

---

MILTON MUELLER:

Okay, we'll get started. The doors have closed. None of you can leave. So, this is a panel about the intersection of two different governance structures. The GDPR is a law passed by the European Union that deals with data protection, and WHOIS is a service that is contractually required by ICANN and its registries and registrars to provide information about people who register domain names. Is there anybody here who does not know what WHOIS is or has never made a WHOIS query? There's one, there's two, okay, three.

So, when you register a domain name, obviously the registrar needs to know something about who you are in order to maintain your right to own, if you will, the domain name or to control the domain name, and they collect data about you. And based on some contractual requirements that come from ICANN DNS governance, registrars are required to run a service called WHOIS in which you can type in a domain name and you can see a bunch of information about who or what organization registered that domain. So, that in a nutshell is the WHOIS service.

Now, the question of how much data there is and what can be shielded from public view and what can't has been a controversy for some time. So, we have circulated a history of WHOIS policy on one sheet showing you that it really goes back to 1999 when the first registrar accreditation agreement was developed and ICANN was reacting to a report from the trademark entities, particularly the World Intellectual Property Organization, because they were very concerned about trademark

---

*Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.*

---

domain name conflicts at the time and they wanted to be able to track down the registrants of domain names for service of legal process.

So, the final report of WIPO in 1999 recommended that “the contact details of all domain name holders should be made publicly available.” That has in fact set in motion this long-running conflict between data protection rights, the obligations of registrars and registries, and the interests of various entities, including law enforcement and trademark holders in being able to see who has registered a domain and get their individual, personally identifiable contact information.

Now, we’ve also circulated a sheet showing you the interventions over the last almost 20 years now of data protection authorities around WHOIS issue, and you can see that the very first one was in May of 2000 – excuse me, 2001. No, it was actually May of 2000 when the international working group on data protection authorities or the Berlin Group as it’s sometimes called, sent ICANN a position on WHOIS saying basically you need to make this comply with data protection law.

And over the years – and we’ll have more about this – there have been various interventions from data protection authorities, but ICANN community has generally, at least the dominant coalition within ICANN, has favored maintaining WHOIS in its present form and therefore nothing changed.

So, what did change, of course, was that the European Union passed the General Data Protection Regulation and that is set to go into effect about ... Friday. A week from today.

---

The important thing about GDPR from the standpoint of the ICANN system is the threat of major penalties. That is to say big fines, millions of dollars at stake, leading ICANN into a crisis about how it is going to comply, and in the mind of some people, whether it even should comply with this new law.

So, that's a bit of a background to the problem that we're debating here. It's a very real, very immediate problem, although it has been going on for two decades, literally.

Now, on the panel here, we have a very broad representation of people involved in ICANN. We have, starting from over here, a board member of ICANN but also somebody who has been involved with the ICANN community as a representative of non-commercial interests or civil society. And of course she is not here to speak for the board. She's here as a board member.

Next to her, we have Stephanie Perrin.

UNIDENTIFIED MALE: What was her name?

MILTON MUELLER: Oh, I'm sorry, it's Avri Doria. Sorry about that. Next to her is Stephanie Perrin. Stephanie is a member of the Non-Commercial Stakeholders Group and a privacy advocate who has been working in the trenches of WHOIS for what is it now?

---

STEPHANIE PERRIN: Five years.

MILTON MUELLER: Five years, yes.

STEPHANIE PERRIN: But, who's counting?

MILTON MUELLER: A merry youngster. Seated next to Stephanie is John Levine and John is a longstanding expert in domain name and domain name security, and he is somebody who uses the WHOIS data and is here to defend I think its accessibility to ...

UNIDENTIFIED MALE: To some people.

MILTON MUELLER: To some people. Next to John is Eleeza Agopian and she is the unfortunate position of being in the legal staff of ICANN.

ELEEZA AGOPIAN: No, I'm not. I'm not an attorney.

MILTON MUELLER: Oh, you're not an attorney. Okay. So, I'm mistaken about that.

---

ELEEZA AGOPIAN: Strategic partner.

MILTON MUELLER: Strategic partner. Okay. So, she is in some ways deeply involved in ICANN's turmoil over how to comply with GDPR, while keeping its community happy.

I'm Milton Mueller. I'm moderating the panel and I'm with the Internet Governance Project at Georgia Tech. And over here we have Elliot Noss who is really on the front lines of this problem because he runs a big registrar, a Canadian registrar. It's still called Tucows, right? Tucows is the entity that has to collect and sort of operationalize the publication of the WHOIS data for all of their customers.

So, we have a pretty broad spectrum of interests here represented in terms of how the WHOIS issue plays out.

So, now that I've set the framework, I think we want to begin with Eleeza telling us basically where does ICANN stand and then we'll go to Avri because she has an announcement about a board decision that was ... And we'll basically learn what is actually ... Where things stand now with respect to compliance and ICANN's reaction to it.

ELEEZA AGOPIAN: Thank you. So, I'm not an attorney. I work in ICANN's multi-stakeholder strategic initiatives department. My boss, Theresa Swineheart, was going to be here today but she was in Vancouver this past week with a

---

number of our registries and registrars and the board earlier in the week discussing this issue, so she asked me to be here. I extend my apologies on her behalf.

What I'd like to talk about today is the action that the board took yesterday, and I think Avri will get into it a little bit more on her thinking on that, though as she said, she's not here to represent the board in its entirety. But, I will talk about what action the board took and what that means for how WHOIS is going to change, which I think is what we're probably most interested in talking about today.

So, as you may or may not have seen, the board voted yesterday to adopt a temporary specification. This is a change to ICANN's contracts with its domain name registries and registrars, accredited registrars I should say.

The temporary specification includes new requirements for how gTLD registration data will be handled beginning May 25<sup>th</sup>, a week from today, which is of course the enforcement date for the GDPR.

I wanted to start off by saying that ICANN, as an organization, our goal in this whole process has been to maintain the WHOIS to the extent possible in reflection of the law. So, in respect to the law, but also acknowledging that ICANN has a role to play in providing the WHOIS service. It's included in our bylaws, and obviously is of great interest to many people including security researchers which I think John will speak about, intellectual property attorneys and of course law enforcement. I'll talk a little bit about that as I move through, but let me speak a little

---

bit about what the specification includes and how things may change – not may change, will change, as a result.

The way this specification works, it's valid for one year. The board has adopted it. They must reapprove it every 90 days for no more than a year. So, it's still kind of in a temporary, an interim, situation.

