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Emily: I think we can just get started because the first few items are straight forward I hope.

Alice: Operator? Can you please start the recording?

Operator: Recording is on.

Alice: Thank you.

Emily: Good evening as it for me and thank you for joining this call, our first since Costa Rica as part of what we agreed in Costa Rica we will now be revising our calls I think on a weekly basis to try and get the report just knocked into shape and published by the end of April. Alice, is the first agenda item review of your notes of the Costa Rica meeting?

Alice: That's it. And the (inaudible) document of the outcome of your discussion in Costa Rica, you know when you revised the recommendations in light of the comments you received.

Emily: Yes. So, there are two documents to start there. Alice did a very nice summary of the meetings, fairly high level, and then has also published -- this is a working document which we put together really as (inaudible) memoir through the recommendations. So, does anybody have any comments or corrections to make on those two documents, please?

Alice: Who did you write -- ?

Emily: I think what I'd just like to note is that the document on the recommendations is very much a rough, working document. It's not really a formal record. I think I would really say it's there as a resource for us as we continue to work. I certainly found the record of the meeting notes very good. Thank you for doing that, Alice. Can we adopt both of those documents, please? Any objections? Okay. Let's adopt those. Alice, please, could you tell me the next item on the agenda?

Alice: Yes. Next item is the action items list. Members are to report progress made.

Emily: Okay. Could you help me by reading them out one by one and we can see if anybody on the call has done anything?

Alice: Okay. So, first of all, the first action item is to revise the call schedule, make sure I'm going to take down. The second item is review and submit language to the recommendations five to nine by March 28. That's for Susan. Review comments submitted to the team and Anita's recommendation tracking document. That is for everyone. Propose a tentative language for proxy and privacy recommendations by

March 28. That's James, Susan, Peter, Seth. Hold the pen on recommendation three, strategic parity by March 28. That's (inaudible). Sign texts on connotation by March 28. That's Kathy. Work on language recommendation 17 by March 28, Minnie. Review language of recommendations on IDM by March 28, Sarmad, Kathy, (inaudible), and Michael. Review chapters and send (inaudible) right, Seth, Omar, and Alice, by March 21. That's for everyone. And review the body of text in light of comments and integrate changes suggested, required by members, Seth and Omar.

- Emily: Okay. Let's just -- so, Susan, how's it going?
- Susan: I haven't worked on the data accuracy at all but we did have a call on the proxy and privacy recommendation and I have reviewed -- I haven't reviewed comments by the community but definitely have spent a lot of time reading the comments by the staff. They have a lot of questions and concerns. But I will work on the data accuracy.
- Emily: That's great. I'll put that down as in progress, shall I, Susan?
- Susan: That's a very nice way of putting it, Emily.
- Emily: I saw that Peter had sent through some wording on proxy privacy which is great. So, we've got that out on the table.
- Susan: Right. And we've actually gone further with that. James and I and Seth today.
- Seth: Actually I just sent a further draft, just a few minutes ago. I think our sub team may need some more time to work on it.
- Emily: It's great to have a draft now in circulation that we can all focus on. So, thanks for doing that. I'll had a look at Peter's first draft earlier which seemed nice and it's good that you're taking this on. What would you like the rest of the team to do? Do you want to be left alone to do some further drafting work or do you want the rest of the team to comment at this stage on the list?
- Seth: I think it may be pretty much -- go ahead.
- Peter Nettlefold: I was going to say -- It's Peter Nettlefold. Sorry I'm late. I'm just joining now.
- Emily: Hi, Peter. We're doing the walk of shame through the action items. Actually we're -- thank you for sending through the language on proxy privacy. Seth just sent a revised draft through to the list and I'm saying to this small team what would you like us to do and what's the next step on that?
- Seth: Peter hasn't really seen the comments. I think maybe our sub team could work on it another week. That's my feeling. I don't know how the other sub team members feel.
- Susan: Well, if anybody's reviewed it, comments now would be fine too. I think we definitely made some twists and turns in our work on proxies.
- Kathy: This is Kathy. Can I ask a question, Susan?
- Susan: Sure.
- Kathy: I apologize. I've been running around for the last few days. Could we get a preview of what's going on and what kind of major changes, just kind of big picture, what's shifting?
- Susan: Maybe Peter or Seth would be better at answering that question?
- Peter Nettlefold: You go, Seth.

Seth: We took Peter's draft and we embedded with many comments and I tried to revise it to address some of the comments. Perhaps it could be reveal in that format. So, you see the thought processes up to about 20 minutes ago. If that's okay with my co-sub team members?

Emily: That's great. That's really helpful to know, actually, Seth, that you both looked at the draft and also looked at the comments which is great. I see that you have incorporated proxy and privacy, the recommendations into one which is a direction that many of the comments were encouraging us to go in. So, I'll just look forward to further iterations of that with interest and encourage everyone to get involved. This is a very important part of our work and it's one that we've struggled with. I'm sure that small team would appreciate early input from people.

Seth: Could Alice just post that to the list? I emailed it to Emily and Alice but not to the list.

Alice: Okay.

Kathy: Quick question -- is James in the call? Have you been able to -- I don't know if he's on this call.

James: Yes. I'm here.

Kathy: Great. Okay. You're in the loop on all this too, right?

James: Yes. I was on the call this afternoon and now this one.

Susan: Basically, Kathy, it's sort of strengthening the recommendation and calling for accreditation of proxy service providers much in the same way that we lined it up for privacy. But we definitely had a discussion about how we should recommend this or how we should lay it out for ICANN and James' suggestion was a PDP. So, some of that language Seth has incorporated in Peter's draft. So, it's definitely a stronger recommendation on proxies than what we ended up with at the end of our work in December.

Kathy: Great. I'll continue online. Thank you very much.

Peter Nettlefold: I was wondering if I could ask a question, having missed the discussion that Seth, James, and Susan had. Apologies for that. I've seen the latest version of the text we've incorporated. There's some comments in there as well. Can I take it, from what you just said, Susan, that the edits themselves reflect where people are currently comfortable with and that the comments in the sidebars have been addressed by that text or are there still -- is there still further edits that are needed?

Susan: Go ahead, Susan.

Seth: Peter, what I did is we asked James to revise because he had probably the strongest concerns. He embedded comments. The comments are basically mine and then James'. I tried to draft to address some of James' comments but there hasn't been any feedback, any opportunity for any of us to comment beyond that. So, I suspect it's a work in progress.

Emily: James? I think you've got your hand up, haven't you? Do you want to come in and make a comment?

