ANDREA GLANDON: Good morning, good afternoon and good evening. Welcome to the Registration Data Policy IRT Meeting, being held on Wednesday, the 15th of January, 2020 at 1700 UTC. In the interest of time, there will be no rollcall but attendance will be taken by the Zoom room. If you are only on the audio bridge, could you please let yourselves be known now?

Thank you, hearing no names, I will like to remind all participants to please state your name before speaking for transcription purposes and to please 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: Thank you, Andrea. This is Dennis Chang, the Implementation Project Director for our Registration Data Policy. This is our meeting number 17 and let's get started. From the agenda today, we have a couple of new IRT members and if they've joined, I would like them to introduce themselves. I want to do a quick look ahead first and talk about the IRT sessions at ICANN67 webinar that's coming up. A IRT meeting that we may have a conflict with the PDP, we need the issue resolved.

Then, proceed to talk about the [inaudible] map, Implementation Methods, Comment Guide Timeline, including the Goran letter to GAC. Then we'll get into our [inaudible] and talk about Roger suggested the policy language for [inaudible] versus examples, what they all mean and where they should be. We have a few comments that we can just

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resolve. Then we'll get into substantive discussions that we have had for discussion.

Let's get started. This is our ITT IRT list and on the IRT we have two new members and I would like to have them introduce themselves, is Carmen here? Please state your name, your affiliation and say hello if you are here? How about Chris?

CHRIS LEWIS-EVANS: Chris Lewis-Evans for those who don't know me, which I don't think there's very many. I was on the Phase 1 EPDP and on the Phase 2 EPDP. I just joined this to help out with some resourcing issues and obviously there's some things of particular interest to my background which is from a law enforcement angle. Thank you very much.

DENNIS CHANG: Thank you, Chris. You're very welcome. Carmen's not here now. How about Matthias? Is Matthias here? No? Okay. Let's get started. If you're not speaking, if you could put yourself on mute it would be good. I'm hearing a lot of background noises.

Let's go to our next step, looking ahead. 29th of January 2020, we've learned and those of you who are on the EPDP Team knows that there is going to be a face to face meeting in Las Angles on the 29th of January 2020.

Now, this face to face meeting is a big important investment for ICANN and we actually absolutely want to maximize the value of using face to face. I would like to try and avoid this conflict where we miss key

members of the IRT to the EPDP meeting. I have a proposal or let me hear from the IRT first, if they have a proposal of what they would like to. Have you thought about this, those of you who are on the EPDP Team?

ANDREA GLANDON: Dennis, I think it makes sense to not conflict with the EPDP Team meetings but I do have a question. I see that we have the 24th as a webinar and then we have ICANN67 on there but I don't see that pesky open public comment on there? I think that if we think about skipping or at least moving that meeting so that we don't conflict, if the goal is still to have the consensus policy out for public comment beginning of March, then we should move it and not cancel it.

DENNIS CHANG: I agree with you. I don't want to cancel the meeting. I think it's important that we have a meeting. To move it, what I found best is, use always the same time slots of the week. So, we can move it one week ahead or one week behind, meaning that -- what's the calendar date for one week after, that Wednesday?

ANDREA GLANDON: February 5th, Dennis.

DENNIS CHANGE: February 5th, thank you, Andrea. That would be my proposal but I don't know, what do you think? Do you want to try to get a meeting next

week, Wednesday? Would that work better for you? Let's decide right now. Sarah likes February 5th. Okay, that's enough. February 5th it is, let's go with it. We're done with that conversation. Andrea, please make the reflective change in your calendar and then send out the meeting notice as the 5th.

Next is what we call an ICANN67 Trip Prep Week Webinar. You've all seen these webinars being done prior to the ICANN meetings on topics that are of high interest and we're learning, of course I think you all know that this Data Policy Implementation is of high interest and many are wanting to find out more about it.

We do have IRT meetings scheduled at the ICANN session. The 7th of March and 12th of March is the tentative dates and they're both in the morning, 10:30 to 12:00, those are two prime times, so we're very fortunate to have those times. What we were thinking of doing is, at least one of those IRT sessions, we're going to have a brief presentation with the public in mind and talk about the status, maybe some background and particularly REC 27 is an important topic, we want to do that.

But before then, to minimize the general public and information, we thought we would use this webinar as a vehicle to communicate with public. Now, what I'm calling for is a couple, two or three, IRT members to join us, us meaning staff here, me and likely Karen, to be co-hosts. When we present and do Q and A, we are more prepared as one Implementation Team. You don't have to answer now but please think about this and let us know as quickly as possible.

If I don't get any volunteers I'm going to have to come after two of you, don't make me do that. It is very important that we work together as a team, IRT is an interracial part of the Implementation of course. Any questions on this? If not, let's continue.

The [inaudible] map, let's start here. This is what I call our [inaudible] and use this to communicate with you. A little more tangible. Public comment, we obviously need to fill out a form and that's what's published and we are going to need our [inaudible] policy language, which is basically our One Doc working on. We have two other things; we have a data elements matrix here and you've all seen this. This is our extensive detailed mapping of every data element and the transactions.

Then we have data protection of DPA, with the contacted party we need first to go to public comment. Here so far are the comments that I've gotten, here is from Sarah, that she does not think that data elements matrix is appropriate for public comment and Roger says the same thing and I kind of agree with that.

My proposal right now, as we are planning, is to move maybe to the IRT wiki, so we can all have access to it and even the public has access to it but we do not reference directly from the public comment form or the policy. What are your thoughts? Sarah likes it. I'm sure you like it. I was wanting to hear from someone else other than Sarah or Roger. Sarah and Roger, we've already heard from. Beth.

BETH BACON: I think there's five agrees in the chat, myself, Jody, Mark, Marc, Ann.

DENNIS CHANG: Okay, never mind. Anybody object to this? Marc Anderson wants to speak, go head Marc.

MARC ANDERSON: No, I was just going to point put the same thing Beth said. I think you have agreement there Dennis.