This is important to note because, for those of you who may not know – there's a lot of ICANN faces in the audience, but for those of you who don't know, the way ICANN makes policy and sets policy for the domain name system is through a bottom-up multi-stakeholder process. That means all of our policy recommendations, requirements, all of which are baked into our contracts, come from the bottom-up multi-stakeholder process. This is really important. I think Avri will talk a little bit about why the board took this action now, but I can say that this was an important change to the system overall in light of the impact of the GDPR and how [inaudible] remain in compliance with the law.

But, ultimately, the changes that need to be made have to come from our community. So, in addition to passing these changes to the contract, the board has also requested that the Generic Names Supporting Organization, which is our policy development body in ICANN, begin a process to come up with permanent policy recommendations.

So, what's going to change in WHOIS? I think the most public change will be that you'll no longer see any personally identifiable information in a WHOIS lookup. That means the registrant's name, address, phone number, e-mail address, as well as the technical and administrative contacts that are included in a WHOIS entry.

---

Another important note is that the e-mail address, in the e-mail address field, registrars will now be required to display either an anonymized e-mail address or a web form that will ultimately direct it to the registrant, to the contact, that's on file.

The requirement for WHOIS for these changes will apply to both natural and legal registrars. So whether you're Eleeza at [inaudible] registrant or Eleeza at [inaudible] Inc, all of those fields must now be redacted that I just mentioned, all of the contact information.

The reason for this, and a lot of people have argued that perhaps this is an overreach is in practice it's extremely difficult to distinguish between legal and natural persons. A legal person – for example, Eleeza@[inaudible], I'll use myself as an example – could contain personally identifiable information. E-mail addresses often include personally identifiable information even if you're representing a legal entity. That was the thinking behind that requirement.

Another important point to note is its applicability. So, the GDPR of course is applicable to anyone who has a connection or a nexus with the European economic area to go through hundreds of millions or a hundred million or so domain registrations and determine who has a nexus with European economic area can be quite difficult in practice.

So, what ICANN has required its contracted parties to do is to ... That the contract requirements must be applied to anyone who does have that nexus, and unless it is commercially infeasible or if it is commercially infeasible to do so, may also be applied globally or on a broader basis because it's so difficult to distinguish those registrations,



---

at least for those that exist, the many that already exist and I'm sure Avri will talk about that as well a bit. So, those are kind of some of the key elements I would say of contractual changes that are coming or that are now effective.

I think perhaps I'll probably stop there. If there are any questions, I can answer to the best of my quickly.

MILTON MUELLER:

Alright. We're [inaudible] questions yet. I think the original plan was that we would have Elliot go next telling us what it's like to be in the middle of this from the standpoint of a registrar.

ELLIOT NOSS:

Thanks, Milton. I think that the important departure point is to understand in clear language where we are and why we are there. Milton mentioned rightly that the ICANN community has been battling over WHOIS for 20 years. In fact, in 2005, there was finally resolution after five years of hard work that was going to essentially move WHOIS to very close to what the solution we're looking at now are, and there was a late political intervention outside the system that killed what was at that point a deal.

What we have today is an anachronistic database full of personally identifiable information that is available publicly simply because of historical accident.

The second thing to note about that is the vast majority of the parties who are using WHOIS today for generally legitimate purposes are doing

---

so through third-party aggregators who have stolen the information from registrars like us. They have violated our terms of service and the terms of service of GoDaddy and [inaudible] and Web.com, etc., for 20 years now. Have aggregated the WHOIS data and then sell that on a commercial basis to third parties. Third parties are often law enforcement, are often CSOs of Fortune 100 companies, but are also often cyber criminals or other dark web actors who use that information.

And anybody who has registered a domain name and actually had the good Canadian character to provide their accurate information would have experienced the immediate inundation of phone calls and unsolicited e-mails from people offering them services aggressively.

So, what will happen next Friday is a couple things. First, ICANN has provided a spec. Sadly for us who actually have to deliver this, we've been working on this GDPR compliance for many months now. ICANN's spec is nothing but wishful for us. We will be implementing in the way that we had to. We were left alone, as were all registrars, to interpret the GDPR through our best legal resources and then to apply that to how we best felt we could apply a legal implementation of WHOIS.

So, you will see with us and with many other registrars significant diversion from the ICANN spec. We'll all have to work through that as a community.

The other thing that I think we will see, but this will take time – this will be over the next two to five years – is we will now see a legitimate tiered access regime emerge in the market. And when I say in the

---

market, in the community, because it won't be a lucrative commercial exercise for anyone at this point, where there will be some oversight and some structure and some rules around who gets access to WHOIS data, on what basis and what kind of access.

That's very important because today the system is rife with abuse. I've talked about a couple types of abuse. Today, anybody – and there is what are known in the ICANN community as WHOIS zealots. Absolutely can file a WHOIS complaint anonymously in any volume against any name. I'll finish here and pass the mic.

Today, there are people who look for the absence of a fax number, which is a contractually required field, issue a complaint on an anonymous basis, hope that maybe the e-mail address is also wrong because that complaint will be enforced rigorously with compliance, and if the registrar sends an e-mail and it's responded, sends an e-mail and it's not responded, that name will drop. That can be done both from commercial actors looking to pick up a name that they desire or by political actors who are just trying to disrupt some other entity that they don't like for whatever their political purposes are.

So, what we have here is finally, after 20 years, a forcing mechanism that highlights, first and most importantly, how incredibly difficult it is to try and solve global problems through national frames. And secondly, one that is a forcing mechanism that's going to finally cause all of us in the community to evolve the systems that should have been evolved over the last 20 years, because again, the best political actors inside of the ICANN system are those who are the ones who have managed to keep this open when it shouldn't have been for 20 years.

---

And we all know that it's easier to stop change than make change.  
Thank you.

MILTON MUELLER:

Yes. He brought up an issue that I didn't actually prepare you for properly, but in this conflict over the accessibility of WHOIS there was a big push around accuracy of WHOIS data. So, in addition to the registrars being contractually required to supply this data on a query basis to anybody who asks for it, there was a growing sort of regulation of the accuracy of the information and this was even the subject of US congressional hearings. You can get a very clear picture from Elliot's statements about how conflictual this whole issue has been, that there have been attempts to deal with the policy change needed and those have been interrupted or destroyed by external political interventions. There's just no nicer way to put it.

