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DENNIS CHANG: Greetings, everyone. This is the Thick WHOIS Policy Implementation Meeting with the IRT, on the 13th of September, 2016. My name is Dennis Chang; I'll be facilitating the meeting today, and I see that we have a lot of people online. This meeting is being recorded, so please identify yourself before you speak for the transcript.

So, let's get started. Welcome, again. Now, I'll have an agenda before you. It's the same agenda that we published last week and on the IRT Wiki page. And what we intend to do today is to continue our reviews and edits of the draft consensus policy document for the Thick WHOIS transition policy for .com, .net, and .jobs, and we'll quickly look at the public comment readiness status for us. And then if we have time, we were going to discuss the draft memo to GNSO Council on privacy. That was suggested by Theo, and also Theo suggested that we discuss the WHOIS conflicts procedure, if time permits. And then we'll talk about the next steps.

So, let me pause here. Everybody okay with the current agenda?

Jody just joined us. Hearing none, we will proceed, then, with the review of the policy language document.

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FRANCISCO ARIAS: [inaudible] click on the blue bar, Dennis. That will [inaudible]. Right here. Double-click. Oh.

DENNIS CHANG: Not quite. We'll try there again. I guess mine is set up differently. It's okay. So if everybody can see this okay, on the Adobe Connect, and also this has been distributed to you before. And what I did was took our last version and edited it, and added – this first item is the thick Registration definition. And that was suggested by Roger. An ultimate definition for the thick registration reads, "Domain name for which the sponsoring registrar provides a copy of the associated contact information to the registry operator. The registry operator maintains the technical information [inaudible], name server statuses, creation date, and the sponsoring registrar associated with the domain name. Contact information for the domain name is maintained by the sponsoring registrar." What do you think about that definition? Go ahead, Francisco.

FRANCISCO ARIAS: Hi, this is Francisco. Sorry I didn't raise this issue before in the mailing list. The issue with me is that the definition is not complete. It only says "associated contact information," for example, without describing exactly the fields that need to be provided. I see at least two options on how to fix this. We can use some language like the one we had before, that was referencing the [inaudible] specifications, at least the fields that are required, and which are optional, and so on, and so forth. Or we can replicate that information in an appendix here or somewhere

else, so that we can have clarity on which fields are we talking about when we say “contact information.” And also, it should be noted that there is more than just contact information that now will be required for registration to be thick. I think, for example, the fields that were added in the [inaudible] policy to the registry RIDS output, like the [inaudible] contact fields, which are required; and so I think in that sense, the definition seems incomplete to me.

DENNIS CHANG: Marc, I’ll give you the floor. Go ahead.

MARC ANDERSON: Thanks, this is Marc. Before Francisco’s comment, I was going to support this edit. I like Roger’s definition; I certainly like it better than the previous definition. It may not be a perfect definition of thick, but for purposes of describing thick – for the purpose of migrating from thin to thick – I think it accomplishes what’s needed. I guess I’d need a little time to digest what Francisco said. I don’t disagree with your point about this definition not describing all the fields, but I’m not sure the purpose of the definition of the thick registration in this document should be to define the fields. Maybe that should be defined elsewhere. So that’s the concern there. Thank you.

DENNIS CHANG: Thank you, Marc. Roger, go ahead.

ROGER CARNEY: Hi, this is Roger. I suppose I'll just tag on with what Marc was saying. I'm not sure if we need to redefine them here; they're in several other policies and contracts. I'm not sure that we need to relist them. Otherwise, if we do that, we run into the problem of, if they change, then you're changing them in multiple spots again. But it's one of those things. Can we just refer to other policies, or something like that? Just my thought.

DENNIS CHANG: Francisco?

FRANCISCO ARIAS: Thank you, Dennis. That's a very good point, Roger. So perhaps that's a good reason why we should not list the fields that are defined elsewhere. So in that sense, what if we were to keep the language that we had before? The language we had before was not listing the fields, but instead was referencing the already existing specification of the defined, or the required fields. So it was saying something like, "[inaudible] provide the fields that are defined by Spec 4 of the [inaudible] Agreement." So it's referencing some other document that defines whatever the required fields are, instead of listing them here. So just a suggestion.