DENNIS CHANG: Okay, no objections, I'm going to go ahead and move it. The decision make, the data elements matrix is no longer going to part of the public comment, may I resolve this? Our resolver, designated resolver Isabelle is going to resolve this comment. We're set to go there.

                     Next item was the implementation method. This was a -- I'm sorry. You had comments Beth, go ahead.

BETH BACON: I have a question; can you go back? So, where it says, 'data protection agreements third party REC 26' that's not the data protection agreements between ICANN and contracted parties, that's the REC 26 ones, right? Okay, I just want to make sure because I saw it in two places, that one was 26 and one was the 28 or 29.

DENNIS CHANG: Which one was the DPA with CTP, is that 19?

BETH BACON: Yeah. Okay. Cool. I just wanted to make sure they were different. Thank you. Ignore me. I'm done.

DENNIS CHANG: I'm going to ask you about DPA later on, so be prepared.

BETH BACON: I think my connection is a little spotty, I might not be here.

DENNIS CHANG: I'm going to put your name all over this spot here. Marc Anderson, go ahead Marc.

MARC ANDERSON: Thanks Dennis. Quick clarification. The Date Elements Matrix that is now not going out for public comment, does that mean it's also not going to be included in policy recommendations? I think right now it's linked to in the policy recommendations.

DENNIS CHANG: Perfect question, yes.

MARC ANDERSON: Sorry, that's yes it will not be included.

DENNIS CHANG: Sorry, no it will not be included. I'm sorry that yes and no will confuse me in English because in Korean, yes and no is directly related to how the question was asked. No, since we're not going to go for public comment, I don't think it would be fair to include it as part of the policy, that wouldn't be right.

MARC ANDERSON: Okay, cool. Just double checking. I agree with that. Thanks for confirming.

DENNIS CHANG: That's done. Let's talk about the Implementation Method. Method 1 and Method 2. I've been trying to communicate the approach of how we do our Policy Implementation and there's many ways but primarily it comes down to two things. One is, we write the policy language which is Method 1, policy language written, there's no question about it. The other way is that we don't write policy language and then we do updates elsewhere. This is primarily two different ways we do it.

Of course, the policy language, when we say that, we have a One Doc and you're going to look for it here. We say we have a policy language; it will be in the One Doc. If you're looking for policy language when we're using Method 2, you will not find it. However, this is a suggestion I think Sarah made, that at least let's have a list of those things that does not have policy language in One Doc so we don't forget them.

So, we have listed here REC 23 and REC 24 and I will come back to this because we are making a change on our approach, going from one method to another method. Let's talk about Method 1. As you saw, you have the necessary language in the One Doc and a good example is how we did the One Doc everybody knows how we did the One Doc, what we did was we did all the policy language and whenever there was things like an impact to a different policy, like Appendix C.

What we did in One Doc is that we did not go and change the URS but what we did is we wrote the impact to the URS within the policy here. We did the same thing for UDRP. We did the same thing for other things and the one that I want to point out is, we did the same thing for transfer policy.

These are important because REC 23 is URS UDRP and REC 24 is transfer policy. What we do is, when we do a policy language we write the language and then we write a note on the top of the impacted language, sometimes like this, 'the content of this page has been superseded in whole or part by the direct data policy, see the policy' that's how we do it.

On Method 2 it's different. What we do is, we actually go and change the document that is impacted, that we have shared with you as an example, a red line document. Here is a URS and all these I'm pulling is on the IRT drive so you all have access to this. Here is the red line document for the URS. We actually go and change the document, that's Method 2. What I had originally proposed was Method 2 for URS and UDRP for REC 23.

But now, what I'm proposing is Method 1 for URS and UDRP. That was the assignment that I gave as task number 81. I assigned this task to the IRT and have received no comments and usually that means you're okay with it. I want to make sure that IRT is in agreement with this new method and then we can continue. Let me here from that.

BETH BACON: Thanks, Dennis. So, I did send an email on this because I was looking for some clarification because I was a little confused and I appreciate your explanation because that has helped. I just wanted to note -- I want to ask a question of the group, is it confusing if we use Method 1 for one recommendation and Method 2 for another? Maybe it's appropriate, maybe we should be consistent?

And that's just a question to the group. I also want to note, the GNSO is considering the questions that we sent and part of that is, how do we deal with things [inaudible] policies that are impacted by this language. I just wanted to note that those two factors need to be -- well, one is a question and then that GNSO factor needs to be considered in how we chose this. That was just my comment. Thank you.

DENNIS CHANG: Thank you, Beth. Marc Anderson.

MARC ANDERSON: Thanks, Dennis. Similar feedback to Beth. I wasn't really clear on what you were asking us for, which is why I hadn't provided any feedback so for. I have similar points about them I'm not sure -- I guess it's just on a

sort of procedural stand point, I'm just not really clear that this is the right procedure for updating, for when one subsequent policy recommendation impacts a previous policy recommendation. I realize this is kind of uncharted territory.

Dennis, you pointed out how the temporary specification modified existing policy recommendations and that Staff made updates to those policy recommendations based on the temporary specification and I wanted to point out, I was actually completely unaware that this had been done until it came up in the course of the IRT discussions. I think that highlights the procedural problem, that existing policy recommendations were updated. I'm not saying I'm all knowing or anything like that but I at least had no idea that that was done.

DENNIS CHANG: Okay Marc, maybe I did not state it clearly. I didn't say that they were done. I said that there is a method where we could do it and those red lines as an example of how we could do it but they have not been done. This is the point of decision where we're asking IRT, should we go ahead and do it or should we not go ahead and do it. What we've gotten as input was two different opinions. Some say, "Yeah, we should go ahead and modify the URS rules based on this policy."

Others have said, "No, we should not touch the URS rules, I know it's no longer correct and there's flaws in it but we should not update that and the time to update that is probably when the RTM PDP working group is done and the whole policy is revamped, that's what we should wait for." Those were the two decision points. That's what we're talking

about.   If you thought that we had already done it, I'm sorry I miscommunicated.