James: Yes. This is, I think the conversation may have passed me by here a little bit but I wanted to thank Seth for turning around some of the comments. I know that this -- he probably had this document in his hands for all of an hour. I think Peter's point, we still have a long way to go in my opinion. We still need to put in some significant work. I would say, no,

the sidebar comments have not all been addressed. I think it's very, very important for this recommendation in particular. I would remind the group that we're already in some respects being cautioned against straying beyond what this group can legitimately do within the agreement. So, I would just emphasize that our credibility and the implementation of our recommendations probably hangs on the understanding of what mechanisms ICANN will use to implement what it is that we're putting out there.

So, we have to be I think very clear and at the same time be sure that we're not handing ICANN anything that we consider to be a finished product in this area. Here's the new accreditation program. Here are the rules. Here are the sanctions. Here are all these things. I think that we should be very careful to say you should consider this and here are some things you should consider but this is a non-exhaustive list. Go take this and plug it into your existing process and get people from all over the community to develop policy around it. I think that's just kind of where I'm going with this and I think that's probably going to call for some pretty significant restructuring of the language to make sure that it conforms to something that ICANN can actually act upon.

Emily: Any comments on that?

Kathy: Just as we move towards concepts that I don't think we've really talked about like accreditation, I want to wave a flag and say that's a policy implementation detail and I am -- that does seem pretty detail oriented for what we're doing. I thought we were talking about generally bringing things in, closer in under the umbrella but not exactly how that's going to happen. So, kind of a plus one to change is coming.

Peter Nettlefold: I understand entirely where James is coming from an also just catching up quickly, reading my emails while I was talking, I can see now the trial of language in James' comment. But Kathy's comments, I would say that we have in fact discussed accreditation and accreditation was what we agreed to walk away with today on James' recommendations. I understand that we may want to talk about a range of mechanisms. One of them could be accreditation and so on if it's appropriate but it's not the first time it's been brought up, I would like to make that clear.

Kathy: I'm sorry. When did we talk about accreditation?

Emily: Sorry, Kathy. It's in the previous draft recommendations, not on proxies but on privacy services. So, we were comfortable making that recommendation previously with regards to privacy services. So, I'm not quite sure I understand the --

Kathy: That we would set up mandatory rules? I don't think we ever used the word accreditation. I thought we agreed we were going to say mandatory rules that privacy services would follow. That's different than accreditation because accreditation as I understand it is a certain set of organizations that are allowed to provide the services versus a set that voluntarily signs up. So, WIPO as accredited as a UDRP provider. We will have a credited URS providers. But I have to say I hadn't gone to that place with privacy services because as long as you sign on you kind of self-accredit which is different. Accreditation is a third-party naming you. I think these terms may have nuances which is exactly why I'm concerned. I thought we map out the umbrella and other people define the policy.

Emily: James? You've got your hand up?

James: Yes. I kind of see where Kathy's coming from. We did talk about policy for privacy services which are by our earlier definition already either contracted parties or affiliated with a contracted party. And then we discussed proxy services because they are outside of the ICANN umbrella that we were talking about voluntary best practices. Now, where the concept of an accreditation program came into play, we discussed it as one pops way to bring folks who are outside of the ICANN umbrella into the field of play. Now, one of

the things that I would caution to this group is that we have to be very, very careful how we're positioning the PDP. If it's all -- we spent a lot of -- I think the original draft from Peter, while it contained a lot of good ideas also had I felt a very heavy emphasis on sanctions. We need to accredit these folks so we can do all of these things to them.

I think one of the things that we have to bear in mind is that people come to ICANN and submit to ICANN authority on their own. So, there has to be more of an incentive. It has to be more of a carrot to a proxy provider. Come, please, be accredited. Demonstrate that you're a good guy and you have benefit A, B, C, and D. And yes, you will be obligated to follow the requirements of the accreditation program. So, I think what we need to do is look at ways to make a compelling case of why someone would want to be accredited. Otherwise, the white hat guys like domains by proxy will just throw up their hands, fold up their tent, and say -- This business is no longer worth it. And then we'll just be left with the folks who are going to disagree with anything we put out anyway. So, it will just be a grey market really fast. That was kind of one of the thoughts that we were discussing earlier as to why we need to focus on the benefits of accreditation as a way of bringing those folks into the ICANN tent.

Emily: Thank you, James. Peter?

Peter Nettlefold: Yes. I actually think this is a really important discussion. I know we're going to have a little side group discussion but if possible I'd like to continue this just for a little bit. I guess I have a question for James because this is something I've heard several times, that ICANN has no authority essentially unless people voluntarily come to ICANN. And I really just want to ask a question about that because it's not clear to me that that is actually the case. I understand it, people -- registrars can only sell gTLD with name if they are an accredited registrar. Perhaps I've understood this incorrectly. There are unaccredited registrars that don't have contracts with ICANN that are able to sell gTLD names? If they have to be accredited by ICANN then in my view ICANN has a very substantial power in this area if it chooses to use it. I guess that's my question. Have I misunderstood? Is there something I'm missing here?

James: You are correct that ICANN registrars must be accredited to sell gTLD domain name registrations. But I think that the -- you're discounting the line, the distinction between the registrar and the proxy service provider. They are not the same entity.

Peter Nettlefold: No. I understand that fully. We need to consider ways that they can be brought in, if they're going to be brought in and requiring registrars not to knowingly take registrations from unaccredited providers would do that as one example.

Emily: Peter, do you have any thoughts on James' suggestion of emphasizing benefits and I can't remember the word -- it's a bit late here.

Peter Nettlefold: Absolutely. I'm all for it. The sanctions really should be a last resort. If everybody played ball and agreed to be good actors, that would be ideal. The perfect situation. But I think we need to be mindful of real world situations and make sure that if that isn't the case we're also well-prepared. We need a balance in place.

Emily: I think what I'd like to propose is we have a very good team of people working on this and appreciate the work you've done so promptly after the Costa Rican meeting. It's clearly going to be a difficult road. There's stuff to thrash out. I think my only observation is -- and this is obviously looking at it without the track changes, the draft is now substantially longer than it was when Peter sent it around. That doesn't necessarily -- I think it was probably because I'm looking at it in a way that doesn't show the comments. But I think it's a good step if we can try to take on board the guidance we've had from public comments, perhaps distinguishing between the two might make it a bit too much of something that might not be significant in practice. We do -- I'll probably repeat my mantra which is that we can always fall back on the agreed language that we went out to

public comment on if we're unable to take this forward. But I don't think we're nearly ready to call that yet and appreciate very much the work that's been done. Any more on that?

