

CARLTON SAMUELS: Good morning, good evening, good night everyone. This is the ALAC WHOIS Seminar. We have a lot of our friends on the call from where you are. I will turn it over to Gisella to put in a few housekeeping matters. Gisella?

GISELLA GRUBER: Thank you very much, Carlton. We won't be doing a roll call on this briefing session but we have made note of all the participants which will be added to the meeting page afterwards. However, we would like to remind you that we have French and Spanish interpretation on this call today, so if you would be so kind as to state your names when speaking not only for the transcript purposes but also to allow the interpreters to identify you on the other Spanish channel. We will also be muting all the lines except for those of the presenters until we reach the question and answer session, at which stage we will unmute all lines.

Just to remind you if you are on the audio bridge as well as the Adobe Connect, please do remember to mute your speakers; and if you are only participating via Adobe Connect please do mute your microphone during the presentation. Thank you, over to you Carlton.

CARLTON SAMUELS: Thank you, Gisella. Hello everyone, again. My name is Carlton Samuels for the record. I am the Chair of the At-Large WHOIS Working Group and a Vice-Chair of the ALAC. My job on this call is to frame the WHOIS

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with the facts and then leave it to the discussants to tease out the many issues surrounding WHOIS.

So let's start off with WHOIS and what is it. By way of contracts and some consensus policy agreements, ICANN has made it a requirement for registries and registrars to collect and display WHOIS data. So WHOIS in the context of ICANN is a directory service. The registrar-level WHOIS is contained in the RAA agreement, Clause 3.2 of the current RAA, and it says exactly what the WHOIS should be and what should happen. The registrar by contract is supposed to collect WHOIS data and must display that data publicly via a Port 43 service or on an interactive website.

Let us be clear – registrars collect a lot of data from registrants. This requirement only speaks to some specific items of data which is called the WHOIS dataset, and that is outlined in Clause 3.3 of the RAA. The list, then, is like this – it compels the registrar to collect and display from registrants the registered name, the name of the primary name server and secondary name server for the registered name, the identity of the registrar, the original creation date of the registration, the expiration date of the registration, the name and postal address of the registered name holder; and the name and postal address, email, voice telephone number, fax of the technical contact – the same pieces of data for the administrative contact. That is the current WHOIS dataset.

That dataset must be publicly available. That is current policy. At the registry level, registries are required to collect certain pieces of data as well. There are two flavors that are collected by virtue of what is collected for registries, and there are so called “thin” registries that only

collect the registrar and certain registration data; and “thick” registries which inclusive of registrar and registration data collect data on registrants, both admin and technical contacts for the registration. That’s a thick registry.

If you look at the registrar level and what is required, it raises the issue of compliance. Note very carefully that the data that is collected and should be disclosed publicly is a contractual obligation, and so it raises the issue of how this requirement should be policed for compliance. Over a period of time, the registry/registrar data has been used for a lot of other uses other than what it was originally intended, and this has been the source of a lot of issues.

I will ask you to look at the WHOIS Service Requirements Report to the GNSO that was written by Dave Piscitello, Liz Gasster, and Steve Sheng – this is an excellent outline of everything WHOIS and it went into detail to list the uses of WHOIS as well as the abuses of WHOIS. It’s a whole long list, I won’t go through them here, but what is important to take away from this is that the original objective of WHOIS data purely as a directory service has morphed into new areas of use that were not intended at the time.

The WHOIS issue has been a burning one in ICANN. So let us go now to what has happened in the last little while. Most of you would know about the Affirmation of Commitments which is an agreement between ICANN and the United States Government about what should happen when it was made free of US government oversight as it were. The AOC commits ICANN to review the WHOIS issue, and so by virtue of the AOC a Review Team was formed and they spent a lot of time going into the

WHOIS issue. They issued a report, the WHOIS Final Report, that provided 16 recommendations for WHOIS.

Among those 16 recommendations, the first one was that the WHOIS ought to be strategic and it should be treated as a strategic issue. Well, apparently the Board did get that one because by a Board resolution in November of last year, they agreed and requested the CEO to form a committee to have a look, a comprehensive look at the whole WHOIS issue. At the same time, they also resolved that current WHOIS policy must be enforced. That was a Board resolution.

The new agreement for the registry has been at it for a while. They have determined that there should be a few changes. One of the changes that they've been grappling with is WHOIS accuracy. Most will know that there's been a longstanding complaint that WHOIS data is by and large inaccurate. And so the new RAA that is now under negotiation has developed some approaches to improving accuracy. I again will draw your attention to the new negotiations surrounding, there's lots of documentation available for this that you can access on the web.

The new registry agreements for new gTLDs is of the moment because they are intended to be thick registries only. And so if you look at Clause 2.5 of the Agreement you will see what the requirement is for new gTLDs and specifications of that agreement will also outline for you what the WHOIS dataset should be for new gTLD registries that are all going to be under the thick model.

So where do we go from here? The Expert Working Group, of which I am a member, is getting ready to start its work. And for the At-Large

especially, the highest level of attention is going to be placed on the publicly available WHOIS data. That is the At-Large posture, that end users must not be disadvantaged by restricted access to publicly available WHOIS data. We think that is the most important element for the At-Large remit and so we will try to see what is going to happen with the new gTLD.

I don't know if you are hearing me because I've lost connections. Hello? Hello? Hello? Hello?

ALAN GREENBERG: Carlton, we're hearing you.

CARLTON SAMUELS: Thank you. I've lost connections, it's died – I can't see anything.

ALAN GREENBERG: We're still hearing you. Everyone's on mute so they can't answer, though.

CARLTON SAMUELS: Ah. Okay, so back to what we were saying. Our interest, the At-Large interest is publicly available WHOIS data and so as part of the Experts Working Group our remit is to see that that is preserved and that is the remit that was given to me as a representative of the At-Large.

I will now turn it over to Jim Galvin from SSAC who will speak about WHOIS in the context of security and stability. Jim?

JIM GALVIN: Okay, so can you hear me? Apparently not.

CARLTON SAMUELS: I can hear you, Jim, but I don't know if anybody else can. I don't know what's happening but I lost my AC room.

ALAN GREENBERG: I can still hear you.

JIM GALVIN: Ah, we're getting a bunch of yes's in the chat room so I'm going to go forward here and assume that we are okay.

