UNIDENTIFIED FEMALE:	Good morning, good afternoon, and good evening, to all. Welcome to the Privacy and Proxy Services Accreditation Program IRT Meeting on the 29th of November, 2016, at 14:00 UTC.
	In the interest of time today there will be no roll call as we have quite a few participants online. Attendance will be taken via the Adobe Connect room so if you're only on the audio bridge could you please let yourself be known now.
	Thank you. And as a reminder to all participants, please state your name before speaking for transcription purposes and please keep your phones or microphones on mute while not speaking to avoid any background noise.
	With this I would like to turn the call over to Ms Amy Bivins.
AMY BIVINS:	Hi, everyone and welcome. I'm Amy Bivins from ICANN staff. This slide is our agenda for our call today. First we'll confirm our call schedule and then I'm going to ask you to think about suggestions for additional IRT members. We've identified a gap in experience and are hoping to recruit a couple of additional people. Then we'll get into our main discussion topics.
	First we'll go through the first version of the policy outline that I sent around last week, and next we'll talk about the possibility of using subgroups to work on certain topics, and then we'll talk about next steps.

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.

Before our meetings in Hyderabad, we sent around a Doodle poll to set our regular meeting time, and one of the most popular options was every other Tuesday at 14:00 UTC. After the poll we suggested using this time specifically because this is the time that was used for the PDP Working Group calls and this is an easier time for individuals in the APAC region than some of the other times.

During our meetings at ICANN57, someone asked what time this is in the United States and I apologize. I told you incorrectly. Obviously, I said it was 10:00 Eastern but after the time change it's now 9:00 Eastern. So we wanted to check with you on this call to see whether you wanted the meeting time to push an hour later after the time change.

So if you're in the room now, if you want to keep the current call time, can you please check the green check mark? And everyone who would prefer to move it an hour later due to the time change, please check the red X.

Okay, we'll give everybody a couple minutes to do that.

Alright. Again everybody, if you want to keep this time please check the check mark and if you'd like to push it an hour later please check the X.

Okay. So right now we have five Xs and seven – it looks like slightly more check marks. Okay, so Chris, it looks like you want a green check mark so I'll count you as a check mark, too. For those of you who can't find it, if you look at the top of the screen under the little icon that has a hand raised that's where you can find it.

Okay, so Sara says she's good either way. Okay, so it looks like we have a few more green check marks than the red X, but this is being recorded and I'll go back and be sure that the counts are accurate before we move it.

Okay. Alright. So it looks like we have more green check marks but we'll ask everyone on the list one more time. But it looks like probably we'll push this by an hour for the next meeting.

Okay. Thanks everybody.

As I mentioned, we're looking for some additional members of the IRT hopefully. When we were going through the IRT volunteer list we noticed a gap in experience, and I believe this was also the case on the PDP Working Group but we're hoping to find someone or multiple people to add to the IRT to fix that. We haven't been able to identify anyone on the IRT who's working with a privacy or proxy service provider that is not affiliated with a registrar. We're hoping to find at least one person with this type of experience for the IRT, hopefully more, to ensure that as we move forward with drafting the policy and working on the other requirements that we fully understand how what we're proposing to implement, how it will impact independent privacy and/or proxy service providers. So if anyone can think of anyone who has this type of experience, please let me know so that we can reach out to them. We want to get them involved early so that they can be involved and understand and be up-to-date on everything going forward.

EN

Our first substantive topic for today, you should have received last week a document that… Steve, you raised your hand?

STEVE METALITZ: Just wanting to note that if – I know we'll get to this later in the agenda – but if in fact we're going to be given a new responsibility within this IRT that we didn't have before, that we probably don't have all the right people on the list now to handle that issue – the whole IRTPC issue. So if that gets put onto our agenda, then I think there's other areas where we're lacking expertise. I just wanted to note that when we discuss that maybe we can also include that dimension of the issue. Thanks.

AMY BIVINS: Okay. Absolutely. Thanks, Steve. Absolutely we can also, if this ends up being added to the work plan which we'll talk about later, we can send out an invitation to everyone that was involved in the IRTPC PDP and the implementation of that, too. That's a great idea. Thank you.

