ANDREA GLANDON:	Good morning, good afternoon, and good evening. Welcome to the Registration Data Policy IRT meeting being held on Wednesday, the 20th of April, 2022, at 17:00 UTC.
	In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room.
	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 the ICANN multi-stakeholder process are to comply with the expected standards of behavior.
	And today we have apologies from Steve Crocker and Erick Rokobauer.
	And I will turn it over to Dennis Chang. Please begin.
DENNIS CHANG:	Welcome, everyone. Let's get started. April 20th. Wow. Already the end of April. And we're in the second quarter of 2022.
	On today's agenda, we're going to try and cover the … Let's see. I see the ICANN74 session. Did you mention this already, Andrea?
ANDREA GLANDON:	No. I'm sorry, I did not. Would you like me to talk about that now?

DENNIS CHANG: Yeah. Would you mind?

ANDREA GLANDON: Sure. No problem. We will have an ICANN74 session that will be held on Monday, the 13th of June. And that will be from 15:00 to 16:00 CEST, which is our local time. That is 13:00-14:00 UTC. Thank you.

DENNIS CHANG: Thank you, Andrea. I'll send out the invitation for us so that we can put it on our schedule at the right place. And we'll talk more about that as we get closer to the session. I think we'll have a good session again. It's one hour only, but I think this is just appropriate for a public session like this. So I don't think we'll get into heavy requirement content discussion, but it will be more of an overview, getting everybody on the same page as to where we are. And maybe, just before the ICANN74 session, we'll review our schedule again and make sure that, each ICANN74 session, our timeline has been refreshed to us so that those who come to the public session can see where we are at the time.

Okay. So—yeah, Alex, I see your chat there. DPA discussion. Yeah, I have sent an invitation to our colleagues in ICANN Org. And Beth is here, too. So we are trying to get something together so that we can come and give a status, but we're not quite ready yeah. So I'll let you know as we go.

Yeah, me too. ICANN74. These ICANN70 sessions are good in many ways. Oh my gosh. I think we're going to be face-to-face. I haven't seen

you in two years. I hope some of you can make it. It'll be our first face-to-face session in a long time. But—oh, sorry. Yeah. Sadly. But I think the other thing that is good about this is to build that momentum and setting the pace in our progress and keeping the momentum going and lighting the light on the importance of this work and to all of you. So that's great. [inaudible] Sarah [inaudible]. Yeah, Sarah. Okay.

Let's see. I know that some of you have to leave early, and I think the priority for today, in my mind, is getting our RDAP Working Group completed with their work so they can send us their draft profile documents. So I'm sort of anxious to get that because we marked that as one of the [appendencies] for us going to public comment. And I'm not sure how long IRT will need to spend time reviewing that, but definitely we do want to have a review and have a meeting on it. So one of these session I will devote to the RDAP Working Group's RDAP profile documents.

So we have a long agenda, but my priority today, especially as I think Marc can only stay for the first hour, is I want to make sure that we get through that and complete that. And then the second thing, the second priority for me, is the consensus policy on the CL&D, which has been lingering for now months. And this is the last consensus policy redline that we have. So we do want to complete that. We thought it'd be a nice closure to get us ready for public comment.

So with this, I want to turn it over to our master of RDAP, Gustavo. He's been spending a great deal of time trying to get consistent at the policy and the RDAP and WHOIS and everything. So it's really great to have him in the midst. And thank you for inviting to Gustavo to the RDAP

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Working Group, Marc and Roger. That was a really good call. I think it has paid off in dividends. And thanks to all those who are working on the RDAP Working Group. You see things that we haven't seen, and that's just great to uncover those things now instead of later on, during public comment or something. That's great. Thank you.

I'll turn it over to you, Gustavo. Go ahead.

GUSTAVO IBARRA: Okay. Hey, guys. So we did a few changes on Section 10.2, the section regarding redaction. And first, before going through the comments, let me go through all the changes so it's easier to read what we're trying to do here.

So the first change: in the previous version, this paragraph was [kind of a long] paragraph, so there was no bullet or numbering. And we realized that that was complex because, down below, we were referring to redaction requirements. And in reality, it was not always clear that, when we were saying "redaction requirements," it means that specific paragraph. So what we're trying to do here is to have some way to easily reference these requirements.

And we also realized that these are requirements that contracted parties must do if there is a trigger by redaction. So it in reality, we just want to call them just requirements. As the paragraph mentioned: "a trigger if redaction of personal data is required."

Also, during our conversation of the IPT, we realized that that redaction that we're defining now or that redaction that we are saying there in

the paragraph is a really general term. It's not only about removing the value. It's also about, in reality, not providing the data, the real data, that is the database. And we realized that there are two ways of doing redaction in reality in this policy. One way is redaction by omission or removal, meaning that you don't have a value or the key. And there is another way to do redaction, which is in the case of e-mails in the case of registrars when they're redacting registrant e-mails and technical e-mails. You replace the value with something else, with an anonymized e-mail address or with a webform that you can use to communicate with the contact.

