's get started.

On the agenda today, we are going to do a quick IRT work assignment review and we're going to talk about Rec 28, Policy Effective Date, meaning the timeline.  And when we talk about that, we want to peek into Rec 27, because I think there was a comment that's related to the timeline and the effective dates, we want to catch all the comments.  And quickly review Rec 16 and 17, Rec 16 being Approach #3, and I think we can close those two items out, and from now, until the ICANN meeting in November, I'm going to try and close out as many recommendations analyses as possible, so we can get to the ICANN meeting in a wholesome way.

And then #6 I added, Marc gave us a document called the Publication document, and I will go ahead share that with you.  I turned it into a Google doc just a few minutes ago, so we can look at it together and comment on it, as well.  On the team list, we have Antonietta who has joined us on the RTT side and actually behind the scenes we have a lot of people joining because of Rec 27, where last count was 42 policies and procedures we have to review, and we will bring that to you, the

result of our initial review, and that is all spelled out in Rec 27. No changes to the IRT.

Here is as a reminder our wiki, you can find our information posted on the wiki. Andrea is out today, so she will post our session for today when she returns tomorrow. So, first let's look at our task list. We are going to review up to here, let's see, and you will see that I added a couple more assignments, 45 and 46, 45 I sent an email yesterday and I've already received quite a few feedback from that, thank you very much, so keep your comments coming in. And 46, that I have not issued an email but I intend to do so after our call, because I want to look at it together and get an introduction to the document from Marc, and maybe we can add to the document so that when the readers look at it later without benefit of Marc's comment, they may find it easier to read, so we'll go ahead and do that.

Let's get to our Rec 28. This is our Rec 28, and we have received quite a few comments and one thing that I notice is that we all seem to be in line, meaning that yes, the 29th of February we can't meet, there is no way we can see that will meet that date as a policy effective date, and we've been trying as you know, from the ICANN Org to put together a plan that meets that date, and we've been pushing to see if we can do that, but the way the time stacks up, it doesn't seem like it's doable. I'm now wondering if Reuben is here, our GNSO Council liaison.

Can anybody tell me if Reuben is online? I don't see him, unfortunately. Okay, Reuben asked the question, if the group feels we can already rule out the original deadline, I can relay that to the Council, just let me know. That's how Reuben posed the question to the IRT and we have

quite a few comments, we all say no, we can't meet that date and we should communicate to the Council, but at this time I want to open up the discussion so we can hear each other. Let me see if I can put Beth on the mic here. Can you talk, Beth? Because you are the first one to comment on this, and then you said you wanted to discuss, and also I saw your comment on Rec 27, as well, so I would like to hear from you if possible, Beth.

BETH BACON: Hi guys, I apologize, my voice is not great. So we all mostly agree, at this point we were saying it looks like it might shift a bit just because it's taking some time to get through this and there are other component parts of the recommendations that we need to do, such as we have the DPA and all that fun stuff to draft, as well. So, I think we were just curious as to what ICANN was thinking for walking us back and I think if we could just kind of rough out a timeline to see if it's going to make it or not make to February 29? Sarah is on the call this week, right? The 6 month buffer period was important and that's part if implementation, so I think that's what hers was. Is that what you were looking for, for me, Dennis? I apologize, I sound gross, I'm sorry.

DENNIS CHANG: Sorry that you don't feel well. I think I understand. So, you're in agreement with the rest of the IRT in saying that we really can't meet this date and we should let GSNO Council know that, that's a yes, right?

BETH BACON:
Yes, I think that's what we meant. I think yes, we should let the GNSO know but I don't think we should just plop it in there, we need to give them the timeline and work around things.

DENNIS CHANG:
Right, right, and the other comment was, there are two things, one, let them know that the 29th of February is not possible, and two, there is no new date that we're prepared to announce or communicate to the GNSO Council or anyone. Anybody else have a comment on this? Go ahead, Sarah.

SARAH WYLD:
Thank you, hello everyone. I'm also with a bad cold, so apologies if I'm not understandable. So I just want to second that no, we will not make it for February 29th, that's not going to happen, so we should be as transparent as possible to everybody involved in this process so that we are communicating about the new date.