Okay. So, now let's go to Avri because she's a board member and maybe she can explain about how this all or why this all happened the way it did.

AVRI DORIA:

Thank you. First of all, to repeat what they've said, I barely speak for myself let alone speak for the board. I tend to be of several minds on many of the things. In fact, when we were talking about our roles here, one of the roles that wasn't mentioned is I'm a registrant client of Tucows. So, basically, the relationships are all really quite involved.

---

The reason we took this now, first of all, is because of May 25<sup>th</sup>. There is a deadline. It makes not only ICANN liable, it makes all of the registrars and registries, those that wholesale the names, liable.

Now, whether that would have been enough and ICANN wasn't liable, it's hard to say. But, that being the case now, the ICANN staff, the organization, has been talking to the registrars for months trying to understand what they were going to do.

We got to the point where we knew that the registrars were all going to do something. They were all going to do their own thing, and here we were not having yet made a decision on what should be done. And it basically became obvious that if we didn't make a decision now, we would be in a situation where not only would there not be a framework that would be useful ... So, the reason that I chose to vote for it when I did is at first my feeling had been, yeah, let the registrars do what they're going to do and see what happens. But, then, I looked at what was contained in the GDPR in the specification, the privacy rights. It did give the way it was able to give sort of a framework whereby perhaps not today, but in time, the registrars could come back to a common set of views for how to do things.

So, if somebody looks at this temporary specification, they'll see that some of the items, some of the changes, have a period of time. Some of the changes have yet to have discussions between ICANN the organization, and the registrars and other parties with contracts like the registries, to actually figure out how they're going to do some of the profiles for information they put out.

---

There's questions that are open over time because governments are interested on, whether we need to find a way to differentiate between legal persons and natural persons, and if so, how would we? Because at the moment, the system doesn't look like it would be easy to do that.

So, if someone were to ... But, we do have a strong pressure from government saying, "You really should," because legal persons – companies – don't get the same protections that natural people do.

So, there's a lot of questions. It was really kind of an interesting period for years because having long been one of the advocates for privacy before joining the board, although I kind of got burnt out on the topic about five or six years ago before she got here and now I criticize her for getting burnt out – yeah.

UNIDENTIFIED FEMALE: No stamina.

AVRI DORIA: I'm a hypocrite sometimes. What can I say? I get burnt out, but I won't let you be burnt out. But, basically, when put in a position on a board of looking at this, I had to look at it not only with the sort of advocacy prejudices that I may have walked in with, I also had to take into account what governments have been saying, what the folks that are constantly telling me we have to fight the bad guys and others will be able to talk about that more. So, finding that balance.

I'll give back the mic in a second. One of the interesting things, when we say it's a temporary spec, it really is temporary. At the end of the year, if

---

the community hasn't been able to come to a consensus through its policy development processes, then this temporary specification isn't going to become voluntary and then we actually come into the position we would've been in if we hadn't done a temporary specification where each of the registrars and registries will be capable of doing what it is they think they need to do without any imposition of oversight, without any imposition of community consensus. So the next year, while this is going on, will be a very active year and the sort of relief I felt at the discussion being over yesterday when we took the vote was purely an illusion because it really is the start of a year, and if any of you have watched ICANN or are a part of ICANN, the community coming to consensus in a year on something we have not been able to consensus on in 20 years is going to be fascinating to watch.

MILTON MUELLER:

Just a word about consensus. So, ICANN is supposed to make policy through consensus, but I have some concerns about this interim or temporary solution in the sense that whatever is the default, whatever is the status quo when there is no consensus, tends to stay in place indefinitely. This is what happened with WHOIS itself. There was no consensus about WHOIS. It was just there. And in order to make it not there or to change it, we had to get the agreement, the consensus, of the people who directly benefitted from having that information and of course that consensus was never forthcoming. Why would you agree? If you already have what you want, why would you ever agree to change your position, right?

---

UNIDENTIFIED MALE: Because you're well-intentioned.

UNIDENTIFIED MALE: That was the absence of the ...

AVRI DORIA: And the registrars are well-intentioned now, so hopefully they will agree at [inaudible].

MILTON MUELLER: Well, the registrars are not the problem, as we all know. So, let's go on now to here from John Levine, a standpoint of something who really thinks that WHOIS information is important to have accessible.

JOHN LEVINE: Not to put words in my mouth or anything. I would emphasize Avri's point that there is an enormous amount of overlap here. I've been reselling Elliot's service for, what, 20 years now. And I have a bunch of registrants, a few of whom sometimes live in Europe, so at some tiny level, I'm on the hook for the same stuff he's on the hook for.

ELLIOT NOSS: No, we got you covered.

JOHN LEVINE: Oh, great. I can sleep soundly tonight. Good.



---

ELLIOT NOSS: Yes.

JOHN LEVINE: I'm also on the ICANN Stability and Security Advisory Committee where we've been going around with the WHOIS issue for a while. And I've spent a lot of time working with people who do security research. And not to put Milt on the spot or anything, but I was wondering do you know [Manos] [inaudible]?

MILTON MUELLER: Sure. I know [Manos].

JOHN LEVINE: Yeah. He's a colleague of yours. He does really good attribution research and uses WHOIS. This is RightsCon. Avri has heard me say this before. There's a wide range of human rights that we care about and places like this we tend to put emphasis on free speech and privacy. But, if you read the UN Declaration of Human Rights, it's got 30 paragraphs, and there's rights to security of your belongings. There's a right to ... I forget exactly what the word is, but it's to be free from attacks on your personal integrity. Basically, a right against being trolled.

In a lot of cases, in practice, these things have tension. It's like, on the one hand, we're all in favor of free speech. On the other hand, I think we're at least somewhat opposed to gratuitous slander against innocent

---

people. You can't be absolutely in favor of both of those concerns at the same time.

One final stage-setting thing is the security people have had a long-running alliance of convenience with the trademark lawyers, who in fact we don't like at all. And yeah, ICANN made ... Like the first week at ICANN, we made a mistake by letting the trademark lawyers into the room. And this whole intellectual property thing has been a huge distraction because it's not really relevant to anything important that ICANN does.

But, I would say that there's a lot of domain names, the vast majority of them are registered by legal persons, not individual persons. I've been looking for numbers of how many domains are registered by individual people. Normally, I would ask the room, but in this room probably everybody has a vanity domain, so I won't ask.

My guess is there's maybe on the order of 20 million individual domains and there's a billion people on the Internet. So, we're talking like 98% of the people on the Internet are users of domains and don't have domains. And those are the people whose security and whose rights I'm concerned about. We do lots ...