DENNIS CHANG: So, Alan and Steve asked a question; we're on the chat. The objection to the original language – what was it? Anybody want to comment? Roger, go ahead.

ROGER CARNEY: Yeah, this is Roger. I brought it up just because – though I agree with Francisco, and maybe we can just move this along – it is most likely accurate; it just doesn't read very well, and it doesn't even read like what thin reads, and I was just trying to make them seem similar. But I agree with Francisco. I may just put a footnote in and – put the footnote and then list the documents that the fields apply to. Hopefully that helps, Steve.

DENNIS CHANG: Go ahead, Joyce.

JOYCE LIN: Yeah. I thought that ICANN already has the format of WHOIS. Because every time that they check out WHOIS information, they say, "Okay, this is not complete, that is not complete. We are not complying with the WHOIS requirements." So maybe we should say that whatever format is required by the authorities, either ICANN or WHOIS. I don't remember which one; I'm sorry about that. And the registry will maintain all the fields that are required. And the [inaudible] I don't like the way it says the contact information for the – I'm in the last sentence – "contact information for the domain name is maintained by the sponsoring registrar." Does it mean that the registrar here has to maintain this contact information? Right? It's different if there are more fields out there that need to be [inaudible] WHOIS, the ICANN standards, or whatever. The meaning of each standard. Does

somebody know if the WHOIS format is required by ICANN, or something?

FRANCISCO ARIAS:

So, the information that you require is in the – or at least, I thought that’s what we put in the previous definition – Dennis is showing that, so you can see the bullets in the definition section. The second bullet is the previous definition as we had it, and the third bullet is the new proposal. So perhaps we can find a way to combine those, so that we have the benefits of both. I don’t have any specifics [inaudible] help to phrase that, but if it works, perhaps Dennis and I could work on proposing of something to the mailing list.

DENNIS CHANG:

Steve, go ahead.

STEVE 1:

Yes, thanks, this is Steve. I agree that the original thick definition isn’t exactly parallel to the thin definition, but neither is the revised thick definition, because the thin definition talks about what the registry operator maintains and provides. I assume that means provides through WHOIS or through the Registration Data Directory Service. Whereas the proposed language doesn’t have anything about what the registrar – what the registry operator provides. It just says “maintains.” So I would hope that that would help make it parallel, but again, I’m not entirely clear what the – other than the fact that it’s not parallel, I’m not sure what’s wrong with the original thick language. And it does have

the advantage of referencing the documents from which you can find out exactly which elements people are talking about. Thanks.

DENNIS CHANG:

Marc? Go ahead, Marc.

MARC ANDERSON:

Thank you. This is Marc. To what Roger said, I don't feel that there's anything wrong with the thick registration definition; it's just – I guess I just don't like the way it reads, and I don't think this is the place, in a definition of what a thick registration is, I don't think that's the right place to put requirements for what all the fields are. I'm not saying we shouldn't do it; it's just, that doesn't – I think the purpose here is just to define a thick registration, not to spell out a specification for what all the fields are. And it creates some inconsistencies within the document. I want to note – section 2.5 here says, "Starting 1 May 2018, a registry operator must require thick registration data upon receiving successful EPP create command, per RFC 5731. So here in section 2.5, there's sort of a definition – we've sort of defined RFC 5731 as a specification. I guess maybe 2.4 is more applicable, because RFC 5733 defines contacts. So 5733 is – sorry, I should've used 2.4 instead of 2.5 as an example. So we're saying, "By 1 August 2017, a registry operator must support contact operations per RFC 5733." So I guess I feel that's a more appropriate place to define those requirements than in your definition of what a thick registration is. It just seems out of place for me. Thank you.

DENNIS CHANG: Yeah, point well taken. Francisco, go ahead.