So the first change, as I was mentioning, is this change. So now this paragraph was just there alone without any referencing is now having its own reference, is now Section 10.2.1.

Then we have Section 10.2.2. This section is basically when we're doing redaction by omission, also called redaction by removal. In the first sentence or paragraph, we're defining what that means. And this is basically the same thing that we had before in the previous session. It means that the contracted party is not going to show the value (basically, it's going to remove the value) and must indicate that it was redacted. How do you indicate? Well, in the case of legacy WHOIS, it's with the word "redacted."

And then, on this section, 10.2.2, we have subsections that are related to specific requirements when doing redaction by removal. And this idea came from a comment from Alex from Addendum 1, saying that it was not clear that the requirement about [showing] "redacted" only applied to registries. It appears that [does] because, in the past, we had

this section. And I'm going to split it in a few seconds or minutes. This section was mixed between registries and registrars. It was not clear that that redacted requirement only applies in the case of registry operators and not registrars. So now I think it's pretty clear there is no [inaudible] anymore. So hopefully this makes things easier to read and hopefully they are clear now.

So the first subsection that we have is what we had in the past, but now, as you can see, instead of saying that, when the contracted party applies the redaction requirements, we are referring to the actual section—in this case, Section 10.2.1. And in this case, they need to Redact with uppercase R, which means what we have here in this definition. So this is not changing anything.

Now we have Section 10.2.2.2. And this section, in the past, was a mix between the requirements for registries and registrars regarding the e-mail fields. And we realized that it was not clear and it was [inaudible] those and [inaudible] issues. So now we have the requirements for the registry operators in which basically the registry must redact if they need to apply the requirements in Section 10.2.1. And this applies for these fields, which are the e-mail address.

And, again, we have another requirement for the registrant organization and the registrant city. These two other requirements also are redaction by removal or redaction by omission, meaning that you remove the value and you, in the case of legacy WHOIS, show the [word "redacted."]

So now Section 10.2.2, which is highlighted here, is just about redaction by omission or redaction by removal. It's only about that. And hopefully that's pretty clear.

Now we have a new section, which is #[N].2.3, and this section is when you're doing redaction by replacement. And in this case, the only redaction-by-replacement option that we have is in the case of the registrars when they are applying their requirements of 10.2.1. And it basically says that they must publish an e-mail address or a link to a webform to facilitate communication with the relevant contact, which must not identify the contact, obviously. And we added this subsection, ii, and it says that it must indicate that the value is modified. As we were having these conversations, we came to the conclusion based on the report that it appears that it is this idea or desire to also be notified or signaling in the response that the value that you have for the recent e-mail and tech e-mail is not the real value. It's something else. So this section is only for redaction by replacement.

And then, below, we have what we call the miscellaneous redaction sections, which is basically some sections that talk about redaction, but they are not specifically tied even to either redaction by replacement or redaction [inaudible]. And these are basically the same requirement that we had in the past in the previous version. We only changed to say that, when they apply their requirements in Section 10.2.1, instead of redaction requirements [as the rest], we changed the numbering because now that numbering is different.

So those are the changes in Section 10.2.

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So questions? Is it clear what we're trying to do here? Or is it not making any sense?

Yes, Alex?

ALEX DEACON: Thanks. No, that was helpful to get the context of what problem you were solving with these updates because, when I originally read it, I wasn't too sure it was helping. I thought it was overcomplicating and confusing things. But that explanation helps. I'm a little bit concerned that a lot of the words you said to explain what you'd done actually didn't end up in the document here. So future readers may also be confused. But I won't harp too much on that.

But let me go to my first question. So Section 10.2.2.2 is only for replacement.

GUSTAVO IBARRA: This one?

ALEX DEACON: Yes. So this one applies to registries.

GUSTAVO IBARRA: Yeah. And it's redaction by removal. So in the case of registries, they will remove the value of the registrant e-mail or technical e-mail and, in the case of legacy WHOIS, they will put "redacted" in [inaudible].

ALEX DEACON: So essentially what this obligation and requirement does is that, when redaction is in place, or when the registry decides that redaction is needed, there will be no way to contact the registrant via e-mail.

GUSTAVO IBARRA: The interpretation of the EPDP report is that, yes, when the registry applies redaction requirements, they will put the word "redacted" in legacy WHOIS. They will remove the value, basically, yes.

ALEX DEACON: So the assumption of this is news to me, someone who was in the Phase 1. This is a nuance that I didn't quite understand when we were developing the policy. So the assumption there is that, whenever someone wants to communicate with the registrant, they should go straight to the registrar. Is that what we're saying?

GUSTAVO IBARRA: Yeah, I think that's the end result of this requirement. If you want to communicate with the contact, yes, you need to get the response from the registrar. Yes.

ALEX DEACON: Okay. It just seems like a very big change and update. I'm curious if others are as shocked and surprised as I am now that a registry query

for RDDS information will never, ever contain e-mail information of any sort if the registry decides that they need to redact.

