

---

ANDREA GLANDON: Good morning, good afternoon, good evening. Welcome to the registration data policy IRT meeting being held on Wednesday the 19th of August at 17:00 UTC.

In the interest of time, there'll be no roll call. Attendance will be taken by the Zoom room. If you're only on the audio bridge, could you please let yourselves be known now? Thank you. Hearing no names, I would 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. As a reminder, those who take part in ICANN multi-stakeholder process are to comply with the expected standards of behavior.

I will begin with agenda item one which is the ICANN 69 plan. At this time, we have a tentative meeting scheduled for Wednesday the 14th of October at our normal 17:00 UTC for 90 minutes. This is outside of the official ICANN 69 time schedule, but it is on an official ICANN 69 date. We chose to just keep it at our normal time. This will be listed on the official ICANN 69 schedule though, so the public will have access to the link to join the call. And I will send out Outlook invitations and e-mail invitations as we get a little bit closer.

I will now turn it back to Dennis Chang. You may begin.

DENNIS CHANG: Thank you, Andrea. Welcome, IRT. So, planning on ICANN 69, given the choice of doing something a little different like choosing a time of the

---

*Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.*

---

day that is local to where the ICANN 69 will be, and with the meeting being remote, there are new ways of doing things. So I think the idea here is that even if it doesn't fit the ICANN meeting window exactly, if it's close to that and we're having our normal meeting, it's okay for us to just use that forum and open it up to the public.

Andrea and I thought that would be a much better way for us to conduct our IRT meeting. So we'll do it like the last time. We have our regular meeting, but reserve some time for public, very quick overview and introduction and reserve time to field any questions and input from the public. So, not exactly sure where we'll be on 14th of October, but just so that you all know. Please plan on an IRT meeting there, and we're not going to do anything other than our IRT meeting. Probably make it easier for all of us. Thank you.

So with that, let's go to agenda item two, the timeline. Our IRT workbook timeline hasn't changed. It's the same as you've seen before, and that's all I'll say about this, and field any question that you have. Other than that, you know where it is. It's in our roadbook, you can look it up anytime.

And on our OneDoc status map, this is where we see our current status, that we, the IPT, we're editing, I think we have enough inputs from the IRT and we know where you are and what you're advising. So thank you for all of that. So I don't have anything orange for the moment, but if there are questions and we want your input, we'll turn some of this to orange again and revisit.

---

Next item on the agenda is recommendation 7, and here I will turn it over to Sebastien as he has been working on this letter, with comments from the IRT. So, Sebastien, take it away.

SEBASTIEN DUCOS:

Thank you, Dennis. Thank you for those who gave comments to the letter. I think that the most important thing in it [follows a] comment from Sarah. So the design of this letter was to be a letter for me to send on our behalf to the GNSO council with either the findings—just one step back. The GNSO council asked me to go and find out with the IRT if there was a consensus within the IRT on what should be done with recommendation 7, or if we were [out of] consensus and needed guidance from the council, essentially. That’s how I interpreted my mission here.

So this letter was intended to be the letter from us sent by me to the council with either a, “No, we’re fine, we have a consensus and this is where we’re standing as the IRT,” or, “No, we’re not fine, we don’t have a consensus and would like some guidance on what we’re doing.”

So, as you point out, Sarah, I shouldn’t suggest here, we should just turn that into an ask for the council to either confirm that the consensus that we came up with is indeed right and we should go with it, or if we have any other questions, any other disagreement that we need clarity on, then state exactly what the differences are and where we need the clarity. So the path forward, I sort of [miswrote it,] but tried to put it in my answer to your question. It should be—and I verified that this morning with the ExCom—an ask to the GNSO council. This is what

---

we've done, this is what we ask as a reaction from the GNSO council. That's one thing.

The second point that I wanted to cover very quickly is following on discussion last week, I did say that I was going to better quote the input from the board as given on the 22nd of April. So I had already quoted that [inaudible] reference the people but I didn't put any quotes in it. I did not do that, and I did not do that for two main reasons.