In terms of how we could arrive at a goal for our new date, I do think it's not impossible to estimate something, so we should be able to apply our project management skills, figure out all the different pieces of work that still have to be done, estimate how long they will take, and then count that to how much time that it is, and then from there, add 6 months. So I do think we have a good sense of what work needs to be done, and we've already seen for Rec 27 that it's possible to evaluate when do we plan to schedule doing this kind of work. So I think we should be able to plan this, as well. Thank you.

DENNIS CHANG: Thank you Sarah. Any other comments? I see there's a lot of chat going on, let me see, Roger, go ahead Roger.

ROGER CARNEY: Thanks Dennis, this is Roger. I would just caution the fact that I think we could easily come up with some kind of scale or timeline for this, but I think until we actually get through all the recommendations and produce a draft of this, and actually honestly until we get comments back from the public on it, we won't know exactly what amount of work there will be.

As I mentioned in emails, I think we're fairly safe in saying it's definitely going to be at least six months, but I'm not sure that we can say it's going to be six months or 12 months, I think maybe somewhere in between there, but I don't think we can answer that right now, and I don't think we'll be able to honestly until we get to review all the comments back from the public on the draft. So, I think Sarah is right, I think we could easily come up with an estimate of best case scenario, but I think it has to have those caveats that obviously there's a possibility this could be longer. Thanks.

DENNIS CHANG: Okay, makes sense. Anybody else?

BETH BACON:    Dennis, this is Beth, I just had a question.  We're almost through all the recommendations of our first blast through them.  When do we think that we will combine all this into a draft?  I think that's a pretty big milestone and my only fear is that I don't want folks to think that we are not making progress, we absolutely are, I think that this group is doing a really good job.  Most of that is down to the fantastic organization of ICANN Staff that made this really easy for us, with all your hard work, so thank you for that.  And I don't want that to be lost.

I want to make sure that we are constructive as we say here are the reasons why we want to push this back about six months and mostly those reasons are because we want to make sure that we have plenty of time to publish a draft, we want to have plenty of time to review, and those are important things to a consensus policy, as Roger outlined.  But I just want to make sure that we've very clear about that, because this is a sensitive PDP and a sensitive IRT.  We don't want folks to lose their minds unnecessarily.  Thanks.

DENNIS CHANG:    Okay, anybody else?  Beth, I want to look at the Rec 27 comment that you made, and I responded to you here.  I want to make sure that we understood what you were looking for in terms of Rec 27 workplan.  Can you talk to this comment?

BETH BACON:    Of course, this one was from two days ago, so I remember this one.  No vacation fog or being sick fog in between.  So, this one, we just wanted to loop back, we know that you guys have comments, we just wanted to

highlight there, since you were also asking a question there, that we had made those comments, that we're going to need to edit this. So, we just wanted to tie it back and make sure that we were linking the things as appropriate. So, once we have a proposed date, then that date we fill. It wasn't anything exciting, just to make sure we linked all these things.

DENNIS CHANG: Yeah, okay, appreciate that, I understand. We have dates on here and this is the only document we place dates here. This is done largely because we thought that this the initial phase of wave one analysis targeted for the end of this month, for example, is all ITT work, it's all ICANN Org Staff work and we're furiously working at it right now, trying to get it to you just before our meeting at the ICANN66. So, we have the benefit of the in person sessions if you should have questions or wanting to discuss Rec 27. That's the reason. And after that, we were assuming the best case and pushing forward trying to get as much as we can do for the 24th of February of 2020.

Now, this is the clarity that we need to be sure, that when we put together our work proposal it was with the intention that we are going to triage the task involved in Rec 27 and clearly there are things that we must complete before the policy effective date and also clear will be that we cannot complete before the policy effective date and most of those are of course tied to policy revision where we have to defer to the GNSO Council and we know the policy development process or revision process, we all know, and we do not yet have, well we have an expedited ePDP but that's still a year.

