
ANDREA GLANDON: Good morning, good afternoon, and good evening. Welcome to the Registration Data Policy IRT meeting being held on Wednesday, the 10th of May, 2023 at 17:00 UTC.

Attendance will be taken by the Zoom room. I would like to remind all participants to please state your name before speaking for recording 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.

Before I hand the call over to Dennis, I have some information to provide to the group. The ICANN 77 IRT session will be held on Wednesday, the 14th of June at 1045 a.m. local time. You should have all received an Outlook invite to hold that time.

Another update that we have is regarding the IRT membership. Brian King is no longer participating in the IRT due to changing focus at his company. If there are others who will no longer be participating in the IRT, please let me know so I can update the member list and remove you from the email list if necessary. Now I will hand it over to Dennis Chang.

DENNIS CHANG: Hello, everyone. It's been a while. How's everybody? On the IPT side, we have Thomas Moore who has joined the IPT team and his focus is the registration data escrow. So hopefully you can get to meet him too

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soon. And furthermore, the exciting part is that he recently had a baby too. So that makes registration data baby number five in our many years of working together.

So let's quickly review the agenda. So what I'll do following the membership update, we'll look at our wiki space updates because we have been making some changes and it's been a while since we met. And we'll go through that and then we'll talk about the public comment and the most recent public comment addendum that we have published. And we'll look at our OneDoc. This is the final version of our policy language. We are done. The only TBDs on there are dates. So we want to talk about the dates, pick some dates with you that is memorable. It will be published and it will have an effective date. And we'll go over that when I show you the policy language of what we're trying to do. And then later on, as you see in number three, we have implementation timeline that I will show you in our workbook.

There are three registration red docs that I sent out as IRT tasks. And those are updates to the other registration, I mean, other impacted documents, not of course, not registration data policy itself, but as part of the REC 27, we have made changes to about 20 procedures and policies. And as you know, there's many work going on in parallel as we do this. And we have uncovered, including the feedback from the public comments, some minor updates. I think that that's as I would categorize for us to go ahead and clean up before we publish it. And all these documents will be published as part of our policy and at the same time. So it's important that we track all of them and go to it. And then we're also here from the RDAP working group on their documents because I got the word that they're working on updates to those. And as you

have, as we've done before, they'll bring it to the IRT review once they're done. And finally, we'll do the timeline review and then that will be it.

Let's see. So first thing, I think Andrea has announced it and she put in the dates. I just want to make sure that all of you have that in your calendar and hopefully I get to see you in Washington, D.C. And I'm hoping that could be our final ICANN meeting together in a ICANN session. It's been many years and I hope that that that will give us an opportunity for us to get together in person and maybe celebrate a little bit. So think about that as we gather and prepare for Washington, D.C.

So let's get to it. So public comment. And what do I mean by public comment? You all of course know what it is. We've gone through it. We published the public comment report, but most recently we added an addendum. And what does the addendum do? It goes through every single comment that we received. And Isabelle here on our team has done just she led our team in going through and evaluating all the comments and determine the course of action and have come up with three major themes that we want to talk to you about at the IRT because I think those these three items were the items that drew a lot of attention and we received a lot of comments and they're significant and we wanted to make sure that they got your attention. They did get ours.

So number one is the thick WHOIS. Now let me see if I can get to the ... Let's see. Yeah, this is the public comment review document that was published on the 28 on the IRT wiki. And if we go to page number four. Here it is. So we received a lot of public comment regarding thick

WHOIS, and here are the comments. And the analysis part is down below. Let's see. And these are all published, so I'm just kind of pointing out where they are for you. And you know, they're all categorized and tableized. If that's a word. So you can see which comments did not result in any changes. And which one did.

The one that was changed is—Where was it? Which section was it? Go back up. Section five. So that's the urgent—this is a reseller. There's three things. So let me just talk about this. So thick WHOIS. This has been a very intense conversation during our IRT days during our implementation, and it has gone all the way to the board and it came back down as a confirmation that we are indeed making an impact on the thick WHOIS policy. And the bottom line there is that the legal basis, right, the registry operator shall determine the DPA and legal basis to choose which way they're going to go. So that has been a lengthy discussion and we got lots of comments on this, but it is basically reiterating the same positions that were already reiterated with you without any new information. So we decided and we really didn't have a choice, but we had to stick with what the direction that we got from the board, which is consistent with the recommendation from GNSO. That was number one, the thick WHOIS.