Moving on to the next action item which is mine, hold the pen on strategic priority. I sent out a sort of very late -- I don't expect anyone's managed to get on top of it yet. An attempt to do that, what I was trying to capture was the discussions we'd had in Costa Rica where we really said -- Hang on, we think that we might be trying to get two ideas across in a single recommendation and I also took the scene from the draft of the proxy-privacy where we tried to get the findings before the recommendations but I'm very happy to take comments on this. I didn't go back to the draft report and dig out the findings on strategic priorities. So, I kind of did them again. I'm sure the draft can be inclusive. I'm very happy to take comments or queries on it.

Peter Nettlefold: As I've been doing all morning, I'm reading emails as other talk. I was just reading your recommendation three. And in the 30 seconds I've had to consider it I just want to congratulate you. I think you've done a good job of pulling in the thought and putting down some words. Your approach looks good from my perspective.

Emily: Thank you. Thank you very much. Why don't we revisit this on the list and also come back to it next week? Can I ask you to consider specific comments or edits for this next week and we can try and put it to bed then I hope?

Next on the list is the accreditation text by March 28. Kathy?

Kathy: I'm sorry. I had to step away for a second. I apologize.

Emily: Kathy, we're just waiting to hear from you on the task that you have. All final text on accreditation by March 28 which is obviously today.

Kathy: I apologize. I'm not as proactive as James is and Peter and Seth. So, I apologize.

Emily: So, I'm going to put that one down as in progress.

Kathy: Yes.

Emily: Like Susan's. We look forward to a draft on the list in the next few days. Is that going to be suitable?

Kathy: That sounds good.

Emily: Great. Thanks. And the next one is me and again I just circulated something very late today. I don't know whether anyone's had a chance to have a look at it. Recommendation 17 just as a reminder was the famous alternative for -- a point where people can look up. Through our discussions in Costa Rica we seemed to be going towards having that for everyone but also making it very clear we're not talking about transferring any data. We're not talking about ownership changing. We're not talking about policy changes, but merely an operational enhancement to the existing internet service. Perhaps I can ask for comments again on the list and we can discuss next week? Okay?

The IDN recommendations. Is there anybody able to speak to this on the call? I don't think we've got Sarmad or Wilfred or Michael. That would leave Kathy. I'm assuming -- we haven't seen anything. I'm assuming that this has not yet been done?

Kathy: This has not yet been done. No.

Emily: Okay. We'll look forward to some progress on that in the next week. I think that would be good. Right. I'm just laughing at the next one because I just know no one's done this.

Review your chapters and send red lines to Seth. Has anybody done this? I haven't. I skipped mine last week.

Bill: This is Bill. I did mine. Because you own it.

Emily: You've done it, have you? You sent it to Seth?

Bill: Yes. I did my part.

Emily: Thanks. So, Seth, have you been overloaded with people sending in their redline chapters to you?

Seth: Not that I'm aware of.

Emily: Maybe it's the wrong address people are sending it to.

Seth: I figured that must be it.

Emily: I think where you have mass failure to do something you have to review whether or not your target was realistic. Perhaps with hindsight, March 21 was a little bit optimistic. How about -- do you think it's realistic for us to -- I actually think it's probably unrealistic for us to try to do this in the next week. I see the priority as trying to nail these recommendations in the language and the red line should be something that's going on in the background and we should be thinking about by probably the end of the first week of April but we do need to do it. I'm going to take silence as a sign of serenity and non-objection. Alice, perhaps we can review the target date on that and say by the whatever it is of April. The fifth or sixth?

Alice: Yes.

Emily: I think April 6 is Good Friday. So, those who celebrate Easter, maybe we should say by the fifth?

Peter Nettlefold: Can I just check, is this target date the one for finishing up the recommendations or finishing up the red line?

Emily: No. It's not. It's finishing up the red line chapter. That's sort of going back into the long report and having a review of that.

Peter Nettlefold: Look, I'll take the first stab at this. I don't think I'm going to be able to do mine before Easter. I will be extremely happy if we can get all our recommendations sorted by then. The proxy one is still up in the air. Not really. But it needs some work obviously. But from what I've heard I think we're actually probably talking on the same page and just need to talk about text and sensitivities around PDPs and the way we refer to things. There's two other which you just said we've just seen and I believe there are a bunch of others which are still out there. The portal one was one you sent around but there's the IDN ones and a couple of others? Is it perhaps better for next Wednesday's call we sign off on those if we can and then we'll know what we're targeting with our chapter review?

Emily: I think you're right. My feeling is that our priorities are the recommendations. We've got a fairly mature draft in the chapters. If Seth and Omar could do some work in terms of the actual specific comments and make some text suggestions but maybe we can go to the other side of Easter for that? If I can -- what I'd like to propose then in the light of what Peter says which I think is absolutely right is that we go the week after that. I can't think of a date. Let me just have a look -- why don't we go to April 13 for the chapters? Alice? If you could just add that in, add that date on the final two bullet points? Okay. Can we -- thank you for your work on the tasks to date. It's always a challenge after we've had an intense week of an ICANN meeting and sometimes people take a bit of time after that to

get back into the swing of it. So, really appreciate the work that's been done so far and let's focus on the recommendations quite hard for the next week and see if we can really get the majority of them signed off on our call next week. Okay.

What's the next thing on the agenda? Here it is. Comments. Review. That's me. I had a look through all of the comments that Alice -- and thank you very much, I found that document putting the comments next to the recommendations very, very helpful to get things in perspective. I've made numerous comments on the comments. I don't want to detain people longer than necessary by reading through them all. I think a lot of them are within the things that were expressed in Costa Rica. It's clear there's a lot of support for the recommendations. People on recommendation one want to make sure that we're talking about just the documentation job, not a PDP which hasn't been agreed.

On accuracy, on recommendation two we need to expressly say that if we think policy development is necessary it should go through the appropriate processes. The strategic priority one did garner quite a lot of comments. Many were supportive. I think that there was some staff queries and I wondered whether we wanted to say something about this? The staff was sort of going on the line that seeing a member of staff is already there we have John Jefferies, the senior counsel who has the responsibility for compliance. I think in the redraft that I sent around today I tried to draw the distinction which I think was implicit and explicit in our discussions that we're not just talking about compliance but about WHOIS as a whole. There's been some fairly interesting suggestions from the UK government about getting an independent compliance czar which I think we heard in our meetings with the GAC and subsequently.