Does anyone else have any questions or comments before we move to the next topic regarding the meeting schedule or recruiting additional people for the IRT?

Okay, so Tom Kinstler in the chat just asked us to send an e-mail [be] telling the type of candidate we're looking for to forward to the right people. We can certainly do that. At this point, Tom, basically we're looking for anyone who operates a service that would potentially fall within the definition of privacy proxy service as the definition was written in the final report just to ensure that as we're implementing this

because it was really clear in the PDP Working Group that this program not be limited to privacy proxy services that are affiliated with registrars. We want to make sure that what we're drafting and building works for these services that are not affiliated with registrars.

Graeme noted that the PDP struggled to identify these type of businesses and people to participate as well. That's my recollection as well.

Theo, your hand's raised?

THEO GEURTS: Hi, Amy, and thanks. How do you actually propose that we identify those privacy proxy services that are not affiliated with registrars? Those privacy services are accredited registrars so basically there's a lot of registrars who run these services but if they are not ICANN-accredited then we actually do not really know who they are. I hope everyone understands the little friction here. Thanks.

AMY BIVINS: Thanks, Theo. That comment is noted, and that's something that of course we've struggled with as well on staff. That's why we're coming back to you, because we have yet to identify someone that we can recruit for the IRT but we're hoping that someone else knows of someone who might fit this description, specifically because in the discussions in the PDP it was repeatedly emphasized that these services need to be accounted for and allowed to [seek] accreditation. So we're

hoping that someone on the IRT can think of someone that might fit this description.

Steve, you raised your hand?

STEVE METALITZ: Yes. Thanks. I think I thought of one thing that might help with this a little bit, at least in terms of identifying some of these folks. As I understand it – I don't have the document in front of me – but as I understand it, one of the things that accredited registrars are supposed to do now is to disclose to ICANN which are their captive privacy proxy service providers. That information is not, as far as I know, necessarily made public. But if ICANN has that information and is in a position to make it public, then we would know what's the universe that we're not trying to reach out to. In other words, I'm happy to go out to IPC members and say, "Have you guys encountered any privacy proxy services that aren't affiliated with registrars, and if so do you have any contact point there that we can maybe use to recruit somebody?" But I'm not sure that they would necessarily know that unless, if they had had some dealing with a particular entity that was calling itself a privacy service, how would they necessarily know that it's affiliated with or captive to a registrar?

I'm just wondering, this might be helpful in terms of if we did outreach within the IPC to try to find these people, making sure that we're not just finding another entity that's already affiliated with a registrar. That's just the one suggestion that I have.

AMY BIVINS: Thank you, Steve. I appreciate that suggestion, and I am going to have to ask others on staff. I believe the information that's submitted in what you're referring to as the Registrar Information Specifications, that all registrars under the 2013 RAA have to submit to ICANN. I believe that information is confidential. But even if it is, staff at least can look at it and try to get an idea of if there are suggestions that those folks are affiliated with registrars or not.

I've done a cursory look at…I've gone through and sampled some of the information specifications and that was for the purpose of just trying to get an idea of how many services we might end up having applications for to accredit. The ones that I've seen – all the ones that were disclosed were directly affiliated with registrars, but we'll take another look at that and I'll take it back to see what we might be able to do with that information. So thank you.

Does anybody else have any question or comment on this?

Steve?

STEVE METALITZ: Can I ask what you found when you tried to figure out approximately how many applications you could expect?

AMY BIVINS: Yeah, sure. The way that I sampled the numbers I did it just myself – we sampled a smaller group of registrars and so the number is probably over-inclusive because we did all the big groups of registrars which are probably more likely to have a privacy proxy service than some of the

smaller ones. But based on those estimates we are thinking that we could get as many as 200 – 250 applications. However, a lot of the privacy proxy services that were declared, some of the registrars had more than one. So it's not clear whether they would continue to have more than one or just have one. So there are a lot of unknowns there.

But in general, we think around the 200 mark maybe to start is probably a reasonable estimate.

STEVE METALITZ: Thank you.

AMY BIVINS: Does anybody else have any questions or comments?