The first one is I'm finding it difficult to, without quoting the whole document, find quotes that go in one direction or another and that are not cancelled by quotes that are [inaudible]. The conversation as I read it again, yes, Dennis, at some point Becky says very clearly that all the data points in recommendation 7 are considered by the board as data points that are [a must] and it should be a must, or everything needs to be transferred, and that there's no distinction, in their view, between what we had, what the EPDP had marked in green or yellow—I can't remember exactly what the color was.

But then a few paragraphs later when further questions come, [further] questions from Mark, from Roger and etc., she does say that the bottom line in the end is for the GNSO council to decide that. So I think that it still puts recommendation 7 in the position that it was, which is we need to have the wording of recommendation 7 in their entirety. We still need to make the difference between the two categories of fields, and then let other recommendations, such as recommendation one, and more importantly, recommendation 27, play their roles in this.

---

The role of recommendation 7 I don't believe is to confirm, disavow or sign on previous policy. The role of recommendation 7 is just to describe what the transfer between registrars and registries need to be in the context. And in the context, it needs to be, in my view, needs to be that. If there are other elements of the context that need to be defined, that's a problem that is beyond recommendation 7 and the exercise that I'm being asked to perform.

This also goes a bit to the points made by Alex—[and I think I should give Alex some time to also discuss that, there are important points.] But there is one thing that we're trying to concentrate on right now, or I'm trying to concentrate on, and that is the intent of recommendation 7 and how that needs to be implemented and put into our work, into the OneDoc. The other one is all the peripheral, the [inaudible] around it. I think that we need to keep that separated. I hear loud and clear, and the people that are [giving me a hand here on the council] are also hearing loud and clear that this is not about repealing previous policy, etc., it's just about concentrating the task at hand, which is transfer of the data and conditioning the transfer on the data.

The other elements, where those conditions [inaudible] are outside of the purview of this particular recommendation and will be addressed at some other point. I think that's the points I wanted to make. I need to go back [inaudible] and see if anybody had comments.

One thing, maybe I should give, Alex, if you want, just a bit of time to share your comments, because I don't think anybody had time to read them. So the comments came overnight for me, I answered them today and the final comments came in the last hour, so I don't think

---

everybody had time to read it. Maybe you want to discuss your points, Alex.

ALEX DEACON:

Yeah. Hi, everyone. I think, without repeating myself, I think what I'll do is focus on my t comment, which is right there on the screen in terms of what's written there. I think it's okay. I guess there's a nuance though, right? Which is that any of those "musts" with an option to assert a legal basis or create a DPA that supports the transfer turns those "musts" into a "may," and that's where we run into a conflict with the Thick WHOIS policy. And I'm not too sure what's next, but I think that's really the crux of the problem. As I mentioned many times, I think the phase one policy gives us all the tools with regards to the legal basis and creation of a supportive DPA that'll allow us to define a recommendation 7 that does not invalidate Thick WHOIS.

If we end up in a situation where it's not explicitly clear and more things are optional, then I think that's when we run into problems with the conflict with Thick WHOIS. Thanks.

SEBASTIEN DUCOS:

Thank you. And thinking about this, I remember the conversation—I can't remember exactly what the topic was, [if it] wasn't in fact a recommendation 7, and there was a discussion, definition of "must" and "may" and a "must if." And I remember us walking away from that [inaudible] definition saying that it wasn't the way the IRT should work. And here in this particular case, in my very humble opinion, I think that here is typically where there should be a "must if" and not a "may,"

---

indeed leaving it completely open. And I'm happy to be corrected, but here, the intent, if I understand well, is if the legal criteria are met, then it becomes a "must."

So I can't remember exactly what the result of that discussion was on [inaudible] I [feel] Alex has already raised his hand. Is this an avenue that needs to be explored here to make that slightly clearer? Alex [inaudible].

