
ICANN71 | Virtual Policy Forum – GNSO - Registration Data Policy IRT Meeting
Monday, June 14, 2021 – 16:30 to 17:30 CEST

ANDREA GLANDON: Hello and welcome to ICANN 71 registration data policy IRT session. My name is Andrea and I am the remote participation manager for this session. Please note that this session is being recorded and follows the ICANN expected standards of behavior. During this session, questions or comments submitted in chat will only be read aloud if put in the proper form as noted in the chat. I will read questions and comments aloud during the time set by the chair or moderator of the session. If you would like to ask your question or make your comment verbally, please raise your hand. When called upon, kindly unmute your microphone and take the floor. Please state your name for the record and speak clearly at a reasonable pace. Mute your microphone when you're done speaking.

This session includes automated real-time transcription. Please note this transcript is not official or authoritative. To view the real-time transcription, please click on the live transcript button in the Zoom toolbar. With this, I will hand the floor over to Dennis Chang. Please begin.

DENNIS CHANG: Thank you, Andrea. Welcome, everyone. My name is Dennis Chang, I am the project manager for this policy implementation. We call this registration data policy, but many of you may know this as an EPDP phase one policy implementation.

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.

So this is our IRT session number 51, and I will give you a quick overview for the policy for those who are not familiar with this implementation, but this session is mainly designed for a working session for the implementation team.

So what we will do is we're going to go ahead and do our work, and you will see what we're doing and how we're doing it and what we are struggling with. Specifically, we were trying to tackle some difficult recommendations in terms of interpretation, translating it to requirement, and you will get to watch us struggle with that and hopefully make progress.

At the end of the session, we are going to reserve some time—maybe five minutes—so that you can ask us questions, us meaning not just me but the entire implementation team that is composed of the ICANN Org as well as the Implementation Review Team, the community team that supports us.

So we will get going. First, the overview. As I believe you all know, this was a phase one recommendation the Board adopted on May 2019, and adopted 27 recommendations in its entirety, but the Board made two recommendation adjustments, and we are dealing with that in terms of implementation right now.

The first thing we did was we designed a three-stage implementation, mainly because the temporary specification that we were using as a requirement was expiring, so we had to quickly come up with a consensus policy that kept the requirement that was proposed by the

temporary specification [inaudible]. So that's what we call phase one, stage one.

And what we're doing now is implementing all the recommendations in stage two so that we take into account the work that the EPDP phase one team did. So, what have we done so far? As I said, first thing we did was we have published an interim registration data policy. So in fact, we do have a registration data policy in effect right now, and it's called interim. What we're doing is now doing one that is now permanent.

To date, we have delivered various reports per the recommendation to GNSO Council, to EPDP phase one team, and so on. And you'll see some of this today, but one of the recommendations, recommendation 27 asked for us to do a complete assessment of the existing consensus policies and procedures and see the impact.

So we are in fact doing that, and as we do them, we are creating a redline for each one of those policies, and actually publishing them on the IRT Wiki page in preparation for us to use it for the public comment. So when we do our public comment with our policy language, we will use these documents as a reference.

And this is a Wiki page that we use, we call it the IRT Wiki page, and you will see that everything that we're doing is captured in the IRT Wiki. So this is in fact our agenda for today that we'll follow, and you can look back in our previous meeting for the agendas, notes, transcripts and the recording of all the work that we've been doing.

But in particular to the document, we're also maintaining this Wiki page where we are capturing all the reports that the implementation team here is producing and delivering, and you will see them here. And the redline document that I was referring to on the other chart is here. So this is actually available for anyone to view.

In addition, we have our draft policy language that we're working on right now. This is actually available for anyone to view as we make our progress. We're trying to keep transparency in our work, obviously, as we do our work.

So, in terms of broad scope of the job, we have policy language that we're drafting, and this is perhaps the most difficult thing for the implementation team, whereas the recommendation language we received, if it's clear, then it's easy, of course, but when the recommendation language is subject to interpretation and the IRT members—especially those who were part of the development of the recommendation—do not agree on the interpretation of those language so that we can turn it into a clear requirement for implementation, then it takes a lot of work to discuss that and come to an agreement that everybody can support.