FRANCISCO ARIAS: So, on the [inaudible] Marc and Roger, will it work if we were to leave a lighter definition of thick registration in the definitions, but add the requirements section in the body, 2.-something, for example, to describe it as exactly what is meant to have a thick WHOIS output, or something like that? Would that work?

MARC ANDERSON: This is Marc. Yeah, that seems like it makes more sense. I do like Roger's definition, so I think that would be appropriate for the purposes of a thick-to-thin policy document. But then, I also recognize your point about being clear on what registrars and registries are expected to implement, so maybe something in between 2.4 and 2.5, or maybe even part of 2.4, if you were to expand that to specify that. I think that would make more sense, and it just seems to flow better, to me. Thank you.

DENNIS CHANG: Okay. Chris, I'd like to give the floor to you. Go ahead.

Yes, Theo, I don't see Chris requesting to enter, so I can't let him in. So as soon as I see him, I'll let him in.

[AUDIO BREAK]

THEO GEURTS: [inaudible] he's back.

DENNIS CHANG: Oh, Chris, you're back? Can you talk?

THEO GEURTS: He's just listening. He's back.

DENNIS CHANG: Okay.

THEO GEURTS: Thanks. Theo, by the way.

DENNIS CHANG: Alright. Now, let's see. So let's close this discussion on the definition. Francisco, why don't we then take Roger's suggested language without adding any requirements, and provide a similar parallel to the thin definition, and do that.

FRANCISCO ARIAS: Yeah, we can use the language suggested by Roger in the definition section, and then we the language found in the requirements in Section 2, similar to Section 2.-whatever [CROSSTALK]

DENNIS CHANG: Okay. Let's do that. Yeah, we were going to go to Section 2.4 anyway, so let's go right to it, then. 2.4 – this is Marc brought up – is this Marc?

Yeah. Right? You brought this up on the email, and you were talking about the absence of minimum validation rules? And you were looking for – I know that we had reviewed this section before, but I think maybe you realized that’s something that you needed. Go ahead, Marc. I’d like to hear from you.

MARC ANDERSON:

Thanks. This is Marc, and I might kick the serve to Roger as well, since he was the one that first raised it, but the reference to RFC 5733 – including that in the policy would require us to implement validation rules per RFC 5733, which prohibits reduced validation rules that the IRT previously agreed on. So if we’re going to implement something different than what the RFC 5733, it would need to be defined somewhere in here. So there’s just no – the reduced validation rules just aren’t accounted for, and it would need to be, if we’re going to implement that. Thank you.

DENNIS CHANG:

Francisco?

FRANCISCO ARIAS:

Yeah, very good point, Marc. The intention here was not to say that you have to implement the full RFC 5731 because precisely of what you said – relax validation rules during the August 2017 and 1 May 2018. So I think what we could do here, if you guys agree, is we will say something like support all the contact operations described in RFC 5753, our – even list the operations. The point is – and in that point there, the registry

has to support these operations. And then we could add a sentence or sentences describing what are the minimum validation requirements [inaudible] will do something that – perhaps Marc, you could provide language suggesting that? Is that workable?

[CROSSTALK]

MARC ANDERSON: Yeah, this is –

DENNIS CHANG: Go ahead, Marc. You want to respond first?

MARC ANDERSON: Sure, this is Marc Anderson. Thank you. I think that sounds fine. I think at the end, basically what we decided on is that I think there are four fields that RFC 5733 requires, but that the discussion in the IRT was that they would be optional during the transition period. So I think my ask is that we're just clearing the policy document, that the registries implement them as optional, rather than required for the RFC, and then I think also, we want to make sure it's clear in the policy document, because there's also a future date, and I think it's after the transition occurs – I believe that's the 1 February 2019 date – the registries will stop supporting the reduced validation rules. So I think we're looking for two notes. One, making it clear that registries are authorized, if you will, to support the reduced validation rules, and then also make it clear the date at which registries will stop supporting the reduced validation rules. Thank you.

DENNIS CHANG: Roger?