The other one was reseller. There was a desire from the community we received that reseller information be published in one way or another, but again, there is no clear recommendation that had to be done. So we could not rationalize a requirement for the community members to do that. So this has not resulted in a change, but I thought that you should all know about that. The thing that did change is this urgent request. Of course, again, many lengthy discussions we had about how we handled

the urgent request. The recommendations came to us as a basically the PDP working group did not decide on the timing or the definition and asked the implementation team to do the job. So we did. So we came up with, as you know, the definition of what urgent request meant and we got over that and there were some comments that we received on the definition as well, but those were suggestions that we had already discussed and we decided not to expand the definition to a broader or more general terms. And we really needed to kind of focus and confine to the definitions that we had. So definition did not change at all.

The thing that did change is the timeframe for responding to the urgent request. That change was from two business days to 24 hours. And you can read more about the rationale here, but basically what I can say is that a couple of things. The public comment pointed to the RAA requirements that 24 hours is being used in association with the urgent request and that is staying and that has been in practice for a very long time.

And the other thing on the registry operator side, I know that some of you have worked with me on this when we did our security framework and many years ago, it's been a while, that over there we accepted the 24 hours as the timeline for responding to urgent request there too.

So based on our understanding of what urgent request is and how that's different than a regular request and rereading the definition that we have set for urgent request and consulting with others internally here, we felt that 24 hours response time is the more responsible interpretation or requirements that we need to set and is consistent with everything that we are doing. And for us to come out while others

are using 24 hours and for us, our policy to come out and say the urgent request is two business days did not seem like it was the right thing to do.

So that is, I think the only real requirements change in the policy. So I wanted to make sure that you were aware of that and you communicate to your implementation team as quickly as you can so that they're ready.

Now we will look at the OneDoc and maybe I can do it this way. So if we look at our OneDoc, this is our published wiki version of the redline. And we'll go to our urgent request section 10. So what I will tell you is there are other changes that was suggested by people and we have accepted them, the suggestion and made some changes. But I think you can read about that on your own, but I did want to point this out to you. 10. Disclosure requests are 10. And if you look at here, yeah, this is a change. So 10.6 is where the changes. I see hands raised. Okay. I have Beth, Sarah and Roger. Go ahead, Beth.

BETH BACON:

Hi, Dennis. Nice to see your face. Hello, friends. So the question for me is you mentioned that, like we're going through the report and I appreciate that you guys have done all of the rationale and everything. But in other IRTs, it's been the practice to come back and look at the proposed changes and redlines based upon the public comments before with the IRT before publishing those. So I don't really have an issue with the publication, but it sounds like you're saying these are the changes and we haven't actually discussed the public comments or any of the

proposed changes. So I just wonder if that's a step that is going to happen in the process or if we're just going over what the proposal is right now.

DENNIS CHANG:

Well, the way I'm approaching this is this. We are trying to make the process more efficient and we have done the work as the responsible party and accountable party to do the job. When we were trying to do the requirements to require recommendations to requirement work, we really needed to depend on IRT and leverage your expertise a lot more. But after the public comment, I think that we have sufficient understanding and expertise to finish the work. So what we're providing to you is what we believe is the final version and this will save you time.

Now if you see something, and of course that's why IRT exists, if we are doing something in implementation that is not aligned with our recommendation anywhere or board direction, of course, this is why you have your task homework so that you can review it thoroughly and taking your time with your team and get back to us. But I don't envision having the discussions like we used to have going back and forth because we have done it for the last four years and with the public comment, going through the public comment with so many people looking at it now, I don't think that is necessary anymore. But I'm open to hearing you. That's why we're having this meeting. Are you okay with passing it on to Sarah?

BETH BACON:

Sure. I will just say, so I do think that if this is going to be something that happens, then it needs to be consistent across IRTs because I think a lot of us have been going through, particularly in the transfer IRT, we've gone through the public comments, not with a fine tooth comb with everyone talking about everything, but once the staff has done the summary and they have proposals like let's change this from 48 to 24 hours, we discuss that before it's kind of like published as final.