GUSTAVO IBARRA: But it's important to mention that this requirement is not changing from the previous version. This is what we had in the previous version that we had had for months. Well—

ALEX DEACON: I understand. I just want to make it very clear that the policy implementation essentially ensures that, if a registry decides to redact, there'll be no way to get e-mail, any registrant contact information, from the registry response, and that they must always go to the registrar.

I'm reading the chat. It seems I'm the only one surprised by this. So we can move on. Again, it seems … All right, I'll just leave it there. Thank you.

GUSTAVO IBARRA: Yeah because, if we want Recommendation 13, it only talks about the registr[ant].

DENNIS CHANG: Let's turn it over to Marc. Maybe he can comment.

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MARC ANDERSON: Thanks, Dennis. I raised my hand for something else, but yeah, the obligation to provide an anonymized e-mail address or webform has always been a registrar-only obligation. That's the case under the temp spec. And that's something we carry forward under the EPDP Phase 1 recommendations. That obligation is a registrar-only obligation in the Phase 1 recommendations. So that's what I would have expected and what's in place now.

ALEX DEACON: Okay. I'll go back and refresh my memory there. Thanks for the input. I think I was assuming, perhaps incorrectly, that the registrar redacted e-mail address or tech e-mail address would be also made available to the registry and that they would publish that. So that value would be in the registry response in addition to the registrar response. I made a comment somewhere else that kind of exposes this confusion that I have. So it seems suboptimal, but it is what it is.

GUSTAVO IBARRA: Okay. And I think it's really good that we did this change because, for example, now it's clear how the requirement should interpret [right]. So hopefully the change is helping with the understanding and we have clarity on how these requirements are going to be implemented.

So, Marc, you have a different comment also?

MARC ANDERSON: Yes, I do. So, first, I do want to echo what Alex said at the start. Thank you for the changes and the explanation that went with them. I think

this does help. And I'm certainly on board with the intent of everything in here. I think we're all sort of rowing in the same direction, if you will.

With what Alex said, I do wonder, for people that have not had the benefit of participating in the IRT and are maybe picking up this document and reading it for the first time, if it'll be as clear to them as those of us who've had the benefit of the history and the background of participating in this. So I think that's a fair point by Alex. And I don't know if it will or won't. Maybe it would be good to try and get somebody, a fresh set of eyes, to give this a onceover and see if it makes sense.

I do have one comment. It's on the registrar-specific replacement section, if you scroll down to that. Yeah, I think it's—yeah. 10.2.3. It's specifically on i—the "must indicate the value is modified." I think, maybe for clarity, that really only applies when the registrar chooses to provide a replacement value for the e-mail. So they use an anonymized e-mail address. I think that does not apply if you're replacing the e-mail with a link to a webform. So I think the intent there on ii is, if the registrar is replacing the e-mail address with an anonymized e-mail value, then they must indicate that the value is modified.

That's maybe the only thing that jumped out at me. I think that's maybe a minor clarification.

GUSTAVO IBARRA: So, in this case, we want to have text that is technology-agnostic, as you may know. So I think that's a detail for the actual protocol service being used, right? For example, in the case of RDAP—I'm sorry for the rest of

the group; I'm going to get into the weeds—basically what you need to do at least according to the current profile, is you don't show the value in the e-mail value parameter of the v-card or j-card, but we have a different parameter called contact URI, which may be an e-mail or a URL to the webform. So in reality, it appears that the e-mail being blank is being replaced by that contact URI. And the contact URI could be an e-mail or a webform.

So I don't know. I think that's a technical detail because it appears that, even if it's a webform, there is a replacement. Therefore, the e-mail field at least is not there and is needed to create a contact URI, which is a different parameter. So that's the reason why, when we were discussing this, the [inaudible] suggested this text, which is, let's say, general. And then the actual service or protocol may iron out the details for that particular case. I don't know if that makes sense.

MARC ANDERSON: Yeah, that does make sense, Gustavo. Thanks for the explanation.

GUSTAVO IBARRA: Sure.

DENNIC CHANG: Jody?

GUSTAVO IBARRA: Jody?

JODY KOLKER: Hi. I guess I'm reviewing Rec #13 from EPDP Phase 1. And for 2, what is highlighted on the screen—"must indicate that the value is modified"—I can't find in the EPDP team's Recommendation 13. I just don't find that in the two paragraphs that are on there. And I'm curious where that came from. Is that something that I missed?

GUSTAVO IBARRA: Well, that was the long discussion that we had in the previous two meetings of the IRT about redaction means. And if you go to Rec 10, you'll see that table there. It says that the e-mail should be redacted. It says [yes]. And then we went back to the definition of what redaction means and the desire to have a signaling. So the EPDP report unfortunately is not really right. It must indicate or must not indicate. But based on those conversations, we realized that it appears that that was [not] in the spirit of those conversations.

JODY KOLKER: Thanks, Gustavo.