For all the crud that's in WHOIS and for all the poor quality of WHOIS ... And I feel some of Elliot's pain. I get some of those reports about fax numbers, too. On the other hand, I also send a certain number in when I come across a domain where it just says, "Address: New York, Street: New York, City: New York, Country: New York." Yeah, certain registrars

---

do more quality control than others. There's plenty of blame to pass around.

But, we really depend on it. We really use it. People like the guy I was talking to Milt about use this stuff all the time. The security researchers use it in really responsible ways to track down actual bad guys. I won't bore you with the stories, but every day I talk to people who send out phishes with hijacked domain names, with websites that have malware on them that install themselves on your computer or on your grandmother's computer and then steal her banking credentials and suck all the money out of her bank account. This stuff happens all the time and we use this information to fight it.

So, what we're doing about it now is in fact through the SSAC, the committee that's trying to come up with at least an interim way to do this tiered access thing. I think we all agree that it's reasonably possible to identify responsible security researchers. And in fact, the Government Advisory Committee said in pretty unambiguous language that ICANN has to continue providing WHOIS access for security researchers. We're figuring out how to accredit them. Typically, there's a bunch of trade associations they belong to. If you remember the trade association, they will vouch for you to become accredited. We're trying to figure out sort of a temporary way to do it. There's a new replacement for WHOIS called RDAP that is technically much better. Have you guys [inaudible] yet? You must have.

ELLIOT NOSS:

Got to wait until Friday, John.

JOHN LEVINE:

Okay. Critically, it provides the ability to actually [inaudible] log in. so, you can tell this request comes from one person, this request comes from the second person, and this request comes from another person.

So, we're working on that. I think it is reasonable that since the majority of the registrants are legal persons, and since we really do use this stuff to protect the rights – not necessarily the rights that you're talking about here, but actual rights of people all over the world, that it's important that there be access to the people who need to use it. I can rant more about it, but I think that's the essence of this story. And I think it is also ... It's like there is not an essential tension here. We're just [inaudible] protecting privacy of people whose identities are getting stolen. There is a privacy interest in doing the security research. We should all be allies here.

MILTON MUELLER:

So, Stephanie is going to comment from the standpoint of a privacy advocate within the ICANN framework.

STEPHANIE PERRIN:

Thanks. Hard to tell where to start here. I have been in ICANN for five years. I am a privacy advocate, but I'm also a retired federal public servant who worked for 30 years. Well, since 1984 I've been working on data protection. I spent ten years working on the PIPEDA, the data protection law in Canada, which was deemed adequate under the

---

existing data protection law in Europe, which is the laws that come from 95-46, the existing directive on data protection.

Then I left for the private sector and worked an amenity systems and then I went to the office of the privacy commissioner where I actually spoke at back in 1995 at one of the ICANN meetings on ICANN and privacy.

So, when I got the phone call saying, "Would you like to come and join an Expert Working Group that's looking at WHOIS for the umpteenth time?" I said, "Well, this looks like fun. I'm nearing retirement. I'm already doing a doctorate at [inaudible] on anonymous credentials. This might be a nice little diversion." Ha-ha! If I had talked to Avri, mind you, she wouldn't have talked me out of it, probably. She would've said, "Oh, good. Fresh blood."

I mean, this is not about me, but I thought maybe if there was somebody at ICANN who was participating in this who actually had data protection experience ... I have heard the complaint that, well, the data protection commissioners don't show up at ICANN. Well, hello, they're busy. They cover the entire spectrum, so they're not coming here. But, I got here.

No, they didn't listen to me. And I thought, oh, okay, well, maybe it's just me. I'm getting old. I looked. I actually switched my dissertation topic to how ICANN ignores data protection commissioners because I found that the records show very clearly that the data protection commissioners have been intervening for the whole time that everybody here in the Non-Commercial Stakeholders Group has been

---

implored them to come and talk to ICANN, getting letters from them, intervening on every wretched WHOIS debate that has happened.

And yet, we hear that the GDPR wasn't a surprise. Exactly! I mean, I ask myself ... I'm trying to be detached here. There's something wrong with the process as a multi-stakeholder process. If you get letters from ... And we brought with the Council of Europe brought the data commissioners to the Copenhagen meeting March 13<sup>th</sup> of 2017 where there still could have been enough time if somebody had listened to discuss, and there were questions. They were rather poor questions. I had some of the lawyers ... Because, guess what? I know these guys. I brought people like Mr. Peter Hustinx over to [Industry] Canada to consult on what makes a good law. So, the lawyers are going, "Don't these guys have lawyers? Aren't they getting legal opinions at ICANN?" Well, apparently not.

So, there's a problem in how this is being accessed, and I look at it ... I don't want to turn this into an accountability and maturity level conversation, but this is a huge risk that has been run by this institution. It is Elliot sitting over there all alone in the single chair that is going to be running that risk because guess what? It's very hard to go after the third parties who are the beneficiaries of this risk management scheme that is going on.

And that leads me to my response to John here. Giving up on what I would call a mature discussion about GDPR I did successfully defend my dissertation. If anybody wants to be bored to death, I'm happy to share. I'm good for hours on it.

---

But, the critical need here is for the accreditation of third parties to get access to data. So, we put in a bid at the University of Toronto for funds to do international standards on accreditation. There is a well-known tension between data protection and law enforcement. So, we hear from some of the cybercrime community here, “Well, they never talked to their governments. Their governments want access to that data.” Sure they do. Every government in the world is trying to figure out ways to get around the constitutional protections, and unfortunately constitutional protections are often [fought] on the backs of criminals and that’s how we all get rights and this is a rights conference, so you all know that.

Human rights are important and that tension between law enforcement ... it’s not that human rights people don’t want law enforcement. We want it to be transparent. We want it to be accountable. We want it to be creditable and we want to know. We do not want to trust the guy in Elliot’s organization. Some guy shows up, says he’s law enforcement. Okay, let’s give him all the data. We don’t want that.

So, if you’re interested in this, come and see me. We’re looking for people that really want to have a long-term slog to work on international standards, probably in the ISO stream, but we don’t know yet.

With that, over to you, Milton.

MILTON MUELLER:

So, as you may have noticed, we are discussing what’s called sometimes tiered access or accreditation processes. Essentially, we’ve heard that

---

even the people who really enjoy and think necessary to use this data have conceded that some of it has to be shielded from generalized public access. That's essentially a big accomplishment of the GDPR because that was not conceded until now. As Elliot said, it was a forcing function.