So unless someone suggested that we may have yet a very fast track small change to policy process that we can create, until that, we feel that anything that is related to GNSO Council is going to take a long time and we are best in building a plan where we do not create dependencies external the ITT and IRT. So, this will all be more clear to you when we come back to you with your analysis of wave 1 and we'll have further discussions then. But in terms of timeline, what you're looking at as you saw is our attempt to get at it, and we're going to still try to push for that as much as we can on the ITT, but we understand that this will have to get reviewed and revised as we go. So, back to the timeline.

So, what we have, I'm trying to get an IRT agreement so that we can report back to Reuben so that he can take his action in informing the GNSO Council. One, we want to let him know that the IRT call for today, those of us in attendance agreed that we can't meet the 29th February 2020 date and we should inform the GNSO Council.

And as for the new date, we can't really have a new date, and yes, we will estimate it, but we can't estimate it until we finish our review and analysis and that may happen, I think maybe when we have the whole thing together, that's the question, when do we think we can have the whole policy together, and I said that I would like to see it happen before we get to Montreal. So in Montreal we can look at the whole thing together, so that's still my goal, I want to see if we can do that. There are undoubtedly items that IRT have not yet agreed upon and are still under discussion. We just have to know that and factor that in to our estimate when we get there.

Now this is the one question, do we try to estimate after the public comment or do we have to go to public comment with an estimated date? I think that's a good topic for discussion for the public to comment, I think it's fair for us to let them know that we're envisioning 3 months to implementation time, 6 months implementation time, or 12 months implementation time, whatever we decide, I think that should be part of the offering to receive comments back. I want to hear from you about that. Roger, you have your hand up?

ROGER CARNEY: Thanks, Dennis, this is Roger. I think that's realistic and I think as a team we should be able to come up with that date with the only real caveat is depending on what goes through the review, what comments come back, if it changes anything dramatically, we want to be able to adjust that date for those kind of changes. But I think when we produce our initial draft that can go out, I think we can put in a rough date as what we see as the probability. Thanks.

DENNIS CHANG: Yeah, I agree, because that's the benefit of public comment. So those of a small number gathered here, we've been looking at this for so long, we may be overlooking something else. So we should I think benefit from the public comment. Of course the reason we are doing the public comment is because we want to use those comments to revise and improve our plan. Okay, sorry, what, third parties aren't involved in the implementation from the -- is there a different conversation going on in the chat that I should be aware of? Let me give the floor to Marc.

MARC ANDERSON:     Thanks Dennis, it's Marc.  Essentially I agree with what Roger said.  I think by the time we have a draft that's ready to go to public comment, we should be able to reasonably estimate the implementation timeline.  And so we should be able to put that into the public comment draft, and I think it's also reasonable that during public comments people should be able to provide input on the implementation timeline, as well.  And I think that's consistent with how other IRTs have handled implementation timelines.  So essentially just a +1 with what Roger said.

DENNIS CHANG:     Yeah, it is Marc, I can tell you that every time I did a public comment I'm actually planning writing a public comment for our Red Cross reserve names, and with that public comment announcement I will let the public know what we're envisioning as a policy effective date and expect to hear whether that is a reasonable date or not.  So, I also agree.  Beth, you have your hand up.

BETH BACON:     Thank you.  I just wanted to clarify when you say we're going to put this out, and I agree with what Roger and Marc said, but when we put this out there will be an implementation timeline and the public comment, they can comment on whatever they like, whatever aspect, it doesn't mean that we'll take every word, but there are good comments that have come in.  Having another set of eyes is never bad.  I think the concern of some folks, we'll use a comment on the implementation timeline, there's no way that we will ever take a public comment that

says we should make an implementation that is shorter than what is contractually required. So I think a contractual minimum will obviously be there. [Inaudible]

DENNIS CHANG: Yeah, it's really hard to hear you. I think you said that when we get the public comment on the timeline, if it's shorter, we really shouldn't take that, or something like that, but yes, every public comment we receive will come back to IRT and we'll discuss it to see if we should accommodate it, or not. But yeah, rest assured that we will not shorten the timeline when those of you who have been working this policy implementation for such a long time and considered experts are advising it the other way. Other comments on this?