                            Does everybody else remember it that way, too?

GUSTAVO IBARRA: I was not part of the EPDP conversations, by the way. [It's yes,] based on the conversations of the previous meetings of the IRT.

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DENNIS CHANG: This is what was discovered at the RDAP Working Group that came to us as a question. And, yeah, I have to admit, Jody, that I didn't see this either—this scenario—but when they brought it to us a couple of months ago, we had to deal with it and go through some of the logic and the scenarios. "And the data redaction is another redaction. If it's a redaction, then we should indicate. Should we …" So this is where we are. But you're asking good questions and we should be asking these questions right now.

And what I think is we could interpret the requirement this way. And it gives an advantage because of RDAP technology that the RDAP Working Group is working on. They're voluntarily choosing to do this for future benefits. And we want to be able to support them with our policy also. So I think it's good for everyone.

Alex has a hand up. Go ahead, Alex.

ALEX DEACON: So I asked myself the same question that Jody just posed over the past few weeks, and where I ended up is that … Remember that this policy isn't just about redacting data. It's about setting policy to allow requesters to request that data be disclosed under all those rules that we have set in Section 11. So in order for someone who is interested in getting unredacted data [as] part of the process, we have to know that the value has in fact been redacted and isn't the true value of the e-mail address that we're seeing in the RDDS response.

And so an indication that says, "Hey, this e-mail address isn't the e-mail address that the registrant provided. It's one that we anonymized for

them based on the policy here" … And I think ensuring that it's clear to requesters when they're asking for data to ask for only data that has been redacted under the policy … I think it makes sense to flag that in addition to the other fields that will say redacted. That's clear, but for these two fields specifically, it may not be clear whether they'd been redacted or not, which is why I think it's important that there is some indication that the value has been modified. Now, how we do that I think we still need to discuss, but that's how I see this.

GUSTAVO IBARRA: If there are no—

DENNIS CHANG: Can we move on?

GUSTAVO IBARRA: Sure.

DENNIS CHANG: Good job, Gustavo. Thank you for going through that. So I think we should go right to Addendum 1, which Sarah pointed out could help in [inaudible] on this.

GUSTAVO IBARRA: So in the case of Addendum 1, as you remember, we, in the previous meeting, mentioned that now there are two options when there is no data for any specific key. One option is—this is the case, by the way, of

legacy WHOIS only—to not show the value for the key. And the other one is to show the key with an empty value. So those two options are there. And this was, as you will remember, to not change, basically, the service that all the clients are using right now. And in the wild, we have those two behaviors of WHOIS servers. We have Option A and Option B in the wild. So that's there. That's Section 1.

There was also a comment from Alex regarding Addendum 1. "That is not technology-agnostic." Yes, this Addendum 1 is only for legacy WHOIS. And when we added it, we explained that this is the only place that we find that we can put this addendum because there is no WHOIS profile, like in the case of RDAP. CL&D is a registry policy and [inaudible] consistency of the display between registrars and registries. The advisory is just the advisory that we created based on what was in the wild at the time. So this was the solution that we found, which was to add Addendum 1 that is only specific to legacy WHOIS. Obviously, in the case of the RDAP it's easier because we have the RDAP profile, and in that RDAP profile, all the translation of policy requirements to actual technical implementation details are captured there. So that's the reason why Addendum 1 is here.

So now we have a change in Section 2. And this change, I think, clarifies when the e-mail is going to be redacted or not based on the contracted party doing the redaction, which was the comment from Alex. So now it's pretty clear because it says this section only applies to the requirements of 10.2.2, which is basically redaction by removal and not redaction by replacement. So now it's clear that this requirement only applies in the case of redaction by removal.

And we have this Section 3 in the case of legacy WHOIS [inaudible] case of the registrar, they must not provide the indication that the e-mail was modified.

And questions up until this point?

Yes, Alex?

ALEX DEACON: I'm not too sure it's clear, but maybe it is what it is. I still don't agree that we should have technology-specific information in this policy. I think it would be less sloppy if this information was actually included in the CL&D policy or whatever policies, and contracts outline how various RDS protocols, such as WHOIS or web-based WHOIS lookup services, work. I think, if we have this information spread across three of four or more documents, it becomes impossible to ensure compliance with. And so I think we could do a better job here.

And so, again, I appreciate what you've done here and the reason why. I just don't agree with the approach.

GUSTAVO IBARRA: And, believe me, when I was implementing the WHOIS service for the New gTLD Program back in my previous job, it was really difficult to read the requirements. You have the AWIP. You have the CL&D. You have the contract. And it was almost impossible to read.

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DENNIS CHANG: Yeah. Alex, you sound like a frustrated Gustavo [inaudible].

GUSTAVO IBARRA: Yeah, I [inaudible] implementation of the WHOIS. So, yeah, it would be really nice if there was a WHOIS profile, but we don't have it.

ALEX DEACON: We could do it.