So thank you very much for this opportunity. I'm going to say a little bit about several things that SSAC has said with respect to WHOIS. I want to start by calling out SAC-051, a document in which SSAC spoke about WHOIS taxonomy and structure. The primary purpose of this document was to point out that people use the term WHOIS to refer to three different things, and our objective was to identify all of these things separately and try to get people to speak to these issues separately and identify what they're speaking about when they're talking. I see they put SAC-054 up on the screen but I'm talking about SAC-051 in this case.

So the three things are registration data, the protocol, and directory services. WHOIS is really a term that should be used only to refer to the protocol. Registration data is obviously the elements that we collect for the purposes of supporting a domain name, and then there's

directory services where we would have the discussions about access and who has access and why.

So now let me jump forward to talking about domain name registration data. This is SAC-054 where SSAC tried to lay out the question of what is the purpose of registration data? And once you have an answer to that question, what kind of model could you use to represent registration data and why you have it?

SSAC took the point of view that at least one way of consider why we have registration data is to suggest that we have it in support of the lifecycle of a domain name. Now, certainly other purposes are possible but that was the baseline that we chose to start from in order to have a concrete place to create the model that we proposed for representing registration data. We recognize that there are several different kinds of registries; that obviously the two largest categories are gTLDs versus ccTLDs. And even in that split, the data that's collected and why it's collected varies quite a bit. There tends to be much greater consistency among gTLDs and much greater variety among the ccTLDs.

But we proposed a model for how to represent what is registration data and it would be based on the events that exist in the lifecycle of a domain name. The next document that we produced was SAC-055 and this one was the SSAC comment on the Review Team results, the Review Team Study Report. We took an interesting approach in this document and we put something in front of the WHOIS Review Team comments. So let me take the SAC-055 in reverse order of what's published, and comment first to say that we completely supported the recommendations of the WHOIS Review Team. SSAC did make a few

comments about those recommendations, and in fact we grouped the comments into high, medium, and low priority categories. You can go and look at that document to see exactly what we said and why we said it but it is important to note that we really were quite supportive of the Review Team recommendations.

What we did was call out explicitly a recommendation that we think really does need to be addressed in support of all of these “WHOIS” discussions, and that is answering the question what is in fact the purpose of registration data? And a related question is who should have access and why? And we used the analogy of the four blind men and an elephant which I won’t review here. It makes for an interesting read. If you haven’t looked at the document you probably should. If you’ve been involved in these WHOIS discussions for a long time I think that you’ll appreciate the analogy.

But I think that recommendation about answering the question about the purpose of the data and the directory services question of who should have access and why is one of the principle motivations for this Expert Working Group that ICANN has created to in fact look at exactly those questions. So we, SSAC, appreciate the fact that ICANN has taken it on to address that question and create that Working Group, and so we’re obviously paying attention and tracking that work very carefully.

The last comment that I’ll make is simply to let you know that similar to what we did in SAC-051 related to the taxonomy and structure of WHOIS, SSAC is preparing a comment on a taxonomy and structure for registration data validation, which we are hopeful will facilitate, maybe better frame some of the discussions that are going on with respect to

quality of data and validation of data – just speaking directly to the technical issue of what it means to validate data and why we do it, and then giving some examples of how it’s done; and in fact, how well and how effective those things work. We hope to have that available relatively soon, certainly on if not before the Beijing meeting. I don’t really want to commit to a definite timeframe. We tend to focus on trying to get the right information together rather than forcing ourselves to a particular deadline.

But I wanted you just to be aware that that was an area which we were exploring and we hope to have a comment out that we hope will be helpful to the community. So those are the comments and statements that SSAC has made. I’m happy to answer any questions that come up about that when the time comes. That’s it for me, thank you.

ALAN GREENBERG: If anyone’s speaking we can’t hear you.

CARLTON SAMUELS: Are you hearing me now?

ALAN GREENBERG: Now I can hear you.

CARLTON SAMUELS: Thank you very much, Jim. We are now at the point where we are going to have interventions by different speakers. The list of the speakers should be on the top right-hand side of your screen. I am still blind to

the screen but the speakers are listed there and they will speak in the order that is listed. So if you could, the first person on that list, you are up. Thank you.

AVRI DORIA: I guess you can't hear me?

ALAN GREENBERG: Yes we can.

GISELLA GRUBER: Hi, this is Gisella. We can hear you, thank you.

AVRI DORIA: Okay, great, thank you for the acknowledgement. Okay, so briefly I've been involved with various WHOIS groups and WHOIS issues since I first got to ICANN back in 2005-2006. The first actual thing I did was participate in writing an article in 2007 that sort of said "Until we better understand the message we have for doing WHOIS," at this point, I guess it would properly be said for doing directory services, "and get new tools that allow us to have different methods of controlling access and different methods of requiring information we will never solve the problem" – that as long as the problem is defined as you've got to tell us everything of your personal information, you have to tell it to the world or you've got to keep it hidden, and it was a binary choice, that the problem remained intractable.

So I'm really happy to see that the review and then the Board have actually initiated work on methods of being somewhat more discriminating in what we do in terms of directory services. I tend to take a view that looks for a balance between what's absolutely needed to protect security and stability of the internet and what's needed to protect registrants and users.

So at the moment when we look at sort of what can we do with WHOIS, we can either print out all of our private details as a registrant – and that's my name, my address, my telephone number, etc.; or we can hide behind a proxy or a privacy service, neither of which is controlled in any way; or we can lie. And those are really the choices that a registrant has. Now obviously lying is not helpful to those who want to protect the security and stability of the internet. If there's a problem they need to be able to find someone. And I understand that the prevalence of lying, though I'm not sure how prevalent it really is, does enable various problematic acts – crimes or whatever on the internet.

Now when I'm talking about privacy though in the dataset, I'm not only talking about personal data – though I think personal data is the most important and we do need to solve that. I'm also talking about data for what I'd call the endangered group, the endangered organization. It wanders from shelters for abused spouses, culturally prosecuted minorities and their groups, public advocacy groups, local groups of citizens. I've had people who were concerned about the access to who is the mother that is in charge of the local school kids' team that wanted to basically keep their information private, though understanding that law enforcement may have legitimate need through due process for that information.

So the information has to be somewhere but it doesn't necessarily need to be available to the world. In terms of these privacy issues, we now see that many areas, many countries are starting to develop laws and regulations that do protect that personal data and even protect that data for some definition of an endangered group. But the WHOIS is not a sensitive enough tool, mechanism, or process to take those things into account.