MARC ANDERSON: Dennis, I was saying it was done for the temporary specification, not for the Phase 1.   I was referring to the changes that were made to the existing policy, such as transfer due to the temporary specification.

DENNIS CHANG: There was no direct changes when they did a temporary spec.

MARC ANDERSON: Regardless then, my point is that I want to make sure that the process that is followed is clear to the community and that there's GNSO Council involved in that and that the community has a chance to see the changes to existing policies and comment on them before they go into effect.   Apologies if my point, if I took a roundabout way to get to my point.

The point I was trying to make is, whatever method we take for modifying existing policies, it should be clear and transparent to the community, especially those community members that are impacted by those policies and that the GNSO council is involved in making sure that those changes are in line with expectations.

DENNIS CHANG: Absolutely agree and that's what we're talking about now. Method 1 ensures that nothing gets updated, the thing that is updated is this policy, data policy. Method 2, if we chose to implement it, we will be presenting those updates to those policy using the public comment. Yes, we have a way of doing way but is it a good way? This is what we're talking about. Next is Alex.

ALEX DEACON: Thanks, Dennis. I don't have a strong opinion on this and I think like many, I'm still kind of understanding this. Just thinking about personally if I were in charge of implementing these obligations, it seems to be it would be easier, Method 2 would be easier and safer as it's basically a single document, let's error prone and the whole policy would be written and available in one place.

But having said that, with the understanding that the RPN working group is hard at work making changes and updates to URS and UDRP, the best solution would be to let them take care of any changes that maybe necessarily or that we call out in this policy. Those are my thoughts. Thanks.

DENNIS CHANGE: Thank you, Alex. That's the primary reason for doing Method 2, is to make it easier for the implement. For example, if you are an URS service provider, you have one document that is up to date, you always use it. Otherwise, you'll have to look at your document, know that there's other documents these rules impact and you have to go

understand the whole policy, the new policy and then decide for yourself what must change. That is harder for the implementer.

To tell you the truth, Method 1 is easier for our implementation team for IPT and IRS, this is much easier but do we do the work now or do we leave it for later and which is the right way to do it? There is two ways it can be done is what I'm pointing out and we are getting differences in IRT opinions on this. I want to make a decision today if possible, at least on the REC 23. REC 23 URS and UDRP, this is still in debate withing the IRT about the approach. I want to turn this thing to green if we have an agreement, so that's what I'm trying to do. Next is Sarah.

SARAH WYLD:

I was originally thinking that we would need to use both methods, depending on which thing we're working. Some get Method 1, some get Method 2. At this point I do think my view has changed on this, so apologies for any confusion or unhelpfulness I might be spreading. Method 2, I don't think I like, I don't believe we should red line other policy like URS or transfer policy. Either it's updated with the One Doc or it's not updated and it's referred to the GNSO to figure out what to do with it.

I think it would be -- yeah, Method 1 is better and if the other ones need updates it would have to go to their own PDP's but hopefully that method and timing tracker that the CPH team offers would be helpful to keep score of which recommendations get which type of method and I do think they would all end up with Method 1. Regarding the URS review action item that you just mentioned, I was holding off because I

was waiting for having this conversation. I can take a look at that after this meeting.

One other thing I just want to point out, if you could please go back to the method tracker chart? The bottom right box, where it says -- so in Method 2, the One Doc does not provide updates for this policy right, no policy language. Where is says, 'notes are added to impacted documents, the content on this page has updated' that doesn't seem correct. I think that that's wrong, maybe someone copied and pasted from a different box?

DENNIS CHANG: No, I wrote this and what I meant was, let's say I changed URS rules right, and yes, updated version can be just published, replacing the old one but what I do is on top of the box I put a notice that it has been updated on this page.

SARAH WYLD: I notice it says it has been updated makes sense, but the text in white, 'the content on this page has updated by the red data policy' I thought Method 2, it says no policy language.

DENNIS CHANG: This language is on the URS doc. Did I make an example of this? Let's look at URS doc as an example. This right here, on top, top box, do you see what I'm pointing too?

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SARAH WYLD: Yes, I do.

DENNIS CHANG: That's the kind of thing that I do, so when the URS provides service provider comes in and they see basically a notice that there has been something done, that's what I meant.

SARAH WYLD: Okay, so that notice makes sense. My point is just that I don't think the text in the implementation method box is correct but I understand what you're doing. Thank you, I'm back to preferring Method 1. Thank you.

DENNIS CHANG: Method 1, thank you. Just so that you know, Sarah just mentioned something about the tracker, this is what she means. This is an email that just came out a couple of days ago. CPH team has designed this page and, in the page, wanting to do some tracking of the recommendations, it's well organized, 1 through 29. For example, this is the column where the team has plugged in, where it says we have recommendation language yes or no.

Let's go to the 23 right now. Right now, there's not recommendation language, that's the current status. What we're proposing is now we add appendix for URS and UDRP. We are proposing that we add the recommendations, so we are actually proposing that we had originally proposed method last year, we had proposed Method 2 but we are no changing that to Method 1 and I'm try to get that clarity with the IRT and hoping that we can finally conclude this and turn this into green so

ROGER CARNEY: Thanks, Dennis. I think I'm going to agree with almost everybody on parts of this, I'll start with Alex. I think Alex is right, Method 2 probably is the easiest use method, if you're trying to implement say the transfer policy, the langue would be great in the transfer policy. But that being said, I think that's problematic in that I'm not sure that we should be doing that to Marc's point, should we be actually updating other policies?

I think that that's probably a problematic thing for the most part and I think it's more simple if we stick with Method 1. Again, from a use problem, yes, I think it's going to be harder to use but if we can provide the news box like you're mentioning here, I think at least that provides a tie back.