Okay. So moving on to our first substantive topic for today, I sent around a document to the list last week. And since we've obtained buy-in from you on the contract based approach to accreditation the first document that we want to talk about is a rough outline of what we think the policy could look like based on the text of the final recommendation. I distributed the first draft of this last week for you to review and we'll go through the specific sections of it on the next slide.

We're seeking your feedback on this document, specifically whether you think this covers everything that was intended by the PDP recommendation. Obviously this is a first draft and it could and probably will evolve as we get deeper into this project. But we wanted to get your initial feedback on the overall structure that we're thinking about before we get too far into the drafting.

If it's helpful, I went through the final report and took all of the policy recommendations and put them into a spreadsheet and organized them by topic, so there's a separate tab for each topic. And if that would make it easier for you to compare to the policy outline, I'm glad to send that around to you. I didn't want to do it before the call because I didn't want to overwhelm you guys with documents. But if anybody wants it, I can send it to the list after the call.

Okay, so everybody would like that. I'll send it around after the call. We're asking that you provide any feedback on the outline by the 12th of December, at least some initial feedback, so that we can discuss it on our next call that'll be on the 13th.

Our plan generally in the internal project plan that we have is that once we get your feedback on this outline, staff will start drafting sections of the policy to discuss with you starting next year. And while we're working on the initial draft of the early or the first parts of the policy, we'll be discussing other specific topics within the IRT with the goal of incorporating those topics into the policy later. These will be some of the more complicated or technical issues. So we're hoping to discuss those specifically while we're working on the text and then we can add it to the policy when we get to that section.

This slide is just a list of all the sections that was in the document that I sent around to you last week. Section 1, we're thinking would include provisions such as definitions and general recommendations that were included in the final report. The final report included many definitions of terms. Those are what are included in the outline. It's possible that we'll have to add to that list as we get further into the drafting.

Also in that section we believe we could put provisions related to not having restrictions on commercial activity for domains that use privacy and proxy services, and the recommendation that registrars can only knowingly accept privacy and proxy registrations from accredited privacy and proxy service providers once the program is launched.

Section 2… Steve, you raised your hand?

STEVE METALITZ: Yes. Thanks. I know we're not going to get into the substance here, but just on 1D on your outline about limitations on availability of services, I think we need to be clear that what we're saying is that [it's] not a requirement in order to be accredited that it's not required that the service only be made available to non-commercial users or something like that. Because I think it's quite clear in the report that if a service wishes to impose such a restriction, that's perfectly okay and consistent with accreditation. In fact, there would be some benefit to that in terms of the reviews of how those services operate.

Again, I apologize if this is too much getting into the substance but let's just make sure that when we talk about that in 1D [later] in your outline that we're careful about [how] that's done. Thanks.

AMY BIVINS: Thanks, Steve. I appreciate that. And I will certainly make a note of that and add that. And thank you for clarifying that. If anyone else has questions or comments, feel free to raise your hand at any time as we're going through this. Obviously, this is a collaborative effort. This

doesn't have to be me talking at you. So please, this is very helpful so thanks, Steve.

Section 2, we think the policy will probably be the longest section of the policy. Based on the structures that we sent around last week we think this is where the bulk of the policy requirements from the final recommendations will be. The proposed name of this section – obviously it's not set in stone – but as a start we're proposing [to] kind of mirror the structure of the registrar policy. And so the name is "Terms and Conditions of Accreditation Agreements." This is just the major substantial requirements for privacy and proxy services.

Topics in this section we think will probably include WHOIS labeling, data escrow, customer data validation and verification, requirements for terms of service and customer agreements, relay and review requirements, and possibly transfer and abuse reporting requirements though depending on how our work proceeds they may fit better elsewhere or may need their own section ultimately.

Section 3 is where we're proposing to put the IP framework that was included in the Annex to the final recommendations just because this is a very substantial piece of the policy, though it could fit in Section 2. We're proposing to just move it down to make the numbering easier to understand and refer to.