And now the debate is fundamentally about how ... What are the standards for accreditation and how easy or how hard is it going to be and who do you have to be to get access to this additional data?

The worst outcome, and one that I suspect will happen, is that essentially it becomes a hand wave and so instead of having anybody in the world regardless of who they are being able to see that data, people who know the system – trademark lawyers, law enforcement, security researchers – will wave a magic wand and will be granted unconditional all-you-can-eat access to all the data anyway which will not be all that different from what's going on now.

But, tell me I'm wrong, please. Tell me that that's not what's going on.

UNIDENTIFIED MALE: Oh, I'll tell you you're wrong.

ELLIOT NOSS: You're wrong because we won't do it. One of the beautiful things about this ... Well, it's beautiful and ugly at the same time. John mentioned a couple efforts that are going on around accreditation. The Anti-Phishing Working Group has one. There are some law enforcement agencies that have one. And they're all completely internalized. In other words, they



---

look inside of their world and they decide what they want to do for accreditation, and then they're going to solicit ICANN.

I can speak for myself and many other registrars and say we don't care because what we have to do is comply with the GDPR.

I said in Copenhagen after that data protection meeting that Stephanie talked about, I said at the public forum, look, to the board, our choice is to go to court with the EU or go to court with you. We choose you. That's where we have to sit.

What instead of could be happening – and I think will be happening after Friday when people actually want access – is these groups that are responsible groups that are seeking accreditation regimes are going to work with first probably us and a couple of the other big registrars and then in a broader group to balance those interests and rights and need, and end up somewhere.

I do not think this is going to happen inside of the formal community. I think this will end up being facts on the ground because the obstructionists are obstructionists and will continue to be.

You heard it from Milton. You heard it from John. Eleeza can't possibly say it. Avri I think is now precluded from saying that the intellectual property community are obstructionists in all things ICANN policy.

AVRI DORIA:

You're right. I couldn't possibly say. But, I can say that I hope that the processes we've got can be used to come out with something that is

---

legitimate and proportional based upon what you guys are going to have developed.

ELLIOT NOSS:

The problem will be that we've got to do what we're doing operationally now. And so because of that, we're going to be working directly with interested, responsible parties to create a well-functioning tiered access regime and I think it's going to work. I think it's going to end up ... It's going to have bumps and there will be dissatisfied parties on both sides. As we've heard, lots of shaking fists and, "We're going to sue you." And maybe somebody will. Great.

AVRI DORIA:

But, that's not going to be all of you. There's going to be ... I mean how many registrars are there? Are they all going to take the attitude you take?

ELLIOT NOSS:

No, because you'll eventually have to go through the board and the community to have that final forcing function. But, what I'm saying is that the work is going to get done, in my view, in the community directly. I think that's a great thing. I think that's multi-stakeholder working right there.

AVRI DORIA:

[But, you'll bring it in].

---

ELLIOT NOSS: Absolutely. It's multi-stakeholder working, not not working.

MILTON MUELLER: Go ahead.

STEPHANIE PERRIN: One of the things I said after the Copenhagen meeting was that if ICANN did manage to negotiate with the data commissioners and get a reprieve, it wasn't going to help, and I think that's infeasible under the law, but hey, I'm not a lawyer. I'm just a policy person. Then that would drive civil society to fundraise and sue because then they could sue the data commissioners for not doing their jobs. Plus, ICANN. Plus, everybody else.

On [inaudible], Milton didn't want us to get down into the nitty-gritty details, which as you can guess, I'm anxious to do. I've been saying since I got here "but ICANN is the data controller." Do we finally have an admission from ICANN that they're the data controller? Yes, the registrar controls their customer relationship, but very often you can divide it. What they have to do for WHOIS they're a data processor for.

And this is a routine kind of separation that one can make in business between what aspects of a business. You're a processor. Oh, well, look who's here. Just in time for your favorite question. Is ICANN the data controller? I'm just saying it is, but we're waiting for ICANN to admit that.

---

It's a pretty fundamental thing and if they haven't admitted that and they haven't named a privacy officer, then the community has been encouraged to I have to say pester the Article 29 Working Party who are a little busy right now. They're all trying to get their national laws through Parliament and compliance with the GDPR. Write them and tell them what you think about this, as if there weren't 50 other sectors in the economy that have issues as well in complying with GDPR. It is narcissistic of ICANN to take this approach to solving such a problem.

So, what does that say about accountability? We're not there yet.

MILTON MUELLER: We could dwell for some length on the twists and turns and like a hooked fish that ICANN has gone through as it has ...

STEPHANIE PERRIN: Floundered. That's the word.

MILTON MUELLER: Confronted the imminent deadline of the GDPR, and one could, as I say, make a lot of fun of that. But, I think the remaining clear issue here, forgetting about all the "please give us a moratorium stuff" – we won't even mention that. But, looking forward, the issue is are they the data controller? And for those of you who are not familiar with the significance of that, if you're a data controller, under the GDPR, you have certain obligations and certain liabilities if you don't meet those obligations, and my understanding – and again I should be corrected by somebody who is more familiar with this interim decision – is that

---

ICANN has contended that it is not the data controller, that this guy is the data controller.

ELLIOT NOSS: That's great. And I should add that they did admit it at one point, and then in the spec backed off from it completely. And there's a beautiful irony in there because that makes the spec essentially weightless, because if you're not the data controller, what are you telling me what to do with the data for?

MILTON MUELLER: So, I think we need to hear from Eleeza on this one.

ELEEZA AGOPIAN: So, again, I'm not a lawyer, but in Appendix E of the spec it does lay out who is a controller, who is a processor.

ELLIOT NOSS: Are you?

ELEEZA AGOPIAN: In some instances, yes, ICANN is the controller and it's listed in the spec and it depends on the processing activity and there's a number of things starting on page 21 if you want to read it in more detail, but it lays out there.

---

AVRI DORIA: Yeah. It goes for the co-controller notion. There are several controllers.

ELEEZA AGOPIAN: But, ICANN, the registry, and the registrar each act as the controller, depending on what the actual processing activity is and that's what's laid out.

MILTON MUELLER: Okay, so co-controllership. What do we think of that? Stephanie, John?

STEPHANIE PERRIN: I don't see how they can be co-controller with regards to the escrow data because ICANN is a party to the contract for escrow data. For those of you who aren't—

ELEEZA AGOPIAN: There's nothing left now, though.