ROGER CARNEY: Thanks. Yeah, I think that's right. I think that we're looking at it two different ways, and I think Marc said it right, as we need to just allow for those to be reduced. And Francisco, I thought that was good just to add a few sentences there. But I think that we need to look at all of the bullets that mention that, and just make sure that we're covering that, so.

DENNIS CHANG: Joyce, go ahead.

JOYCE LIN: Yeah, I'm not so sure about 2.6, what is it in reference to.

DENNIS CHANG: 2.6?

JOYCE LIN: Yeah. The one next to it.

DENNIS CHANG: Oh, that means that the registry operator must accept all registration data. So they cannot refuse registration data from registrars.

DENNIS CHANG: Yeah. I personally don't see the need for it. Marc, do you think you need 2.6? I think it's abundantly clear you have to accept the data the registrars provide, right? With the minimum validation rule, and what-not.

MARC ANDERSON: This is Marc. Yeah, it's certainly implied, and it's not like – well, now that I think about it, it's probably redundant with 2.4, right? If the registry operator must support all contact operations starting 1 August, then it's probably redundant to say the registry operator must accept all registration data submitted by registrations in conformance with section 3.1, so yeah, I would say it's probably redundant and not necessary.

DENNIS CHANG: Yeah, if everybody's okay with it, I would like to delete it. Make it simpler. Because the referencing the other section is also confusing. I agree with Joyce. Alright? Let's move on. Now, we reviewed 2.6 and 2.7 before, and – let's see – now 2.8 used to be 2.9, but it's 2.8 now because we just removed one section. This one, we said that registry operators shall implement the requirements of the registry, registration data, directory services, consistent labeling, and display policies [inaudible] policies, in conjunction with Section 1 of Specification 4 of the Base Registry Agreement approved on 9 January 2014. Now, any comments on this?

FRANCISCO ARIAS: This is Francisco. I think I made a comment before that – or maybe it was someone else – I’m sorry, I can’t remember. But it came up in the previous meeting that we need to find two things. When is the data going to be available? And the second thing is, what bit of the data is covering. Oh wait, never mind; it says already monthly. So the data is for the month and has to be provided at the end of the first day of – I guess it has to be the “first day of next month,” or something like that. I think it’s very close.

DENNIS CHANG: Which one are you looking at?

FRANCISCO ARIAS: The new 2.6, right?

DENNIS CHANG: Oh. No, I was past that. We already covered 2.6 and 2.7 last time, so I’m on 2.8.

FRANCISCO ARIAS: Oh, sorry.

DENNIS CHANG: Yeah, 2.6 and 2.7 was edited at the last meeting.

FRANCISCO ARIAS: Yeah.

DENNIS CHANG: And this is the edited version. I think we talked about it and we agreed that it needs –

FRANCISCO ARIAS: Then I will just suggest a small edit there.

DENNIS CHANG: Okay.

FRANCISCO ARIAS: That by the first day of the next month, I think just maybe make it clear that you want the data.

DENNIS CHANG: Instead of “first day of the month,” you’d like to say “first day of the next month”?

FRANCISCO ARIAS: “The next month.”

DENNIS CHANG: Okay. If that makes it better. Over here, too? Right? Does that make it more clear, both sections? Those are reporting requirements. Okay.

No objections, right? It should make it clearer. And let's – back on 2.8, any objections to the reference to the CLD policy that we already published?

Go ahead, Marc.

MARC ANDERSON: Thanks, Dennis. This is Marc. I'm wondering, does the language in 2.9 referenced in our conversation earlier about the definition – does 2.9 address that? And I'm just thinking out loud there, but doesn't that cover the required fields of necessary data?

FRANCISCO ARIAS: Maybe. I think it's –

DENNIS CHANG: Should, right? It's pretty detailed.

FRANCISCO ARIAS: – probably will do once we define [inaudible]; then I guess it would be covered. Because this is covering CLD, if memory serves.