ALEX DEACON:

Yeah, I'm not a fan of this "must if" construct. "Must if" is essentially a "may," so I've never been comfortable with our use of "must if." If we stick with this construct, "Must if," and again, it allows folks to pick and choose and decide what's in their DPA and decide the validity or invalidity of legal bases and decide which subset of fields they want to transfer, then we're changing the Thick WHOIS, which I think is, again, the crux of this issue. So that's the issue here, is this vague use, this use of "must if" which allows for the option of this data to be transferred, which conflicts with Thick WHOIS, which the board—which phase one policy did not change and which we've been cautioned, I believe, to not do in the IRT. So we're kind of on this teeter totter, we're trying to balance both of these things. I'm not too sure what the path forward is, other than the path that we suggested, the BC and the IPC, which is use the Bird & Bird memo which outlines the legal bases, define the DPA that describes and supports that, the transfer of that data, and then update the OneDoc language accordingly. Thanks.

---

SEBASTIEN DUCOS:

Marc?

MARC ANDERSON:

Thanks, Sebastien. First, on that Bird & Bird legal memo, I want to remind everyone that that legal memo came in after the phase one EPDP produced its final report. That memo was not in any way considered or taken into account. It wasn't accepted or adopted by the working group.

So I don't see how you can use that in implementing the phase one work. That was a document produced after the phase one completed its work. I think it's up to the GNSO council in taking on its work as part of Recommendation 27 to consider that and decide what to do with that as part of any follow-on work.

The other point I want to make is I'm sympathetic to Alex's concerns over "must if." I do agree with Sebastien that that's really what was intended by the phase one working group. I think that's what the language should be. I am sympathetic to Alex's point, "must if" is not great language to use in this case, but I think that is what was intended.

And we can have a discussion on whether the legal basis exists or not, and I think that's maybe where this is ultimately headed, but if a legal basis exists, then that transfer can occur. If the legal basis does not exist, if the contracted parties cannot establish a legal basis for the transfer of that data, then transferring that data is not in compliance with GDPR, and contracted parties will not do it. We've all discussed, we all know from our experiences here and in the EPDP working groups that contracts and policy do not trump law. So that legal basis language



---

is more a statement of fact. If a legal basis exists, that transfer must occur. If a legal basis does not exist, then policy and contracts cannot force that transfer to occur, leaving contracted parties out of compliance with law. So I think we really need to take a step back and recognize that.

SEBASTIEN DUCOS: Brian, I'll toss you the mic in a second, but sorry, Marc, do you suggest that we [toss that in this part of the] comment that we'll send to the GNSO, or is this implied?

MARC ANDERSON: I think it's implied. I think I'm happy with your document as you've drafted it, Sebastien.

SEBASTIEN DUCOS: Okay. Thank you. Brian King.

BRIAN KING: Thanks, Sebastien. I'm a little confused by Marc's comment about the timing of the legal advice. I don't think anyone's arguing that the Bird & Bird advice is what gives a legal basis for the transfer. In fact, I think a legal basis for the transfer to registry has always existed, well before the EPDP was a twinkle in his daddy's eye. It always has, and that wasn't granted by the Bird & Bird memo or by anything else. So I don't see how the timing of when we receive the Bird & Bird memo is relevant, because that's not what gives us the basis. Thanks.

DENNIS CHANG: Sebastien, I see Theo's hand.

THEO GEURTS: Yeah. Thanks, Dennis. And to Brian's point, I actually question that the legal advice from Bird & Bird—because implying that there is a legal basis for the transfer, I think that's not a factual statement, Brian. We have the largest registry, Verisign, operating Thin, not processing any personal data for the registration of a domain name. So I don't think you can make that argument without having a major counterargument.

So I don't think we should read too much into that Bird & Bird memo. Thanks.

SEBASTIEN DUCOS: Thank you, Theo. I have Marc next.

MARC ANDERSON: Thanks, Sebastien. I also want to respond to Brian. My recollection of the phase one work was that we did not identify a legal basis why that transfer must occur in all cases. So I disagree with the point you just made. That is why we ended up with this recommendation in the state that it is, because we did not identify a legal basis that exists for mandating why that transfer must occur in all cases. And that is reflected in the final report, in the output of our work, and it's why we're having this discussion now.