Section 4, we're going to talk about in a minute and probably a lot in the future. This is just a placeholder section. We don't have the same amount of material to put there that we have in the Section 3. But this is where a framework for law enforcement requests could go, and we'll

be discussing this more later. We're waiting for input from the Board on this, but we wanted to save a spot for this in case we need it and it seems like it would make sense there. But we'll be talking about this later.

Section 5 – Best Practices. Tom, you raised your hand?

TOM KINSTLER: Yes. I'd like to go back to what you were saying about [for] law enforcement and stuff. I think that should be extended towards infringement of trademarks and possible UDRP cases anyone who is looking to find out the information –

AMY BIVINS: Tom, I don't want to interrupt you, but can you speak up a little bit and repeat yourself? I couldn't quite catch all of what you said.

TOM KINSTLER: Can you hear me better now?

AMY BIVINS: Yes. Thank you.

TOM KINSTLER: What I'm saying is with regard to your point on the law enforcement, I think it should be extended to trademark holders with regards to UDRPs that there must be some sort of way [for us] for a registrar or for

someone who is a legal side doing a UDRP to have the privacy unmasked in the case of an infringement of a trademark of some sort.

AMY BIVINS: Thank you, Tom, for that suggestion and we'll make a note of that. Section 3 has a pretty substantial framework for IP requests, so it's possible that it could be handled under that section but we'll make a note of your recommendation.

Chris Pelling is saying, within the UDRP that already exists.

It looks like Graeme is typing in the chat, too.

TOM KINSTLER: Right, but with this being a new policy, [could] that not be listed within this policy for this whole new process?

AMY BIVINS: If anyone else is typing in the chat wants to just raise your hand and talk, that's also great. I'm happy to read your comments but sometimes it goes more smoothly if you just talk.

Okay. Thank you, Tom, and we'll make a note of that. Nick, your hand's raised?

Nick, if you're talking, you may be on mute.

Okay. Does anybody else have a comment on that point?

Nick, if you are not able to get your phone unmated, you can type. I can read out any comment that you have.

Okay. So there's some additional discussion going on in the chat related to UDRP proceedings. Obviously we'll probably talk about this in incredible detail when we start talking about the IP framework. But we're making a note of all your comments and we'll add them to the list.

Mary said that, "I believe the existing IP disclosure framework allows for trademark holders to make requests, including if the domain is subject to a UDRP proceeding."

Nick asked, "Has the IRT Leadership received any further indication from the Board on when further guidance regarding GAC advice is likely to be received?"

Nick, we're going to talk about this just a little bit in a minute. The short answer is no. I honestly don't know when additional input from the Board will be coming, but we're watching the Board agenda. The Board's next meeting is on the 8th of December, so it's possible we could get something then. But the short answer is that we had a placeholder in the project plan and we anticipate that we will be getting more and will be starting work when we get more from the Board.

Nick says he loves short answers. Thanks.

Mary said, "The Board is expected to respond to the GAC advice shortly which includes the GAC advice on privacy proxy." Thank you, Mary, for your help.

EN

Does anybody else have any questions or comments on those first four sections before we go through the final three proposed sections?

Nick is typing so we'll give him a second.

Okay. Nick says, "Thanks, Mary."

Section 5 – the final report included several sections that were addressing best practices, and we're proposing to group those together in their own section of the policy.

Section 6 includes – at least in the outline that we sent around – we're proposing to put requirements for maintaining records and submitting data to ICANN there. There's also a recommendation requiring a review of the policy which we could potentially include here. The document that I sent around to you guys has some comment bubbles and some questions, and this was one of them. The way the recommendation is worded – and we'll get into this later – it's not clear whether ICANN or the community is going to initiating this review. But if it's an ICANN initiated review, there's a question about whether this will need to be in the text of the policy, but we will be talking about this in greater detail later. But we just put it in there now to be sure that we're covering all the policy recommendations.

Section 7 – we're proposing to put an overview of general program requirements and processes. This borrows from the beginning that I believe is Section one in the Registrar Policy. This can include things such as general accreditation processes and the accreditation requirements and other topics. It's probable that the specific [sets] may

EN

not be in the policy. They will probably be in the contract or somewhere else, but just general requirements we're thinking could go here.