With the Process 1, as time goes along and let's say, as you're suggesting Dennis, using this for Method 1 as for the URS and we put in Appendix in the red data policy, when the RPM group comes up and updates the URS, how do they then account for this information or this language that's in this policy that they're no overriding? Something to think about.

Again, I don't know that we need to solve it today but just something to think about. When we're putting appendices in the red data policy to account for things we're not really changing or updating, they're going

to get updated later so we have to think about how that's going to happen.

I think that overall it should be consistent, we should pick on of the methods and stay with one of the methods, we shouldn't bounce back and forth, I think that's just going to be more confusing from a use standpoint and I think as Sarah mentioned, I think Method 1 is the best option to use. That's my input. Thanks, Dennis.

DENNIS CHANG: Thank you, Roger. Before we proceed forward, this is the EPDP Team 1 and they have done this recommendation and we are -- when we're receiving these recommendations, we are noticing two things. One, very clearly REC 27 everybody knows, you just got a report from us. REC 27 says, look at all the policies and analyze the impact, review the impact and coordinate with GNSO, right? That's done.

When you say look at all the policies that means you're looking at transfer policy too, right? But then, in addition to REC 27, the EPDP Team 1 wrote a separate recommendation for transfer policy for REC 24. We are trying to see if they really meant us to do something different for REC 24. REC 27 we all agree that we're going to write an impact analysis and give it to the GNSO and then we're going to coordinate and figure out what to do.

But what was the reason that these transfer policies on REC 24 was sort of separated out and then provide separate recommendations for us to then implement? This is a question that I had in mind and we thought at the IPT we have to somehow treat them differently. For example,

REC 23 and REC 24, when we have a separate recommendation, we must implement this and we must update it immediately, that's a clear direction from the EPDP team, whereas REC 27 catches everything else, that we don't have to immediately act.

That's how we interpreted it and maybe that interpretation is not correct. If somebody of EPDP team could explain the rational for separate recommendation on particular policies verses all the recommendations on REC 27? I'd like to hear from Beth.

BETH BACON: I think Diane was first. I'm happy to have her go first.

DENNIS CHANG: Okay, Diane, go ahead.

DIANE PLAUT: Dennis, you raised -- this discussion is really progressed in the right direction because you raised the point that I've really been thinking on with REC 27, just being put forward and relation to the policy changes.

It really begs for us to make this determination and it seems like -- I do agree with everyone, it seems that Method 1 is best because it allows for us to follow what seems to be the right procedure in relation to being able to make clear our changes and then allow for the cohesion for us to work with GNSO and to keep the tracker going and to make sure that everything is first clear in what we're doing and then allow for later implementation.

But to Roger's point, how are we going to ensure that a proper implementation down the road and then how do we separate out what we're doing in relation to REC 27 as compared to these other recommendations? I do think that Method 1 is the correct methodology but I do think that we have to now address how to handle these nuances and come up with a solid path. That's where I stand basically on trying to sort this out at this point.

DENNIS CHANG:　　　　　　　　Sarah.

SARAH WYLD:　　　　　　　　Yeah, I really like the appendix idea. I agree with Roger and Diane, that we do need to consider what happens after that specific PDP is done. I would say that the appendix should expire when the actual relevant policy has been updated. I would expect it could be written in such a way. Regarding the difference between REC 24 and 27, I think it was basically what Dennis said, that is was the EPDP knew that specific policies needed updates, that those were identified and then REC 27 was more of a general go look and see what we didn't think of. Thank you.

DENNIS CHANG:　　　　　　　　Thank you, Sarah. Beth.

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BETH BACON: Thanks, Dennis. Diane, I think great points and there's some really good points and questions being made my Alex in the chat with regards to how this all becomes -- what's the language we have to follow. For me I think I'm going to agree with everyone, Method 1 allows the IRT to distinctly show what we're changing and where and then it also keeps the path open for the GNSO process to make the actual changes in the consensus policy documents.

That language would reflect what the recommendation says but they would be in charge of making sure that's correct because it is a consensus policy and a PDP made it, so PDP's sort of has to change it even though it's ours. I think that's an important thing to preserve with regards to the process for PDP's and how you amend consensus policy. We all know the EPDP is a bit of a special snowflake and we did things a little differently.

I just wanted to address Alex's question in the chat where he said, which language prevails? I think for the URS and UDRP, the ones that we're talking about now, I do think the language and the EPDP recommendations is the language that the contract parties have to follow and would be subject to compliance, as all consensus policy requirements are and it's just the specific red lining of a document that would be GNSO's is my thought. Alex, I hope that helps from your perspective.

I do think for the other GNSO policies, the recommendations where the GNSO to review, I do think that's a different process and I think that that was meant as Sarah outline perfectly, was we know that there may

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be other impacts and the GNSO is the right place to evaluate that, eventually kicking that is what you should do. That's it. Thanks.

DENNIS CHANG:

Thank you, Beth. I think what I've heard from the IRT members is that Method 1 is the preferred method. Yes, it makes it harder for the implementors but in our case, we feel this is more in line with what the expected from the community and maybe even the EPDP team.

Why don't we just decide today to use Method 1 and I've really heard one good suggestion that I didn't even think about but that is, instead of trying to decide in each case, should we do one or two? Let's all do one. Let's not have this decision where should we update or not update anymore and we are going to decide that Method 1 is the method that we are exclusively going to use for this policy anyways. Any objects to that decision? Roger.

ROGER CARNEY:

Thanks, Dennis. I do not object, I think that sounds perfect. I was just going to add on that if we do Method 1, which I think we should, let's just decide that, you and me Dennis, we decided to do that. We're doing Method 1 and we're going to put a news box at the top of the other policies so when say an RPM does update URS, they'll just remove that news box when they update it, then they probably need a mechanism to maybe put a news box into the data policy that says, 'this is no longer valid, it's been overwritten by' similar to that.

DENNIS CHANG: Maybe we let them worry about it.

ROGER CARNEY: We got to find a mechanism so they know to look.

