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JONATHAN ZUCK: Hey folks, and welcome to the 54<sup>th</sup> Plenary of the CCT Review Team. We're going to go over some revised versions of documents. Before we get started, is there anybody that's on the phone but is not in Adobe Connect?

All right, and does anyone have any updates to the Statement of Interest?

All right, excellent. Thank you.

So without further ado, what I want to do is hand the microphone over to Drew to talk through some changes to the DNS study paper. Drew, take it away.

DREW BAGLEY: Good morning, everyone. I made some minor changes to the DNS Abuse chapter based on conversations we've had in the past two weeks, and so I would love to get even more feedback to make sure we're putting out the best quality, the best version of this chapter before the public comment period.

So as you can see, what I've done in the body is I've added, and a real quick clarification, am I scrolling or can anyone scroll? Just so I know whether to point out page numbers.

UNIDENTIFIED MALE: Hi, Drew. You have presentation rights, so you are the one scrolling.

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*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.*

DREW BAGLEY:

Okay, great. Thank you.

So yeah, so here on page six, previously I had laid out the fact that people were blocking new gTLDs in response to the perceived and/or actual abuse happening and associated with certain TLDs.

And so, what I've done is also on the other side, just at least pointed out what the registry and registrar operators themselves are doing in response to abuse right now and how that varies greatly from being reactive to proactive, and then a few minor style changes.

I've gone ahead and added headings for clarity. This is a suggestion Laureen had early on with this chapter, and so I've added some to kind of highlight the findings from the study about the migration of abuse and then the fact that abuse is concentrated where it does exist in the new gTLDs.

And then, also, the final heading is "DNS Abuse is Not Random" and I've put that in there for the conclusion of this chapter just so that it's made clear that there are actual indicators that correlate with abuse, and that that's what's driving our policy recommendations because it's not just that it happens and there's nothing we can point to. Instead, we can actually point to a correlation between low prices and few restrictions on domain name registrations.

And then for the recommendations themselves, I've gone ahead and put them in the old format that we used in our actual draft papers or the proper format rather. And I've gone ahead and turned it into a more

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broad recommendation and then put the specific parts and the details for each one. And then I've cleaned up the rationale a bit because I know that the, that last week, it wasn't entirely apparent until I explained it as to what I was getting at with the rationale for the financial incentives and why we would provide those just to open registrations, or just to TLDs with open registrations.

And then for the second recommendation, I've done the same thing, putting that in the proper format, but then the other main change I've done here is I've added some language to ensure that this would include resellers insofar as they relate to registrars, so that way you wouldn't have the situation in which a registrar was contracted with a reseller, the reseller had systemic abuse issues, and yet, there was nothing that could be done about that. So I've gone ahead and just added language to account for that reality.

And those are the main things and then also, I've gone ahead and changed who they're directed to and made them a much broader part of the community, so I'd like feedback on all the substance, of course, but especially, I would like direction on ensuring that we are directing these two recommendations to the right place and using the right language for that.

So does anybody have any questions? Jamie.

JAMIE HEDLUND:

Hey, Drew.

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DREW BAGLEY: Real quick, Jean-Baptiste, could you give everyone scroll rights? So that way, people could read through this themselves if they have questions. Thank you.

Yes, I can hear you.

JAMIE HEDLUND: All right. So thank you for the updates because I think this has been a really strong chapter and I know you put a ton of work into it.

Shortly before this morning's call, I sent an e-mail with minor tweaks to the language of the recommendations. The tweaks are intended to be consistent with the Board's role.

As I understand it, under California law, you can't be directed or ordered by third parties, that it must be in a position to exercise discretion in, and exercise its judgment in making decisions because my understanding, I'm not speaking as a lawyer for ICANN at all. I have a law degree, but I'm a pretend lawyer here.

So the suggested tweaks I don't think change the trajectory or the thrust of the recommendations. The Board has established that it does take its obligation to consider and really take seriously review recommendations, so I don't think that while the language is less mandatory, I don't think it ends up at the end of the day any weaker than what you've suggested.