That's the first part on the left, and the right to that is the reports and studies that we've been producing. The other thing that we're doing is data protection agreement. This is a major part of the policy implementation, and of course, as a result of GDPR, we need this, and we are currently working with the contracted parties and having an

ongoing discussion on producing this new requirement or specification on how we do our data protection.

And the last part on the bottom right is the assessment of our everything that is impacted by this EPDP phase one recommendation. And registration data touches just about everything that ICANN does, so this work is extensive. We have produced wave 1 and wave 1.5 so far, and we're working on wave [inaudible].

So what we'll do is we're going to go ahead and get started with the IRT members, and what I request is that this is an IRT working session, so please, those who are IRT members, open your mic and open your video and fully participate. Those who are not IRT members, please refrain from comments until the end when we give you an opportunity to address anything you would like.

So let's get started. First thing on the agenda is the team check-in. I ask the IRT members if anyone would like to share anything of an update, any change in your status or anything that you would like to share with the implementation team to help us in our work.

Seeing no hands raised, I'm going to continue. Project overview, I think I just did that. I think that's enough. The IRT membership, quickly introduce everyone. Here are the IRT members. We have currently 38 members on the register, and we're taking account, attendance for each meeting, as you can see here. And the other particular point of interest is that we're tracking to see how many of our IRT members were indeed involved in the EPDP phase one policy development.

And as you note, we have a very good percentage of our IRT members who have firsthand knowledge and experience in the development of the policy recommendations. So indeed, this is very helpful when we are trying to figure out what the EPDP phase one team meant and how it translated to the language that we're reading in the final report. And you can see the makeup of the affiliation of the IRT as well as the attendance level in terms of meeting.

As you see, many IRT members do not attend all the meetings, but what they do have is the recording and the transcript of the meeting that they can keep up with.

That's the IRT members, and what I wanted to do today was a status map view. As the IRT members know, we use what we call the IRT task list, and so far, I issue these tasks to keep track of all the support that we are requesting from the IRT members. So far, we had 154 requests for support [reviewing] the work that the implementation team is doing. And one of these items is [inaudible] I'm asking the IRT members to take a look at the status map.

What is the status map? We use this tool to have a quick view of where we are. When we started, we started with a task determination status map. We looked at every recommendation to determine if we had indeed a job to do on the implementation, and then we know what that job is. So we had to go through this to agree exactly on the task on hand for the implementation team, and that, as you can see, is complete. So we know what to do.

Now, the other two, this is what we call OneDoc. It's another way for us to say this is the registration data policy language. And we call this OneDoc because in the beginning, we had many documents and we treated every one of the recommendations and we tried to deal with them individually, and at a certain point, we came together and put it into one doc. You will see that today.

This is the status of where we are with OneDoc, which sections of the OneDoc are ready and which sections we're still working on. And this is what we call recommendation status map. This shows in terms of recommendations themselves whether or not we are proceeding with the implementation planning language definition discussion, but we're also noting there are some items here that are pending some resolution. A good example of this is the recommendation 27 and recommendation 12.

This item about the retention is, I believe, the resolution is coming next month in terms of a full resolution or a follow-up work that EPDP team [did.]

So, quick look at where we are with the recommendations themselves. Of the 29 recommendations, what is the status on each one? That is the status map.

So let's go in and do one of our RedDoc. Again, we said that this item is a good example of what we are doing together as a team. We looked at this document called rules for uniform domain name dispute resolution policy. This is an existing policy, and we determined that there was an impact from the registration data protection and we are identifying

those impacts and redlining them and having a discussion with the IRT to ensure we're in line with our understanding.

And mostly, it's pretty clear, but there are some items that we struggle over and it requires some discussion. And so far, I think we are doing pretty well on getting through this, but on this particular issue, let's see what the issue was. Let me go back to the agenda.

Section 4(b), shall versus must. Okay. This is a comment. So we didn't finish this discussion. We were talking about this and we sort of ran out of time.

Now, original language is "shall," which is a requirement, but one suggestion was to make it "must" as a requirement, and then now we're debating whether we need to change that at all. We're using a principle that if it does not have to change, we do not change, so we leave it alone. So I think the last discussion [inaudible] feeling like we were coming to consensus was "shall" is just fine, let's leave it as "shall", we don't have to change it to "must." But I want to confirm that with the IRT. And one more opportunity for discussion with the IRT if there is a strong feeling about this one way or the other. So let me hear from you. Brian says, "Why is this being changed?" So I think he is of the opinion that we shouldn't change.