DENNIS CHANG: Alex, Alex, Alex. We actually had this grand vision when we started, this ideal state where we clean up everything, like take all the policies and categorize them and clean them all up. And it got to a point where I think we were going over our remit as a registration data policy implementor for the EPDP Phase 1 only. And that's why we had to stop: because … And we actually brought some of these ideas to the IRT, and we were met with heavy objections here within this IRT that said it's too much. I know that you can redline things that are of obvious impact to other consensus policy but trying to move everything to a different policy and terminating/retiring the other policies which we don't think is needed anymore is a significant effort. And of course I think it was something that we would have loved to do, but it just wasn't within our charter to do, Alex.

So I hear you. I understand. But we are trying desperately to keep this project within our scope so that we can get it done and delivered to our schedule and get to our public comment as quick as possible while everything else is going on, of course, in parallel.

GUSTAVO IBARRA: Yeah. In the good news, in the case of RDAP, I think we're doing the right thing and we have a really, really good structure with the RDAP profile and this technology-agnostic policy. So hopefully in the future, if you want to implement RDAP, you only need to read this—I think the RDAP profile—and that's it. That's hopefully the end result.

DENNIS CHANG: Thank you very much.

Any more on Addendum 1? If not, let's go to the CL&D. Can we? Everybody ready?

GUSTAVO IBARRA: Yeah. There are no other comments on the OneDoc, right? There are no other comments on these sections, right? We are good.

DENNIS CHANG: Yeah, we're good with Addendum 1. We haven't covered Addendum 2 yet, but let's prioritize CL&D first.

GUSTAVO IBARRA: Yeah. So on CL&D, let me go to the changes we have in the document. So I'm going to scroll down. I don't want to [inaudible].

DENNIS CHANG:	Is Marc still here or did he leave? Marc and Jody, I think, are sort of the instigators for us having to relook at this. And they did a good job. Okay, good. Go ahead.
GUSTAVO IBARRA:	So as you'll remember in the case of CL&D—and, again, this policy is a registry policy, so the examples that you will see here are how the output of legacy WHOIS will look like in the case of a registry because now we have all these different variables in the OneDoc; if the data has been transferred or not, if the data has been redacted or not, and so on and so forth—we added a new variable because, now, if you remember, in Addendum 1, Section 1, the registry has two options to show or to display when there is no data. One option is the key with an empty value. And the other option is to completely omit the field. So we added this new sentence in all the examples to explain what the registry is doing in that particular example. For example, in Example A, what the registry is doing is showing their key but now showing the value. They're showing the key and not showing the value. Why? Because they decided to do it that way. In Example B, which is the example with … Well, this doesn't change this. [It's an] example of the full transfer with things that are subject to redaction. In this example, the registry is not showing the field, so you won't see any key with an empty value. If there is no data, the field is not being displayed. And, final, we have Example C, which we call the minimal required output. And this is basically a registry that is not transferring any data

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from the registrar. And in this example, the registry is not showing the field. So this is the example that we came up with after we applied all those different variables.

So I think this clarifies the comment that Marc told us on these sections.

So, questions about these examples?

Yes? I think Beth was first. So, Beth?

BETH BACON: Thanks so much. Can I trouble you to scroll back up to the first [inaudible] examples?

GUSTAVO IBARRA: Sure.

BETH BACON: Okay. So this is a full transfer not subject to redaction, but we are in fact giving an example of where we're omitting a field. But then B says, "full transfer subject to redaction," and we're showing an example where you don't show the field at all. You just omit it. But then there's also sections down here at the bottom where it says you have the field and the word "redacted." So I feel like this is maybe a little bit confusing, perhaps just because I didn't look at this before the call because I'm a terrible person. I just didn't get to it. But I'm a little bit confused by that. Like, maybe we're mixing things? Or I'm just slow and not catching on.

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GUSTAVO IBARRA: So what we're trying to do here is providing all this information of why the example looks like it does. So in this example, the registry is transferring basically all the potential data that is transferring from the registrar. And that registry is not subject to redaction requirements. so basically in this case the registry is showing all the information that it has.

Now, these fields are optional fields. And in this case, they don't support or this registry doesn't support [inaudible] data reseller. So basically there is no mechanism for the registry [service] to accept these values from the registrar. So there is no data. Basically, there's no data in the database for this particular [inaudible]. So that's the reason why you see the key and empty value.

And a registry—well, not only the registry but the contracted party—has two options when there is no data, according to Section 1 of Addendum 1. One is to display this, and the other one is to remove this field entirely. So basically you won't see anything. So that's the idea.

In Example A and B, it's the same. It's full transfer. They're transferring all the information that they can. But in the case of A, there is no redaction. And in the case of B, there is redaction. That's basically the difference.

DENNIS CHANG: Gustavo, I see Beth's point. If you didn't look at all the details but looked at the titles only, I can see that it could be confusing. Let me have another look at the titles and maybe we'll word it differently. Thank you.

Thank you, Beth, for your input there.

Marc is next. Marc, you better like this.