So I do think that there's maybe one or two things that we're going to want to discuss personally, and I'll pass it to Sarah. But I do want to say thank you for doing this work. There was an enormous amount of public comments. No one wants this to be done more than I do. So I think we are so close, like so close. It's a really great job and thank you, staff. And thank you, Dennis. I think that you've gone through so much.

DENNIS CHANG:

Yeah, I think we're all anxious to get this one behind us. I mean, you know what's coming and you're involved in all these things that are going on. We got like a tsunami that's about to hit us and we're just paddling as fast as we can to get this one safe, into a safe space and publish this policy and get on with implementation phase of this. So thank you and let's pass it on to Sarah.

SARAH WYLD:

Hi, this is Sarah. I really want to echo Beth's thanks. We do appreciate the IPT taking the time to review all of these extensive comments and proposing changes to the policy. And overall, I do agree with most of the final round of suggested updates that we've seen. Also I really

appreciate the way that you provided the documentation. It's very easy to review with the redline and the companion document.

With that said, there is some significant concern around the change that's been proposed here for 10.6 on the screen, urgent responses. So I have a few points to raise. I'm going to thank you in advance for your patience as I go through them now. It might be a lot of information. So I'll try to send this to the mailing list as well for full review.

DENNIS CHANG: Yeah, thank you.

SARAH WYLD: 24 hours is not a faithful implementation of the recommendation. The working group did not specify the exact timeframe, but they provided a framework for the implementation to use. The working group could have determined 24 hours was appropriate, but they did not. We should not, we cannot say that this must have been their intent. Recommendation 18 said business days. We need to implement business days, not calendar days, not hours. I see that the IPT is concerned that business days might vary by region. This could instead be the very reason that the working group chose business days instead of calendar dates. So implementing as anything other than business days is not implementing the recommendation faithfully.

Beyond that, recommendation 18 said business days, plural. That means that they considered a minimum of two to fill in that X. Otherwise it could have just said day singular. Considering also the rationale that was

provided in the companion document, I note that recommendation 18 used square brackets to indicate the phrase less than X business days goes together as a unit, not that it is brackets to indicate it as a side thought or throw away idea. It's telling us less than X business days is the timeframe that we need to specify.

Thinking about the RAA requirements for abuse reports, those are for different things. Abuse reports are different than disclosure requests. They are handled differently than disclosure requests. The working group was aware of the abuse requirement for response times, and they could have made the urgent disclosure request match that timeframe if they wanted to, but they did not. We should stick with two business days.

And I remind us all that this is a maximum, not a standard. The expectation is to respond without undue delay. And if not, it must be a maximum of two business days. Thank you.

DENNIS CHANG: Thank you, Sarah. Roger, you're up next. How are you?

ROGER CARNEY: Thanks, Dennis. Good. How are you doing? I'm just going to echo what Beth and Sarah were saying. I'll say it a little different than Sarah said, because I think she said it maybe a little too nice, but the 24 hours is not acceptable. And it goes against—I don't think it's bad faith or anything. It's just not what the policy states. So I think that this implementation here is not compliant with what the policy came out. So I just wanted to

stress that more, and that I think that this written text is against the recommendations. So thank you.

DENNIS CHANG: Thank you. Marc Anderson, how are you?

MARC ANDERSON: Hi Dennis. I'm doing well, all things considered. I don't want to weigh in specifically on this discussion. I want to ask more generally what your preferred way to provide feedback is on everything you've put out for review. We've got quite a lot of material. I've been through a good deal of it. I have a list of items to -- fortunately a short list, but I do have a list of items to give feedback on. Some of them are typos. Some of them are inconsistencies. Some of them are just sort of grammatical issues. So I guess just sort of generally, what is the best way to provide feedback on items that need to be addressed?

DENNIS CHANG: Write back to the email, the IRT tasks that I issued for specific items, that's the best way, I think. That way the whole IRT views your input and then can respond to it.

MARC ANDERSON: Okay. Thank you. I will do that. Thank you, Dennis.

DENNIS CHANG:

Yes, I expect our IRT meeting emails to get some traffic with what I'm hearing now. And the same goes, right, if you have a feeling that what's implemented here is right, I would appreciate hearing from you also. And specifically, I do want to hear for you to bring like new things, not the same argument that we already are familiar with. But it would be nice for something else that we can consider. But you know, ultimately as a representative of the ICANN Org, I am ultimately accountable for the words on this policy. And that's what I have to live with. So I'm trying to be very, very personal, I guess, personally responsible for what I'm doing here with your help. So I'm looking at the whole not just one side, but every side. Laureen, hey, nice of you to join us. How's the GAC business?