Even when it comes to the issue of well, if you are a registrar in a country that's got data protection regulations you're allowed to meet those but you're only allowed to request the exception to meeting those, as I understand it, after you've been prosecuted for having broken the regulations. You're not allowed to just look and say "The European privacy directives instruct us to do this, we therefore need to do this. ICANN, may we?" That doesn't even seem to be a provision; it certainly doesn't seem to be something that is happening. So perhaps we do need to organize lots of court cases and prosecutions in Europe to make sure that the registrars are able to request, I don't know. But what it really comes down to is how do we honor these privacy regulations that are being created?

The last thing I want to mention that comes up is what happens in terms of this jurisdictional issue? We have an unfortunate circumstance in which the Board, without following a policy process, decided to impose the thick model on all new gTLDs. I think that's a problem but that's a problem that needs to be solved by solving privacy issues and directory services. In a thick WHOIS transition for the incumbent registries, people who might have protection under a European directive or some other national jurisdictional directive would lose any of that protection,

any of that potential protection they would have once the registration data was put under the control of the registry that happened to be under a different jurisdiction.

It's a complicated issue. There are people that deny it's an issue because we haven't seen any registrar defending their national privacy regulations, and yet it remains. And so I think that you know, we have quite a bit to do in terms of the purpose, the [rules], and the protections taking us forward. I'm really glad that there's groups that are looking at it. I think we're going to need a policy process of some sort to actually talk about ICANN and privacy in manifestations such as WHOIS and elsewhere; and perhaps that's the next step. But I really do see quite a set of complex problems.

The last thing I want to say is we often decry, "Oh my, ICANN has not been able to solve the WHOIS issue and it's been with us forever!" I would look at the world in general and sort of say we've not yet solved the conflict of rights between the right to be protected by law enforcement, the right of privacy, and the right of property in any other sphere. So the fact that we are challenging it within ICANN and it is becoming tractable is actually a good thing. Thanks.

CARLTON SAMUELS:

Can I remind everyone that's going to speak that you have five minutes to talk? I was very lenient with Avri this time but could you please try to keep your remarks to the five minutes that is allotted? The next person, and I am still blind here, the next person that's on the list, you're up. Thanks.

EVAN LEIBOVITCH: That's okay, Carlton. This is Evan Leibovitch. Am I okay? Am I heard on the rest of the call?

CARLTON SAMUELS: Yes.

EVAN LEIBOVITCH: Okay. So I'll just start right in. My name is Evan as I said. I'm based in Toronto. I am a Vice-Chair of ALAC and a former Chair of the North American Region, NARALO, and I come at this with I think a fairly basic, straightforward point of view. To me, this is a matter of public confidence in ICANN. This is a matter of ICANN being able to essentially enforce the minor regulations that it puts upon itself. The fact that WHOIS is not universally accurate is to me a major source of embarrassment for ICANN and for the registries. This is something that should be taken for granted. It's not taken for granted and that I think is a very big concern.

Personally, I separate the issues of freedom of access of content information from privacy, both on a theoretical level and a practical level. On a theoretical level I note that ICANN made a conscious decision a long time ago that domain names were to be a matter of commodity, not identity – a domain name can be bought and sold, it can be transferred, and so as such its use as a non-moving point of identity is severely diminished. That's one reason that being able to have usable, viable and accurate content information is very important.

At the same time, I think that there's far less of a link between domain names and privacy than is sometimes painted. For instance, I manage myself one of the kinds of sites that Avri would call endangered. It's a site for refugees and refugee research, and it has inside there people who are blogging who could be in danger if their identities were found. And yet, they don't own domains. They're able to speak; we're able to protect them and the domain name system is not part and parcel of what enables them to have freedom of speech.

There are many, many mechanisms that allow people to have privacy and anonymity on the net. Owning a domain name is not a requirement of speaking. It is not a requirement and it's not an enabler of free speech. The fact that third-level and lower-level domains are so poorly used within ICANN is to a certain extent a condemnation of the ability to use domain names and sub-domain names in fact to protect privacy and anonymity, since lower levels are not subject to WHOIS. So there are a number of issues at play here.

Like I say, my basic concern is that privacy should be protected to the point of allowing individuals for instance to have accurate information but perhaps information that is not universally and widely disclosed. I happen to like the example being set by the .ca domain from CIRA that has a mechanism that has different standards of public access for corporate- versus private-owned domains. And it's I guess ironic that the one domain that I think provides a very good model for use by the rest of the registries is one that as a ccTLD is actually one that's not governed by ICANN>

So I'll leave my points at that and I will pass over to the next person, thanks.

CARLTON SAMUELS: Thank you, Evan. Next up is Michele Neylon. Michele, you're up, sir. Is Michele on?

ALAN GREENBERG: We can't hear you, Michele. *7 to unmute.

MICHELE NEYLON: Can you hear me?

CARLTON SAMUELS: Yes, we are hearing you now.

MICHELE NEYLON: Okay sorry, I think I was actually muting myself instead of unmuting – sorry about that.

Okay, very briefly, Michele Neylon speaking. I'm a registrar from Ireland which of course is within the European Union. So from my perspective, I appreciate some of the comments made by some of the previous speakers with respect to the entire difference between WHOIS data which is collected and that which is displayed. From our perspective as registrars, the entire area at the moment around the contract obligations is highly problematic because we are obliged to breach European law; and as I think Avri pointed out, the current situation is in

order to get an exception to have to already be facing prosecution, which is hardly ideal.

In common with Carlton I'm also a member of the Expert Working Group on Directory Services. Carlton, we need a shorter version of that – I mean I think EWG is being used in some cases but we have to have a nice simply acronym or else it won't be a valid ICANN group. [laughter]

But the thing is this kind of thing can be addressed and it should be addressed with respect to both the collection and the display. As a registrar we see our clients wanting to register domain names for a wide variety of purposes. Some of them might want to register domain names for businesses; others might want to register domain names for personal blogs. It might be for, there are freedom of expression issues that Avri rightly pointed out and I would strongly disagree with Evan's perspective on this, strongly. I don't have long enough to actually argue out the reasons why I think his argument is flawed, and as Evan knows we will never agree on this so it's kind of boring. You can sit on the sidelines and watch us argue about this for days – we'll never actually agree.