The recommendation five again drew a lot of comments. I'd encourage people to look at them. I think that we need to change the wording from unreachable to undeliverable because that seems to be confusing people. And we've got the classic situation which I think means we're probably fairly close to the mark in that some people are saying 50% is too severe, too harsh a target, and some people are saying it's not harsh enough. The staff were saying do we mean that we need to repeat the study and bare in mind it cost \$200,000 and I think we say to this bearing in mind the discussions we've already had, no, we're not saying that but we do need a statistically significant sample. We don't really care how you do it. It's up to you. But you need to find the best, most cost effective way of measuring it and staff also said -- Do we mean 100% accuracy? I thought that was clear from the wording actually that we're not talking about 100% accuracy. We're talking about just improving the records which are totally unreachable.

I think that we do need to -- I'd like to borrow the language from the registry stakeholder group or the registrar it might've been saying that we're talking about using existing tools and policies on this 50% one because some of our commentators are saying -- you need a PDP. In fact staff is saying you might need a PDP on this. And I think we should be clear what we're talking about and limit the language in that regard. Is this helping everyone with me just babbling on about this?

Peter Nettlefold: It's very useful, Emily. For me anyway because I've yet to read it. It's a good overview for me. I promise to read it.

Emily: It's at home actually.

Peter Nettlefold: I was going to say the last point, I'm quite intrigued by the idea that staff suggested having a mechanism to reduce inaccuracy would require a PDP. I'm wondering how useful they think their existing tools are in that case? It's quite telling in some regard.

James: We did hear from them that they thought it was a new requirement.

Peter Nettlefold: Yes.

- Emily: I'm confused by that one. Maybe I've misread it? I think that we should in some place research the ongoing dialogue about verification. But it's obviously -- I think there's actually some quite exciting ideas going around about verification and it might well find its way into the RAA. I don't know. It might. I think that we do need to say something somewhere that verification would be great if it happens but in any event you do have a legacy problem and that's affecting a huge number of domains. So, it doesn't actually get you off the hook from trying to do this.
- On this, the non-commercial stakeholders group made a very good point and one that I think we agree with but we probably haven't stated clearly enough in the report which is the contact ability is more important than accuracy. We think that is the actual baseline that must be achieved. Accuracy is great but what is essentially contact ability. Let me just see.
- James: I just had a comment -- I think you may have said something here in passing that we think verification would be great. I think that we need to qualify -- if we're going to make a statement like that we need to qualify it a little bit more substantially. We talked about it would be great if it didn't create language barriers, for example, for people to get online or cross barriers or people weren't blacklisted, for example, or whole sections of the globe didn't go dark because they were underserved. So, I think we should probably not just rubber stamp the idea that WHOIS verification would be great. Maybe that's not what you meant to say by that?
- Emily: No. It isn't actually. I was -- I think you and I have talked about verification and we've talked about it in the group. I think it creates -- it will solve some problems and probably create a whole load of new problems and so, yes, I was probably over-summarizing on that. I think what I meant to say is whether or not verification is adopted there is still a legacy issue on data accuracy. That's probably a better way of saying it.
- James: That's correct. And if we do want to weight in on the verification merits we should probably make sure we're painting a balanced picture there.
- Emily: Yes. It's probably quite useful at this stage to just have a little straw poll on that, really, to see whether we should -- whether we can usefully weight in on the verification issue that has popped up quite a lot in some of the comments and it's obviously a live issue in other parts of the community. Is it something that we want to comment on? If we don't will we seem to be ignoring it? Is it too late in the day to add that sort of substantive component? Anybody want to comment?
- Peter Nettlefold: I agree with both you and James. I think it's probably worth commenting on. We're all very aware of what's going on in the RAA negotiations. At least if there's something going on for most of us outside the closed door, we're less aware of the detail. But I think that's probably where the sensitivity lies as we've sort of explained it to the community already. We're looking for an accuracy increase. However that can be achieved and appeased. One way to do that is to look at some verification that needs to be done. There's a lot of issues around that. So, in addition to portraying it sensitively I think we've also got to be aware that -- it's very difficult, as we've said many times, to comment on a system in progress. I think none of us would want our recommendation to do some damage to what was already underway in the RAA negotiations I guess. But I'm extremely happy to comment on them and put it forward as a flag as something which could be usefully considered in some way.
- Emily: I think that's probably the approach to take is to note that these discussions are going on, that negotiations are ongoing at the time of writing this and to make the distinction between verification and obviously that the dialogue around practical and effective means of verification are going to take the discussion forward or it's going to be useful.

Okay. On recommendation -- unless there's anything more on that -- on recommendation eight which was about graduated sanctions, generally people saying -- Yes, this is all very good. The registries are saying define serial or serious breaches I think they mean. I don't really see that as our role. Unless anyone disagrees? I think that they're quite right that these would need to be defined as the graduated sanctions are articulated. Something that staff pointed out and I think we need to go back and have a look at the contract. They're saying in the RAA 2009 it already allows for graduated sanction which is something I think we missed and something I wasn't really aware of. James?

James: That's correct. We did discuss that when we discussed with compliance that they had now this ability to extend a registrar which they actually exercised for the first time which allows the registrar to manage the names that it currently has but not to add new names through registration or transfer.

Emily: Right. When we're talking about clear and graduated sanctions, are we meaning more than that or are we referring to the ones that are already in the contracts?

Susan: That was a point I made because I was involved in possibly pushing ICANN compliance to suspend a registrar and it just seemed even that, even though that's not terminating the registrar, that there should've been some other sanctions prior to that. So, I know we had that discussion. So, to me there should be a step of -- I don't know -- find -- I don't want to define what those actions would be but I think our intent was there would be more actions that they could take in smaller steps.

Kathy: Something less than just termination.

Susan: Yes. That really puts a hold on this.

Emily: So, James is saying it's correct because you can suspend rather than just terminate. But you, Susan, are saying actually that something a little bit milder, a sort of slap on the wrist level of sanction would also be helpful. And also because staff has specifically imposed the question here, do we mean better education or are we asking for greater contractual tools. I think we're asking for greater contractual tools.

Susan: Yes.

Emily: We just need to make that clear. And I think that's very helpful that staff pointed that out.

Bill: Emily? ICANN's right to suspend is limited though to fundamental and material breach. So, it's still a -- while they can suspend and they can terminate, the bar that they have to cross in order to suspend is quite high. I don't believe that's really measured and going from at least what I intended or what I thought we were intending in our responses.

Emily: It's sort of naught to 60 in three seconds, isn't it?

James: It is possible I do have two, it appears -- suspension and termination.

Emily: We can add just a little bit more clarity I think would probably be helpful there.