DENNIS CHANG: Somebody, I forget who, at this call, somebody had idea, maybe we add something like this but then we don't know what's going to happen in the future, right? Let's think about that, let's table that thought for later. Let's proceed.

What I'd like to do at this point, is with your permission, on URS and UDRP, we're going to change this to green because that was the only reason why was yellow, that we couldn't agree on how we're going to proceed with the implementation and I have proposed the new approach, new approach is we are going to URS and UDRP in One Doc as appendices is what I'm proposing.

If everybody is in agreement at this call, I'm going to decide, we're going to decide that you don't need to even comment on this, you've done your homework, you didn't say anything and you're okay, so we're fine. Everybody agree? Any objections? Done.

Transfer policy, same thing. I haven't even assigned this to you yet because I wanted to wait until you observed the REC 23 but we can just skip this homework or maybe I'll assign it anyways but I think we're in align. If we're making the decision that we're going to do Method 1 exclusively, then we don't have a separate decision to make on REC 24.

That is moot point. I'll turn this to green, REC 24, that we are going to add policy language for transfer policy within the One Doc. Objections?

BETH BACON: I have a question. Shocking, I have a question, I know. This is for the transfer policy, are we doing the exact same thing we just did?

DENNIS CHANG: Yes.

BETH BACON: Then, yes. It's perfect timing, their scooping out the transfer policy PDP as we speak.

DENNIS CHANG: I know, not only that but just to make sure that we don't repeat ourselves, we're not going to talk about which method anymore because we as a team, already decided that we are going to use Method 1 exclusively for this implementation. It will always be like that. Is that point clear? Sarah, go ahead.

SARAH WYLD: Okay, in terms of reviewing the content for the appendices that we've now agreed to put in. At what point do you want us to do that? Are you going to put it into the One Doc and then send one of your emails that tells us to go do so or do you want us to look at here in the standalone docs? Thank you.

DENNIS CHANG: We haven't drafted the work yet but I'm going to give you the direction to review the words once we have written them. I haven't decided yet, now that we have One Doc so well established, maybe we'll just do it here directly and not go to the separate document. But let me decide that and I'm going to make an assignment for you as we add the words in one place or another.

I think that's good. We've talked about the -- IRT comments guide, I'm not sure whether there's still confusion on this or not but I tried to explain it on this guide. Look at this again if you keep wondering how decision are made, who's going to make the decision and when the decision is made. I tried to explain it here and I can also review it again. I don't feel like I need to do it now. We're going to skip that or I'm going to consider that done.

Now, we're going to talk about timelines. Let's talk about the timeline. What I asked for in the timeline and you know that I'm using this to communicate with the team in an easily format, easily reviewable format and this basically the timeline when we decide, are we going to have policy effective date as a default six months or are we going to have a different policy effective date, 12 months, 15 months, 18 months, what is it?

Then, I was trying to get the IRT's expertise because this is a particularly important decision and as someone asked, do we need to go and present the policy effective date in the public comment? And the answer is absolutely, yes because the public needs to know about when

this policy will be fully in effect and how long they have until that happens, we have to give them two data points. One is, when we expect to the publish the policy and when we expect to complete the implementation for the policy effective date.

What I've asked for is input from the IRT and contract parties, Sarah leading the team there has provided an extensive input in what I call the scope of the implementation process. In project management we have scope which is the volume of work but what we're talking about is critical task schedule. We're talking about those series of tasks that lines up in sequence of dependencies that must be done and that's what determines our schedule, calendar effect date, that's what I'm talking about.

I was hoping to get some comments and I see that this is new. Let's read this, what I was trying to look for is actually something like this, right? Number one, we have to do something. Number two, we have to do something else right after. Three, four, five, so only a handful of tasks that are in series, that cannot be paralyzed, must have dependency and we start here and we end here and that's what we call critical tasks and that's what's important and that's what we need to understand. Go ahead Sarah.

SARAH WYLD: Thank you. I will admit, I did not understand until now that that's what you were looking for with this request. I thought you wanted more feedback about the amount of time that it will take to do the work and what I'm hearing now, is that you wanted us to put in order, the work to

be done to get from where we are to compliance with the new policy. In that case, I don't know that we can request that.

I don't know that we should request that because different contracted parties will want to implement this in different ways, right? And we have no idea what parts of different people's systems are dependent on other parts. For example, maybe I would need to change what data I collect before I can change what data I transfer to a registry but maybe another registrar working on it doesn't need to change anything about collection and they can start immediately with changing what they transfer to the registry.

My point is, I don't think that we can outline the order in which this work should occur. I think we should leave to the individual contract parties to come into compliance in whatever sequence they want to do so and all that we should provide is an end date. Thank you.

DENNIS CHANG: Jody.

JODY KOLKER: Fortunately Sarah said everything that I was going to say. Remember, we've got 300 different entities that are trying to do this. We've given what we believe is going to be to take, how much time it's going to take to complete this whole task list and as I've written in there, once this goes out for public comment, you have a subsection of registrars here and registries, this does not include the whole CPH. I think that once this is out there for public comment, this could be longer.

I would expect that other registrars or registries are going to say, "There's no way this is going to be done in 18 months." Once they start tacking on what they need to get done. I didn't know that you wanted a critical path and I seriously do not think that we should be doing that kind of analysis on this because of how many different registrars there are and registries. Thanks.

DENNIS: Roger.

ROGER CARNEY: Thanks, Dennis. I agree with what Sarah and Jody were saying there. I just wanted to add on because Rubens made some comments in the chat. I think the rainbow bridge does help but I think there is also dependency issues that have to be taken into account.

Some things are going to happen at the registry that registrars will need to wait for and there is a certain order of things and again, that order I'm not sure it's going -- you're not going to be able dictate because somebody going to take some low hanging fruit and get it done quickly and some are going to maybe tackle the bigger items, some of the things the legal consequences, consequences are going to start now and four months from now they might start actually writing code because they actually get an answer.