But I think the key thing here is what is displayed. What is collected, you know, you can argue about that. There are privacy considerations with respect to the collection and retention of data within Europe and in other parts of the world. Obliging registrars to display full contact details for every single registrant to anybody and everybody does lead and does contribute to a certain degree of inaccuracy. The other thing is with respect to the term "accuracy" itself, I personally don't like that term because I consider it to be far too binary – I mean, either

something is accurate or it isn't. And the reality is of course that accuracy, if you're looking at it from that perspective, something could be deemed inaccurate if for example you were to change address, you were to move house, you were to move office. How long before the data is considered to be inaccurate?

There's other issues around WHOIS at the moment with respect to internationalization – IDNs are a problem. Many of us end up being forced to provide bogus post codes on order forms because people assume that every country in the world uses post codes – they don't. I mean there are a lot of different issues here, and I can see there on the chat Jordi who used to be with .cat, "There's a difference between the WHOIS data for personal websites and the WHOIS data for business ones." And for us in Europe this is a key consideration and something we should have the ability to differentiate between. But at the moment we don't.

It would be nice to think that any changes in the policies and in the contracts and everything moving forward would reflect national law in a sane fashion – and by sane fashion, that means that we don't need to go to court in order to defend something that we shouldn't have to defend because we should not be obliged to breach local law. The current situation is pretty much the reverse, which I would view as being highly problematic. And I don't particularly want my company to be the one footing the bill for some massive court case because it would be massive and it would be expensive.

I've been told that my time is up so I will now cede to Alan.

CARLTON SAMUELS: Thank you, Michele. The next person on the list to speak is Alan Greenberg. Alan, you have the floor, sir.

ALAN GREENBERG: Thank you very much, Carlton. First of all, I'll make a couple of comments on some of the things other speakers have mentioned – that's one of the advantages of speaking later in the list. I butt heads with Avri on many things but I agree with pretty much everything she said on the privacy issue. I disagree strongly with her on the thick WHOIS. I'm one of those unbelievers who don't understand how data, if it resides on a registrar's site and is completely public and replicated around the world many times has a problem if it moves across jurisdictions – it's already moving across jurisdictions. But we'll address that in the Thick WHOIS Working Group.

Also a comment about the difficulty of addressing the privacy issues. I find it a bit curious because several registries have put in place provisions to allow privacy for individuals according to European law, and so there are implementations. The registries that have done it have done it differently from each other but there are implementations. Hopefully we will come up, with all the WHOIS work that's going on, with a method of doing it that's a little more streamlined than the ones they had to use; and as Michele said, that you don't need to be under investigation or prosecuted before you can put something like that in place. But there are options.

What I'd like to spend a little bit of time on is privacy and proxy services. The two terms are often used interchangeably and I think the WHOIS Review Team came up with a useful set of definitions, and that is that a

privacy service masks some or all of your contact information but not your name – so you put your name is, presumably your correct name, and that shows on WHOIS but your contact information is not shown. A proxy service takes full responsibility for the domain; that is, they have their own name, contact information, and everything about the registrant is masked from the point of WHOIS.

Now these concepts, certainly proxy has existed forever. Everywhere around the world lawyers register corporations and domain names for clients and do it under their own name – that’s quite common. And it was common practice for corporations and for other things way before ICANN came around so it’s not a new thought. The concept has been heavily used and is even slightly addressed in the RAA in that it says if you are registering on someone else’s behalf, you take full responsibility for it.

Yet we know it has been problematic. The UDRP for instance where people can be cited for infringing on trademarks has some real implementation problems associated with privacy and proxy services. And ICANN unfortunately has known these problems have existed for many years and has done nothing about them. And I think that highlights one of the problems with the model that we have for ICANN in that somewhere in the process, be it in the community or within ICANN staff we need to start addressing problems that everyone knows are there but that we’re afraid to tackle.

And I don’t have the solution but I think it’s something we’re going to have to think about more because this is not the only case of a problem that everyone knows about but we don’t want to talk about. So it’s

certainly positive that we're now looking at accrediting privacy and proxy services, and hopefully that will address some of the problems that are inherent in that concept and implementation.

I don't have a lot more to say right now. I'm going to cut it short and leave time to other speakers and for questions and answers, and I look forward to seeing what kinds of questions come up. Thank you.

CARLTON SAMUELS:

Thank you, Alan – as usual the voice of reason. The next person on the list is Holly Raiche. Holly, you are up.

HOLLY RAICHE:

Thank you, Carlton. I'd like to concentrate on another area – accuracy. And I note what Garth has said in the chat is accurate-ish, which I think is an interesting concept. There are a couple of problems with the actual RAA itself that should be highlighted. I think the first is to remind people that the original onus is on the registrant to provide accurate data but then we've got a requirement in Clause 3.7.7.2 that requires and determines what is reasonable and commercially practicable. And honestly, I think we need to untangle what that means from a registrar and registry point of view, to know what we mean by accuracy in the real world context. And I take Michele's point, do you use the term "accurate?" Do you use another term like "quality of data" to really understand?

I should also like to point out in the final WHOIS report, one of the things they said was at the end of the day...

GISELLA GRUBER: Holly?

HOLLY RAICHE: Yep, I'm here.

GISELLA GRUBER: Holly, sorry to interrupt, it's Gisella. Terribly sorry to interrupt. We're not able to interpret you. Would you be so kind as to speak a little louder? The interpreters are having a difficult time.

HOLLY RAICHE: Oh, I'm sorry. Is this better?

CARLTON SAMUELS: Yes.

GISELLA GRUBER: That's much, much appreciated, thank you.

HOLLY RAICHE: Sorry, I'll use my [loud lecturing] voice. Okay, 3.7.7.2 of the RAA talks about what is reasonable and commercially practical in terms of data accuracy. We really need to unpack as far as terms, terms of what can reasonably be done and what do we actually mean by "data accuracy?" There has been some presentations where ICANN has tried to put some

flesh on it. I think we need to and perhaps take up Michele's point which is do we talk about accuracy or do we talk about quality of data?

The [thing Garth talks] about is the problem with Clause 3.7.8 which actually makes it fairly difficult for the compliance area to come to enforce the contract requirements for data accuracy. The other point I'd like to make is really a question, it's something Avri brought up and that is the possibility of differentiating access which will mean that people with a legitimate claim to have data accuracy access will have that access; others won't. It mayn't be a solution but I think that on one of the lists I've been reading, the focus of the WHOIS Working Group now seems to be on numbers and not names, so what I was hoping was a solution may not be.