Was there anyone who was viewing this as a necessary change? If there isn't—I'm not hearing anything—we will reject this suggestion and then keep the "shall," as I noted here. Thank you. Make a little note for our staff who later on comes back and document the changes and record them so we can remember when we made a decision and why .

So I believe it was the last remaining item for this RedDoc. So unless I hear anything more, I'm going to consider this one completed, and then ask Sam to create a PDF version of the RedDoc so that we can post it on the IRT Wiki. Thank you. That one's done.

So let's get to OneDoc. We have a number of items on the OneDoc. We are going to open it up here, and we want to finish the conversation regarding notes at the bottom of section 9. We were talking about section 9 last time we met, and I think we were making good progress here. Perhaps Alex had received his answer, so we're okay to close this, point number one. So there's actually two separate notes for this point that Alex made, and I want to be sure that we cover both points satisfactorily. Alex, do you feel that you got your answer and we can close the first item?

ALEX DEACON:

Hi everyone. If you remember, the reason why I raised this was a while back, perhaps maybe a year ago I kind of went through and just made sure that the OneDoc covered all the issues and all of the recommendations. And for some reason, the phase one EPDP called out in recommendation 8 number two, updates to contractual requirements for registries and registrars to transfer data that they process to the data escrow provider, etc. You could read that all.

And I understand that eventually, if we're lucky, this will become consensus policy, but I was just curious as to why this was called out, and as it was called out, what, if anything, the IRT should be doing

specifically to address recommendation 8 number two. That was my question.

DENNIS CHANG:

Yes. It's a good question. IRT members should know the answer to that. We should all know. Does anyone want to address that? I think Roger had a good comment on this if Roger is here today. You want to repeat what you said last time? [I think] it was succinct and meaningful. No? Roger, you don't want to speak?

Okay, well, then I will just tell you what I believe is the case, and you can correct me if I'm wrong. At any time we have a consensus policy, consensus policy is a community document that sets a requirement for our contracted parties and the contracts, and therefore, part of the implementation for that consensus policy is to update any of the contractual requirement if we need to, as needed. And therefore, on the IRT, I don't believe that we need to direct anything of the sort because that's already understood and that's how the consensus policy works, because if you look at the contractual requirement, it actually calls out the fact that those that contract must adhere to the consensus policies that the community develops. But that's the answer.

So, why the EPDP phase one team decided to put that into the recommendation as a specific language, I cannot answer. But I can tell you that there isn't any more work the IRT has to do in terms of policy language for here to address that. Marc Anderson, thanks, go ahead and speak.

MARC ANDERSON: Thanks, Dennis. So I can help you with the answer to the question of why we put this particular language.

DENNIS CHANG: Ah, you remember?

MARC ANDERSON: I do remember that. And I suspect that that won't change your answer to the question, but for the sake of completeness here and just giving a little background, I'll do that quickly.

So on that language, we were specifically—we're cognizant of the fact that as a working group, we were recommending that it is no longer necessary to collect the administrative contact. So we were thinking specifically about that particular answer but also aware that there may be other cases where we were recommending changes that could have unintended consequences to contracts and for example escrow.

So we put that particular 8.2 section in as a little bit of a catchall for the IRT to take a look and see if there were updates that needed to be made to account for the fact that administrative contact is no longer required. For example, in specifications in the RA and the RAA that require the collection and further processing for the admin contact, that was the specific example we were thinking of, but we were aware that there may also be other items. So that's what we were specifically thinking when we included that and why that's there. We didn't want a situation where

there's some ambiguity or conflict, I guess, between these policy recommendations and other existing policy or contractual obligations.

DENNIS CHANG:

Well, that's good to know, Marc. That actually helps me a lot because when we were reviewing Rec 27 with this recommendation that we review all the consensus policies and procedures, I think I knew what that meant, but [we left out] the word "contracts" and I wasn't sure whether that was deliberate or not. But I think you're kind of making it clear now, of course, contract has to be updated, we should know what that is and we should review it. Alex, does that help?