MARC ANDERSON: Yeah, and maybe that's just something you can double-check offline. I think that might address the conversation earlier about the required fields not being in the definition. But yeah, just a thought. You can take that off-line.

FRANCISCO ARIAS: This is Francisco. I remember now why we put this here. The reason being is because these three [inaudible] would be in a migration phase between August 2017 and January 2019. So this is saying, during that period of time, data related to contacts and it's optional, in the sense that if you have it, you have to show it; if you don't have it, then you don't show it, which is not exactly as it is described in CLD. In CLD, this data would be required. So this is saying you have an exception, while the data is being migrated. Does that make sense?

MARC ANDERSON: Yeah, this is Mark. Yeah, what you said definitely make sense. I'm not sure 2.9 reads that way, so I might suggest revisiting that offline, as well. But yeah, I definitely get what you said there. Thank you.

DENNIS CHANG: Anybody else? Roger, go ahead.

ROGER CARNEY: Yeah, this is Roger. I brought this up on a list as well. I don't know if it belongs in this board or if we need to create another board, but that holds true for existing registrations indefinitely, and I think we should probably say something about that. If we move a thin registration over and some of these data fields are missing even past February 2019, if that registration continues, it's still going to have some blank fields. So they wouldn't be required to show that, either. Does that make sense?

DENNIS CHANG: Yes, Roger. We talked about this several times. I don't know if you were on the call each time. The idea here is that 1 February 2019, all data must exist. And that's the policy, and the reason for the long duration of the transition is so that people have time to fill the data.

ROGER CARNEY: This is Roger. No, that's not correct. No. That won't be happening. We're going to populate the data that we have into the SRS, but we're not going to backfill any missing data.

DENNIS CHANG: So if on 1 February 2019 – and this is really the compliance topic that came up before, right – so we need to be very clear about this, because if it's the policy, the ICANN Compliance Team will be enforcing the policy, and if the data is not there as thick and is violating the policy period. Now, let me turn it over to Theo.

THEO GEURTS: Hi, Dennis – and this is Theo, for the record. And just to track back on what Roger just said, that is just not my recollection of the events that took place during the last eight months that we were on this. We never talked – we actually wanted to avoid that situation, that compliance would kick in and start to – I mean, we assume a mass data correction, here. And I've always been against that from the get-go, so we shouldn't go there, as a mentioned in the early deliberations, that we should be very cautious about this, because we are opening up a can of

worms here, the size of a huge building here that is very huge. So, no, that is maybe what it says here, but it's not what it should say. So I'm very against this language here, and I would caution the IRT here to think very carefully about what we are doing here. Thank you very much.

DENNIS CHANG: Jody, go ahead.

JODY KOLKER: Hi. Can you guys hear me?

DENNIS CHANG: Yes.

JODY KOLKER: Yeah, this is Jody. Yeah, I agree with Theo. I mean, the data that we're putting in here is what we have in our database. If there is a WHOIS problem, or a problem with the data right now, then a WHOIS request should be – invalid WHOIS request should be [inaudible] on the contact information. That won't change with what we put into the thick registries, or the thick contacts at their side. Again, Theo is bringing a very good point. If we are trying to do a data cleanup, that's just a huge problem. I think you will see tons of domain names going off of the Internet because they have invalid WHOIS information. Those should be coming up right now, if that is a problem.

DENNIS CHANG: Alan?

ALAN GREENBERG: Thank you very much. I'm having trouble understanding these longer-term scenarios. Clearly, I don't think we're in a position where we want to say, "If there is invalid information today, and it is not fixed before the transfer, then there is grandfathering that their side has no obligation to fix it in the future." Therefore, we're really in a situation where, if there is information that is invalid, or not in compliance with the current policy – and compliance is not following up on this – we have a real problem. We can't grandfather the errors in perpetuity, and it's clearly not really what we were envisioning, to have their side have to fix 10 million registration information data. Therefore, I think compliance has to understand that they have an obligation to really scrutinize the data for the registrations that are going to be transferred, before they're transferred, and make sure they're doing their job properly. Thank you.