SEBASTIEN DUCOS:                   And I have Brian again.

BRIAN KING:                        Thanks, Sebastien. I'd like to respond to Marc's comment there. Kind of similarly along the lines of my comment on the Bird & Bird memo, a legal basis does not exist for transferring data because an EPDP decides it does. A legal basis either exists or it doesn't. And legal bases for transferring data from the registrar to the registry have existed for a long time, and several of them are noted in the Thick WHOIS policy.

So the dispositive factor about whether a legal basis exists or not does not come from Bird & Bird or an EPDP, it's a factual matter. I think what we've made it boil down to is the fact that some folks aren't convinced but some folks are and think there just plain is a legal basis for the transfer. There's several and they're noted in the Thick WHOIS final report. Thanks.

SEBASTIEN DUCOS:                   Mark SV, just one second because I had a [small question for Brian.] So, [if that] legal basis existed and always existed, what's the impact of GDPR? It's a legal basis that predated GDPR, or one that comes from it? Or what's the influence here?

BRIAN KING:                        I'm not sure if that was a question for me. I'm not sure if I understand the question.

SEBASTIEN DUCOS: Yeah, it was. If you're saying that the legal basis [doesn't wait for] Bird & Bird or EPDP or anybody but it always existed, is there an influence on GDPR on that legal basis? Because in the timeframe GDPR did appear.

BRIAN KING: Okay. Thanks, Sebastien. I can speak to that. So certainly, a legal basis and good reasons to transfer the data from the registrar to the registry have always existed. When the GDPR came into effect, it was required by law to have such a legal basis. Great news though, there already was one the whole time. Does that help clarify it?

SEBASTIEN DUCOS: Yeah. I don't know that I fully agree, but yes, I understand what you mean. Okay. Mark SV.

MARK SVANCAREK: Thanks. I want to address Theo's comment that because Verisign is not currently a Thick registry, that no legal basis exists. I think he's saying that if processing is not already existing, that it cannot be added. That's certainly what I'm taking from that statement, that because Verisign is not processing personal data, there is no legal basis for them subsequently processing data. And I think you could see that that's a logical a fallacy. If it were true, then one could never change a business process or could never add a feature to an online service which added additional processing of personal data. Thank you.

---

---

SEBASTIEN DUCOS: Thank you. I have Theo next in the queue.

THEO GEURTS: Thanks. So I think we're repeating ourselves again and again, like we already did in the EPDP phase one. But to add to Mark SV's comment and Brian's comment, The Berlin Group, which consists of over 120 DPAs, already advised ICANN to re-look at the entire Thick WHOIS policy because they already noted that there is no personal data required to register a domain name. So they put out an official statement that ICANN should look at it. But if we keep ignoring simple basic facts, then we are having this circular discussion which is going nowhere. Thanks.

SEBASTIEN DUCOS: Marc, [if you're talking, you're still muted.]

MARC ANDERSON: Sorry. I think, to Theo's point, we're all well aware of each other's positions on this one. I do want to take a moment to say that the Thick final report itself, to say that it provides a legal basis is really a bit of a stretch. It concludes that on the balance, there are more benefits than disadvantages to requiring Thick WHOIS. That's a far cry from identifying a legal basis, or perhaps more importantly, a purpose.

And I think I'd like to remind my colleagues, before we identified the legal bases, we identified purposes in phase one, and under GDPR, there's concepts of privacy by design and data minimization. When we

---

looked at all the processing activities, we focused on the collection, transfer and publication or disclosure of data, and we looked at what data elements and what data must be processed in order to achieve that purpose and then identify a legal basis for that purpose and that processing activity.

And as Theo said, the fact that there are registries operating without that data, without requiring the transfer of data from the registrar to the registry makes a pretty strong case—and it's really hard to argue against that—that it is absolutely necessary for that transfer to occur in all cases and that, and that under GDPR and other similar privacy laws, it's possible to mandate that that transfer occur in all cases.