LAUREEN KAPIN:

It's fine. And I'm going to be leaving for vacation actually at the top of the hour. So you're a top priority. First of all, abundant appreciation for the very careful and nuanced approaches that you and your other colleagues took to this endeavor, which I know requires a lot of thinking, a lot of time, a lot of review, and a lot of weighing of a lot of different viewpoints.

We think that the IRT outcomes as a result of the public comments made the right call in terms of the 24-hour time period. It was always the intent to have an expedited time frame for urgent requests, which are very narrowly defined. And we agree with the reasoning set forth both as to the time period and the usage of 24 hours because it is clear. And I just wanted to emphasize that for the record, I'm not going to go into a whole re-litigation of this because I know different people had

different viewpoints. But I did want to emphasize that in terms of the outcome, in terms of the optics about being responsive to this very narrow category of by definition urgent requests, this is the right call.

DENNIS CHANG: Well, I appreciate that. Thank you, Lauren. Yeah. Anything more? Okay. That is that discussion. And Eric has a hands up. Go ahead, Eric.

ERIC ROKOBAUER: Hey, Dennis. Thanks. And yeah, it's just going with everyone saying thank you so much to you and the staff for putting this together. So I think just following up on something Marc was trying to ask, and maybe I missed it. Yeah, definitely can go back to the emails, probably have conversations through the mailing channel. But was just curious, is there a set timetable, a deadline when we're looking to get the feedback in by? I know part of the IRT, which I really appreciated was seeing, holding us to some deadlines to get some feedback and comments back. So just curious if we have one of those also in place here.

DENNIS CHANG: Yeah. So I'm glad you brought that up. So the last agenda about the timeline is when we're going to talk about it. So I'll show you the timeline that I have in mind. And then we'll see how we can fit all of this into that timeline. Thank you.

All right. Let's see. We will go back to our agenda. And the other thing that I did want to show you and what I was talking about earlier, and maybe we'll come back to this, was the effective date. That is section

four. Yeah. So we'll read this later, but I wanted to have this ready to show you as an effective date discussion.

And the other things that we wanted to talk to you about is a URS high level technical requirement. And we made some, I wouldn't say minor changes, but if I missed some notes here, let me bring it up quickly and show you. This one is the high level technical requirement.

Oh, one thing that we did was Gustavo, who was deeply involved in the RFC and pointed out that we have a new requirement wording on the RFC about the use of must, must not, the keywords. So since we are going to publish this as a new policy, it is appropriate that we update these words. So that was done.

And then the other part that we did was in the available and full, let's see, that was in section ... The other part that URS service provider—so available here. Yeah.

So the other part is that this word used to be full and these things are being discovered because as you know, Antonietta is leading an implementation on the RPM side and Gustavo is also supporting that work. And he has noticed that, hey, in the review that when we say full registration data, that has connotations that people may have to interpret.

So just the word full registration data. And so what should we use as another word? And we just chose available. So that was the change. And yeah, there was some placeholder text that was there too, that got deleted along with this update.

And then there's an AWIP. AWIP was changed. And what we did was we basically restructured this document. And as you know, and we'll talk about this a little more, that RDAP amendment got approved, board passed the resolution, and I sent you an advisory note on that. By the way, thank you for all of your help in getting that through. That was a tremendous accomplishment for the RDAP team and the whole, the contracted parties in general in working together to get that thing done. I think that's the first time I've seen RA and RAA updated at the same time with all the votes happening. That was pretty impressive to see. So thank you for that. And that is a significant accomplishment, but also an approval for implementation. And now we're really trying to differentiate between the WHOIS, web-based, things versus the RDAP. And so we are trying to update this document to be more timely for implementers so that they can clearly see the difference between the two. And we have created a [inaudible] added to a rationale document so you can read about this later.

The other thing is URS procedure. And on this procedure, we changed, let's see, section 4.2. We changed something under 4.2. We added a footnote, 4.2. Thank you. Sam is so good about pointing me to, she's super well organized and she's keeping up with all these things for us.