I think that that level of detail is going to be impossible to get to. I think you've got to be careful because there are certain things that have to occur before other things can occur. Thanks.

DENNIS CHANG: Thanks Roger. You know those certain things that you just talked about, is what I wanted to know. That's what I'm looking for. Let's just review the role of the IRT. The implementation is being done and led by the IPT and providing it and we are asking for review. If we say 18 months, then you are, the IRT as a team has to be able to review the 18 months and say, "Why 18? What are the critical path items that goes up to 18, why is not 12 or 6?"

This is the kind of questions that we expect to review, we expect to get and we expect to answer. This is where we need the expertise of the IRT to help us. Remember, the IRT is put together with the industry experts to represent the industry, to help us and guide us technically because we are dependent on you to know pretty much all that we can know before going to the public comment, the best plan that we can put together.

I don't know if I can just except to say that the registry and registrar say it's 18 months so therefore it is. I need to really think about that, if I can go forward with that logic and that rational only. Let me hear from Diane.

DIANE PLAUT: Hi Dennis, that's an excellent point. I really feel that from a policy standpoint and a legal standpoint, that it would be hard to enforce anything more than an end date and it would impractical. I do agree with the majority it seems here in that, the policy really can't dictate these business dependencies and we simply have to have the end date

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but I see your point that you just made that no matter, we have to be able to substantively defend why it is 18 months.

It seems that even the experts that are part of this team would find it hard to come up -- should certainly be able to provide guidance as to why it's 18 months but given the size, the scope and the different economics of the different parties that will have to makes these changes, it's going to be hard to explain with precision why it's 18 months but perhaps we certainly should be able to explain it to some degree. I do think though that one end date is definitely the most practical and enforceable type of policy.

DENNIS CHANG: Jody.

JODY KOLKER: Dennis, what I'm hearing is that you'd like know how long it's going to take each one of these tasks, is that right?

DENNIS CHANG: No, only the critical path.

JODY KOLKER: Hang on. Critical path remember, is different for every registrar. I understand what you mean by critical path but I'm telling you that some of these things are not going to be able to be done in parallel. So,

remember, remember what we've said before Dennis, many times, is that some of these registrars only have two or three programmers.

Now, a critical path for them is going to be from one end to the other including these in sequential, so that's their critical path. While a critical path for a large registrar may be able to do it in parallel. Now, how many different critical paths do you want, Dennis?

DENNIS CHANG: One.

JODY KOLKER: One, you're not going to get one. I feel like I'm preaching to the wall here. There are so many different registrars out there with so many different levels of programming ability or number of programmers, you're not going to get one. I feel like no matter what we come up with Dennis, that it's not going to be good enough for you. I have the list of how long I think it's going to take us. I've added up the months and weeks, that's how we've been able to get to this and I'm sure other people have done that, why is that not good enough for you Dennis?

DENNIS CHANG: Here is what I would like to see, if you have done that, share that with me in a form of a critical task. Name five steps or three steps and breakdown the 18 months for me, please, help me here. Beth is next.

BETH BACON: Thanks, guys. I think that Jody pretty clearly said, I think there's not going to be a single identical critical path, simply because of the size, the different ability, resources of all the registries and registrars. So, I think maybe the best suggestion I can come up with is, if we say obviously, we see the beginning date and then we will go through and say, "How long do we think this could possibly take someone?"

And I think Berry also said in the comments, the slowest registrar or registry to implement is the time span we're looking for. If you're looking to say that you need to justify it, then I think a little more information is needed. Do you want to know how long different tasks take in between or are you just looking for us to say, there's an extensive list of tasks that will have to happen for each registry and registrar and they won't necessarily be able to be done in a path?

DENNIS CHANG: Thank you, Beth. I think you were helpful there. This is what policy does, right. When we decide on a policy and make it a legally, enforceable or legal notice we're sending them and say that you must to do this [inaudible] business that they have to adhere to.

If there is 1000 implementors and one of them says, "I cannot do that because I don't have enough resources." We're basically saying, "You have a decision to make. You have to get more resources because what we have learned from the community within the implementor is that this is reasonable and adequate time period."

If we say 18 months, we are going to be asked questions. What I'm looking for is actually much simpler and it sounds like Jody already has

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it, you have a series of tests that are dependent, what are those? One, two, three, four, so this is what I mean, here is an example. Internet Rev, if we assume that Internet Rev is what we're going to use and we assume that let's start working on it in March next month and we're going to be done in August when the policy is published, then we get that work out of the way.

This could take four to eight weeks but we have six months to do it. That's called managing the risk. This is the critical path. Is the EPP the critical path, yes or no? If it is, then it's going to take three months, three months, three months, and we add up, oh it's 10 months and we know that how things go we give a couple of buffers so maybe let's settle on this date, give them two months buffer.

This is how typically a project schedule is put together. I'm looking for that help. 18 months can be broken down into three things, four things, five things, I just don't know right now but as the IRT is convened here, with industry experts of implementors, I'm looking for help here. Go ahead Roger, you're next.

ROGER CARNEY: Thanks, Dennis. Again, I think the issue with coming up with an exact or even a linked list is it's different for everyone and I'm not sure how we can say that much more clear. Some people may have a dependency on EPP and some may not have that dependency. There's going to be different issues, different registries have different policies already. I'm not sure that again, that you're going to be able to get to that linked list.

I really don't think that that's even appropriate. You're saying we're just saying 18 months but we're not, we provided a document that shows all the work that has to be done. Just because there's not time set to each one of those, doesn't mean that there's not work there. Again, it's going to be depended on each party. You're talking about thousands of people, thousands of different companies that have to do this.

DENNIS CHANG: Yes, I understand. I think that -- let's not repeat the information. I understand why it's difficult. I understand why we can never know. I understand both sides and I understand there's a lot of work, I understand all of that. All I'm trying to say is, when 18 months I would like to be able to say because these three steps take this much time, this information that we have collected from the industry. That's all I'm trying to say.