Let's see, what I got is as for the new date, we shouldn't try to estimate until we're done with a review, but I think when we have the whole draft we can estimate and with that estimate date should be part of the public comment. I think those are what we agreed to. I know Reuben wanted a new date so he can report back, but I think we shouldn't be trying to do that right now. So, I'm typing this sort of like a note for the IRT so Reuben can see this and formulate his reporting to the GNSO Council. So the reason for not meeting the recommended date is the large scope of work and unresolved IRT discussions on several recommendations. We have outstanding interpretation recommendation that we have to continue to discuss and until we do that, of course, we can't do that. Anything else?

So far, let's see, point out the amount of work accomplished. I think Reuben knows already, but we'll try to make sure that he's aware that we have gone through the recommendation review and we have gone through a lot of the analysis and we will try to get through the whole thing by the ICANN meeting, but that in itself is an ambitious goal from where I stand, I don't know who you feel, there's a lot that we have to do between now and then.

So the timeline discussion can't be had without us looking at our rainbow chart, and if you recall this is the chart that we started with. I just remind everybody that we are exactly doing what we said we would do, and we are here in the implementation planning stage, beginning blue, headed toward the public comment. So this again is Stage 1, Stage 0, Stage 1, Stage 2, that terminology will be used at the ICANN meeting too, and may be communicating with the GNSO Council too, and it is spelled out in our interim policy that is published.

So, one thing that I wanted to make sure that we are using the common language, is that we have a registration data policy in an interim form that is Stage 1 that is already published. So we have a registration data policy, yes we do, and that was published on 20 May, of course that policy says continue to do, implement the same requirement as temp spec, so that's the policy.

Now, what we're working on Stage 2 policy where when we have it announced and until the final effective date, during the policy implementation period of Stage 2, we have a case of rainbow where contracted parties can transition in element forms into the new policy and after Stage 2 is over, and when February 22 is the recommended

date now, and whatever the new date is, and what we might do is maybe on this chart we will change this box here on the right and remove the 29 February and replace it with TBD or something like that, to make sure that we are communicating clearly to everyone who is looking at this rainbow chart.

Okay, anymore discussion to be had on the timeline? This is important because I want all of us in the implementation team, I'm including myself and the ITT and ICANN Org, we want to make sure that we report out to our channels, because we're ICANN Org and we were directed by the Board and the CEO to implement and we'll have to go back and report back in a consistent manner. So it's very important that we are all on the same page here and there is no objection. So, one last time, for those of you, let me know if you have any other objections. If not, thank you for that discussion. We'll call that a wrap. I'll be sure to communicate with Reuben after our call that we have an IRT agreement that he can move forward on.

Next I want to bring up the IRT Recommendation #16 and #17. So, #16 is at approach #3, #17 is at approach #2, and I want to thank Sarah for the suggestion, and Roger for +1, and Marc agreed, Jodi +1, it looks like we have a good string of agree, agree, Reuben I see added gTLD to the paragraph which is fine. So what I'm wanting to do it this, and I'm going to use the word 'close' for the first time here in association with our analysis.

I want to close the analysis for Recommendation 16 and 17. We have the statement on 17 that we wanted to add to the Scope section, which everybody agreed to, and then later on when we were looking at 16

again, we realized it's in the same situation and therefore we should go ahead and use the same approach. So far I've only received consensus or agreement and have not seen any objections or different opinion on 16 and 17, and therefore I would like to go ahead and close these two items, 16 and 17. Let me give the floor to the IRT and hear comments on 16 or 17. Anyone?

I was thinking about how to do this easily so we can keep track of it, and we're working on kind of a status chart, one page form, but until then, let me do this. I'm going to mark these things green here, 16 and 17, okay? So, for now, just between us, those green marks are good things, that means IRT has done its job and IRT's job is done, basically. So, no more discussion, we all agree, and we're moving forward and we don't have to worry about those two bad boys anymore. So, that was my intention and what we want to do, of course, is to turn this whole column green as quickly as we can, and when we do that, we'll have a whole policy in place that we can start estimating our timeline on.