ALEX DEACON:

Yes. I think it is helpful. So again, but I still have the question, is, have we done that? Has the IRT adequately done its work with regards to recommendation 8 number two, especially now we've been reminded as to why we wanted to do it from Marc? And if not, what is the plan to do it?

DENNIS CHANG:

Oh, we have not done that, because we have not reviewed the changes to contracts just yet. We are doing that, meaning that the ICANN Org team is looking at the contract to see where the changes are, and we will bring that to the IRT for confirmation. So that is to come . And here's a poll for the IRT. Thanks, Alex, for pointing out—asking the obvious question, but perhaps it needs to be clear. If the IRT believes there are documents that we should be updating or are impacted but we have

not put it on our list for example, then please let us know. They are documents that we have reviewed and determined that that it had no impact, so we are not looking at it, but that's our plan, and we wanted you to know that.

So when we do public comments, I think it's fair to say that we are going to let everyone know where the impacts are and how we're going to update them. I think that is sort of the primary motivation for the Recommendation 27 when it gave us a broad mandate to study all the policies and procedures and report back to the GNSO Council and determine whether the changes themselves can be just made as part of the implementation working with the IRT or deferred to the GNSO Council for possibility of additional PDP.

So that's what we're doing. Alex, stay tuned. We have more work to do and we're going to have to look at the contracts and we'll show you what we believe is the change that's necessary. And we're going to ask you to review that and add it to the IRT task list.

Now, the second item, this is another item—I believe I know the reason why you're asking this question. Are there additional data elements? Yes, there are. And we may have had this discussion before you joined the IRT, actually. But what we did in this case is that recognizing that registry operator may need other data elements that is not covered by our policy, that's okay, we want to make sure that we're not making a requirement that prohibits the registry operator to [inaudible] process and do business with the data they need.

What the implementation decided to do is add an implementation note here. If you look at implementation note A, this is the reason why we added this note. Does that make sense?

ALEX DEACON: Dennis, sure, it makes sense, it's just inconsistent. In the OneDoc section for Recommendation 8, we explicitly call out all of the optional fields, tech fields, all kinds of stuff, right? That could be transferred, but we don't do it for this one. So, why is this different? Why aren't all the optional things logically—by your logic—in the implementation notes? It's something, again, I've never quite understood, and which is why I raised it, to better understand it.

DENNIS CHANG: Okay, so let me see if I understand what you are saying. You're saying that in section 8, we have requirements for must, we have requirements for may must, we have requirements for—yeah, must do something.

ALEX DEACON: 9.5, that's right, tech name and all that.

DENNIS CHANG: Yeah. so we have—

ALEX DEACON: I'm looking at the table in recommendation 8, we have all that stuff in 9.5, we don't have that very last row in the table, additional data

elements as identified. I'm just trying to understand why that one is special and why that one should go underneath and not be added here. Again, I don't have a position, I'm just trying to understand why this one was special. It doesn't seem special to me, which is why I raised it.

DENNIS CHANG: Okay, so do you have a suggestion on how to make it more clear?

ALEX DEACON: Yeah, add it to section 9.5.

DENNIS CHANG: Add what?

ALEX DEACON: Add the requirements or optional requirements outlined in the last row in the table in recommendation 8 to section 9.5.

DENNIS CHANG: Let me make sure, when you say table, do you mean this table?

ALEX DEACON: Yes.

DENNIS CHANG: And when you say last row, do you mean this row?

ALEX DEACON: Yes.

DENNIS CHANG: This is not a data element that was called out. This seems more like a note, right?

ALEX DEACON: No, it's the same as all the rest above that are marked in yellow.

SARAH WYLD: May I jump in for a moment? Perhaps I can [inaudible].

ALEX DEACON: But I'm happy to—hopefully Sarah can clarify.

DENNIS CHANG: Yeah, jump in. [I hear several] voices. Sarah, is that you?