MARC ANDERSON: I think I do. I was just raising my hand to thank Gustavo for the explanation. I think it's a helpful clarification and addresses the concern I had earlier. So thank you for that.

GUSTAVO IBARRA: Okay.

Alex?

ALEX DEACON: So, again, my concern is that these updates are really impossible to understand by anyone, I think, other than Gustavo. The updates don't make it more clear to me. They become less clear. And I think it's a terrible way to implement consensus policy. So we end up with text that's confusing and unclear and vague. So not only is it impossible for anyone to implement but it's going to be impossible to enforce compliance on it. We're going to be in a bad spot. I don't know what the solution is, but I think the updates in the OneDoc, the updates that we're making to the CL&D policy, and the addition of these addendums just put us in a terrible spot. There's got to be a better way.

DENNIS CHANG: Yeah, I thought about that a lot. And I think my thought is maybe a—what do you call it?—global uniform PDP from the community that demands that we combine the policies that are alike in nature and that are just the same thing or something like that. But I think the way we're doing it right now is the best we can think of doing with us keeping within our scope. But that is the subject of a process of sort of a global PDP policy development and implementation process and is a worthwhile topic for somebody. And I'm not exactly sure how to initiate it from my perspective.

But, Alex, you're in a lot of different areas, and you cover from the initiation to implementation and also the working groups. So maybe you can make some suggestions? Thank you very much.

GUSTAVO IBARRA: Just to reiterate the point, in the case of RDAP, the other group is working on the RDAP profile, and they have been able to digest the OneDoc. And they are working on changes to the RDAP profile.

ALEX DEACON: Yeah, I know.

GUSTAVO IBARRA: And probably that's the way, right? I mean, if you have something like the RDAP profile for the legacy WHOIS, it will be, for sure, way easier to implement.

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DENNIS CHANG: Yeah. Okay. So we're anxious to see those profiles. So I don't know if we can get a clear indication from Alex--you're in the RDAP Working Group, too, right?—Marc, Roger, those of you … Do you have any more questions from us from the IRT we can help with to get the final draft back to us?

Go ahead, Marc.

MARC ANDERSON: Thanks, Dennis. I think we're in pretty good shape with the RDAP profile. I think, unless I'm missing something, our big outstanding item is how to … It's basically everything around redaction. And I think, with this, that'll clarify what we need to do and will help us wrap it up.

I will say we're making some changes as to how we reference existing specifications. And we're actually making it in line with what's been proposed for the amendments that are being done for implementing RDAP in the contracts. So that's a separate effort for amending the registry and registrar agreements. So I think that's a good change. It sort of syncs up how we're doing that in both places.

So I think wrapping those things up are outstanding items.

Other than that, I think we're substantially complete with the work, and hopefully this will let us finalize the profiles and get a copy to the IRT for review.

DENNIS CHANG: That's great. Do you think next month, in May?

MARC ANDERSON: The next meeting of the working group is on the 28th—so a week from tomorrow.

DENNIS CHANG: Okay.

MARC ANDERSON: I think we'd have a much better idea after that meeting. I think I'd be able to say, "Yes, this addresses all our issues," or, "No, we have some other outstanding things to work out still." So I'm hopeful we're almost done. Let's put it that way.

DENNIS CHANG: Yeah. Let us know. Sam is tracking us closely with all our tasks in the background there. So I have to answer to her.

                       Okay. Next item is Addendum 2. You want to go back there? Gustavo?

GUSTAVO IBARRA: I'm [on] Addendum 2 now, but I think that you're going to explain this one, right?

DENNIS CHANG: Oh. Yeah. Well, the explanation is that we replaced the whole thing. Thank you or jumping on this, Sarah. She didn't waste any time jumping on it and making some obvious things that she suggested. They're

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highlighted or darkened original language. I will go ahead and delete it or ask Sam to delete it after this meeting because I don't think we need that anymore. The entire thing was replaced, and you are already commenting on the new language. So that's a good thing.

Now, on the first comment there, I think it's … Can you click on the first comment on [webform] domain name registration preexisting policy? Yeah, that one. Yeah. [inaudible]?

Okay, Alex. Let me hear from you.

Are you here? Do you want to talk to us about this? I think I understand you correctly. The one thing we can't do is reference the recommendations numbers, but what we do is we reference the policy within our documents. So I'm not sure if I understood you correctly there. What did you have in mind there? Can you explain?

ALEX DEACON: Yeah. I just wanted to make the point that the text in this new box should not apply to RDDS data associated with privacy-proxy services. That's how I interpret the Phase 1 policy. I just wanted to make sure others agree. And if that's the case, then, yeah, we should reference 10.2.5.

DENNIS CHANG: Can I hear from others?

Marc?

MARC ANDERSON: Sorry. I hate to do this. I was distracted with something else and missed that. Which section are we looking at? And what was the question?