I don't want to add anything because I know Garth is on the list – I didn't think he was but I see he is now. So I think I'd rather give my time to Garth and maybe have him talk about what he thinks accuracy versus quality of data needs to be made quite a practical and real world concept. Thanks, Carlton.

CARLTON SAMUELS: Thank you, Holly. We are moving to the next speaker. The next speaker is Patrick Vande Walle. Patrick, you're up sir.

PATRICK VANDE WALLE: Hello Carlton and hello everyone, do you hear me?

CARLTON SAMUELS: Yes, we hear you.

PATRICK VANDE WALLE: Okay. So I'm Patrick Vande Walle. I'm a former member of the At-Large Advisory Committee and of the Security and Stability Advisory Committee. I won't repeat what other people said before; I just wanted to note that I fully agree with Avri Doria's and Michele Neylon's comments on all counts.

What I would like to add to this is some people already talked about the EU privacy laws. I just wanted to add to that that indeed, we are in a strange situation today because these laws are old. If I remember correctly the directive was voted in 1997, and of course that was way before the internet. And the current directive, each national regulator is interpreting the rules somewhat differently, which means for example that .cat and .tel fall under one regime; that some registrars fall under another regime depending on the country, and it all makes things quite complicated. It also makes things quite complicated because there's no general organization that could actually coordinate and take measures.

This will change in a few months' time because the EU is revamping its data protection laws, and under the new laws the European Commission will be able to investigate and coordinate actions against companies, both local and in third countries – the same way that it does for example for competition – which means that there will be one global approach and the new laws will apply to all companies processing data from European individuals regardless of where the company is located. That means for example the European Commission could take actions against American registrars if they have any data of European customers

or gTLDs, even if they are not located in Europe and so on. So that's going to be quite interesting.

What I would like to add also is that we talked a bit about, especially in the chat room, who should have access to the WHOIS data and whether the... The question I would like to ask is several people claim they need to have full access because they have a legitimate interest. The question that we should I think answer is what is a legitimate interest? There's no legal definition on that and depending on who you ask you will get a different reply. But obviously within the framework of the replacement of the WHOIS protocol, there will be a possibility to have differentiated access to the data. And I think it will be interesting to start right now to define which classes of users should get access to which kind of data; and also have some mechanism, some mutual and external mechanism to determine what is legitimate interest and which are the groups that could get access to this data?

And I also wanted to point out that the recent [NORC] study on WHOIS registrant identification pointed out that already one-third of the registrations are coming from private persons. And it's interesting because often I and several people say "Well, you know, domains registered by individuals are only a small number and not significant." But actually it seems that one-third is quite significant. For example, ICANN collected nearly \$70 million last year through registry fees. That means that these registry fees are paid by the registrants in the end, even if they transit through registrars and registries. So from this \$70 million, \$23 million are coming from the pockets of individual users.

So the question I'm asking is if these people contribute \$23 million to the ICANN budget how are they represented within ICANN proportionately? And my concern here is that despite their weight in the ICANN budget they are not really well represented, be it in the GNSO or the ALAC.

And finally I would add that until the next overhaul of the RAA I think that ICANN should have a process in place to accredit privacy providers for the WHOIS. The current jungle is indeed problematic. It's been pointed out in several studies that proxy and privacy providers, external and uncontrolled, lead up to the impossibility to actually access the data. And I think this is not correct. If we want people to use privacy services, privacy providers, the community needs to be able to have a mechanism to access the data from the privacy provider after following a due process, of course.

Okay, well thank you Mr. Chairman. I'm open to questions if there are any after the discussion.

CARLTON SAMUELS:

Thank you, Patrick, very kind of you, sir. The final speaker in this segment is Garth Bruen. Garth, you are up.

GARTH BRUEN:

Thank you very much, Carlton. Thank you to the group for giving me the opportunity to speak. One thing that I want to put on the table which some people may not want to hear is we have to talk about ICANN's role or non-role in this issue.

The first problem that I see is that the contract as it is written is not enforceable. We've gone back and forth about Section 3.7.8 and the WHOIS Review Team came to the same conclusion, that the contract is actually not enforceable on WHOIS accuracy because it does not have any provisions for mandating that the registrars do anything specific other than investigating about WHOIS inaccuracy. And ICANN has been asked multiple times in multiple venues to reply to this, and it's actually been proven in a few case studies that the contract is not enforceable.

So until the contract is actually enforceable there is little weight behind discussions about what is accurate and what is not accurate, and what is required and what is not required because ultimately, even if something can be defined as being accurate there's no way to enforce it. And until ICANN acknowledges the fact that the contract in its current state is not enforceable we can make everything 100% accurate and it's just not going to work.

The second thing I want to lay on the table is that beyond commercial entities that are registering, beyond individuals who are registering domains who want to retain their privacy and should have an expectation of privacy absolutely, we have to acknowledge that there is a large domain ownership which is completely illicit in one context or another; that there is population of registrant out there and we can call them mal-registrants or mal-users of the internet and they only exist to abuse the DNS or to use the DNS for illicit purposes. And this is the larger concern, and these are the people that when we talk about WHOIS inaccuracy and wholesale WHOIS inaccuracy, these are the people that we're really concerned about.

People who work in the internet security industry and people who work in law enforcement, they're usually not interested in who owns the Girl Scout troupe's domain name. We're talking about very sophisticated groups of people and individuals who have engineered the registration system and turned it into a weapon for their own benefit, and this is really what's in front of us.

And the fact that ICANN does not seem to want to enforce the rules as they exist or cannot enforce the rules as they exist is a huge problem, and the earlier presentations talked about the blind man and the elephant – this is really the elephant in the room, that the registration system and in many cases against the registrars themselves has been turned into a weapon. And I'm sorry to be so blunt about it but that's where I stand. Thank you very much.

CARLTON SAMUELS:

Thank you, Garth. We're now at the point where we are going to have questions from the audience and probably more conversations. For me, I'm really interested to hear more about two points that came up: the differentiated access issue, I would love to hear some more opinions about this as well as the enforcement issues – whether we think the 3.7.8 clause is sufficient to enforcement. So I am still blind, I can't get onto the AC room for some reason – it gets stuck on the first page – so Matt is helping me to tell me whose hands are up on the board.

So the floor is open for questions. And the first one I see up is Yaovi. Yaovi, you have the floor sir.

YAOVI ATOHOUN: Thank you, Yaovi speaking. Can you hear me please?

CARLTON SAMUELS: Yes, I'm hearing you.