James: I'd like to consider that we discuss financial penalties as something -- somewhere in between the nasty letter and suspension. That kind of opens up a larger discussion about different SLAs for service level agreements for things like WHOIS systems. As a registrar that has invested significant dollars and people into keeping our WHOIS systems active. It's very frustrating to know that there are other registrars that sound like they've got it running on Grandma's old Dell that sits in the closet or something like that. We'd definitely like to see some teeth behind the service level agreement on that.

Peter Nettlefold: I just had a comment to the chat. Plus one to what everyone has just said. Sort of a suspension and termination, yes, there's a graduation there but I think we're looking at additional -- I'd always thought we were looking at far subtler and less sort of heavy-handed interventions early on. So, the people who cross certain thresholds are subject to additional reporting or auditing or oversight requirements. As James just mentioned, some sort of financial penalties and incentives for people who don't potentially. Again, as we've talked about all the time here, it cuts both ways. I'm all for setting up a system which has multiple steps with certainly a good number of steps I would think before we would go to a suspension. That being the first step is still very worrying to me. There should be -- from everyone's point of view, including for the registrars, they should have plenty of warning and plenty of chance and opportunities to have small, less intrusive compliance activities before a suspension.

James: I agree but I will say that they are all intrusive, every single one.

Peter Nettlefold: Yes.

Bill: For me, what we would hope to go to is basically more of a -- Yes. We want to do the right thing. James, I'm not suggesting you guys are not. We want to do the right thing as opposed to waiting till the end and then having to say there's all this stuff now that we have to procure in order to get out of suspension. The gap between those two is just huge. I think that's part of the problem. Many people are living in that gap.

Kathy: And they know it.

Bill: And they know it. Yes. And they know there's nothing that anybody's going to be able to do to them. They've made that calculation. To do the right thing is more costly than to suffer the consequences. The economist in me says make the right thing the compelling financial case and these problems will be reduced.

James: I agree I'm in favor of economic incentives for doing the right thing and a little bit of stick or variety -- basically multiple levels of attempting to force compliance with lots of time to cure. I don't want to get into a state where we just say -- Off with their heads! But if there are issues people should be notified quickly and given an opportunity to cure.

Kathy: Or on the incentive side allow them to advertise or show a badge that they're a preferred accredited ICANN registrar because they have provide a higher level of service.

Bill: Platinum provider.

Kathy: There we go!

Susan: It looks like we lost Emily.

Peter Nettlefold: While we're waiting for Emily, it seems there was some sort of agreement on that path that Bill finished up with the exciting proposition of platinum providers. Is such a thing possible? Just out of interest? I understand last time the RAA was negotiated there were sort of incentives for signing on as I understood it and some of those were financial like you paid less fees to ICANN or something like that. Sorry, I don't know the detail of this. But is it possible that ICANN can build this kind of thing in if there's -- sort of registrars who have very good compliance across a range of functions, that their costs to ICANN decrease and to the other guys, their costs relatively speaking, whether they increase or not, relatively speaking they pay more? Are these sorts of things actually possible?

James: I think ICANN as one of its core values has this non-discrimination agreement with contracted parties and I think it definitely includes that in the registry contract as well. So, it doesn't matter if it's Go Daddy or someone who just set up business five minutes ago, if they're accredited then you have to treat all registrars equally. Putting that aside

for a moment, I think it's probably worth maybe not within the context of this review team but in terms of other things, I think we would be welcome to the idea that registrars --

- Emily: Hello. I'm back.
- James: Hi, Emily. We just went ahead without. We're a leaderless organization like a starfish.
- Emily: Have you finished? Have you done it?
- James: We fixed everything. But just to continue, Peter, I think we would love to see something that provides rebates for good actors and penalties for bad actors and really sort of says -- Hey, you're externalizing a lot of your costs now onto the community by not having a WHOIS system or by allowing bad guys to come out of your network. So, I think that we're interested in talking more about these types of approaches as opposed to -- Hello, we're ICANN-compliance on the phone. You have 24 hours to answer our email questions or you're dead. That's kind of the calls that we get now.
- Peter Nettlefold: I think this is a conversation -- if this isn't the place but it possibly is because we've got our things about graduated sanctions. I think we're all willing to look at the incentive side and in our strategic recommendations, at least I think the early version we had in there stuff about making a culture of compliance, however that happens. But if this isn't the place to talk about this then I'd love to talk to you about it somewhere else, James, because this is something I'm really very interested in.
- Emily: I think we can probably -- Sorry, Susan. Go ahead.
- Susan: I was just going to say this is -- that the incentive and having kind of a platinum provider, that exists in almost every business and it seems like ICANN could put something in place. Maybe it's not contractual but it's voluntary and then they receive some sort of a bonus to do so, to follow the best practice rules. And then hopefully leading into contractual requirements down the way when the whole world sees how well it works. So, it's not a novel concept, it's just ICANN hasn't implemented anything like this.
- Emily: Thanks for that, Susan. Kathy?
- Kathy: This is interesting. I think there's a lot of agreements. My question that I put on the list is what direction are we going and how much detail do we want to go down. But I also just wanted to note that the world is going to be changing and in some ways the changes are already incorporated because the new gTLDs are coming out and within each new gTLD application there is a requirement of talking about how you're going to handle certain types of abuse. And all sorts of domain name registration information. So, this idea of the platinum translated into the fact that if you have a .bank you're not going to get it unless you really stipulate to lots and lots of checks and securities and abuse and fraud monitoring versus a .civilliberties where it might be lower. In some ways this concept may be incorporated and I think I heard Soka talk about this a little bit at the RAA session where kind of the type of monitoring may depend on the type of use and we may be moving towards that naturally. Maybe we're helping push them in the right direction too. Thanks.
- Emily: Thank you. I think the points that I throw out at this discussion, most of which I've missed is that we're liking the idea of -- we have to clarify that we are talking about extra contractual powers, not just educations as well as talking about sanctions we also want to talk about incentivizing this behavior. I think that's a point very well made there. And I'd encourage you to have offline or online conversations to just align your thinking further on that. That would be very helpful. If I could just continue with my sort of canter through some of the highlights that I picked up from the comments. On recommendation nine, one of the comments made by staff on this which again I'm not sure if I fully

understood, is they are suggesting that we might need to have a consensus policy which would obviously require a PDP to have registrars communicate with registrars on their existing obligations. Maybe I've misread it but I don't understand why that would require a PDP. Can anyone comment on that?