Of course, we recognize that for some registries, they do have a purpose and a legal basis, which is why we drafted the policy recommendations in the way we did, to account for the fact that some registries do have that purpose and some registries did not. And that is what we concluded in the final report, and that is what we should be implementing here in the IRT.

SEBASTIEN DUCOS:

Thank you, Marc. So here's my question to you. Tomorrow, I have a GNSO council meeting. I need to report on our progress. On our last GNSO council meeting [after having spoken to everybody, I thought we were getting pretty close, I announced that we were getting] pretty close, and a month later, we are no closer.

What, in your view, do I need to report to the council tomorrow? What part of what I drafted and shared for people's comment can I use? What

---

part can I not use? Do you need more time to comment and have a statement that you're all comfortable sending back to the council? Where am I [standing today?] I see no hands. That's okay. I'll need to have a think of what I can then report if it's not already what I've stated.

Dennis, did you have a comment on any of this? Again, I noted in the report, and I believe that is still the case, that at least on the [inaudible] you were sending out or staff were sending out, not you personally. Did you have any comment on it?

DENNIS CHANG:

Yes. Thanks, Sebastien. Our comment is already here in the baseline language. I just want to make sure that it is noted that there is an ongoing disagreement within the IRT about this so that it does not come across as an IRT has a consensus. There is a disagreement within the IRT based on legal basis. It sounds like that's an ongoing discussion from the EPDP phase one days and it's still continuing. I know that when we were doing Thick WHOIS, I recall having this discussion, but it concluded with the final report and then Thick WHOIS policy got support of the GNSO council back then, and the board, and it got published.

So here, because of the way the final report came out—and we were being directed by the board—we had multiple meetings, and we can have meetings again to make sure that the staff here is implementing according to our understanding, and that is what's reflected here. And I cite—very clearly, I think—the rationale for why the language is as it is. So I think it's becoming clear that—I think this discussion probably made it clear where the disagreement is, really. It is, at the end of the day, is

---

there a legal basis, and who decides on that legal basis, and are we going to continue that discussion, or stop having that discussion with this policy language?

And as much as we can, our job is to make it clear for the implementers so as to avoid future discussions when it becomes effective. I don't know what else to say, Sebastien. I think I see two hands.

SEBASTIEN DUCOS: No, I think it's pretty clear.

DENNIS CHANG: Two hands from Theo and Marc.

SEBASTIEN DUCOS: [inaudible] hands from [inaudible] Theo I still think it's the old hand, unless you want to take it down and back up. But before that, Marc Anderson.

DENNIS CHANG: Let's give Theo and Marc a chance to speak. They may have comments on this.

SEBASTIEN DUCOS: I think Theo's hand is an old one. Yes, he just took it down. Thanks. So Marc Anderson.



---

MARC ANDERSON:

Thanks. I think what Dennis just said, maybe the heart of the disagreement is whether the legal basis exists in all cases. And I'm not sure, maybe that is ultimately the question that needs to go back to the GNSO council. Sebastien, you provided language around next steps asking council to confirm the language, but maybe that's the appropriate question to ask.

This isn't a new discussion. We've had this discussion for pretty much the life of the IRT at this point. And one thing that's confused me—and maybe Dennis, you can shed some light on this—in drafting this language, you're trying to treat the green and yellow items the same. And I have to ask, why do you think the EPDP working group and the final report has some fields listed as green, required, and some fields listed as yellow, optional, if you're interpreting that to mean they must be transferred in all cases?

So, why didn't the EPDP phase one team just put them all as green required if, as you say, you believed that the intent was that they all are required to be transferred in all cases? That has really confused me, and why you're continuing to ignore that chart that has green and yellow, required and optional, fields.

DENNIS CHANG:

Thanks, Marc. Go ahead, Sebastien. Did you want to answer that?