Does anyone on the call have feedback or questions about this outline now before you take it back and take a look at it before our next call?

Carlton's asking, "Will Section 6 also contain specific data items to be recorded and reported for compliance purposes?"

That's an excellent question, Carlton, that I don't know the answer to at this point. I anticipate that we'll be discussing this. Section 6 at this point only includes what's explicitly included in the policy recommendations that we received, so that was not… I don't believe it was specifically there but I don't have the report in front of me so I can't quote it.

Alex, you have your hand up?

ALEX DEACON: I'm just curious. This is the outline for I guess the IRT's final reports, and do we envision there will also be additional documents such as a Privacy Proxy Accreditation Agreement in addition? I'm just trying to understand, when we're done, how many documents will we have and what they will be.

AMY BIVINS: Hi, Alex. Thanks so much for your question. Yes. I should have been more clear about this at the beginning. This, we're anticipating that through this IRT ultimately we will have an Accreditation Policy, and this

is an outline of that, or at least a proposed outline and what we think it will look like based on the final recommendations. We're also anticipating that there will be an Accreditation Agreement that will be part of this accreditation program. We'll be discussing that further down the line in the IRT process. Some of the requirements in the contract will come from the policy and then there'll probably be other just general contractual provisions that are in there as well.

ALEX DEACON: Okay. Great. Thank you.

AMY BIVINS: It looks like Steve's typing.

Does anybody else have questions or comments on this?

Steve.

STEVE METALITZ: Yes. Thanks. Just to say that you're right. I assume there will need to be an Accreditation Agreement, but on the other[hand] Section two will have a lot of the content of your policy [will have] a lot of the content of that. My understanding is, once this is done if you read Section two then you'll know pretty much what's in the Accreditation Agreement, but I agree there needs to be a separate document.

AMY BIVINS: Exactly. Thank you so much, Steve, for saying that more succinctly and clearly than I did. I appreciate that.

Does anybody else have any questions or comments on this?

Awesome. Okay. Take a look at this – Steve, your hand is up?

STEVE METALITZ: I was just going to say thank you for putting together this outline which is very helpful. I think those of us particularly who are on the working group, but everybody should go back and look at the report and see if this covers everything. I know I haven't gone back and looked at that in a while. That presumably is something we can do over the next two weeks just to make sure everything is covered. Thanks.

AMY BIVINS: Absolutely, Steve. If you guys need more time after I send around the spreadsheet to aid this process, we could certainly discuss that as well. Obviously, it's possible that things will come up as we're drafting and things could be moved around or we could discover other things that need to be in here, but this is where we're proposing to start based on the final recommendations. That's what this is.

We just want to get your feedback on this before we get too far down the road of drafting just so that we have an overall path of where we're going so that as we start to look at specific topics in isolated fashion you understand where they fit into the bigger picture so that makes more sense.

Okay. So moving on to our next topic – and I can thank Steve for cleaning this up for me on the list yesterday. We're expecting that we may have at least one additional item to incorporate into our project plan and possibly more, probably two. Steve circulated some materials on the list related to one of these topics yesterday related to transfer policy issues. As many of you know, the [admitted] transfer policy goes into effect on December 1st and the Registrar Stakeholder Group has requested that the IRT do some additional work on transfer policy issues, specifically as they apply to privacy and proxy registrations.

The GNSO Council is working on a letter to the Board requesting this. I think the Council's meeting is on the 1st. The materials that Steve sent around yesterday, I believe these are the most recent drafts of the materials that the Council will be considering in their meeting. We're waiting to see what we get from the Board on this, but I wanted to flag this now because this could be added to the IRT's scope of work.

Graeme, your hand's up?

GRAEME BUNTON: Thanks Amy. Can you hear me okay?

AMY BIVINS: Yeah. Great. Thanks, Graeme.