DENNIS CHANG: We're looking at Alex's comment for domain name registration pre-existing this policy. And he pointed out that we have to make sure that Rec 14 applies here. And I asked the question, "Is that 10.2.5? It's within our policy." And he said he thinks so, but he likes to hear from others.

And you want to go to 10.2.5 to show them what that is, Gustavo?

MARC ANDERSON: Okay, yeah. Thank you. Sorry for that. Yeah, I agree. Yeah, certainly the intent is, if there's privacy-proxy data, it should not also be redacted. So if that's not already clearly understood, then it should be. And that includes the organization field. If the organization field is for some reason populated with privacy-proxy data, then it should not also be redacted.

ALEX DEACON: Or, more importantly, Marc, the obligations in this box here should not be applied if it's privacy-proxy.

DENNIS CHANG: Sarah?

SARAH WYLD: Thank you. The text in this box here refers to registered name holders. It refers to the data that they have entered. I think there's a general understanding that that is different than the privacy or proxy service provider and the data that is used for a domain with a privacy or proxy service enabled on it.

So I agree with Alex that these obligations do not apply to a privacy or proxy data set. And also, I don't really think anything else needs to happen for that. Thank you.

Dennis, if you're talking, you're on mute.

GUSTAVO IBARRA: Yeah.

DENNIS CHANG: Yeah, I was reading your comment there. "Compliance [interprets it that way." Yeah, I believe they do. We have Compliance team members on our team.

Now, the next comment is … Can you go to #3? Who's comment is that?

You want to answer that one, Gustavo?

GUSTAVO IBARRA: Sure, but I don't know if we have Amanda on the call. I think Amanda may have a better understanding.

DENNIS CHANG: Okay. So the name holder declines publication of the org, right?

GUSTAVO IBARRA: Yeah.

DENNIS CHANG: And the registrar … Okay, Sarah raised her hand, so let her talk first.

GUSTAVO IBARRA: Yeah.

SARAH WYLD: Thank you. So this is referring to Section 10.2.2.2. Gustavo, can you scroll up and show us that? Great. Okay, so 10.2.2 tells the registry operator what to do but that does not help us here about the org field. Keep scrolling down. See, it doesn't mention the org until we get to 10.2.6. So I wonder if it's just a typo. I wonder if maybe this was intended to refer to 10.2.6. Thank you.

GUSTAVO IBARRA: I think it's just a typo, yes. So, yeah, this should be … It looks sort of …

AMANDA ROSE: Can I jump in here? This is Amanda Rose.

GUSTAVO IBARRA: Sure, Amanda.

AMANDA ROSE: Basically, I think this is what we had added—Gustavo, you have added—to indicate that the registrar may apply redaction as defined in 10.2.2. Basically, if they decline publication, they can redact. But redaction is a local definition, so we didn't want to use capital Redact here in the addendum because it is a localized definition for 10.2.2 only. So we just said, "apply the requirement of redaction as defined in 10.2.2." So it was not a typo, but I see how it could be confusing. So we could probably tighten up the language.

GUSTAVO IBARRA: Yeah. Thank you, Amanda, for that.

Should we go to the next comment, Dennis?

SARAH WYLD: Can I just follow up with that?

GUSTAVO IBARRA: Oh, sure, Sarah.

SARAH WYLD: Thank you. Maybe we can just make it say 10.2 because that is the section that deals with redaction. Thank you.

GUSTAVO IBARRA: Yeah, but I think that the comment from Amanda is the requirements for doing [inaudible] redaction with capital R are in 10.2.2. So that's the reason why we tried to refer to that one. So, in other words, we're trying to say that the registrar may omit the value and indicate that it was redacted.

DENNIS CHANG: It's a suggestion. I'm going to think about that. But Alex has his hand up. And unfortunately, Amanda had to drop, too.

ALEX DEACON: Sorry. This conversation reminds of a thought that I had around this addendum. Why have we stuck this language in an addendum? Why isn't it somewhere in Section 2, where there's context around it? Why is it adrift in an addendum? Perhaps it would be better and clearer if we placed this in the section that is relevant to the organization field.

DENNIS CHANG: Sarah is correct. It was up there. Then we decided to pull it out and localize it because it only [inaudible] temporarily.

Any more on this?

Okay. If nothing else, let's continue with the next topic. We got through a lot of stuff already, so I'm pretty happy with the way we're progressing here. So the next item was Rec 12 implementation. We

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wanted to go through all Rec 12 wherever Rec 12 was implemented. And so I see that you would agree that we had interpreted Rec 12 and then implemented it in the policy language here. I don't if anyone had any particular comments on Rec 12.

Sarah, did you have any thoughts on Rec 12 implementation? I remember you were voicing some interest there to go over Rec 12. Now is the time.

SARAH WYLD: Perfect, yeah. Hi, everyone. I did have a chance yesterday to sit down with the OneDoc and the original recommendations. And I read it all together and it's looking pretty good.