SEBASTIEN DUCOS:

I just wanted to remind Marc that part of the reason—but I'll let you answer that also if you want to answer—I think is also the input of the

---

board, particularly in the call on the 22nd of April where Becky Burr quite clearly said that as far as she understood the board's interpretation, there was no such thing as green and orange, everything was green, everything needed to be transferred [in that list.]

Where [I might put—sorry, the question mark here in this comment] also from the GNSO ExCom is people's roles and places. I understand that the board has an opinion. I understand that the board has points of view. But I understand also that the GNSO is quite adamant that it wants to control the policy development process, and where the board may have [contributed and opinions] and etc., it's all fine, but we need to be careful also to take that just as such and not orders to comply. And I think [it's fair to say that] the GNSO would very much [inaudible] on the policy. But I'll definitely pass that on in my comments tomorrow also. Dennis, if you want to say something.

DENNIS CHANG:

Thank you, Sebastien. Let me try this, Marc. We spoke about this many times before why and how we're interpreting the yellow versus green, why that is. Because it is optional in the way you're looking at it. Let's look at registrant data—this, by the way, I'll give the floor to Andrew in a minute. I'm trying to find something. This is for registry operator.

So it's like this. This is, I think, how we're understanding the yellow, that registrant name is not a "must" in terms of collection, it's if collected, so the option there, yellow, indicates that in the collection part, but if it is collected, then it needs to be transferred. That's an example.

---

And at this time, what I like to do is give—first let me ask Sebastien, are you done with your part, or do you need more?

SEBASTIEN DUCOS:

I think I am. So I will, again, not share this written document yet because I don't think it's ready, but I will definitely share the elements that we discussed, including the fact that there is disagreement on legal bases that I heard, because I still heard it and I haven't been contradicted, that I think the community part of the IRT agreed that the recommendation 7 wording wasn't the problem and that it should be kept [inaudible] interpretation on the legal basis might be, and that would need assistance from the council. And if anybody else needs me to report anything else, I'm happy to. But otherwise, I'm done.

DENNIS CHANG:

Thank you, Sebastien. The IRT [inaudible] data elements, this is the data elements chart that we have created for educational material to educate the implementers, but it was very useful to really check out the requirements that we have here and see how it applies to each data element so that you know, for example, this is the baseline language, and it does not have legal bases in the requirement as a prerequisite for transfer.

So right now, this is the baseline language that we're applying to this data elements chart, so it's consistent with the policy language as is. If we do add legal basis here, then this chart would have to change and say it's not a "must" but something else as we have indicated, like basis

---

or based on legal basis that the registry operator is going to establish or not establish. So that is different than the language here.

So what I want to do—and this is pretty extensive and it took us a while to put this together. I know that we gave you a task to examine this for us, check it, and that's due on the 24th, this homework, but I thought it would be useful for—Andrew here joined us to just quickly lead you through and do a brief presentation about what this is and how to read it. Go ahead, Andrew.

ANDREW DICKSON:

Thanks, Dennis. I've been a member of the IPT for a while, but I was tasked with giving you some history, I guess, of how this document came to be and the purpose of it. So yeah, this is our registration data policy processing requirements chart. It's intended really to be an educational document to provide an overall picture of the registration data policies and requirements for data elements processing.

So overall, I think the intention here is to include it as a reference in published materials for public comment, and eventually, the public policy.

In terms of where we're getting all these requirements from, the document is based on the IPT's analysis of the data elements matrix, which I think we introduced and discussed last year. Just to jog everyone's memories, this was a Google sheet, I guess, that listed the data elements of all the processing activities in which the IRT could make comments, and I guess it's still in the IRT folder, but I'll drop a link to it in the chat just in case anyone wants to [get a bit more history.]

DENNIS CHANG: I did already.

ANDREW DICKSON: Oh, great. Thank you, Dennis. So I guess we consolidated that work into this document with the goal of creating an educational summary document, just having everything all in one place with quick reference of capabilities.

In doing that, we tried to ensure that the chart reflected the current baseline language in OneDoc, as Dennis mentioned, and we also paired it to the PDP phase one final report and [inaudible] analysis and recommendations. And then we insert a line [under the board's direction from the] board resolution and accompanying scorecard.