DENNIS CHANG: Theo?

THEO GEURTS: Thanks, Dennis, and this is Theo, for the record. Just to remind everyone what we said a couple of months back, we discussed this several times and we agreed on the process that if there is data missing, it should go through the usual process as it is known today, and in time,

the data will correct itself in a natural, organic manner over time. And that's what we said back then. Thank you.

DENNIS CHANG: Go ahead, Krista.

KRISTA PAPAC: Hi, everybody. It's Krista Papac, from ICANN staff. So I'm trying to wrap my head around this conversation and understand what the vision is here. So, I think what I hear people saying is, "We'll transfer the data – what we have; if, come February 2019, there are missing fields, that's okay. It'll correct itself over some period of time, which I guess is an unknown period of time." And that that's okay and that the policy should not require that all registration at the registries – .com, .net, and .jobs – they don't need to be thick. And I guess, if I'm hearing that correctly, my follow-up question to that is, "How do we reconcile publishing a consensus policy that doesn't require all of those registries to be thick by the implementation date with policy recommendations that say the provision of thick WHOIS services should become a requirement for all gTLDs, both existing and future?"

DENNIS CHANG: Theo, you're – [AUDIO BREAK]. Theo, go ahead.

THEO GEURTS: Sorry, you were breaking up. Okay, this is Theo, for the record. I cannot answer Krista's question, but like I said again, several times, if you guys

are going to kick off a huge data correction program, it's going to be a major train wreck. And that's why we came up with the language – that's why we agreed on several points there – that we would not follow that route. We would go with missing data, and if that was the case, then so be it. I mean, we are talking about a registry that's been operating for a very, very long time. We have registrars operating for a very, very long time. Data will be missing. And those domain names are functioning right now without any problems. If we are going to correct all the data, you are going to put a huge burden on the registrars – which can be done, but not within the time frame here. We have to go about this a completely different way, then. Thank you.

DENNIS CHANG:

Roger?

ROGER CARNEY:

Yeah, hi, this is Roger. I'm going to start out like Theo did; I'm not sure I'm going to answer Krista's question, but the timeline was set up here was with the assumption that the data as it is today – as anybody can see it in WHOIS today – will be the same on February 1, 2019. So if you go out and do a WHOIS lookup on a domain at .com, like godaddy, and get some information back, that's the same information you should get back after February 1, 2019. And that's what we agreed on, and that's the timeline that we put together to make that happen. I wasn't around during the .org transition, but several people were, and if we're going to do a clean-up, no one's going to like the timelines, I don't think. And I

think that one thing to be clear on is, any new [inaudible] will contain all the data. It's just, the existing registrations would not. Thanks.

DENNIS CHANG: Joyce?

JOYCE LIN: Yeah, this is Joyce. I don't quite understand Theo's concern. Because you said that all registrations, the data missing, or something like that. But we all have to comply with ICANN and WHOIS. So if any domain name that is complying with the WHOIS, you should have all the data there. It might not all be accurate, or something, but at least it'll all be there. So why can't you just upload that data to the registry? Because if we don't set a date, then it's going to take forever to finish it, and [inaudible], right? Because everybody has to comply with ICANN requirements for the WHOIS right now, for the thin registries, for the thin domain names. So I assume that [inaudible] correct the WHOIS format. So maybe I'm missing something, or maybe Theo has some special concern that I haven't picked up.

THEO GEURTS: Well, if I may interject, Dennis –

DENNIS CHANG: Go ahead.