GRAEME BUNTON: Just for everyone's edification, registrars sent a letter at the GNSO that we're hoping the GNSO will endorse and go to the Board to move a

specific piece of the implementation of IRTPC into the privacy and proxy IRT. My sense is that it is not going to be a lot of work. In fact, I hope it's pretty trivial because I don't – having looked at this quite a bit over the last few weeks and I don't want to get into the details too much – but I think it's going to be pretty straightforward and not add a significant amount of time. At least that's my hope and certainly what I'll commit as Chair of the Registrar Stakeholder Group is that registrars will work pretty hard on this and make sure that we've got something out to the rest of the IRT when it comes to tackling with these topics so that we can move forward as fast as possible. Thanks.

AMY BIVINS: Thank you, Graeme. I appreciate that. As I was saying – Steve, your hand's up?

STEVE METALITZ: I think Graeme is far more expert on this than I am. I take it at face value that this may be less of a complex issue than it looked like to me. My real concern here – I agree there's an issue here – my concern is whether this is the appropriate vehicle for addressing that issue. To me that boils down to the question of how will this impact the timeline that you've circulated, which is already frankly very protracted in my view? We're not going to have an accreditation system going until well into 2019 under this timeline. So that's two to three years. Effective date, January 2019, but then there may be an onboarding. In other words, it is already a protracted timeline and I'm concerned that adding these

additional issues to this group's work would further protract that timeline.

I'd be interested in people's thoughts about that and whether – I don't know whether the staff has thought about this or how they would handle it and how we could keep this from postponing the actual implementation of the service. I'd just welcome people's thoughts on that.

My sense is that the alternative ways of addressing this have not been really considered and I just don't want to see this group become the default place where any issue that arises that has something to do with privacy and proxy services gets put on our plate along with everything else. Thanks.

AMY BIVINS: Steve, did you raise your hand again or is that an old hand?

STEVE METALITZ: No. I'm lowering my hand. Sorry.

AMY BIVINS: Okay. Great. Thank you, Steve, for that. That's certainly noted. Obviously or perhaps not obviously, as the Project Manager I myself have been doing a lot of thinking about the timeline and on the potential impacts on timeline, and we're certainly conscious of the fact that this is going to be a long implementation and that the goal is not to extend this further than we have to.

To the extent that we can, we're hoping to mitigate the impact of this work and also potential work on law enforcement related issues depending on what we get from the Board by using a subgroup type of approach to handling these issues. What we're proposing to do and what we have built into the timeline is to have potentially sidetracks on these issues so that when we get instruction from the Board to create or to address transfer policy issues or law enforcement issues pursuant to the GAC advice and to the recommendations that were in the final report, we're proposing to use subgroups to develop proposals that can be brought back to the IRT for discussion with the hope that some of the more difficult issues can be considered and handled by a smaller group of IRT individuals that are really focused on these issues and really understand the impact so that work in the larger IRT can continue on some of the more broad scale issues. That's our hope.

As I mentioned, there's a Board meeting on December 8th. Honestly, what I'm telling you is what I know. I don't know if we're going to get anything from the Board on either one of these topics. But we wanted to tee these up and let you guys know that it's coming so that we can think about and you can think about if you want to be on one or both of these subgroups so that we can get them going and to be in a more prepared state and being less reactive to what we get from the Board and we can be ready to start work on these topics and try to mitigate the effect on the timeline.

Please, if you want to be involved in the transfer policy work, provided that we get it from the Board, and/or if you would like to be involved in work on developing more detailed requirements for law enforcement requests depending on what we get from the Board, just please be

thinking about that and be watching out for what we may get from the Board on this and be ready to sign up. We're hoping that because the IRT meetings are every other week that we can do the subgroup meetings on the alternative weeks to avoid filling every week of your calendars with multiple meetings on privacy proxy issues if you want to be involved in these subgroups.

Does anybody else have any other thoughts that they would like to share on either the transfer policy issue or the law enforcement related issues?

Luc is asking if we have law enforcement representatives on this working group. We do have a few, Luc, and you can see the names that are on the IRT volunteer list that are on the wiki. We're also working closely with, there's a new staff liaison to the GAC Public Safety Working Group – Fabian – he was formerly on the Registry Team so we're working through him to coordinate working with them and we are going to be working more closely and hope to recruit more folks to work on this. So that's what's coming.

Okay. Questions or comments from anyone else on transfer policy, law enforcement issues, or the use of subgroups generally?

Steve?