I do have one concern, which is around Section 7.6, if we could put that up on the screen. So here in 7.6, it doesn't match 10.6 because this one right here is saying that, if the registered name holder provides an org, then the registrar has to tell them that it will published and that it will be considered the registered name holder. But 10.6 says we have to ask them if they want it to be published. And it's only published if they agree. So I feel like that's confusing. Sorry, it should be 10.2.6. That's what I meant. Yeah.

And so 10.2.6 matches the recommendation. Maybe what we can do to fix it is just say that 7.6 is subject to the redaction requirements outlined in 10.2.6 because … Well, another thought would be maybe we just take out 7.6 but I feel it's important for that to be there because we need registrars to inform registered name holders of these things. It's just they only have to do in combination with the redaction requirements.

DENNIS CHANG: Hmm. I understand. Yes, it's a good point. This is a collection requirement only, but I think you're saying that you could imply a publication requirement by the way it's written.

SARA WYLD: I think it's not so much a publication requirement but it's that, if we follow what it says here, we're going to be telling the registered name holders something that's not correct because we'll tell me, "If you give me an org field, it's published," but actually what's correct is that, "If we give me an org field, it's redacted unless you want it published," which is different."

DENNIS CHANG: Hmm.

SARAH WYLD: Yeah.

DENNIS CHANG: And I see your suggestion. Yeah, "Subject to redaction requirement." Okay. Thank you for the suggestion.

Anybody else have a comment on this, 7.6?

That's pretty good. Anything else on Rec 12?

+1, Sarah/Rubens. Thank you. Jody, too. Okay. Sarah, you're getting a lot of good support on your recommendations. Very good.

Okay. So if there isn't any other comments on Rec 12, I think we did a pretty quick turnaround on Rec 12 implementation. So I'm pretty happy with the way it turned out. So I think that requirement is now behind us. So the next topic or item on the agenda is a drafting error and implementation explanation document. We had 10, 11, and 12. There were comments. I didn't see any more comments from you. So what I would like to do is … Let me see. We do want to close these things out. And there's actually maybe new things that we want to add.

But is there any questions from anyone on 10, 11, and 12? These are supplemental documents to help people in reviewing our OneDoc. So this is maybe the place where your prior comments about … Maybe something is not clear to a brand-new reader. And maybe we should provide some more explanation. This may be a vehicle to do that. We have two vehicles. We have this document and the other document— this FAQ document—that we haven't looked at for a while. But we can use both to provide some explanation for our public comment. It will be a difficult public comment for a lot of people. It's so far-reaching and connected.

Okay. There is one here. Sarah [inaudible] Sarah here. Go down to 12. Yeah. "Putting each section in the boxes." Yes. Okay. So that's a formatting suggestion. So we'll do that. And it is after ICANN73, so this may be a good time for us to do that.

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So, Sam, let's take an action item to go ahead and do that. And we'll go ahead and keep working on this document.

But anything substantive? Please feel free to make them. Otherwise, we'll keep working on it on our own.

The next item is the public comment readiness status map (7) in the workbook. We haven't been looking at this in a while, but let's take a quick look at the status map.

GUSTAVO IBARRA: Sure. Let me just find the link. Or if you have the link handy … There you go.

DENNIS CHANG: Okay, yeah. So in the middle here is a recommendation of the status map. And I think we're pretty safe to turn #12 green. So I think that would go green. The DPA is still an outstanding item. 27 I still have as a yellow, but we may even turn that green. We know how to interpret it and implement Recommendation 27. So that's the middle document.

And the other thing that I wanted to point out is just below. I copied this language from the OneDoc, and I'm going to remove that and just maintain it here, just to remind us.

But on the left side is the ready-for-public comment status map. We're quickly turning all of these to green. And they're already green, I guess. There are a couple things. Implementation notes I think we can turn into green. We don't have any more comments there. Addendum 1 of

course we covered. We added Addendum 2. It's not on the map either. But this is what I'm using to [protract] myself and focus on the things that I should be focusing on on getting to our public comment.

So I just wanted to show you this. This is being updated in the back. And it's still a variable on your priority workbook.

And maybe I'll pause here for a minute and ask a question to the IRT. We're on our way to get ready for public comment. What's on your mind as a risk to that? Anything that you're concerned with? Anything still bothering you? Is everybody okay with the progress that we're making?

Yeah, like overall, Sarah. Like overall.

No, we didn't finalize Section 5. We were going to wait for us to get see the draft of the DPA before we temp that, but we may want to get to that before we see the draft DPA. And that is something—you're right— you're locked in on. We should probably try to deal with that. But I think the other things that we could do are getting done.

Yes, Sarah can just write it for us and we'll be done.

Okay. Chat me up. Send me messages if there's anything that you want to float to me as a risk item so we can mitigate it and deliver.

With that, I think we can close this meeting. That was the last thing I wanted to talk to you about today. So go ahead. I'll pause one minute here if there is anyone who wants to speak [kinder] words. Otherwise, we can conclude the session. And we'll see you in a couple of weeks.

[END OF TRANSCRIPTION]