STEPHANIE PERRIN: Aren't immersed in the arcana of ICANN, in order to make sure that when a registrar disappears, goes bankrupt, you don't want to lose the registrants of that registrar, don't want to lose their domains. So there's a mandatory escrow policy where a certain section of data that is detailed in the contract is deposited with an ICANN-approved escrow agent and ICANN is a party to that contract and will take over the domains and find a new registrar to take control of that.

---

So, it seems to me that sounds like controllership to me, and that's not a community decision. I would perceive it as an attempt to kind of make the community and the multi-stakeholder organization responsible for a lot of the policy.

Well, guess what? There is no WHOIS policy at the moment, and our last two-and-a-half year effort where there were a lot of really [competent] people striving to get a policy out has been put on hiatus because we failed. There was a lack of, I think – I'm going to say it. A lack of goodwill in terms of everybody being willing to compromise and come up with a policy. So, stalemate yet again for the umpteenth time.

So, I'm not optimistic that in the one year we've got [inaudible] a lot of policy, unless we totally change the way we do things, that we will actually reach agreement within a year. So, this interim spec may be all we ever get, and if it doesn't meet liability concerns of the registrar, then we're back in Noman's Land.

MILTON MUELLER:

Alright. I did want to open it up to the audience, but Stephanie just raised another issue that we actually ... It's pretty fundamental think about we haven't talked about at all, which is the purpose of WHOIS and what is ... Have we ever settled on a policy for that? I think I'm going to just quickly indicate the significance of that.

UNIDENTIFIED MALE:

I can answer your question, which is no.

---

UNIDENTIFIED MALE:            Yeah, exactly. [inaudible].

UNIDENTIFIED MALE:            The SSAC is sending out yet another reminder that five years ago and ten years ago they said you need to figure out what WHOIS is for, so we can wrap policies around it and ICANN hasn't done it yet.

MILTON MUELLER:            Well, again, we did do that. I was on the GNSO Council at the time and we had the rug yanked under us in a clear abuse of process, but that was then and we will move forward. I look forward to that.

So, the significance of the purpose issue of course is if you're going to comply with data protection law, you have to have a defined purpose. You can only collect what is necessary for that purpose and you can only distribute in ways that are necessary for that purpose.

So, the big debate there is people like John who believe that the purpose is a broader mandate to basically provide security and third-party access to this information so that they can enforce various kinds of rights versus people who think it's only about ICANN's mission to maintain the security and stability of the DNS and that's all they're supposed to be doing with that data.

But, we will move on and now open it up for questions. Probably we'll have a lot. So, this gentleman. We have Colin, and it's Courtney, right? Okay. We'll take all three questions at a time. I think that's the most efficient way to do it. Then we will have the panelists answer those questions and then we'll go onto another round.



---

UNIDENTIFIED MALE: Hello, [inaudible] data protection supervisor. I'm on the other side of this discussion. And Peter Hustinx who was named here is our predecessor as the European Data Protection Supervisor, and my colleague, Giovanni Buttarelli, European Data Protection Supervisor whom I am [inaudible] of was at the Copenhagen meeting as well.

Let me say first in the beginning that I have no mandate to speak in the name of the working party of Article 29 even if I am a member of this party. So, everything which I say is my personal opinion. I also have no [inaudible] reflects what EDPS, European Data Protection Supervisor, thinks about it. I also have no mandate to access what has been done inside ICANN.

But, I guess there are four small comments or explanations that should be given also to this discussion. First of all, for those who are not that familiar with the discussion, there might be the impression that there is a fundamental conflict between data protection authorities on one side and ICANN on the other side, which is not true.

There is a big understanding of the role of ICANN, and first of all, the role of the registers and [inaudible] data protection community including the fact that many of the data protection authorities have been involved in the activities of the registrars before. Or, like me, I was the National Data Protection Commissioner in Poland and later on the [inaudible] European Data Protection Commissioner. But, before that, I was also the [inaudible] of the arbitration [inaudible] for the registered

---

domain names in my country of origin, so we know what is it all for and we know how important it is.

The last letter which was sent by the working party of Article 29, the letter from 11<sup>th</sup> of April this year has set the number of points [inaudible] working party of Article 29 is not sure if they are clear enough to meet the requirement of GDPR. That's the problem of the [inaudible] limitation which you said about in [inaudible] which is probably the most important.

The second is the amount of data which is accessible to everybody and the amount of data which is accessible on request. And there is also the question about codes of conduct, but I guess this also shows very well that the attitude of the working party of Article 29. They proposed solutions on the [inaudible] side is [inaudible] codes of conduct as one of the bases of the data processing which we do not question. We just say as the working party of Article 29 that we don't know at the moment what codes of conduct you are talking about because there are no, none of them, at the moment on [the market].

So, we ask ICANN to explain. Do you mean the codes of conduct as tools [inaudible] GDPR? If yes, then we are talking about the tools under GDPR. If no, if you are talking about other ways of declarations from the ICANN members, that's another story there. That's the first thing.

So, there was no fundamental conflict. There are things to be clear. There are things to be explained.

You also recalled the first letter that was sent to ICANN in 2001 was a letter sent from the so-called [Belgian Group]. Once again, it sounds to

---

be very European. But, you have to be aware that the group on practicing telecommunications of the [Belgian Group] is an international one, and the Canadian [inaudible] Commissioner is a member of that as well. As well as the Korean authorities, as well as the Japanese authorities, and etc. So, that's the problem which is not seen only in Europe, but is seen in many other jurisdictions as well.

The third thing I've already said about the codes of conduct, and going to this codes of conduct thing, which you said that you are going to work on also as the accreditation rules are concerned, I would like to say that our experience as data protection authorities in Europe is that it's extremely difficult to prepare the document like that on the side of the controllers, not on the side of the data protection authorities.

Throughout the whole history of the [inaudible] from 1995, there is only one code of conduct which has been passed. That was by the [Direct] Marketing Federation, and the others didn't even reach the level of being discussed in the working party of Article 29 because they've never been agreed by the sectors.

So, once again, what the working party of Article 29 says is that's good. That's an interesting tool to deal with, but please do so. Please sit down and discuss because the time is running. And even if we will not be ready on the 25<sup>th</sup> of May, it's good to have some schedule for that.

And of course there is absolutely no way to put any kind of moratorium because the data protection authorities are not allowed to do the things like that.