ROGER CARNEY: Dennis, I think we're provided that to you.

DENNIS CHANG: Maybe we should have a separate conversation because I don't see it here. I don't see what step one is, step two is, step three is.

ROGER CARNEY: And you're not going to see that Dennis, you're not going to see that because you're going to see 3000 different versions of that. It's just not

possible. Somebody may have legal issues that they have to resolve and another company doesn't even have those issues to resolve.

DENNIS CHANG:	Roger, I got you. Maybe I should just stop this conversation and then back off. I understand or I can do, for IRT to support us and provide us with information. IRT has every right to say, that's enough, no more and I think I'm getting that answer. If there are contracted parties or implementors out there who can help me, I'm going to reach out to them individually, separately and try to put together a strong and critical path. Let me just make that statement. Let me allow Theo to speak. Theo, Jody and Beth are in line. Go ahead.

THEO GEURTS:	Thanks, Dennis. I think it's best that we sort of come back to this topic again and I'm not going to repeat everything that Jody and Roger just said. I mean back in [inaudible] started doing different things and their backends are not all the same, they're not working on the same, you're going to have a planning nightmare from here to the moon, you need to keep that in mind.

	Our CTO didn't give any timeframe because he going to wait from more final version, so that we know what impacts what because we can't make that assessment now. What we provided you in the document, that is what we see as what is coming down the pipes and it sort of reminds me back when we implemented the IRA 2014 and we backed off on signing that when it came out. We looked at it and noticed a ton

of work there, we didn't implement all these registry modules from all these different TLD's.

The work here is possibly much greater than the IRA 2014 and if you look back at how that process worked, you see also that there quite some with registrars took quite awhile to sign the 2014, quite a while before the IRA 2009 was phased out and I think you needed to look that reality there because what we are doing here in this IRT, build a temporary specification recommendation, we are heading right for that scenario there, so it will be completely different for registrars on how to do this. I only got four programmers and that's it and not in position to hire more on the spot to do this. We need to break down…

DENNIS CHANG: I understand. Your message is, until the policy is clear, we cannot estimate, so you're not able to help with timeline because your own CTO is telling you that. I understand perfectly.

THEO GEURTS: Okay, so consider that factor.

DENNIS CHANG: I'm considering. I hear the factors. One, we haven't finished the policy and therefore we cannot do an estimate. Two, there's thousands of implementors and we can never know what they're going to do, right. Three, based on everybody's resources and different way of implementing, we don't know what critical task it is for this registration

data policy implementation. I got those facts and I got this data points. Understood.

Let's turn now to see and I already said, I'm going to back off and I'm going to try to see if there's a different way that I can get some help to what I'm trying to do and establish a timeline for this policy. There's no need to repeat so I'm backing off from my request of establish critical task. Go ahead and Jody is next.

JODY KOLKER: I was just going to take my hand down. Thanks.

DENNIS CHANG: Okay. I'll point out Sebastien is willing to help me, so let me get with him later and see how he can help us. If there is anyone else who has knowledge of implementation and be able to put together a high level timeline because that's what I'm trying to do, get to a timeline so we can communicate with the community and when community asks, why is it 18 months, we have some rationale that can provide. That's enough for timeline.

That was a fun discussion but I knew it was going to difficult. This is the request that we have GAC, which you saw, that Goran had responded to and thanks to Goran, he supporting the IRT and the implementation team and saying that we're not going to arbitrarily set any timelines, we're going to let the implementation team come up with a timeline, based on their own process.

That is exactly what we're doing and all I'm trying to do is maybe try to get it done as quickly as possible. But if we have to take more time, we will. I'm certainly not going to rush you to get to a point where you feel uncomfortable because we all need you to support this timeline when we come up with it.

Next one is One Doc. I'm going to give the floor to Roger because I think he has a good point that we should discuss of what language means, implementation notes mean. Roger, maybe you can introduce this topic that you wanted to talk about.

ROGER CARNEY: Thanks. Really, it's more of a question and maybe clarification of what the implementation notes section is going to used for? Is this really policy language that compliance can use to build off? Things that they can check off? If it is, why are we separating it into a separate section? It would seem more appropriate or more useable if it was in the sections that they apply to, unless of course they apply to multiple section.

I think that's probably the big thing. Is this going to be policy language that everybody has to conform to and compliance will use to make their checklist and their checks on? If so, is there any opportunity to put them in the correct spots in the policy document?

DENNIS CHANG: Is that it?

ROGER CARNEY: Yup, thanks, Dennis.

DENNIS CHANG: Okay, so let me try to -- again, I think it's a question of implementation note then. Very focused, specific, what is implementation notes really trying to do? Why isn't it part of the policy language? To answer your question directly, is it compliance enforceable? The answer unfortunately has to yes and no because if the implementation notes said something that is consistent with what's up there in the policy language, of course it is.

But if it's an implementation note where we are providing examples, that example is not policy that you can enforce. We are trying to provide for the implementors, some additional information to help them implement when policy language we feel is lacking or could be interpreted in a different way possibly.

We talked about this a lot throughout, should it be language or should it be notes and we have actually moved some of the language from implementation notes to the policy because IRT members felt strongly about it, we did, right. And vice versa, when we said, this should be treated as a note and not a policy language. It's up to us to decide and if you have a recommendation or a suggestion, that language belongs in one section or another, we will take your input. Let's ask Beth, Beth go ahead.

BETH BACON: Thanks Dennis and thanks Roger for putting this back in the comments. I think we've talked about this a few times. With regards to the implementation notes, I disagree a little bit on the recollection. I think that when things made to implementation notes it was kind of a parking lot and we're like, "Alright, let's put it in the notes."

And it wasn't really -- there wasn't an understanding of how the implementation notes, the weight of them would be. If you're saying yes they're essentially part of the policy, I think that views should be either put the language in the policy or take it out. If doesn't need language then it doesn't language. I think it's going to be confusing, there's already enough ambiguity in some of these places in this policy and the impact on other policies, I don't think we need add another layer of confusion.