YAOVI ATOHOUN: Yes, I have three sub-questions but first I have a comment, that's first to thank the organizer of the now very important work which is very, very important for end users. Why? Because if I were to talk about WHOIS in some African countries for example, today we are promoting (inaudible). People don't know what is happening when they sign contracts with companies to own a website. And I can tell you that people who [contract] with companies to have a website are people who will own the domain name for one year.... Can you hear me better? Is this better?

CARLTON SAMUELS: You have a little interference happening, Yaovi.

YAOVI ATOHOUN: Is this better, can you hear me?

CARLTON SAMUELS: Yes, better.

YAOVI ATOHOUN: Okay. I'm saying that we have some examples where people that contract with companies to have a website online, and these countries

just pay the domain name for one year for these people, these end users; and at the end of the year the website disappeared. So my conclusion on that point is that we need more information to the public, to the end users. So this one issue is very, very important.

The second is I have a question, a technical question. If people make queries to WHOIS, the person they're [contacting] is coming from one contract database. So that is one question and the answer is coming from one [structure] database. The second question, you talked about something at the beginning which is very unclear to me – how the new gTLDs can affect the WHOIS from the user's side as the users have contact with the registrar and not the registry who are the people managing the TLD. So how is the link between the new gTLD WHOIS and how that can affect the WHOIS as an end user (inaudible).

And the last question, before ICANN gives an agreement to a company to become a registrar, I want to know if ICANN checks if in the country of the company there is a law on privacy protection. Thank you.

CARLTON SAMUELS:

Thank you, Yaovi. I'm not going to attempt to answer those now because in the conversations I have a feeling that you'll hear the answers, so just stand by. The next person on the list is Lutz Donnerhacke. Lutz?

LUTZ DONNERHACKE:

Hi. I only want to point out that the main problems we have with the WHOIS system are homemade. We try to find the solutions for building a centralized database and at the same time provide detailed regional

access for law enforcement, detailed lawful solutions for various privacy laws which can be altered every few months; and we try to prevent registration fraud, wrong entries in the database by using a long chain of resellers which have to correct data upstream and upstream and upstream until it enters the central database.

So the main problem we have with the WHOIS system is that it's centralized. But we have a solution for this. We see it at whois.iana.org which is a very thin WHOIS registry. They only point out that they have a contract with a sub-registry and then hand over those questions to those registries. We can do this with WHOIS services for gTLDs. We can do this even for WHOIS services with the registrars or more down the chain up to the resellers, and now if we had such a chain we are allowed to apply local laws on each WHOIS instance. So we do not have a problem with managing or simulating the world of laws in a centralized database but we can point to different locations and apply local law there. Just think about it. Thanks.

CARLTON SAMUELS:

Thank you, Lutz. So Lutz's issue is really the issue of centralized databases and I think differentiated access is probably part of what he's saying. But he's also brought in the issues of resellers and the long downstream link between resellers all the way up to the registry and what that has to do with data accuracy and so on. Those are interesting words. Perhaps we can go further with that and we'll hear from Don Blumenthal. Don?

DON BLUMENTHAL: Hi, Carlton, I pulled my hand down, thanks.

CARLTON SAMUELS: Oh okay, thank you Don. So Holly, you're up next.

HOLLY RAICHE: Thank you, Carlton. Two questions, one to Jim and that was on the agenda. What was listed next to his name was SSAC's DNRD Model. I'd like to know what that stands for. And the second is really a question to Michele, and how from a registry point of view do you interpret the words "data accuracy" and the words that are in the contract, which is "reasonably and commercial practical" in terms of getting the data and keeping it accurate. Thanks, Carlton.

CARLTON SAMUELS: Thank you, Holly. So Holly's asked about the Domain Name Registration Data Model that was put out by SSAC. Perhaps Jim can speak to that right after Michele speaks. Michele, you're on sir.

MICHELE NEYLON: Can you hear me there?

CARLTON SAMUELS: I'm hearing you, yes.

MICHELE NEYLON: Perfect, sorry, I must say I'm confused by all these mutes and unmutes. Holly's question was how as a registrar I would interpret that clause? Is that correct?

CARLTON SAMUELS: Yes, that's one question, yes.

MICHELE NEYLON: Okay. My way of looking at this is very, very simple. If somebody submits a complaint to us about WHOIS accuracy we'll investigate it and then if the simplest level is does it pass the sniff test, the sniff test for those of you whose first language isn't English it's a colloquial way of saying is the complaint in anyway close to being legitimate or is it just somebody wasting time. And believe me, when you've got a large number of clients and users you do get some rather interesting queries, and "interesting" is the most diplomatic word I'll use on our call that's being recorded.

Then just reasonably, what we would then do is we'd investigate it, we would see if it's obviously incorrect – but to be perfectly honest, the bulk of complaints that we get would be where there's a disagreement about what is constituted as correct. And this is not something which could be covered by any contract with ICANN because ultimately this is a dispute between two third parties – one person saying "The domain is mine," the other person saying "No, no, it's mine." A simple example being let's say a married couple start a business and six months later they divorce. The domain name might have been in the business' name with one person's identity attached to it.

I mean obviously from the registrar perspective we get notifications from ICANN Compliance if there are WHOIS complaints or any complaints that can be governed by the contract, and I'm not going to get into an argument with Garth about this now but both myself and other registrars would dispute that something is not enforceable. I mean we take complaints from ICANN Compliance very, very seriously. Any we get we will act on.

I mean the thing about accuracy versus quality, I mean Avri's asking there on the chat does a misspelling mistake make WHOIS data inaccurate? That's a very valid question – is it inaccurate? If you misspell my first name and put two L's in and it is inaccurate, but is it inaccurate enough to trigger being an issue? There's no real guidelines there which is why I think a sniff test and things like that make sense.

To address the gentleman whose name I've completely forgotten...

CARLTON SAMUELS:

Yaovi.

MICHELE NEYLON:

Yaovi, sorry. To address Yaovi's query about the ICANN accreditation, at the moment there is no onus on ICANN in my understanding for them to check against local privacy laws. My understanding is that ICANN will check to make sure that the entity requesting accreditation in simple terms is not a criminal entity and some of the registry operators will actually conduct extra validation checks on registrars before they allow them to connect. A prime example of that being VeriSign who go through an entire verification and validation process with registrars and

they also ask us to revalidate certain things every single year – questions, for example, I think about whether we are laundering money or something or doing something which would be in breach of some federal law.