- Lynne: I agree, Emily. This is Lynne. Because it's already been established that ICANN is going to be compliant with privacy regulations and that is a common one that you basically notify registrants who would be individuals. So, that doesn't make sense to me either.
- Emily: I suppose if we put ourselves in the shoes of the compliance team, they're anticipating the registrars who don't do this communication will be sanctioned in some way and they need some power that they can point to or some authority to do that. So, that might be where they're coming from on that. But it did seem a rather a heavy and lengthy process to go through.
- Lynne: Isn't the PDP process something like three years?
- James: No.
- Lynne: I thought it was a very lengthy process.
- Susan: It can be.
- James: It can be. But I'd say it averages probably 12 to 16 months.
- Emily: James, am I off the wall on this one? Is it something that you would anticipate would require a PDP, to have registrars communicate with registrants their obligations under the contract?
- James: I don't know what they're talking about. We should probably get clarification. It seems like if it's something relatively straight forward it could be added to the charter of an existing relevant PDP. It doesn't have to have its own.
- Bill: The other thing is this is the kind of thing that could be added to a business program that says you've got the gold, silver, diamond seal if you do the following things, right? My concern -- what I see with ICANN -- I agree with James. They are very good, very careful about being fair and equitable. Okay? That doesn't mean everyone has to be treated the same. Here are in order to be considered in this group, here are the things you have to do. In this group you do these things. That's being fair and equitable. It doesn't mean that everyone is absolutely equal. We don't treat people differently in their expectations. We treat you based on the expectations and the things you agree to do.
- James: It's equitable treatment versus equal treatment where everyone has the opportunity to be treated at the highest level of service.
- Bill: Exactly. What has happened in my opinion is ICANN basically is treating everybody equally and the bar is very low now as a consequence. And there are good actors who are paying a price for that and that's unfair. I want to reward them in some way or force the others to come up.
- Emily: Perhaps we can handle this in our final text preamble to this recommendations on graduated sanctions and the distinction between equitable and equal treatment and so long as there are equal opportunities for all registrars, then there's no reason why good behavior should not be rewarded even if that's a financial incentive. James, thank you for joining the call. I know you have to drop. We look forward to speaking with you next week, I hope?

James: I'm sorry, was this a fifteen minute call or a 90 minute call? I may have mismarked my calendar.

Emily: Actually I don't know if it was specified. I'm going to carry on until half past and we'll see where we get to. I'm nearly finished on this item.

James: Thank you. I apologize it may entirely be my fault, if I misunderstood that.

Emily: No. I don't think we provided a time. Alice is normally extremely efficient so she probably did and I just didn't note it. Moving on to the comments on the later recommendations, on recommendation ten, we -- there's some comments that this is a fairly -- this is a proxy. Sorry, this is a privacy recommendation but these are quite complex. Others recommend or note what we're recommending requires a PDP which I think we would all agree with and we should probably just state. The single point of contact comes up in several commentators and might well be worth a look. I think that there are obviously -- the staff points out that with a number of these recommendations there are going to be financial budgeting, the resourcing impact which will need to be thought about. I think that my take on that for us is if we don't think that they require a major resourcing but simply a change of entity then we should say so with various recommendations.

And equally if we do think they will need resourcing, again we could help by being a bit clearer on that. There are a number of general comments on things that we -- that people thought we had missed. A lot of them are just sort of nice commenting that we've done a good job which is very nice. The European Commission and I think the non-commercial stakeholders group would like us to be more explicit in our support of proxy and privacy services which I think we do mention but we could probably bring this forward into our findings a little bit more. The European commission sets out several requests for us to address stage protection more explicitly and the need for protection against individuals against states of abuse which I think is a fair point and they refer the rest of the number of documents. Actually one of our commentators, the N3AAWG actually answered our request for people to highlight priorities. They said they thought our recommendations one, three, eight, ten, and 15 are priorities.

I think there were a couple of comments and this is something that Kathy highlighted during our talks in Costa Rica was that we should be explicitly stating that the implementation of applicable or national laws should of course take into account human rights, respect for individuals, privacy, or freedom of expression and so forth. So, those comments came through from NCSG from Zahit Jamal and from (inaudible). And finally the UK government suggested the need for a WHOIS reform team to take our place and made some very detailed suggestions about the competition of this reform team and finally remarking that ICANN's failure to adequately address seriously undermines its performance in serving the global public interest.

So, on that note, that concludes my very brief run through of the comments. I would say once again I think we have been extremely fortunate with the quality and quantity of comments that we've garnered from across the community. There's some really substantive stuff in there. It's well worth a read. And obviously people will have their -- will be working through in little groups, looking at different bits that do assessment with the privacy and proxy look back at the public comments specifically when you amend them.

Okay. Let's move on. I can't -- I'm just trying to think what the next agenda item is. I can't see this. Where are we on the agenda?

Alice: The next agenda item is next steps.

- Emily: Next steps. I think we know our next steps, don't we? Because we're basically going to take home the work that we promised to day for today, circulate comments on the list for any document that has being circulated. Susan, you have your hand up? Please, go ahead.
- Susan: One of the next steps I think -- or something that I think we need to do in this report and whether it be a recommendation or I'm not sure how to hold ICANN staff accountable here but I think we need some draft language surrounding a call for a specific timeframe for ICANN to deliver back to us or to the community, maybe not to us if the team isn't in existence at that point, but a specific timeframe and a deep, developed, and detailed plan for implementing this, something that they're going to commit to and we can go back as individuals then, contributors to ICANN, and say -- Wait. You said the WHOIS review team said this. You agreed. And this is how you said you were going to implement it and now it's 18 months out and you haven't done anything. So, whether we add that as another recommendation -- and I could draft some language around that and send it out to the group or if there's a different mechanism that we can use, I'm open to that too.
- Emily: That would be really helpful. If you could give a starting point, Susan, that would be brilliant. I noticed that Kathy said on the chat another very good point which is something we can talk to in the next call, but if we've got some starting language to go with and actually there were one or two comments about timeframes that came through in the public comments, one that I recall said they thought this could be achieved in six to 12 months. I think actually realistically some of these targets can't be changed within six to 12 months but perhaps as you're going through the recommendations you could think of appropriate timeframes and also have a look at those comments and priorities as well. I think that might help. That would be brilliant if you could do that.
- Susan: I'm not sure we want to give a timeframe for each recommendation.
- Emily: No.
- Susan: But we want them to come back to us and give us that in a detailed, developed plan is the way I see it.
- Emily: I totally see your point. I take your point. You're quite right.
- Lynne: I have a vague memory that the AOC actually lays out a process where once our report is finalized I think ICANN has some kind of obligation to respond within a certain amount of time.
- Kathy: I'm not sure that is concrete enough. I'll look at that also in drafting this but I think we really need to hold them to the fire.
- Emily: Would you be able to just look up that point and help Susan out with that?
- Lynne: Sure.
- Peter Nettlefold: I think just to emphasize the talking to the next point. As I recall from our discussion in San Jose, Steve was very clear that with the ATRT ICANN had a very -- it sounded like a very comprehensive tracking tool for where things were up to and so on and he indicated that they were going to use a similar mechanism for the WHOIS review. It may just be finding out a way of getting some clarity on that and then referring to it in a way that makes sense. It sounds like they certainly intend to do this and I'm very keen to hold them to it but we probably should acknowledge what they're intending to do as part of this.
- Susan: Right. Exactly. I'm sure. The other issue I think is as we've talked through some of the staff comments it's obvious that we need to talk to them again. We did have a phone call with several of us on that in that discussion but I didn't find it very fruitful now that we've