---

MILTON MUELLER: Thank you for your comments. We should have had you on the panel. That was extremely helpful. Thank you.

[COLIN CARIA]: Hi. My name is [Colin Caria]. I'm with Article 19 and I'm also a member of the ICANN community. I just wanted to make an observation first. We have a lot riding on this next year. I found it interesting, Elliot, that you said the work will get done in the community. I think work will get done, but whether or not a solution will be found, I'm maybe a bit less optimistic about that.

I also found it interesting from Avri that at the end of the year the temporary spec will become optional, will become voluntary.

So, we've got a lot riding on this, and as Stephanie said, we've got a lot of problems in ongoing PDPs where we have roadblocks. We have wars of attrition going on.

So, all of this put into context, we've got a lot riding on the community. It's a lot of pressure. There's been a lot of ... We're getting nuggets of information here or there. There's asymmetrical information. There's rushed turnaround times, which I think really undermines the accountability that ICANN is meant to be held to, rooted in the IANA transition.

As a community member, it makes it very difficult for me to meaningfully engage when I have no idea when I need to be active, what is expected from me, what is an [inaudible]. What does this even mean? When does this start?

---

At the end of the year, we know we've got a hard deadline, but there's no visibility on the process of how it's going to take shape or how I can contribute as a community member, as a volunteer, as a person who spends a lot of time on ICANN calls.

So, I just beseech you, ICANN, please give us an idea of how we can contribute and how we can engage in this, so it doesn't end up like all of the other failed PDPs.

UNIDENTIFIED MALE: [inaudible].

[COLIN CARIA]: Oh, probably development process.

MILTON MUELLER: Elliot wants to respond, and immediately [inaudible]. Do you want to do all three or do you want to just ...

UNIDENTIFIED FEMALE: I think you should go ahead because mine is way less technical.

ELLIOT NOSS: Okay. I just want to clean my language up a bit because I think I created a bit of a misapprehension. I think the work will – I know the work will get done because the sun will come up next Friday. There will be data that's available. There will be data that's not available and we're going

---

to have to deal with. There will be urgent security matters on Saturday that we'll have to deal with. There will be urgent legal matters on Saturday that we'll have to deal with.

I think that the work will get done by community members. When we're going to be doing what we're going to have to do around tiered access, we're going to try and make that as open and transparent as possible and we'll say that that's a great ... Your comment is a great reminder to me to put that into the community so people can plug in, but I don't think it'll get done through a formal PDP process or through ... And there won't even be ... I don't even know what the alternative to a PDP is at that point.

I think it will be ICANN community members working in good faith, and I think it'll happen around the obstructionists, which means that it will be much more ad hoc and therefore much harder to involve people. But, I think that's what us, the people who are going to have to do the work because we have to are forced and left with.

UNIDENTIFIED FEMALE:

Just really quickly, part of IANA ... Or ICANN is meant to be held accountable because it could have potential impacts on end users. That's why we have the At-Large constituency. We have the Non-Commercial Stakeholder Group, the Non-Commercial User Constituency. We're meant to be representing the interest of users.

If we have some sort of ad hoc process ... This is the biggest thing that's hit ICANN in a while. This is shaking things up and this does have actual implications for people's human rights at the end of the day. So, why

---

would we have something that is so important and so influential to such a huge part of the global—

ELLIOT NOSS: Because the formal process didn't work.

UNIDENTIFIED FEMALE: Why would we make this ad hoc? That was [inaudible] ICANN's accountability.

ELLIOT NOSS: I share your frustration. I agree with you 100%. Us who are the govern are stuck implementing this by ourselves at our own risk. We don't want it to be like that. The formal ICANN process – and I don't say ICANN the organization there; I say the formal ICANN process has let us down, and so we're just left doing the best we can.

The one thing I would urge you to keep in mind is we've had now 250, depending on how you want to look at it, years of democracy and it still pretty much sucks. We've had 20 years of multi-stakeholder and it is so far from perfect.

So, I think this, when people are writing the history books on multi-stakeholder 100 years from now, this will be one of those things that was deeply influential in the way the process has evolved long term.

---

AVRI DORIA:

I want to put something in on that, though. I think both of those can actually happen. It's true it is going to take a little while for the formal process to get geared to do it. There's no reason why the community, the registrars or advocates of [inaudible] don't start coming up with the idea of what it is they want to see there, and then when the process is finally ready to receive it, to get it in there and to do it. I think it has to be both. I think the community has got to work on it as best it can and we have to put it through the process so that it does have the accountability and legitimacy and everything else.

MILTON MUELLER:

I would go a little bit even further than Avri in this respect. ICANN was actually designed so that if there is no consensus policy, everybody would be free to do whatever they wanted. That's what was supposed to happen. And when they created policies that didn't really have consensus, such as WHOIS, they got stuck in the contracts anyway. I think it's perfectly fine to now that the consensus has broken down that he and any registrar has the freedom to say, "What do we need to do to comply with GDPR?"

And the GDPR is a democratic, legitimate law so it's not like they're just violating rights. They're trying to comply I think. So, I don't think it's [inaudible].

AVRI DORIA:

But, we did let WHOIS into the bylaws, so we've got to deal with it in multiple places and multiple ways. We did allow it in our bylaws when we went through the transition. We didn't stop it there.



MILTON MUELLER: Okay. We have at least two more questions.

COURTNEY RADSCH: Okay. I hope I'm not the only person who's not deeply involved in the technical stuff that you guys are talking about.

AVRI DORIA: I think many people aren't.

COURTNEY RADSCH: My name is Courtney Radsch with the Community to Protect Journalists and am involved in Internet governance, but when I heard that the WHOIS database is going to become you're not going to be able to see what's behind it, it made me think of two things.

One, you're talking about tiered access, so this is interesting. How are you thinking about journalists and investigative journalists? You mentioned, for example, a log-in function or some sort of tracking. That's deeply problematic for journalists. It tips off whoever you're looking into. It tips off what story you might be pursuing, etc. So, I'd be really interested to think about have you considered the use case of journalists at all?

Then, also, as we're in the era of fake news and disinformation and propaganda, the idea of putting behind a curtain information about who owns websites and information sources seems like exactly the wrong

---

direction to be going. So, I'd love to just hear about that. Did that ever come up? Are these issues that you guys are thinking about?

UNIDENTIFIED MALE: There's so much irony in that one.