And you know that I'm looking at our workbook, this is a task list and this is our analysis list, where you can find the recommendation and the action listed here, and the requirement in short form as we have stated. So, that's good, we have closed two items, and I'm not going to do it now, but I'm going to send you emails after our meeting so that you can come back to me and say you agree or no objection, and I'll start turning those into green and we'll keep going that way.

Okay, moving right along, we have a proposal from Mr. Anderson. This is the attachment, is everybody on board now? This is the attachment that Marc gave which I turned into a Google doc here, and you can find

it in the IRT drive and you can also find the link in the task list, #46, that you can get on with me, if you like.  So, I took the document and I read it quickly, I didn't have much time, Marc, but I could see it's just an amazing amount of work that went to in creating this, and I really appreciate this.

But I do want to give it good attention, so together, because it is from the IRT, I have no more insight than you do as I'm reading it here.  The only thing I did was I added a couple lines in highlight, so when you open this document you know what you're looking at, and I'm going to call this an Anderson Proposal with affection from now on, so we all know what I'm talking about when I say Anderson Proposal.  So at this time I'd like to see if Marc can come on and tell us about this.  It is an interesting concept and I think maybe looking at it from a different perspective can give it more clarity.  Marc, are you there?

MARC ANDERSON:          Yes, Dennis, this is Marc.  Thanks for giving me the floor here.  This came up on our call, not the last call but the previous call, we were talking about Recommendations 10, 11, 12, 13, and 6, which cover most of the recommendations related to display of RDS data.  There were a couple of points that came out of that conversation, one was that the language in that document so far, or as it had been drafted to that point was fairly WHOIS-centric.  It was sort of based on a WHOIS world and since now registries and registrars are required to implement RDAP, we should at least take that into account, but also more to the point, we should try to be technology agnostic.

And the other thing that came out of that conversation was that these recommendations related to display of RDS data are recommendations to the registry and registrar, I guess the policy requirements to the registries and the registrars will have to implement them. So the policy requirements need to be clear to the registries and registrars and to that point they had gotten rather confusing. So I agreed to take a look at this and try and draft some recommendations to make it technology agnostic and easier to understand from the implementers point of view. So that was sort of the genesis of this document.

And so I tried to do that, I tried to focus entirely on all the ePDP Phase 1 recommendations related to publication. So I tried to make this publication specific and I tried to make it a standalone document specific to publication and not covering any of the other aspects of the ePDP Phase 1 report. And then also, as stated, I tried to make this as technology agnostic as possible. And so to help, I started off by listing my sources here, and this was a little bit just to aid my work, put in some handy links, but you'll see, obviously I looked at the Phase 1 recommendations, the workbooks, the elements matrix, the consistent labeling display policy is really in a lot of ways the baseline for our currently display requirement, and then I also took a hard look at the current RDAP requirements.

To be honest, there's not a whole lot useful in the technical implementation guide, but the response profile was one I looked at a lot, because the current response profile is based on the temporary specification and specifically provides instructions for how to implement the temporary specification in RDAP, and it would be the response profile that would need to be updated as a result of these policy

recommendations. I also referenced the IRT data elements matrix and the IRT analysis review document that we are currently talking about.

And so in order to pull all this together, I started with a list of all the fields that are applicable and I had a little bit of a shorthand initially where I just made notes to myself as to what are the policy rules, and here if at any time I was critical of how confusing it is to read the current IRT analysis review, I want to just say it's confusing because the policy recommendations are confusing.

Look at the registrant fields, for example, the number of rules that you have to take into account is a little bit surprising. There are redaction rules that must be applied, there are redaction rules that may be applied, however, none of those rules are applied if privacy proxy exists or if it's affiliated privacy proxy registration. And then if redaction is applied, then there has to be a mechanism to allow consent to publish the data.