So the 4.2 footnote, this footnote was added to this document. And again, to help the team that's working with the URS and UDRP. And as you know, even though our policy is not implemented, they are already leveraging the work that we have done, if you will. So they know that this IRT has gone through all these documents and have brought it up to current and they are actually using our redline version, clean version, as a launching point for their work. So just so that you know, there's a lot

of appreciation for the work that you have done, not just for this policy, but the policies that are coming. And you know that many things are coming on our way. And this policy is really, if you can think about it as a foundation, like the basis where all the other policies are going to be built from. So it's very important that we get this right, but also do as much as we can and setting the baseline and all these policies will be published at the same time as our registration data policies. So they're 100% in sync across the Board, all 20 some odd procedures and policies and documents.

Next is the implementation timeline. So let's talk about this. Oh, RDAP profile. Yeah. So one thing that I don't have for you, or two things. I have everything else finalized and is presented. There's two documents that I don't yet have. And they are the RDAP documents. And fortunately for us, we have RDAP working group representatives in this IRT, Marc and Roger. So if I could ask them to provide a status on how they're going, and we'll talk about the timing of that. Go ahead. Hey, Marc or Roger, who's got the hands up first? Marc, you're on.

MARC ANDERSON:

Yes, thanks. This is Marc Anderson. So I agreed to provide an update on the goings on in the RDAP working group. And in case anybody is not aware, Roger and I are the liaisons between the IRT and the RDAP working group. So it is our job to keep the lines of communication open between the two groups to make sure both are aware of what the others are doing and faithfully implementing the work as appropriate.

So with that, the work going on in the RDAP working group relates to four changes proposed by Gustavo from ICANN Org. Those changes were not directly related to comments received during public comment. As I understand this, and please correct me if I'm wrong, those were all related to ICANN Org's internal review of the policy and the RDAP profile documents. And just the internal review to make sure all the I's are dotted and T's are crossed, so to speak.

So there were four items that came up as part of that review. And Gustavo shared those with the RDAP working group. The RDAP working group discussed them on their mailing list and had a meeting, I believe, two weeks ago to do initial discussion.

And I'll cover these at sort of a very high level. And for those of you familiar with them, I'm going in reverse order. So the sort of the fourth item was really just some incorrect references some references within the document that were pointing to wrong sections within the same document. These were just sort of administrative changes. Everybody agreed with making those.

The third item related to sort of similar non-substantive references and text that were really just administrative cleanup items. And again, very non-controversial, and everybody agreed to make those changes.

The second item had to do with a potential transition in the future within RDAP from J-Card to another technology such as JS Contact. And a little background for everybody. You know, within this working group, we tried to make the policy technology agnostic, meaning that the policy is not specific to any one specific technology.

Within RDAP, we had sort of a similar challenge in that RDAP was originally written for J-Card, which is a way of representing contacts. So the RDAP specification used J-Card as a way of representing contacts within that specification. J-Card proved to be not very practical or popular within implementers, and there's a desire to replace J-Card with JS Contact, which is just a different way of representing contact information within an RDAP response. So hopefully that's a sufficient level of detail there for this explanation.

So the specific feedback from Gustavo was basically related to this particular section, and he had feedback on ways to make the language better, more technology agnostic, and a little bit cleaner for how to implement and how to transition from J-Card to JS Contact in the future. So there was broad agreement for Gustavo's suggestions, and I think the group is tweaking the language a little bit, but the concept they generally agreed with.

Okay, so the last item has to do with a registrar URL field that seems to have been missed. And so somewhere along the lines, this is a required field that wasn't accounted for in the profile, and so there was general agreement that it needed to be added in and needed to be clear on how to implement that requirement. There was some discussion on the terminology that the registrar URL needs to point to a home page, and there was discussion as to whether or not this was appropriate. And Rick Wilhelm, who chairs the RDAP Working Group, pointed out that the job of the RDAP Working Group is to make sure the profile supports the policy. And so what the RDAP Working Group needs to do is provide a mechanism for providing this value in an RDAP response. What exactly

goes into that field is a matter of policy and outside the scope of the RDAP Working Group.

And so on this, there was agreement, and so the RDAP Working Group is, again, I think we haven't quite finalized the language here, but they are in general agreement that there needs to be this field and are working on getting it into the RDAP profile so it can properly support the policy.