MILTON MUELLER: Let me get one more question in and then you can answer both of them. So, Stephanie ...

JOHN WARNER: John Warner [inaudible]. I'm involved in a number of international standards and I've also worked globally a bit, so it's interesting that Elliot's equivalent from Shang Hai is not here because it would be really interesting if we had a Chinese registrar talking about this in light of the new Chinese privacy laws as they have them.

And to the point earlier, while we want to see who owns this, that's exactly the question that authorities in authoritarian countries want to know about dissonance in their countries.

I foresee one possible track that leads to a vulcanization of the ICANN trying to do something internationally in a world where, as the Internet goes, it becomes increasingly vulcanizing in serving national interests. So, there's a significant effort here in recognizing that some stakeholder interests are inherently contradictory. So, I like the idea that if you can't come to a consensus, you have to leave it alone. Everybody brings their

---

own view to the table, and sometimes you can't achieve consensus. That's I think a good resolution.

MILTON MUELLER: Okay. Who wants to respond to Courtney?

UNIDENTIFIED MALE: Stephanie hasn't had a chance yet.

STEPHANIE PERRIN: In terms of the journalism, that is a problem with the tiered model that we have thought about. Accrediting journalist is very difficult when everybody is a journalist these days. So, if you would like to join that accreditation group or a press freedom group and would like to help us out in figuring out how to accredit, because unfortunately if we say, "Okay, carte blanche, all you can eat for journalists," well many authoritarian countries are going to come in as journalists. So, this is a real problem.

One consolation prize that I got out of the Expert Working Group exercise that I mentioned was the concept of secure anonymous credentials for people at risk and I think that's an issue that I want to keep pressing for human rights workers and folks that are likely to be dead if they're found.

The other thing I wanted to note is often in this security debate about how if WHOIS goes dark, security will end and it will be a nightmare on the Internet, there's also an argument that consumers need to know

---

who they're dealing with. We're conflating websites with domain names. They are not the same and there should be national regulation, as the EU has for instance that if you have a website, you have to be identifiable. If I have a collection of cool names that I'm ready to launch for my next NGO or my next company or whatever, why should I have to expose that to my competition? The conflation happens all the time, and no matter how often we repeat it, that's a regulatory function that nation states should step up to the plate.

ELLIOT NOSS:

Two quick things for Courtney. The first is that one of our groups that we talk about protecting with privacy is journalists. They are one of the prime examples. I was expecting you to say exactly the reverse of what you said, and I will tell you that the general input, feedback we get is journalists are one of the prime groups that need that privacy and cloaking and that need privacy protection.

The second thing is congratulations. Journalists have not, at least, in the informal processes that I'm involved in at this point being represented, you are now their spokesperson. All journalists can have [inaudible] right there. Seriously, it's easy to get involved. This is going to be, back to [inaudible] earlier point, this is going to be about the substance, not the form. It's what's going to happen informally by people who pick up the pen and pick up the mic and publish stuff. It's not going to be done in the form of processes. For better or worse. That's an observation, not a judgment.

---

MILTON MUELLER:                   Okay. Go ahead, John.

JOHN LEVINE:                       Yeah. [inaudible] what they said. This just comes back to my point that there's this horrible [inaudible] tension between transparency and security and all that stuff. I'm afraid you are now are now the official journalist. It's not a group that has been particularly active in it. We have obviously given quite a lot of thought to how you make queries without disclosing who is asking because that's something that law enforcement and security researchers also want to be able to look at people without tipping them off that they're being investigated.

It is, to use a technical phrase, a can of worms and one that we need to think about.

UNIDENTIFIED FEMALE:           I'm a former reporter. I feel your pain.

MILTON MUELLER:                   Okay. I think we don't have time for another question. I'm going to ask the panelists to come up with cute and succinct summaries of their position that would fit in a 140-character tweet. I'll give you ten seconds to compose these tweets and we will start on this side of the aisle.

AVRI DORIA:                         Oh, with me.

---

MILTON MUELLER: Yeah. And I'll cut you off if it's too long, just like Twitter.

AVRI DORIA: I'm happy we managed to take the first step yesterday. I know it's not as much of a step as we want and I really look forward to how we do the future steps.

MILTON MUELLER: Stephanie?

STEPHANIE PERRIN: I think it's really important that ICANN figure this out and succeed. I believe in critical analysis, so ICANN as a multi-stakeholder organization and this is, as Colin pointed out, a key battle and we should be able to win on this. I may sound like I don't believe that, but I'm still here.

MILTON MUELLER: You exceeded your character limit.

STEPHANIE PERRIN: Too bad. I don't tweet. I'm too old to tweet. And you're not going to distill this in 140 characters, just like you're not going to get thoughtful comment on a document that shows up yesterday and we haven't had time to read it.

---

This has to work because ICANN ... It's the biggest policy issue ICANN has ever dealt with, and so far it's looking like a dog's breakfast, to use a technical term.

JOHN LEVINE: Dog's breakfast. I was going to call it open heart surgery because we need to fix it while ...

STEPHANIE PERRIN: While the patient is open.

JOHN LEVINE: Well, if the heart stops beating, it will be really bad, so we need to figure out how to figure out what we're going to do. Stephanie and I agree about practically nothing, but we do agree on I think principles of what's important for people and broad ideas about security and privacy. Working out the details is hard.

ELEEZA AGOPIAN: I'll try and keep it short. I think the real hard work, as Avri mentioned, starts now and it's in the community's hands. It makes it even more challenging I think for all community members for ICANN as an organization. I wish everyone luck.

MILTON MUELLER: I think my tweet would be that I hope ICANN has learned that when it breaks process and it does the wrong thing, it will come back to bite it.

UNIDENTIFIED MALE: I think that anybody who found any interest in this, there is really a chance to impact the way that this whole process goes forward. It's a unique opportunity and I think it's one that doesn't present itself very often. I've been watching in the last week just in my inbox important policy being made in real-time because of this forcing mechanism.

So, this is a place, if you're interested, pick up the cudgel. I'll close there by saying 25% of attendees I believe at most ICANN meetings are funded, so even if you can't afford to travel all over the world, funding is available. I believe Adam in the front row there can look after anybody. Didn't you have a show special that anybody who can [inaudible] qualifies for funding to Panama and Barcelona?

MILTON MUELLER: Coupon code for ICANN travel. Edmund? Oh. No, no. Alright. So, thank you all for coming and let's thank the panelists for a great panel.

**[END OF TRANSCRIPTION]**