THEO GEURTS:

Joyce, to your point, of course we need to be compliant with DRA 2013. That is not the point here. I mean, we already have a process in place, and I think you and I, and all the registrars on the call here – if we encounter an issue with missing data, we either go out to the registrar where we have an issue with, and they correct the data, and we usually get all these ICANN complaints where there is missing data, incorrect data, and we follow up on them. We have a clear process there. What we do not know is how much data is missing. Could be a lot, could be minimal. We don't know. But we cannot operate under the assumption that there is no missing data. And in my experience as a Dutch registrar who's been operating since two decades now – missing data will happen all the time. Incorrect data will happen all the time. And it's a pain to correct that data in a huge operation. If it gets under – if we use the usual procedure that we have now, under the [inaudible] with compliance, then there is no problem. I mean, if there is data missing, we'll solve it the regular way. But let's not go out in advance and try to correct all the data at once. I mean, the Dutch registry does that, but they have a huge incentive to get all those registrars organized to do it. They supply you with technical data, how you can solve it. It is a huge operation. It will cost a ton of money. So I don't think we should be taking that route. I mean, there is no problem now, so why should there be a problem after the transition? That's the point that I am trying to make here. And if there's missing data, we will encounter it through the usual procedures and process. And we will fix it then. Thank you.

DENNIS CHANG:

Go ahead, Krista.

KRISTA PAPAC: Thanks, Dennis. Quick [inaudible] again. Thanks for that, Theo. So, I believe we have the same understanding here, from a staff perspective, meaning that there is this period of time where you're working to transition the data. That period of time, and January 31, 2019, all data should be transitioned at that point. In theory, it should all be there; however, if it is not, for whatever reason, beginning February 1, 2019, the requirement for these three registries to have all data becomes a contractual requirement under the consensus policy. And if registrations are identified that don't have the complete data, those would be followed up through some sort of compliance process. So I think you just said the same thing, Theo; and if that's what everybody else is saying, then I don't think we have a disagreement here. But if folks are saying something else, then we need to discuss that.

DENNIS CHANG: Jody? Go ahead, Jody.

JODY KOLKER: Yeah, I agree with Krista and Theo. To me, we have all the data that we have, as well as we can get it. And on February 1, 2019, all the data will be at the registry, and it will be the same information that we have now that is in the registrar database. We try to clean it up before we put it in there, registrations are going to be failing, or it's going to be a huge mess. But what I want to say is that, beginning February 1, 2019, I believe that that's when we started to take off the minimal restrictions for registering a domain name and for updating contacts. I believe

that's when we said that those minimums had stopped, and that that's when we would start doing a validation on the information that's actually used to register a domain name. And I'm just talking about syntax validation, not verification. So then, supposedly, all good data would be used from February 1, 2019 onward. In fact, if we're trying to update – if we're doing a transfer of domain name from one registrar to another, if we're doing a change of registrant from one registrant to another – then that data is going to get updated and cleaned [inaudible] organically, or naturally, from that point, February 1, 2019. And again, if there are WHOIS violations, we're going to fix them the same way that we do now, with an invalid WHOIS request.

KRISTA PAPAC: Yeah, Jody, it's Krista again. Sorry, Theo, I know you have your hand up; I'd just like to respond if it's okay, to Jody.

DENNIS CHANG: Yeah, go ahead.

KRISTA PAPAC: So, generally speaking, I think that's okay. I just want to make a couple of clarifications here, which is – the implementation of this particular part of the policy, transition from thin to thick, is what is in scope. Data validation and clean-up is something different, and doesn't – equally just as important, so I don't want people to think that saying data validation or clean-up or verification or whatever the various efforts are going on – those are equally important, but not in scope for this project.

And whatever data validation work, or verification work that's going on out there, with respect to registrar data, for example, works independently of this. And then, just – Jody, thank you for also confirming your understanding that, come February 1, 2019, the expectation is that these three registries will be thick, they'll have the data they need, and if they don't, that will just be followed up and cleaned up through some other process.

DENNIS CHANG: Theo, go ahead.