So there are just a number of rules that just sort of build on each other for each of these data elements and so there's a lot that goes into this, so basically what I was trying to do is list out all the fields apply and what are the policy recommendations that are applicable for each of those fields. And you'll note, I didn't list every field. For example, the admin fields which previously existed but are no longer part of the policy, I didn't speak to them at all. So I only included the fields where we have policy that tells us what to do with those fields. So you'll note that specifically about what's in those fields. And with that background, if you'll scroll a little bit to where the actual proposal starts with the requirements for the registries and registrars.

DENNIS CHANG:             Do you want me to scroll down?

MARC ANDERSON:            Yes.  So, starting here, so the rest is just background, starting here with registries and registrars, I listed out all the fields that make up the minimum public data set.  So these are the fields that must be returned by registries and registrars to an RDS domain request.  On the expiration date there's a couple of different ways I could have approached this one, but I felt like the expiration date was meant to be part of the minimum public data set, it's just for registries it would be the registry expiry date and for registrars it would be the registrar registration expiry date.

So that's why I represented it the way I did.  And so, scroll down a little bit, there's name servers and DNSSEC, I put an asterisk on those because even though these are part of the minimum public data set, that data might not be there.  For example, if you've registered a domain name but haven't yet allocated it in the DNS, then there wouldn't necessarily be data for these fields, but for all the other fields, those are required for the activation, or at the very least, the allocation of a domain name.  So this makes up the minimum public data set for RDS queries.  If you could scroll down a little bit.

DENNIS CHANG:             I have a question, Marc.  Was the minimum public data set, is that a defined term, or are you proposing that we define it in the policy?

MARC ANDERSON: That was defined in the ePDP Phase 1 recommendations, so I stole it from there.

DENNIS CHANG: Okay, thank you.

MARC ANDERSON: Okay, so those are required for everybody with the exception of the expiration date, which is registry and registrar specific. On the registrar output they have two additional fields that are required, the registrant state or province and the registrant country, those are both required for registrars and then for registrars there are three purely optional fields, reseller registry expiry date and name server IP address. After that, we get into what I call the special publication logic. And that's sort of what I was alluding to earlier where if per Recommendation 14, if the registration is associated with an affiliated privacy or proxy provider, and basically all the fields in this, all the special publication logic fields must be in the RDS output.

However, if they're not associated with an affiliated privacy or proxy provider, then there is redaction logic that must be applied or redaction logic that may be applied, and so I put two different options on there. Option 1 is more or less in line with the language that was in the IRT analysis review document. So I basically used that as a starting point and used that language. The Option 2 language is a little bit simpler and that I took from the language that was in Recommendation 10, I think

that's essentially the same thing, but it's a little simpler, although I also noted that people had commented that is shouldn't be GDPR specific, and so I just made of that, that it's probably better to say processing is subject to GDPR or similar data protection legislation, or something along those lines. But I just left that in as a comment for people's consideration.

So, two different options there on scenarios where redaction must be applied, assuming privacy proxy is not in there. And then I had the language in there next about where reaction may be applied, again assuming privacy and proxy doesn't apply. And then finally I have a section there about how if redaction applies, the registrar must provide a mechanism to consent to publish that information and that's taken straight from Recommendation 6. So, that covers all the fields for registrars with this special publication logic, that's my term that I made up.

And a couple of notes on there, the tech fields are optional, to be supported by the registrar, and if they're supported by the registrar, they are optional for the registrant to provide, and there is some additional policy language around that, but I think that's probably outside of the scope of a document focused on publication. And so when we get to the requirement around collection of data, I think that's the right place to mention that.

There is also additional policy requirements that apply to the organization field, Recommendation 12, and again I think that is better handled in a different section. I think it's sufficient to cover it here in this manner. It's also a field that's optional for the registrant to provide,

but there is additional policy requirements that apply to that.  I did note that not everybody has a postal code, so a postal code is not required for countries that don't use postal codes.