So I think that summarizes where we are. Hopefully that wasn't too detailed. Hopefully I got the level right. I tried to provide some detail without getting too much into the weeds. The RDAP Working Group is planning on meeting again tomorrow. Hopefully they will be able to finalize everything at that meeting. And either way, I expect they'll be able to provide updated documents to the IRT shortly.

DENNIS CHANG: Okay, thank you. That was one of my questions. Does it involve both documents or just one? And you said documents is in plural, so I'm assuming both of these documents will be updated.

MARC ANDERSON: Yes, that is correct. The changes touch on both documents.

DENNIS CHANG: Okay. And IRT's job, once you bring it to us, I'll issue the IRT task like we normally do and give them homework to review. So we'll just wait for you to send those docs to us. Okay, thank you so much for that update.

By the way, Gustavo is on vacation. So Gustavo, as you all know, is such an interesting guy. He took his kids to Mexico City. Do you know why? Because his daughter is in immersive program in Chinese school, and she knows everything about Chinese culture. She's afraid that she's losing the connection with the Mexican heritage. Very interesting. So he'll be gone for a couple of weeks. So he'll miss the IRT working group. But probably, let's just continue to make progress without him as much as we can. And of course, we have to have him involved. You know, he'll be back. And I think we have time for him to engage and finish the work. So that's good.

So the last thing on the agenda, thank you, that was for RDAP, is the implementation timeline. So let's look at our implementation timeline. So a couple of things on that. One is this, I added this thing for you, is called policy change calendar. And what this document is, it was published in 2015 when we were doing policy work. And we decided that with the policy implementers and everyone, that we should really have a calendarized sort of a set calendar, predictable pace we implement our policy. So we then agreed to six month cycles. And the month that we chose was February and August. So February and August of each month, look for changes to come.

Now, with our policy, that's significant. And we really need to pay attention to this to help everyone, because it's so significant. So that's one thing I want you to keep in mind.

The other thing, of course, is the amendment to the registrar accreditation, this resolution. And of course, they're still working on it, the amendment team, and there's some here, I mean, Danielle on our

team was heavily involved in supporting that RDAP amendment. And now that it has the approval, we need to get that implemented. But luckily, we're in very close coordination with that team too. And as you know, there are other teams that we are coordinating with.

So then, with that in mind, let's look at our implementation timeline. So our implementation timeline, as you know, is in our workbook. We've been maintaining this timeline picture since when we got started. Board resolution happened back in May 15 of 2019. And we published our interim policy on the 20th of May 2019.

I just want to remind you that for those of you who are feeling like this is taking a long time when we're setting a record on how long a policy implementation takes, we actually already set a record for how fast we can do the policy implementation. We did it in like five days. So that is where we started.

And we have, as you know, two scope changes. So when people say this is a phase one, EPDP phase one implementation, they're accurate, but also they need to remember that we are also implementing phase two, priority two items. And then there was also a scope change number two in March of 2022. So about a year ago, there was the last scope change that we had to accommodate that had to do with the org field.

And then, so this, I just wrote these notes on here to remind you the interim policy was effective on 20 May, and I'm going to get into policy publication date of 1 August of 2023. The reason I wrote this here as August is because I wanted to use the August and February timeline.

So some were asking, how much time do we have to do things? We have time to incorporate the RDAP working group's work. I think they're going to be done in sufficient time to support this. Now I do have to tell you that we do have a sizable lead time we have to reserve for our internal teams, because it's not just publishing our one policy, it's actually 20 different policies and procedure all getting updated at the same time. And it's going to hit multiple websites across at the same time. So it requires quite a bit of coordination internally for ICANN Org. And of course, we need to do that in an orderly fashion. So I'm kind of reserving like a month to do that.

So if we use the 1 August date consider July as sort of internal processing time for us that we're going to do. And I know it's the time that people are going to go on vacations and stuff like that too.

So I would say June is a good time. By June, we should have everything done. So ICANN 77 in June, as I was saying, would be a nice time for us to review everything finalized. So that's my goal. And I hope that we can work toward that goal.

At ICANN 77, we will have everything finalized and we will have everything done. And that's our final review. And we're going to put our pens down and say, we're done and we can celebrate. That's what we should be all working towards. So Eric, does that answer your question about how long we have? Oh, but before you answer that, let me just run through the rest of this timeline.