SARAH WYLD: Yeah. I'm sorry to have interrupted. I just hoped that I can be helpful, because I think I understand what Alex is getting at here. So this data element table is all the elements that the registry might have, which may need to—or may—transfer to the escrow provider, and the bottom row, with all that text, says any other data elements separate from what is listed up above, but if the registry operator in their policy collects those data, then they may—optional—also escrow it. And so I don't see a difference between that row and the ones above it that are showing

on the same page that are all yellow. So it seems to me like that is an optional data that could be escrowed and so it should be included in our policy in that section 9.5, whatever it was. So hopefully that helps. Yeah, right there, so right after nameserver IP addresses, maybe we should have another row for additional data elements identified by the registry operator.

DENNIS CHANG: Does that not put in a new requirement? [inaudible]

SARAH WYLD: I don't think it's different or new, Dennis, because we have this option that a registry operator could define other data elements that they collect, and we see that also in recommendation seven, which is transfer of data from registrar to registry. If we're looking in the PDF, page 10 at the top has those additional data elements. So that's a scenario where a registry might require other data specifically because of the type of TLD that they offer. So if that data is being collected by the registry—and again, it is optional—then the registry should have the option to escrow it, so it should be included in 9.5.

DENNIS CHANG: Yeah, so the way I was reading the note is there may be others, and this is not meant to be a comprehensive list in the recommendation language, right? That's why I think the team stopped listing the data elements individually and opted to create sort of a general note. That's how I took it, because we don't know what other data elements will be

available or needed tomorrow. So I hesitate to add to our policy language and trying to make a comprehensive list and complete list. I don't know if that would serve us better. I think the way we decided early on was to use an implementation note such as this.

SARAH WYLD:

So I don't think that you would need to put a row or a line in the policy for every possible data element. I think our policy already contemplates that there are some data elements that may be escrowed. So if you look at, for example, 9.3, the registrar may escrow some of this data. And then we have some open comments about certain data that perhaps should be "may" for escrow rather than "must." So I don't see a corresponding section where the registry may escrow data. I see "registry operator must escrow" and I see "registrar may" and "registrar must." But there's no "registry may" section. And I think the tech contact should be "may," as we discussed, and I think this section also, the extra additional data elements should be "may escrow." Thank you.

DENNIS CHANG:

Okay, so let me see if I can make this more tangible for me. I think what you are recommending, Sarah, is suggestion is really create a new section for ... Is that the suggestion, that we want to see another section, 9.6 perhaps, that says "registry operator may."

SARAH WYLD: Yes, Dennis. I certainly don't speak for the registry operators, but that would be my suggestion for how we should implement the recommendation.

DENNIS CHANG: Let me hear from a registry operator. I'm not sure how to go about it, but is it obvious to you what needs to be there if we had a 9.6 that says “registry operator may?” Marc, go ahead.

MARC ANDERSON: Hi Dennis. So in listening to Sarah and Alex, I don't find myself disagreeing with the points they're making, but one thing I want to flag is this isn't a new concept in the base registry agreement, the idea of additional fields was considered and accounted for. And I'm skimming through it real quick, and the escrow section for example that talks about extensions—and I'll just paste this into chat. This is the language from the base RA, section 3.2 on escrows, which contemplates what happens with escrow if a registry operator defines additional fields, for example.

So I think this is very pertinent to the discussion we're having right now. So Dennis, I think maybe I'm tapdancing a little bit to say it might be worth us taking a moment to review the language that exists in the base RA already around this to see what precedent already exists and if changes are necessary to account for this. Hopefully, that's helpful.

DENNIS CHANG: Okay. I think you just gave yourself homework, and that's good. Beth, let me hear from you. How are you?

BETH BACON: Hi Dennis, how are you?

DENNIS CHANG: Excellent.

BETH BACON: So I think that perhaps maybe we just drop in a [may] section and keep it very tentative so that we can take a look at it and digest a bit of the conversation, because that was kind of—it was a little bit of—I think we want to go back and review, and now Marc—

DENNIS CHANG: Yeah, I was trying to translate the concern to a policy language, but now I think I see [what is] potential, and if a new section should be added and makes the policy language better, definitely, that's what we should be doing. So we will go ahead and—go ahead.

BETH BACON: Sorry, Dennis, when we add that in, can we keep it flagged as tentative? Just because I think that we're going to want to look back at our registry [inaudible] and stuff.