My suggestion would be that we go through the implementation notes maybe as homework and put comments where either we think that it should stay, should find a home in the policy and put where you want it in the policy or say, we don't think we need this, please delate. I think that's the cleanest way to do it. Either it's in or it's out, that's my view.

DENNIS CHANG: Thank you. Marc Anderson.

MARC ANDERSON: Thanks, Dennis. I guess I share the views of others here. I've never been quite sure how to read language that follows the implementation notes header. I've just never been sure exactly what the words

implementation notes connotates in the policy language itself. If we just don't do that, that resolves that problem all together. Either oust the policy and should be included in the policy language or if it doesn't and remove it that address that protentional ambiguity.

DENNIS CHANG: Thank you. Beth, go ahead.

BETH BACON: Old hand.

DENNIS CHANG: Okay. We have used implementation notes in the past. Those of you have worked with me in the policy implementation when we thought that it was a good idea and I was trying to get an example up and running. Let me give you a quick example. Bottom line, what you have suggested, that we can take the languages and move into the language and out of the language and anything that is helpful, we can go ahead and keep it somewhere else. This is kind of an example, implementation notes.

We're saying that we're taking a name and converting into the label. How are we doing that? People need to know this. Here's where we explicitly describe the procedure and the format, so this is the kind of implementation note we thought was helpful. As you make your decisions and comment, I want you to think about that too. Think about the implementors. This is for the implementors. Think about them and

go ahead and make your comments, you're free to suggest. Beth, go ahead.

BETH BACON: I'm not saying the implementation notes are the devil and we should never use them; I'm saying that in this particular case we already have a very lengthy policy and I don't know that these notes add any clarity. The ones that you showed, those are the type that are helpful, it's was basically clearly an example, if this than that, when I say will be converted to this is the example, it's really clear and it's very concrete.

I don't think what we have in ours is concrete so I think that we should definitely do our homework and see if we can provide a consensus policy that is as clear and crisp and unambiguous as humanly possible and I think in this case the notes are just more confusing and less of a tool.

DENNIS CHANG: Yeah, Beth, we've already taken your suggestion.

BETH BACON: I love your other notes, your other notes are great. These notes are not as good and that's our fault, we wrote a terrible final report.

DENNIS CHANG: We created it together. If we think that this is actually get more confusing to the implementors, we definitely should not provide them.

Keep in mind and you need to talk probably people who are maybe outside of the IRT who are familiar with the policy as we have drafted, we're thinking about those implementors and they are looking at this for the first time and when they read the policy language and go, I wonder what this really means and the implementation notes, now it's clear, that's what we're looking for. Roger, go ahead.

ROGER CARNEY: Thanks, Dennis. I agree with Beth and I think you're Dennis. I think it's the consistency issue that we're running into. If it's policy language and compliance can use it, it should be in the policy not implementation notes. If it's examples, useful information, maybe that is something that's useful in implementation notes. I think if it's policy language, it needs to be in the policy and not the implementation notes. Thanks.

DENNIS CHANG: What you just said is exactly what we tried to do and if you don't think it's like that, then please make your suggestion as Beth has suggested. Let's mark those implementation notes and see if we can find a proper home for them. That is an assignment for you. We've got five minutes left. Before we break, I want to read off some of these comments. I'm going to turn to Isabelle to tell me which comments we are prepared to resolve.

ISABELLE COLAS: 11.11.

DENNIS CHANG: 11.11, I'm anxious to do this kind of thing. This one? The tech email. Are we ready to say that the tech email is no longer required to log and Roger, Eric, Sarah all said, yes, we no longer need to log a tech email? Anybody object to this? Roger, go ahead.

ROGER CARNEY: Sorry, old hand.

DENNIS CHANG: Is Mark here? I know he had a particular interest in the tech contact and I really want to hear from him because I'm ready to delete that as requirement but maybe we're not ready on that one. The other one I know we're ready because we talked about it and I answered you, is this one. Data elements matrix. We decided early on that we are going to delete this, so watch this go away. I'm going to delete this. Roger, you're next.

ROGER CARNEY: On the tech logging, I think that we would need to see some rational document for that because there's no language in the recommendations for it. I think if it stays, whoever wants it to stay should provide a rational document.

DENNIS CHANG: I 100% agree with you. That's why I was calling on Mark because he was sensitive and he provided a lot of documentation. I don't know whether he would actually argue with logging requirements because I

don't think tech emails have to be logged. Don't let me delete this as a requirement just yet.

This one I want to resolve. This one, particular point of what is the duration? I've gotten many emails on this. My last comment is that, I agree with Roger on the 15 months. I think that we can just delete, the last phrase and make it a simple 15 months retention requirement and be done with it. Any objection here? Sarah, go ahead.

SARAH WYLD: Thank you. My hand is not up to object, I think that sounds fine. Since I'm talking, I just want to mention I do have a more general concern about retention that I think we can discuss at some later time. My question is actually about Roger had mentioned rational documents, it reminded me that we had requested a few, so I wanted to check in about the status about, but maybe the IPT can provide that by email since we're almost out of time? Thank you.

DENNIS CHANG: Thank you, Sarah. This gives me great pleasure to resolve this comment. We have decided on the retention requirement of 15 months. We are going to -- what is this one? Delete that phrase. Retention requirements, that's decided. We are going to complete with 10:29 mark on my watch, so one-minute left. Any final remarks before we conclude, questions, comments?

BETH BACON:	We can still go ahead in the One Doc and flag things if we see questions?
DENNIS CHANG:	Oh yeah, One Doc is our document we want to go to public comment with, so please go head, yeah. We're not until we're done. Okay. Bye now then, everyone. Thank you for support today.
ANDREA GLANDON:	Thank you. This concludes today's conference. Please disconnect all lines and have a wonderful rest of your day.

[END OF TRANSCRIPTION]