seen their comments. I think that we need to sort of ask. One of the things was why the registrant education and notification -- we need to get a clearer picture of what they're thinking about. Maybe we shouldn't be doing that yet until we've refined all of our recommendations. But I would hate to end this team and provide the final report without another discussion with John Jefferies and his staff.

Emily: Yes. I think that's something to recommend. It was something that Kathy was very keen to try and set up for this call actually and Denise unfortunately couldn't make this call because she's literally on a plane or in transit. Why don't we do it like this? We talk to her as our very informed contact and liaison on the next call and she and Kathy's just reminded us she's offered to walk through staff comments at the next meeting. Would you like to set up a special telephone call with John and the other team and throw it open to the staff? Or should we have some preliminary chat with Denise first?

Susan: I think we need to refine some of the recommendations. I think we have still some work to do. But then Denise would be great. She's always amazingly knowledgeable. But John Jefferies is one of the individuals that are actually going to be core to implementing these recommendations and there seems to be some push back from him. That was my opinion in our last phone call with him. So, I think that a recorded call with John Jefferies and his staff and whoever else within ICANN staff would have a part in this would be good. I think it would just be good due diligence on our part.

Bill: You're being generous with the word push --

Emily: Thank you.

Kathy: This call is recorded, you know.

Bill: I know.

Emily: Okay. Kathy, you have your hand up. Have you finished, Susan?

Susan: No. I'm really concerned about your language on recommendation three because I'm not seeing the part about the senior member of the executive team in that and I don't want to lose that. So, I can do that on an email thread but I don't know why that was removed.

Emily: By accident. I'll be honest. Thank you. Just put it back in?

Susan: That's fine. That's absolutely fine. The response from ICANN staff was very disturbing to me because John Jefferies is not the person -- the high level person that we want.

Emily: I also thought but forgot to put in that there are a couple of points where we should make it clearer where we don't think that the current situation meets what we're recommending and we are in fact recommending change. This is probably a good point to do that and I forgot to do that as well. So, I'm going to have another look at that text, Susan. I just wanted to get something out to the team before the call. Thanks for pointing it out.

Susan: I'm not trying to beat you up. I was just like -- No, let's not lose that.

Emily: It's very helpful. Kathy, you have your hand up?

Kathy: Yes. I want to suggest -- I like that idea of talking to John Jefferies after we've done our work but I'd also love to talk to Denise sooner rather than later. I found some things about staff comments disturbing also. I set down some that I didn't understand. Some of it's been highlighted here, things that we think are easy and straight forward or at least straight forward, maybe not easy, they think are PDPs. Since -- I know all comments are equal but this, since ICANN staff is charged with implementation, I'd love to spend a little more time working to clarify so that before we respond to John Jefferies, we've gone

through -- I'd love to go through the comments with Denise. It should take ten, 15 minutes, maximum 20 on our next call. She's offered to do it. I'd like to suggest that as a first step and then after, when we're further down on our work and finalizing recommendations, coming back through with senior staff I think is a great idea.

Emily:

Okay.

Bill:

Emily, if I could, I think we also though -- we need to respond to those comments so that the community can see the response that we give to comments made by staff as an example where they think it's going to be very difficult, I think we should be saying regardless of whether we have a conversation with them, we disagree, we think this can be done in such and such a manner.

Emily:

Bill, thank you for raising that. That was something that occurred to me going through all the comments actually and it's something that came through in the ATRT recommendations is that where you have a public comment and you're not following, you're not taking on board the comments, it's really helpful to explain why and I think that we could probably develop an appendix where we just literally add another column to this table and I would say incorporated or explain why we disagree. I'm not going to suggest that we do this right now but I would like to do it before the end of our time together. So, thanks for that timely reminder. Peter?

Peter Nettlefold:

Just while I have the mic, regarding that idea, I think short to the sweet, we probably won't have a huge amount of time to do it but I think our response to each of the inputs would be a really valuable part of our report. Hopefully in the majority of cases it will be simply pointing to parts of the report where either we on balance went a different direction than they recommended or on balance we did what they recommended and hopefully it will be a relatively easy cross referencing exercise in some ways. Useful. I was also just going to come back to comments on the discussion just before that which was done on recommendation three about a senior member of staff being -- we announced with that recommendation, it's two part, one part is specifically about WHOIS in all its aspects.

And the other part is about compliance. I guess just putting on the table in terms of not pointing at particular individuals but I'm certainly very interested to make sure that WHOIS is given appropriate priority and that may involve having a WHOIS czar or a senior member of staff and so on contractual compliance, I think I'm coming to the position of almost wanting more and that is potentially making sure that compliance is set up as a separate regulatory unit. So, I'm not sure whether other people are going to come along with my discussion on that and if anyone followed the GAC discussions with the board in San Jose, I'd be more interested in principles in terms of compliance than with pointing out a specific staff person. I think that's the sort of thing which I'm interested in seeing with compliance is actually a pretty major shift from ICANN in the medium-term to longer-term. So, just putting that out on the table.

Emily:

Thanks for bringing that up. That suggestion is made explicitly in the UK government contribution to the public comment. It also was discussed as you say in the GAC board discussion and the response from the chief executive was -- We've considered that. We're not doing it. I'm summarizing, probably unfairly, but it was fairly negative. Let's just -- anybody have strong views against Peter's suggestion which is just to repeat, he's proposing that we strengthen our recommendation on compliance and recommending that we set it up separately.