So the other thing that I'm paying attention to is this RDAP amendment was resolved in June. So we are going to implement, implement. And what's significant is this? What's significant is WHOIS sunset.

Now, why is that so significant? So RDAP amendment authorizes implementation that will result in WHOIS sunsetting. And based on the calculation that we did internally and doing a sort of a stacked schedule timeline, it falls in August of 2025. So what we want to do is make sure that WHOIS gets sunsetted cleanly in February 2025 and our policy to be effective in August of 2025, giving six-month window.

Now furthermore, there's one idea and that is a cut over period. We want to allow basically a month. The August 2025 is a significant month. At the end of August, policy is effective. But beginning of August is when we say that transition happens from interim to the registration data policy. So consider that cut over. I think a lot of the engineers like to use the word cut over and they know what it means. And trying to do the cut over in this magnitude globally with this many implementations involved in one day is not very practical. But one month I think is quite doable.

So what we will do is setting these dates. We publish our policy in August this year. And I think it should be 1 August. I haven't, I think I looked at the day of the week, but that could be adjusted a little bit. But one day, 1 August is something I can remember.

And the other thing is transition starts happening in one August of 2025 to 29 August of 2025. And then policy being effective on the 30th August of 2025. So what this allows is a good time period for our

implementers to develop, coordinate and build and test all the way until we start our cutting over period together. And as you know, just as I mentioned data escrow before with Tom, we have to work with our data escrow suppliers. Of course, you are all involved in managing that relationship and you have your suppliers. And then also we have EBERO that we have to do. And of course, the RSP has to be updated and we are getting a lot of RSP requests that are coming through. And so there's a ton of work that we will have to do and what I would call implementation work or preparation work.

And my thought right now is that in June, we finish our IRT work in terms of policy and the requirements for implementation is completed. From that point on, we secure a firm requirements, set of requirements document and we publish it 1 August. And that is what sets off all the work in the development work. That gets the "quote unquote" and I've heard this, we need this to authorize the companies to start working on the policy implementation. So that's what I'm expecting to have happen.

So let me see. Any questions or comments? Let me ask Eric. Eric, I held you up when you asked the question. Does this answer your question? Did you have more? Oh, Beth has her hands up. Go ahead, you go first.

BETH BACON:

Thanks, Dennis. So I have a couple questions. One is to follow up on—just clarity on Eric's question, which is if we are going to have our like pencils down, we're just doing the last sanity check of this policy text in ICANN in June, what's the deadline for us to make—for the back and

forth? Because I know that we've discussed a few items on this call, including the 24 hours. And then Marc noted that he had a few things to contribute on smaller items in the redlines. So what's the deadline for us to have those discussions and agree on those changes?

DENNIS CHANG:

So I would say, first of all, I think I would like you to pay attention to the due dates that was assigned for the task. So for each items, there's due date. So make sure that you've completed your review and submit your feedback on those due dates. And then after that, I think we're probably counting on people's travel time. And then we also have what we call that pre-ICANN meeting, pre-meeting week that people are busy on. I would say we should shoot for finishing everything by end of May for the discussion be done. What do you think?

BETH BACON:

I can leave that up to discussion of other folks too. But I think it's okay. Assuming we can submit everything and then resolve it online. But then I have another question. I'm just stacking them up. So if we go back to the timeline for a minute. Actually two questions, I lied.

So in the previous version, our original version of the policy, and throughout the temp spec and all these discussions, we have discussed an 18-month implementation. And this looks like we're only getting a year. If it's August.

DENNIS CHANG:

You're getting actually more than a year. You're

BETH BACON: So are we getting 18 months? Because I think that's pretty solid. That's what people have been planning on.

DENNIS CHANG: You are getting 18 months and more.

BETH BACON: Well, if so, the publication of the policy is August 1st, and then it implements August—is this the August '24 or August '25?

DENNIS CHANG: '25.

BETH BACON: Okay. All right. I was like, that's too short. Oh, man. So my last question is, in the past, and we also discussed this, is that once the policy is published, anyone can implement that on or before the implementation date. So I just want to clarify that that is also the expectation for this. I don't expect people to be like flipping switches immediately.

DENNIS CHANG: I'm so glad that you brought that up. So I think this is kind of -- we need to communicate this clearly. Well, we talked about that, and after consideration and talking to the implementers, our policy is funny this

way. We usually do policies to be consistent behavior across registry, all the registries and registrars.