So it's a pretty simple layout. We have a description of the rules at the very beginning, sort of a legend, I guess, and then Dennis, I think you've already gone through a couple of the requirements that are specific to the registrar chart and then the registry operator chart that follow.

There is a lot to take in here, so I think our ask is that the IRT take some time to review and digest this. If anyone has comments and questions, please do plug those in using the comment function in the document, and like Dennis said, we appreciate feedback by the 24th and hope that this is useful as sort of a consolidated reference document. That's all I had.

---

DENNIS CHANG: Do you want to say a little bit more about the color coding? I know we can all read it, but you have three different greens and two different yellows.

ANDREW DICKSON: Yeah. Sure. Just as we were talking about, I guess, there are some nuances here in terms of the conditions that give rise to certain requirements. We stuck with the green just for the “musts” but had to have carveouts for the exceptions. I guess the big one would be “must if collected.” So providing an opportunity to registered name holder to provide that information and if they elect to do so, then the requirement is a “must.”

So yeah, like you said, Dennis, I think you can read through each of these individually, but they are just intended as carveouts [inaudible] exceptions to the baseline rule “must” and “may.” I'm not sure how much more detail you'd like to go into, short of just reading out each of the descriptions.

DENNIS CHANG: Maybe pick out an example, registrar [registration] expiration date where you have a “must” but you also have [noted a drafting error.] So I think those are kind of things that will help the IRT, but probably the note here, we'll delete before it gets published for [permanent] use, but for the public comment, I think it'll probably be helpful. And this is one of the things that Alex noted also in his review and assessment.

---

And the other things are—okay. Well, I wanted to give you an opportunity to ask questions, but if there are no questions, then we're okay. You have until the end of the week, I think, to review this and give us your feedback. I think it's useful, and we're looking for both the accuracy of the content as well as the format. Marc, go ahead.

MARC ANDERSON:

Hey Dennis. I guess I want to make one comment here, and I believe I've made this comment previously when the original—I think it's Recommendation 10 was first proposed by the IPT. Having the publish field and redact fields done the way they are, I think, leads to some confusion.

Just looking at registrant city for example, saying the publish is a must is kind of misleading because that's a conditional must. It's conditional depending on what redaction logic applies in that scenario. And this isn't necessarily specific to this chart because I think that comment applies to recommendation 10 in general as well, and I believe I've made this point before, but maybe it's an old one.

But I think it is, at least to me, and thinking of how this'll eventually be turned over to engineers to implement saying the publish is a must when it's not really a must. The publish is dependent on the redaction logic.

So that's something that's always bugged me about recommendation 10 and is something that really jumped out at me here in looking at the chart. So I'll just give that as a general comment here.

DENNIS CHANG:

Yeah. We were struggling on how to make this clear between publish and redact, so we thought we first deal with the publish and have that as a requirement, and then we come along to say that redaction requirement is on top of the publication. That was sort of the thought here, but I see your point. Thank you for that input. Anybody else?

“Very problematic.” Alex, yeah, I hear you. Conditional must is difficult. And we couldn’t figure out a way to avoid it. But maybe there is a way still. Thank you. Any other comments? No? That’s all I have for you today. Unless you have anything more, we can wrap it up and give you some time back and resume our conversation online. And of course, there's a GNSO council meeting tomorrow when Sebastien is going to report on our status, and we’ll hear from them.

There's also other agenda items in the GNSO council that could impact us, as I said. I got heads up from our team that we should be attentive to tomorrow’s meeting because we may get suggestions or directions that is different than the way we may have been implementing in terms of planning. So that would be an interesting meeting tomorrow.

Comments, anything before we let you go? Our next meeting is September 2nd, and as Andrea said, she's going to add to this list, including the October 14 ICANN meeting version of our IRT meetings. Going once, twice. Thank you very much, see you in a couple of weeks and I'll see you online. Bye now.



---

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

**[END OF TRANSCRIPTION]**