STEVE METALITZ: Just to say I think there's been some discussion in the chat here on this transfer issue about what alternatives were considered. Again, I think if this group can provide any guidance to GNSO about what the impact

would be of adding this additional issue – and maybe we don't know – but I think if we could provide that that would be useful since I guess this is on the agenda for the GNSO Council on Thursday. Anyway, I just thought that… just referring you to the chat and I know it's hard to Chair this meeting and look at the chat at the same time but there's been some discussion in there.

AMY BIVINS: Okay. Thanks, Steve. And I'll go back and read the chat obviously after this meeting and try to answer any questions that are in there on the list. I'll send around answers to everyone.

For overall impact, I have to take it back and really discuss it with other people internally. The short answer is we're hoping that we can mitigate the impact by using a parallel track. Even if Graeme – and he has his hand raised. I'll let him talk in just a minute. Graeme, thank you for your patience – but given that the current project plan anticipates that this implementation is going to be as long as 18 – 24 months at this point, obviously we're hoping that discussions surrounding law enforcement or transfer policy issues specifically won't take that long. But provided it does – even worst case if it did take close to that time frame, we're hoping that it could still be added into the implementation at the end so that provided the work is done in parallel it wouldn't necessarily push the implementation track back too far that it could be [added] whatever it is complete and surely hopefully it will be completed long before the end of this implementation.

Graeme?

GRAEME BUNTON:	Thanks, Amy. Steve, first I hear those concerns about time and we share them. No one wants to drag this IRT out for forever. Maybe it's a conversation that we can have offline and maybe there's a few of us that should have that conversation and everyone would be welcome to talk more about this particular transfer issue. But I am being quite genuine when I think this is actually relatively trivial to solve. I think the interaction between the change of registrant policy and privacy and proxy should be pretty simple. I don't think it's actually outrageously complicated. I think it's the sort of thing where registrars can put a paper to the list and people can read it and it's less than a call to be like, "Yes, this makes sense." Certainly that's the goal. Maybe we can chat offline more about this and others that this interests.

To answer Alex's question about other alternatives, there weren't too many options available on how to deal with this, certainly not too many that we came up with that were expedient and immediate and, to be frank, this sort of interaction between privacy and proxy and change of registrant wasn't really picked up on by registrars or service providers until code was being written and implementation began to loom, and so we're certainly behind the eight ball trying to figure out the best way to solve that.

I do think that the privacy and proxy IRT is a good place for it. I think we can get it done pretty quickly and efficiently and [it] we have the expertise in the IRT certainly from people who are in the PPSAI PDP. So it feels pretty good to me. Thank you.

AMY BIVINS: Theo, your hand's up?

THEO GEURTS: Yes. Thank you, Amy. Just to circle back on Steve's comments. I agree with him. We shouldn't use this as a vehicle to put in all kind of issues from other working groups, IRTs, consensus policy, or whatever what's popping up. Being one of the original IRT members for the IRTPC I think and I completely agree with Graeme here, we build up enough experience on this and we should be able to flesh this out really, really, quick and [back] in the IRTPC we already identified like, "Okay, we actually should have pushed this back to this working group back then." It drifted off and never got picked up. But actually the original IRT already suggested to move it to this group.

Like I said, given [with] the experience we have now on this subject and given the many people here that are present and have been through the entire process through the working group process, I think this is something we as registrars can simply pick up through another Work Stream Subteam and just present it to you guys and then it's just a matter of looking at it and moving forward. It shouldn't take much time. Thanks a lot.

AMY BIVINS: Thank you, Theo.

                                        Steve, your hand's up.

STEVE METALITZ: Thanks for Graeme and Theo. That's helpful context. But I have to come back to the point I raised near the beginning of the call. If this group is going to take on this issue, I don't think that we necessarily have all the people that would be needed. I just know this issue has arisen on the IPC list in the last 24 hours, we've had a dozen at least postings from people who I don't think are on this IRT that have some expertise and interest in – or some interest in this anyway – it's hard for me to evaluate their concerns. But all I'm saying is we would need to bring some more people into this process and I don't know if anyone from the IPC was involved in IRTPC. I'm just ignorant of that fact, but I know I wasn't. I just think that we would have to bring some more people into this process if we're going to do it here.