What we have done is produce a policy that actually injects variation to how registry operator will behave, because they have to make their determination on legal basis and DPAs, and then they have to communicate with a multitude of registrars, as you know, so then the registrar on their side, they have to deal with all these registry operators who are going to behave differently.

And that is complication and complexity that is by design we're injecting to this process. So when we talk to the implementers, what they ask is, is there a way to make it simpler, including our own implementation team?

And we said, okay, what we will do is then limit the transition time and cutover time where you say -- and just like what you said, is that you can go ahead and implement some of it, all of it, or a combination of -- we're going to narrow that window down to one month, and that is the August of 2025.

So please communicate this change. We're not going to have anyone transition to the registration data policy until August of 2025. We're going to do all the work we need to do and create a good coordinated transition planning, but we're not going to actually push the button to transition until August 1 of 2025, and everybody has to do that, be done by 29th of August 2025. Does that answer the question?

BETH BACON:

So it answers it, but it raises a few more. First of all, I appreciate that you guys did outreach to implementers, but we're implementers. As an implementer, I'm saying this seems weird and not consistent with previous policy. I understand the outcome is going to be that there's a little bit -- I mean, everyone's not going to look the same, but it's predictable in the fact that we know how people aren't going to look the same.

And registrars and registries, we've already started coordinating internally on this to understand what makes sense for us, and frankly, tying our hands to a one-month period is abnormal, be something I would want to talk to with my technical implementers. And I think considering that some of us would want to make our changes on a different timeline from a business perspective, this is a little bit challenging. So I just want to flag that. And just for something that we might want to need to discuss.

DENNIS CHANG:

Yes, please do. That's why I'm presenting it to you. That's why I did not write in the dates into the policy document just yet. But I did want you to hear the rationale that's behind it before you talk to your team so that you can have that discussion in the right light. Okay? Thank you. Yeah, come back to me about what your implementation team thinks about this. The implementers that I spoke to like this much better. And it's much more predictable. Yeah, you're right. Thank you. Yeah, Sarah, we are past -- oh, my God, one hour passed. So I'm going to conclude the meeting. And is there something else? Somebody -- sorry. You're trying to get my attention. Oh, Marc, go ahead, Marc.

MARC ANDERSON:

Thanks, Dennis. Marc Anderson. I realize we're over the time, but this is important. So I'll just say this. This is extremely different than my expectation. I understood that we would have an 18-month window to cut over and that we could make the cut over immediately after that policy was published and went into effect.

In fact, I'll go so far as to say at the summit this year, the contract parties specifically asked Russ -- and ICANN Org—that question, and Russ responded specifically saying that once the policy is published, contract parties will be able to implement that policy. So that is a significant deviation.

Publishing the policy in August 2023 and then effectively saying you can't transition or implement that policy until 1 August 2025, I have significant concerns about that. You're saying this policy is published in 1 August 2023 but cannot be implemented until 1 August 2025 and that the period from 1 August 2023 to 1 August 2025 is for development and implementation testing and preparation.

This is a considerable deviation from my understanding, and I think you're going to get considerable pushback on this point. I certainly have reservations and concerns.

DENNIS CHANG:

Thank you, Marc. Yeah, so give me your feedback and give me some ideas. Sarah, go ahead.

SARAH WYLD:

Thank you. This is Sarah. I share the concerns that Marc expressed. This is a really big surprise. It is a significant change, and I'm sorry, I don't understand how this is useful or helpful. Implementing registrars have already started planning and preparing to go live with these changes. I don't understand why it's useful to make us wait a year when everybody involved has expressed that it's very urgent and important to get this policy in place as soon as possible. I don't see how a delay is helpful, and also this is just such a surprise. Thank you.

DENNIS CHANG:

Thank you. Yeah, I hear the same thing from the Roger in the chat. Okay. I hear you. Anybody else before we conclude? No? Okay. So communicate with me via email on the timeline as well, if you like, and I'll talk to you again via online. And right now, the next IRT meeting is scheduled for our ICANN 77 meeting, but if we have to come together, maybe we can, but it depends on our schedule, I guess. Okay, I'll say goodbye now. Thank you. Bye-bye.

[END OF TRANSCRIPTION]