DENNIS CHANG:

Yeah, tentative, meaning that we're not deciding to add it. I still don't know what to add. But we are flagging it and giving you a homework to take a look at it and see if there is a section that we can add as a 9.6 that would provide value and clarity for the policy language. So that will go out as a homework, and of course, I'll look at it too after our meeting, but we can do that offline. Agreed? Beth, do you want to speak again? Hand's up. Hand's down. Okay, let's see the note. Thanks, Alex, for bringing that to our attention for discussion.

Next item is 9.4.13, registry/registrar ID. Okay, let me see if I can remember. We flagged this for the IRT discussion. Right now, we have this under "must," right? And I can't remember, I think it may have been Roger who flagged this and said we can't do this because—maybe it was Marc—a registry/registrar ID doesn't exist in many cases and people don't use it and therefore we cannot make it "must," so it's more appropriate to move it to "must if."

And I kind of saw the logic to that, but I'd like to hear from the IRT if I'm reading that correctly or understanding the comment. Who wants to speak? This is a registry operator item, so if registry operator says he's okay with 9.4.13 being added right now, I'll accept that too, so we don't have to say anything. I want to address somebody's comment sometime. Go ahead, Jody.

JODY KOLKER:

Hi Dennis. I don't want to speak for the registries, the same as Sarah here, but I believe I was the one who probably brought this up. Some thin registries don't have a registry/registrar ID. So this one particular

field cannot be transferred to escrow because it does not exist at thin registries. So the spec is incorrect and it needs to be moved for this one field.

Now, whether we do this as a “must if” or whether we have a different section that says this must be a “must if” alone, but I’d sure like to have a registry discuss this. I’m just bringing this up as it just doesn’t look right to me. Thanks.

DENNIS CHANG: Jody, didn't you guys become a registry too?

JODY KOLKER: I'm speaking as a registrar. I'm only on the registrar side.

DENNIS CHANG: Okay. I think Marc is a registry, right? Go ahead.

MARC ANDERSON: Hey Dennis. And thank you, Jody, for the memory jogger there.

DENNIS CHANG: He's looking out for you.

MARC ANDERSON: Yeah. I'm staring at this thing drawing a blank until Jody spoke up. So thank you for that, Jody. Yeah, Jody is correct. In fact, I did follow up on this one and confirm with our engineering team that this does not exist

in all cases, so I think Jody is 100% right there and a “must if” language, as you’ve done in other places, would work here, Dennis.

DENNIS CHANG: Okay. Good to know.

MARC ANDERSON: So thanks, Jody, And yes, I agree with that.

DENNIS CHANG: Thank you. So the additional note that I made here—and it sounds like we’re agreeing. And it’s a fact, we just reconfirmed the fact. If that’s the case, we’re going to note this as another item in the drafting error, because the recommendation said “must” and we cannot accept that as a “must.” So we’re going to change that. So we’ll note that and add it to our list of drafting errors and of course, publish that along with our public comment. Agreed? Thank you for that discussion.

Next item is changes to paragraph a the bottom of 10.1, “shown” to “returned,” 10.1. I think this may have been another Jody item. I can't remember. But you brought up a point where we cannot accept this as a recommendation or a requirement, so we needed to offer flexibility of returning to inquiries as a blank or omitting from the inquiry when there is no data. And suggestion here is that shown is probably not a good word to use, so we are suggesting returned as a more appropriate word for us to use. What do you guys think?

I see Marc, then Alex. Go ahead, Marc.

MARC ANDERSON: Hi Dennis. So yes, thank you for this. I think the new text is good, and I also agree with changing “shown” to “returned.” I think that’s a great point. The obligation is to return data in a response. “Shown” can be kind of confusing, certainly for the implementer. So I think that’s a great point and I like the proposed change, so I’m supportive of this.

DENNIS CHANG: Thank you. Alex.

ALEX DEACON: Yeah, at the risk of going down a rabbit hole here, by initial thought on this text here was that it’s more appropriate for the RDAP profile spec than it is for the policy implementation. But unfortunately, I haven’t had [the cycles] to join RDAP. I’m not too sure what’s going on there. So I’ll just leave it at that as a comment.