The other thing I'm hearing now is that this would come in at the front end. I don't think that Graeme is suggesting that it be put in here so that it'd be part of the mix that's going to result in a policy [what] goes out for public comment next June or June of 2018. I think he wants to get it fixed faster than this. Again, that's a little bit different. That's like saying before we really get started on the actual work of this IRT, let's do this other thing.

I think again, that's a question of whether we have the right people here or whether there's another place to do that. You can reconstitute the IRTPC group, the group for implementing that policy. There's other avenues that could have been taken here, but we are where we are but I'm just concerned about diverting this group from significant amount of work it has to do by first putting another topic on our plate that may –

and if you're right, if it's trivial and can be handled in two weeks or four weeks which is I think what you're suggesting – then that's fine. But if not, then we have other issues. Thanks.

AMY BIVINS: Thank you, Steve.

Graeme, your hand's up.

GRAEME BUNTON: Thank you, Steve. Sorry, I'm gathering my thoughts on that. I think it's a call or two at best. It' shouldn't be too long. You're right, there could have been other avenues explored for the best place to put this but you're right. We are where we are on this.

I think the intention of moving the IRTPC piece into where it interacts with privacy and proxy into the privacy and proxy IRT, the intent there is not to put out a piece of work, at least from my understanding – and [some of] the other registrars can pipe up – onto, put another output into this IRT. I think just by moving this particular interaction into this IRT, we can deal with it in due course and it's an output of the working group as a whole, whatever time that takes. I think moving it into this IRT for discussion and resolution solves our immediate problem. Thank you.

AMY BIVINS: Thank you, Graeme. Does anybody else have any comments or questions on this topic?

Okay. And again, I'll emphasize that on both of these issues obviously we're waiting for direction from the Board on this. And whatever the Board tells us to implement and do to this IRT, that's what we'll do. And Mary emphasized in the chat – and thank you, Mary – that obviously if a policy issue arises or an issue that seems like it could be a policy issue or maybe a policy issue that's been debated, obviously that'll be referred back to the Council so we have a process for handling that now. So we'll also be following that process.

Okay, everybody, so stay tuned on that. Obviously as soon as I hear anything that I can share with you after the Board meeting related to our work, I will send along the information to you.

Okay. Our next steps – and this is our last topic for today – I just want to repeat my request to please send your feedback, at least your initial feedback, on the policy outline document no later than the 12th. If you can send it earlier, please do so that we can prepare for the meeting on the 13th. But I wanted to give you as long as possible so if you can't send anything until the 12th that's fine, too. If we end up needing more time to talk about the outline and the structure of the proposed policy or the first version that I sent around, we'll take more time obviously, but we're hopeful that because this is just a very initial draft that we can get some feedback on that so that we can get into the substance of this.

At our next meeting on the 13th of December which is our last meeting of the year somehow already, we'll discuss anything relevant or related to this project that comes out of the GNSO Council meeting or the Board meeting, we'll discuss input from you on the policy outline document, and then also we'll begin discussing what's next in the

project plan in terms of substance. After we receive your input on the policy outline we're hoping, as I think I mentioned earlier, to talk about some specific items that we have questions about or that could be more technical or complicated to deal with at the beginning while we're drafting some of the initial pieces of the policy. So we're thinking that we'll likely be talking about potentially WHOIS labeling and data escrow first early next year.

With that, I will send around the policy recommendation summary spreadsheet that I have after this call. The slides will be posted on the wiki and I can send them around to you as well. And the recording for this call – It looks like the majority of the IRT is actually here which is great – but that'll be posted as well.

I'll go through the questions in the chat and I'll listen to the call again and send around any additional information that I can get to you on any questions that were raised.

Does anyone have any questions or comments before we wrap up this meeting?

Okay. Fantastic. Thanks you, guys. I know it's early on the West Coast and let you know I really appreciate so many of you guys attending the call and participating actively. So we'll talk to you in a couple weeks.

Bye, everyone.

[END OF TRANSCRIPTION]