To Garth's... Garth, I'm dealing with pragmatics here, not pedantic interpretations and reinterpretations of wording. As I've already said, if I take the Compliance notices seriously then that means I'm going to check whether something is accurate or inaccurate and investigate it. And if we feel as a registrar that the registrant has provided completely bogus data we will tell them to correct it; and if they do not correct it we will enforce whatever terms we choose to enforce up to and including deletion of the domain name. And I think other registrars will do the same thing. I mean ultimately from our perspective we want to get paid, we don't want to have issues; we're not interested in having domain names on our credentials that involve problems because ultimately they cause us more headaches than anything else.

What am I making for a single domain name on margin – a few cents maybe? Maybe €1, maybe €2 a year? Ultimately it's not where we make money. I'll go on mute again; I think I've answered everything unless there's something I missed, Carlton.

CARLTON SAMUELS:

No that's good, thank you Michele. So we have about eight minutes left and Olivier is still to come on, and he says he'll need two minutes so we're going to keep it real tight for now. Fatima Cambronero is up next. Fatima, you have the floor. Fatima may be speaking through the interpreter? While we wait for Fatima, can I ask Jim – Jim, are you on?

Can you respond to the Domain Name Registration Data Model that SSAC put out? Would you please?

JIM GALVIN: Yes, thank you. I typed in some references in the chat room, so very quickly here as you already stated, DNRD stands for Domain Name Registration Data – that is the generic term that SSAC had put forth in SAC-051 when we created our WHOIS taxonomy in order to split the discussions into three parts. And SAC-054 actually talks about a model for how to represent registration data, DNRD Model. Thank you.

CARLTON SAMUELS: Thank you, Jim. Fatima, are you available now?

HEIDI ULLRICH: Carlton, this is Heidi. We're having an issue that the interpreters cannot hear Fatima so we're still working on that.

CARLTON SAMUELS: Okay, alright, very well. Thank you. Alan, can I ask you to speak to the privacy/proxy registration issue? I want people to know that there's a distinct difference between the proxy and privacy services and maybe you could speak to it, sir.

ALAN GREENBERG: I think I already did but I'll repeat it. People do use the terms interchangeably. The WHOIS Review Group came up with specific definitions that differentiate the two types of services and I'm not going

to argue with whether they picked the right definitions. But it's a useful distinction in that privacy services ensure your privacy. They can mask some or all of your contact information, so instead of providing your email address they provide a pass through email address which they will forward to you but not display your real email address, the same with phone numbers and things like that; whereas a proxy service also masks who you are and puts their own name in that place.

I'll add one more comment, and Yaovi mentioned – and it's certainly not unique to Africa – a web service provider who contracts with a business to provide a website and they roll in a domain name with it, and a year later it's all gone. Typically in that case what has happened is the web service provider perhaps knowingly to the customer, perhaps not, has acted as a proxy service – that is, they've registered the name in their own name and can do with it what they want at the end which might well be cancel it or sell it to someone else or whatever. And it's partly a matter of user education and partly a matter of lack of clarity to the registrant, but we're talking about the registrant who never actually registers a domain name. They're simply in a business transaction with a web hosting site which then registers the name.

So the whole issue of proxy services being accredited may catch that if we do the work properly and treat that web hoster as a proxy service. On the other hand there are web hosters and contractors who do this legitimately with the knowledge of their customers for the customers' convenience. So it's a thorny issue and it's going to take a lot of work to fix, and part of it is just education. Thank you.

CARLTON SAMUELS: Thank you, Alan, that was exactly what I was expecting from you, sir. I think it's important for people to get that distinction and how it fits in with Yaovi's question. We're waiting for Fatima who's going to type a question in the chat, but I haven't seen it yet and it's 11:27 so I'm going to ask Olivier to come on. Olivier, you have the floor, sir.

ALAN GREENBERG: We can't hear you, Olivier. He just dropped.

HEIDI ULLRICH: Yeah, we're dialing him back.

ALAN GREENBERG: Fatima should be back now, maybe she can go on.

CARLTON SAMUELS: Oh, is the question in the chat? I am also blind to the AC, I have to tell you that it won't let me in for some stupid reason so I'm not on the AC at all.

HEIDI ULLRICH: Carlton, this is Heidi. I think that Fatima is able to speak now if we wish to offer her the floor?

CARLTON SAMUELS: Okay.

FATIMA CAMBRONERO: This is Fatima speaking, can you hear me?

CARLTON SAMUELS: Yes, go ahead.

FATIMA CAMBRONERO: Thank you very much, my name is Fatima. First of all, thank you for this webinar which is very interesting. I'm sorry for not participating before. I had an issue. My question has to do with the accuracy of WHOIS data. Patrick and Michele were talking about this issue. I'm sorry if I got lost but who is responsible for, within this framework who is responsible for determining which data are accurate or not? That is my question, thank you very much.

CARLTON SAMUELS: Thank you, Fatima. Michele, can you take one minute to answer the question?

MICHELE NEYLON: Fatima, if you can hear me, it's a shared responsibility I suppose is one way to look at it. It's ultimately the responsibility rests with the registrant, which would be under the Registrants Rights and Responsibilities which all ICANN-accredited registrars must link to – this was established in the 2009 RAA, oh God, acronym central. So if you register a domain name you are obliged to keep your contact details and everything up to date. The shared aspect of it would be that if we as a registrar are informed of issues with the WHOIS that we should do something about it.

Now, this is where Garth and I will get into kind of a death match. Maybe people might want to throw the two of us into a room with a couple of sporks and go away and come back. [laughter] Since my diet isn't going that well I think I'll actually win that battle, so over to you, Garth.

Anyway, the point being that there is a certain degree of shared responsibility but there is an onus on the registrant. Now, one thing that I think needs to be made clear – harping on about certain clauses within the 2009 RAA, while it's fine and good, what you might be better off doing is looking at what you would like to see which would be reasonable and acceptable to registrars and registries in any forthcoming RAA which is currently being negotiated. However, I would ask the ALAC to have a look at the way that ICANN has put the RAA directly in the path for new gTLDs, which does mean that the timeline on that might be a bit short which doesn't help you particularly either.

I'll shut up now since I've used more than a minute, thanks.

CARLTON SAMUELS:

Thank you. Just to let you all know we cleared another ten minutes with the interpretation so we have ten minutes additional to this call. I will let Garth in now and then we'll go to Olivier. Thank you, Garth?