THEO GEURTS: Thank you, Dennis. And no worries, Krista. Actually, that was a pretty good clarification, there. I think we are all on the same level here. Though the language must reflect that, because [inaudible] talking about data correction projects, that is way out of scope of the recommendations that we had – I mentioned before, other people mentioned before – so that must be taken care of in the language. So I think we're all good to go there; though I would like to point out that I also would have some clarification from compliance how they are going to deal with that process. I mean, I've been operating under the assumption that, if there is a complaint, okay, we follow it up and we work it out just as usual. No problem there. But what I do not want to see is, like, having a Friday afternoon and having my email box full of ten thousand complaints of missing data, and have it completed within the next fifty days. Not that that situation will happen, but the registrar I'm looking for, but like I said, we cannot make assumptions here. But I

do want to make sure that such a scenario will not unfold for registrars who have been in the business for a very long time, and for whatever reason do not have the data and must double their efforts to make sure that the data gets corrected there. So I want to have some clarification there on how that should work, because I'm looking at the WHOIS ARS project, I am not completely happy there, though it is manageable. But if the registrar is missing a lot of data, then that process is not a process to go through. So if you guys could come up with something there, some clarification or how you envision this, that would be great on the list, or the next call. I would really appreciate that, and I think we should clean up the language, like I suggested a few minutes ago. Thank you.

KRISTA PAPAC:

Thanks, Theo. Krista again. So, regarding your question about compliance, generally [inaudible] on the call this week – our normal contact is on holiday right now, or the person that normally participates – but that being said, they would still follow their normal processes. I understand your point, though, about bulk processing. That's certainly something that we could mention to them, to make sure that – I mean, they address complaints as they come in, but I know what you're referring to [inaudible] project, and so we'll certainly take that feedback back to them and share that. With respect to cleaning up the language, I guess – now that our understanding is equivalent, the part we don't understand still is, what would you change in this language here? Because we think this language represents what we've just all agreed to be our understanding. So could somebody maybe help us understand what needs to be cleaned up here, in the new 2.9?

DENNIS CHANG: Yes, we have four minutes left to this hour of our meeting, so may I suggest that the IRT maybe do this online via email? Go ahead and propose your language. 2.9 was really meant to provide provisions for the duration of the transition, to give relaxation. And if we all agree on the effective date of the policy, which comes right here – 1 February 2019 – and it needs to be very clear when the policy is effective, and there's nothing more about this policy after that. Go ahead, Theo. You have the last word.

THEO GEURTS: Thank you very much, Dennis. The language about RDAC – we agreed that we should continue to develop the language for the draft, even though there is an RFC pending. My question here is – and you don't have to answer it now or anything; you can do it on the list – but how will that affect the comment period? If, for some reason, RDAC gets delayed or something, or there are some unseen consequences, what's the process there when it comes to the comment period we are aiming for? Thank you.

UNKNOWN 1: Theo, just a quick question. Which [inaudible]?

THEO GEURTS: Sorry, it's pretty late here and my brains are fried. The RFR that the registry currently have [inaudible]. Sorry, my bad.

KRISTA PAPAC: Thanks, Theo. That's a great question, and we were hoping to be able to discuss that a little bit with you guys today, but we're still having internal discussions here, so – we're having lots of internal discussions here about that, so it's being actively worked on. I hope you know that. And as soon as we have an update, we'll definitely be discussing that with the IRT folks – the reconsideration request itself, and what it means, as well as how it potentially impacts the transition policy that we're working on. So I'm sorry to ask for this, but if you guys could give us just a little bit longer on that, hopefully we'll have something to discuss at the next IRT meeting.

DENNIS CHANG: And the next IRT meeting is next Tuesday, same time, as you see here. And we have one more scheduled at the end of September and have not yet scheduled for October, and we are planning on an ICANN 57 session. And hopefully, we will have our public comment up before then, and we'll get some feedback from the public on the policy, also to discuss that. Now, anything else before we adjourn this meeting? The meeting agenda, of course, next week will be pretty much the same as this week. Any more comments? Shall we say goodbye, then?

THEO GEURTS: Yes. Let's say goodbye.

DENNIS CHANG: Okay.

[CROSSTALK]

DENNIS CHANG: I'll see you guys next week.

UNKNOWN 2: Goodbye. See you.

UNKNOWN 3: Thanks.

UNKNOWN 4: Thank you.

[END OF TRANSCRIPTION]