And then I didn't get into this one at all in the document, but there is special logic for the registrant email and tech email fields, that's from Recommendation 13, basically where those fields are redacted there is a requirement for the registrar to display anonymous email or web form to enable contact.  So those fields are not pure redaction fields.  If they are redacted, there has to be an anonymous email address or web form contact mechanism in place.  I did put a place holder in there, registrar are required to have logs for use of the email for an anonymized email, I put it there just to make sure it didn't get lost, but I think that's probably a requirement for a different place, it's not really specific to display requirements.  If you can keep scrolling, Dennis?

That gets us to the registry fields, and there are two fields that are optional for registries, the reseller and the registrar registration expiration date.  We have a conversation previously about the name server IP addresses.  Essentially on domain look ups it's optional to have the name server IP addresses.  I know some registries provide that information, some don't.  On name server lookups essentially it's required that the IP addresses be there for in-zone hosts, but for out of zone hosts, the registry wouldn't know the IP addresses, so it would be able to provide that information.  So, I just captured that by saying optional for domain queries, required for name server lookups for in zone hosts, that's essentially the logic that would apply for name server IP addresses.

And then the remaining fields are optional for registries, but I just noted from the policy recommendations, it's optional but if the registries are including them, they are required to establish a legal basis and have appropriate data processing agreements in place. They don't say it but the data processing agreements must in place with the registrar including the legal basis in order to facilitate that publication. So, it's optional, but with the caveat that if the registry does choose to publish that data, they have to have data processing agreements and establish legal basis to do so.

A couple other things I wanted to note here, Purpose 7 in the Phase 1 recommendations talks about where additional data may be required, if you have additional eligibility requirements or additional data that your registry requires for some reason, it's accounted for under Purpose 7, and I put that in as a place holder, but I think it's probably appropriate that there is some kind of language in the policy to account for where additional data elements are required, but I didn't really want to spend a whole lot of time on that.

And then some reminders to myself and anybody reading this, make sure it's technology agnostic, I wanted to make sure I avoided any mention of key value pair terminology, which is a WHOIS-centric concept, making sure that order doesn't matter, and no mention of having empty field in there, those are all very WHOIS-centric concepts, and especially in an RDAP world, don't really apply. I wanted to hopefully produce something that is understandable to implement. Those of you on the call who will have to take this document and implement a new RDAP or update your RDAP implementations, please take a look at this and left me know if this is something you can turn

over to your engineers and say implement. I'm definitely interested in your feedback on that.

I had a question, I wasn't really sure how to deal with this. The temporary specification had a concept of where fields were redacted, they replaced the output with the language I think is similar to redacted for privacy. And I checked the RDAP profile also includes that, so the RDAP profile includes instructions that where fields are redacted, they're redacted for privacy in its place, and that was a temporary specification concept that didn't really carry over into the ePDP Phase I recommendations. So, I just left that in there as a question, I wasn't sure really however to deal with that.

On DNSSEC we had some discussions about listing all of the DNSSEC elements, there are four different DNSSEC elements, versus just returning a response that says signed delegation or unsigned. If you look at the current RDAP response profile, when there is a signed delegation, the response includes all four DNSSEC elements, and I think that's a desired output, but it's not really talked to in the policy at all, so I just left that as a question.

And then one last one here. There are other required output elements, for example there is a requirement to include domain status links and a URL WHOIS inaccuracy complaint form. Those are aspects of other policies that will continue to be in effect and so don't need and probably aren't appropriate to be included in this policy. But I just kind of mention them here so that when we review them, we have that in the back of our heads, that there are other fields that are required to be included in the output, such as domain status links and the URL for the

WHOIS inaccuracy complaint form. I think that's the end of the document.

DENNIS CHANG:    It is, Marc. We're out of time. I'm happy to allow continue longer, if somebody has immediate questions for Marc. Otherwise, we'll continue our dialogue online. Any final questions for Marc while we have him here? Marc, you did a good job explaining, apparently. We'll continue. I do have to look at it carefully, there is a lot here, and it seems to make sense, but we'll have to study it and comment on it. I already see comments from Jodi here, and thank you for that Jodi. So, we'll say goodbye for now and then we'll continue our conversation online. So, I'm going to stop the recording. Thank you everyone for joining today, bye, now.

**[END OF TRANSCRIPTION]**