GARTH BRUEN:

Thank you, Carlton, Mr. Chair. Very quick question to anyone on the call who has the ability to respond: can anyone show me where in the contract ICANN is given the authority to breach a registrar who does not

delete an inaccurate domain or does not correct inaccurate WHOIS data? Thank you.

CARLTON SAMUELS: Anyone want to answer that?

MICHELE NEYLON: Carlton, I'm going to respond to that since this is something I think Garth wants me to respond to. I think asking that specific question as far as I'm not a lawyer, there are lawyers so maybe they might be able to answer that. But I think the thing really here is while there may not be a "breach thing specifically for that particular issue," which I'm putting in very large inverted commas, if ICANN Compliance were repeatedly to see a disproportionately large number of complaints for a particular registrar then I would suspect that ICANN would view that registrar to not be, using ICANN-ism "in good standing," and that that registrar probably has underlying issues which would lead to a breach notice.

If you think however that ICANN is going to send a breach notice to a registrar because out of a portfolio of thousands or hundreds of thousands or even millions of domain names the registrar has not deleted one or two domain names for which the complainants feel the WHOIS data is inaccurate, then it would be unreasonable to expect ICANN to send a breach notice. And we're never going to agree on this, ever, so it's just going to go around in circles, thanks.

CARLTON SAMUELS: Thank you, Michele. It's three minutes past the time so I'm going to ask Olivier to come in now. Olivier, you have the floor, sir.

OLIVIER CRÉPIN-LEBLOND: Thank you very much, Carlton, can you hear me?

CARLTON SAMUELS: Yes.

OLIVIER CRÉPIN-LEBLOND: Oh, thank you. Well, I think it's been a very, very interesting call but I'm coming into this call just to try and see where we go from here with regards to At-Large and the ALAC. There are a couple of things which are currently in the works. The first one is there is a public comment that is open: the At-Large WHOIS Registrant Identification Study and a draft, well a workspace has been set up with I believe it's you, Carlton, holding the pen on this if there is indeed something that the ALAC needs to send in. So I might have to ask you and put you on the spot, I'm afraid, whether you think there's something that the ALAC should contribute to right away.

CARLTON SAMUELS: Yes, I think we should make a response to the [NORC] study.

OLIVIER CRÉPIN-LEBLOND: Okay, thank you Carlton, it's Olivier again. So effectively this is closing on the 8th of March which is not very far from now, and it would be good for input to be brought into this as soon as possible and to go

through the usual process of a first draft being drafted, etc. And because this is At-Large everyone is encouraged to participate and to bring in their point of view on that.

That's one thing which is immediately on our doorstep. The other thing that is arriving on our doorstep somehow and is unrelated to WHOIS but is a parallel separate process that also deals with this is the Expert Working Group on the gTLD Directory Services. And as you know, many members, several members were selected – in fact, we're very lucky to have at least two or three of them on this call, and I wondered Carlton or Michele whether you could just say a couple of words about this? And I was also wondering if you would be able to whilst being in this group also relay back to the community and engage with the community to find out the input that should be brought into this.

CARLTON SAMUELS:

This is Carlton for the record. We've decided that most of the outputs from the Expert Working Group will be posted to our Wiki page. We have already set up the Wiki page for that, Matt has done that already, so we expect to put it there. The idea is that the At-Large has certain touchstones that it needs to be aware of in the work of the Experts Group and it is our duty to ensure that the At-Large is adequately informed of what the sense of the committee is and how these touchstones stand up against the sense of the committee.

OLIVIER CRÉPIN-LEBLOND:

Okay. And one more thing, Carlton, it's Olivier again. Last but not least, of course this call is recorded and has also been interpreted, and so we

will have the recording of this call, the transcript and also the chat which contains a wealth of information and interesting discussions and questions – all of that recorded and made available to whoever wishes to access it. So I think that's a really good point forward. That's all for me, Carlton, thank you.

CARLTON SAMUELS:

Thank you, Olivier. Alan will have the last word on this. Alan, you have your hand up, sir, you have the floor.

ALAN GREENBERG:

Thank you very much. I'm going to address what Olivier alluded to at the beginning; that is what people can do. The turnout for this seminar is really gratifying – there's a lot of people here, some of whom we rarely see on these kinds of calls. There's going to be a lot of activities going on on WHOIS and related subjects. The Expert Working Group was just mentioned and they're going to be soliciting input both from ICANN organizations, constituencies, stakeholder groups and individuals. There are going to be one or more PDPs which likely will come out of that; there are some PDPs going on right now and perhaps it's a little bit too late to get involved.

So my blanket statement is get involved. Read the things that come out. If you disagree with them say so; if you agree with them say so. And hopefully we can get this morass of WHOIS behind us and go on to more productive things in the future. This has been around for too long. We need people to work on it so that we actually can come to closure on this in a reasonable number of years, and it will take years at

this point. So I encourage people to stay involved and actually participate. Thank you.

CARLTON SAMUELS: Thank you, Alan, plus-plus-plus to that. Olivier, you need to say one more thing to lock it up?

OLIVIER CRÉPIN-LEBLOND: Thank you very much, Carlton, just ten seconds to also tell everyone that there is an At-Large WHOIS Working Group meeting during the ICANN meeting in Beijing as Heidi has very kindly put on the chat. That's on Wednesday, the 10th of April from 15:00 to 16:00 local time. Judging from the number of people on this call I hope that there will be an equal number if not even more people in the meeting itself since it seems to be a very hot topic. Thank you.

CARLTON SAMUELS: Thank you, Olivier, for mentioning that. And please understand that we have an open Working Group. We invite information from every quarter; everyone is welcome to come in and put in their two cents' worth. So we are wide open, thank you all.

The past WHOIS statements of the ALAC have been placed there on the agenda. You can see ALAC has a consistent view of WHOIS and what we are meant to do. It is important for you to read them to see how consistent we have been in terms of dealing with the subject. I would urge you to look at the past WHOIS statements of the ALAC because most of what was discussed here has been in there.

It's 11:40 my time, it's very early in the morning in Los Angeles and the staff there has been very helpful. This just leads me to say thanks to all of you who have participated here, thanks to staff, thanks to the interpreters – I truly appreciate this. I have been blind most of the time to the AC room and certainly with the help of Matt I have been able to keep this going. Thank you, Matt, especially for helping me through this.

I hope to see you all at the WHOIS meetings in the future and this webinar is at end. Thank you all.

[End of Transcript]