DENNIS CHANG: Okay. So those of you who know, there’s an RDAP working group behind the scenes parallel to us. I’m not involved that, but I know that Roger, Alex, Jody and Marc are working hard on looking at the profile to see the impact from this policy. So we appreciate that. And so that everybody is in agreement, and I’ll remind us that we have chosen to be technology agnostic for this policy implementation, but at the same time, we want to ensure that we don’t put down a policy language that makes critical technology unusable such as RDAP. So we are sensitive

to that. And I really appreciate the fact that many of our IRT members—and this is the benefit of having a powerful IRT group, and when I look at this IRT working group, we have four members on the RDAP working group that's tracking their work and making sure that we are moving in a consistent manner.

We have seven minutes left. I know that this is a one-hour meeting instead of our typical 90 minutes. What I want to do is instead of following the—let's see, changes to section 10.3, instead of following the agenda items in order, with the given time, I want to address this requirement.

Earlier today, I was in the GNSO Council meeting, and we talked about and they asked, so I gave an example how GNSO Council could—what they could do to help the implementation team. and Karen asked for clarity of the recommendation language, and I gave an example of this. So when I said when we read the recommendation language such as this, sometimes it's very clear and we appreciate it, it's easy to produce a requirement such as this and there's no controversy, not more than two business days so we said not more than two business days from the receipt, boom. Okay, thank you.

But in other times, we have sort of, I would say, a separation or disagreement in what we must interpret now, because for example, this requirement says business days, clearly. This policy language does not say business day but it just says day, so when we read days, are we supposed to interpret that as 30 business days or 30 calendar days? So I'm bringing this up for discussion.

Of course, in my judgment, when the recommendation language did not specify business days, I used calendar days. I think that's most common interpretation. But Sarah makes a point here that maybe it should be business days. So I'd like to hear from you. Alex, let's start with this one.

ALEX DEACON: Sorry, that was an old hand.

DENNIS CHANG: Okay. So we have to make some decisions to move forward, Sarah. Are you okay with us interpreting this as calendar days and making the requirement calendar days, or do you affirm that we now have to change it to business days and write in the word "business" in our requirement? And perhaps if we do that, then we may have to add it to our drafting error. Sarah, are you still with us?

SARAH WYLD: Thanks, Dennis. I am still here. In terms of the regular requests, I personally am fine with 30 calendar days, although I think business days is equally logical, but I can't speak for the other registrars on the group. I have not consulted with anybody about that lately. Thank you.

DENNIS CHANG: Yeah. Please consult with them. We are here and we need to make some decisions and move on. But what we are going to do is stay with this as what I call baseline language. So we will stay with 30 calendar days as

our baseline policy language and move forward, and of course, you can come back later and provide more inputs, which you do.

The other requirement is what we call additive timeline versus the acknowledge two business days plus 30 calendar days is a baseline requirement. The reason that I say this is because when we are talking about acknowledgment, it says two business days from receipt. Very clear, from receipt. But on this side, response time, it leaves out the word “from receipt.” So, from when 30 calendar days is the question, right?

And we in our last discussion heard that what was meant was that it’s acknowledgement first, then comes a response, so they’re additive in timeline. So we have a mix of two business days and 30 calendar days, so the total timeline is this, and that is our baseline requirement. Is everybody okay with this? Because we want to move toward the urgent request, I think that’s where we have more of a discussion.

Okay, I don't hear anything, so we are going to move to the urgent request.

ANDREA GLANDON: Denise, one minute left, just so you know.

DENNIS CHANG: One minute left. So, dear IRT, I ask you to review this and provide comments and suggestions, and there were some e-mails written and discussions, but I believe we have to come back to this. It’s too

important. And so we will come back to this. And now, if you're joining for the first time, you understand why this is so important when we receive requirements like “less than X business days” and we are to come up with requirements, is it this, is it that, does it make sense for an urgent request to have two business days plus one business day for response? Is that what was really meant?

So this is the question on hand. This is why our job is not so easy. But it's interesting. So, anybody have comments or questions? I can stay a little late to answer any questions from the public, and you're welcome to stay also. And of course, we continue to have our meeting and work on this policy, and you can contact us anytime.

Thank you, everyone. Thank you for your support and we'll see you next time at our next IRT meeting. Bye now.

[END OF TRANSCRIPTION]