Peter Nettlefold:

Perhaps I should be clearer, Emily. I'm not sure -- I'm actually relatively comfortable with the way you've got it drafted now which is at the level of -- I'm not actually proposing to strengthen it. If other people want to I'll probably support them. I just didn't want to suggest that we change what's currently there and say contractual compliance should report to a senior executive. I'm actually more comfortable with it being at the

level where it currently is, where it's talking about principles of strategic, clear budgeting, reporting, and incentivization and the like.

And then we're going -- well, to ask ICANN to consider more broadly the way that it does that rather than tucking it away in a part of its existing organizational structure. And just to your summation of the conversation with the board, certainly the CEO did initially push back but he approached a number of us afterwards and is interested in exploring it and certainly a number of board members were as well. We've in fact been asked for examples of existing organizations like ICANN where there is a structural separation for them to consider.

- Emily: I think that if we are going down that road --
- Bill: Are we going down the road less traveled now?
- Peter Nettlefold: Did someone just drop -- did Emily drop out or did I go quiet? Did my sound disappear?
- Bill: You're there, Peter. I think Emily is on the road less traveled.
- Peter Nettlefold: Okay.
- Kathy: Poor Emily. She's having troubles today.
- Susan: Peter, I guess I'm not understanding exactly what you're requesting.
- Peter Nettlefold: I'm actually requesting nothing which is perhaps what's confusing. I was responding to your comment about bringing back in the comment about having a senior executive. And to be perfectly clear, the way that recommendation three is drafted now in Emily's version, I'm perfectly happy with that for the first part because I think it's entirely appropriate that someone within the organization actually stand up and say --
- Emily: Is anyone still on the call?
- Peter Nettlefold: I'm reluctant to do it for the second part and I'm actually comfortable with the way that it's worded in terms of broad principles. Does that make sense?
- Emily: Peter, I was just sort of in mid-sentence and the call dropped. But I think that if we're interested in exploring this, if we would like to encourage ICANN to explore it, then I think we probably need to be a bit more explicit in the recommendations and what I'd like to do is ask you -- and I'm prepared to look at this language as well, to consider something to put some language there into recommendation three on this sort of structural separation idea. I don't hear anybody firmly objecting. We don't have a full call. It would be a bit of a change of direction it's something that we have been hovering around in our compliant small team for awhile. So, how about --
- Peter Nettlefold: I think we should we put something forward and to work with whoever's interested to do so, absolutely.
- Emily: Okay, Peter. How about you and me try and knock out some language before next week to just run past people?
- Susan: My concern and I expressed this at the Costa Rican meeting, that we don't want to give anything to any of these recommendations to ICANN that they can just check off. We want some action done. To me they've already checked off of our recommendation three and I'm not seeing the change in language that is going to change that situation. So, I agree with you in theory, Peter. But in actuality I think ICANN's going to say -- Okay. They don't even want a senior executive anymore. They've deleted this and lightened the

recommendation and, wow, we're doing all of this anyway. And we all know that's not happening.

Bill: We could always suggest that since there has been an executive in charge of WHOIS since 2010 I believe, the failure to have addressed these issues is actionable.

Kathy: Are you going to sue them?

Bill: No.

Peter Nettlefold: Now that I'm clear where others are coming from, perhaps you're right, Emily. We perhaps do have a sentiment in the group that we can move stronger on this. This is one that we previously talked about. We talked about this in San Jose as potentially being our first recommendation and I think we all agree that it's very important. I think we all agree with Susan that we don't want them just to say -- Yes, we've done that. Yes.

Kathy: Emily, can I ask a question? Sorry, Peter. I just wanted to make sure we didn't move on. Let me let you finish your sentence. I apologize.

Peter Nettlefold: I was just going to say perhaps this is one like the proxy privacy one where we could get several people working on it to try and come up with something for the next teleconference. It sounds like we've got quite a few people with an interest in this one.

Emily: Anyone -- ?

Kathy: But I've got a question before we do that. It's always really hard to admit you don't understand what's going on. But I don't understand what's going on. Not that we have to discuss it now. But let me just say -- I got buttonholed on a lot of different issues in the hallway. Proxy-privacy. But not on this one. So, just -- I'm wondering what our findings are. I'm not trying to say they're not there but what our findings are because it does seem to me -- again, I haven't heard what you've heard in the hallways. Like some other compliance issues, this is one that ICANN did take seriously and acted on already.

So, they're going to try to claim credit for that. John Jefferies, I'm a lawyer, they've appointed their general counsel to work on these issues. That does seem to be movement forward. There does seem to be a problem with that. But I've got to tell you, I'm not sure what the problem is. And so, I'm kind of lost. I think we need some findings and just a little more background.

Emily: Kathy, I think that's a good motivation for us. Peter and I have offered to try to work on some text. Maybe we can try to express the justification for what we're proposing in that text. If it's not convincing to the team, then out it goes.

Bill: I'm happy to throw some things in there.

Peter Nettlefold: Could I have the one minute stab at actually starting to answer that question so Kathy at least has a --

Emily: Thank you. But we're already six minutes over our time and I'm -- so, do a minute.

Peter Nettlefold: Okay. I'll do the minute. ICANN has a very important role in overseeing global industry which is now critical to lots of things. Many other organizations that do this kind of thing, that have an industry regulatory role have taken very clear steps to poll the regulatory or compliance function out from its operational function so that there are very clear separations of responsibilities, incentives, and priorities. There are examples where they've been set up as separate companies under the same umbrella, where there are structural separations and very clear lines of reporting.

I agree that the general counsel is a very senior member of ICANN staff but I don't agree that this is sufficient for an organization of that stature and importance of what ICANN does in terms of industry regulation. So, like the GAC is arguing in many cases and the community is supportive of those, that ICANN looks to examples of best practice. Like, really best practices in terms of its conflict of interest and its ethics it should do equally so in terms of its oversight and compliance activities with regard to this industry. That's the underlying principle from my point of view.

Kathy: Thank you so much, Peter. That was great. I appreciate it.

Emily: And you're actually inside a minute. Bravo. So, I'm going to bring the call to a close at this stage. Thank you very much, everybody, for your time. I think we know what we're going to do in the next week. It is going to be tough for us for the next few weeks. We're revising all this work again and getting it done but we are really -- we've got a very good product already in our draft to start with. We've got some excellent comments and I think that we think -- we've found that interaction very helpful and stimulating for new ideas and ideas for what we could express more clearly. So, let's get to work in the next week and produce this stuff that we need to and that will set us up to have the amount of time we need so we can try and avoid the mad scramble at the end. Okay. Thank you, everybody. And good night. It's 20 to one my time.

Kathy: Sleep well.

Emily: Bye.

Alice: Bye. Thank you.