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DREW BAGLEY: Thanks, Jamie. I just saw that e-mail now. I hadn't seen that before, so thanks for sending that too.

So with that said, with what you're opining with regard to –

JONATHAN ZUCK: Drew?

DREW BAGLEY: The non-profit status of ICANN and saying that we can direct them to consider things but not to make decisions. Can we direct them to consider things with more forceful language than “should”? “The Board must consider such-and-such.” Or are you saying that that, too, would be, from your understanding, that would be dictating and be out of line for us?

JAMIE HEDLUND: So there's actually two things. One is the language directing the Board and the second is, the context of these recommendations that it involves third parties, contracting parties in both instances in amending agreements with third parties, so I don't think the Board can... Serious limits on the Board's ability to unilaterally amend or direct the amending of contracts no matter how appealing the proposed changes might be to the contracted parties.

But the [inaudible] is, so the second is, but “must” versus “should”. I mean, this goes more to the semantic issue that Jonathan raised in

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response to another e-mail I sent right before the call on the parking recommendation.

I think, I'm guessing that as a technical legal matter, "should" is more appropriate. I think that they, the Board, would, I don't think from a practical perspective, I don't think it makes a difference, would make a difference to the Board – obviously, I can't speak for them, but based on their experience with previous reviews – I don't think it... they're less likely to, to consider to move forward with the recommendations because it's "should" versus "must".

But again, my sense is it's not appropriate to try to bind the Board without [them] having the ability to exercise their fiduciary duties and consider and exercise their judgment. But as I also said, it might make sense to at some point down the line bring in legal who can help explain this more articulately and maybe more accurately than I have.

DREW BAGLEY:

Thanks for paying such close attention to the language so that we can assure that, as you said, that we get a good recommendation that will be listened to.

And then I see Jordyn's comment in the chat about us being able to get it right before the final report even if right now, we don't get it completely right. But either way, I'll go ahead and tweak the language accordingly, so thank you.

I see Jonathan's hand up. Are you speaking Jonathan, because we can't hear you? Yeah, we can't hear you at all. Are you there? Is that you,

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Jonathan? All right, okay. Jonathan will log back in. In the meantime, Waudu.

WAUDO SIGANGA: Yes, thank you, Drew. I think it's a good paper. My question is regarding Recommendation #2. You mentioned, I hope you can hear me. Hello?

DREW BAGLEY: Yes.

WAUDO SIGANGA: Hello?

DREW BAGLEY: Yes, I can hear you. Yep, I can hear you.

WAUDO SIGANGA: [Inaudible] myself.

Now, in your Recommendation #2, you mentioned about the [resellers]. You [inaudible] currently exists few and [inaudible] mechanisms to prevent domain name abuse as [inaudible] [resellers].

I'm not seeing how you've dealt with that in the recommendation itself because the recommendation itself is talking about the registrar accreditation [as limits]. How do you plan to [inaudible] in the referrals in the recommendation?

DREW BAGLEY: That's a great point, Waudo. Yes, I need to put some language into the chapter regarding the fact that ICANN does not have a direct contractual relationship with resellers, and instead, it's the registrars that have a relationship with the resellers, and then of course, the registrant on the other hand, having a relationship with the resellers so I definitely need to put some language in the chapter about that.

But that's what I'm getting at with the fact that there currently are few means for ICANN to enforce anti-abuse policies against systemic abuse that may exist with resellers.

Instead, even right now, as we're pointing out, on a case by case basis, you can have a registrar with very high level of abuse and then you can go one more level to the reseller and then they're not even a contracted party. So that's what I'm getting at with that.

But thanks for pointing that out, and absolutely, I'll add some language for that. Laureen?

LAUREEN KAPIN: Thanks. Thanks, Drew. Hoping people can hear me.

DREW BAGLEY: Yes, loud and clear.

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LAUREEN KAPIN:

First of all, thank you for all the work on this. It's a complicated topic. The study itself was quite dense and I think this puts forward a lot of information that's going to be useful to act on.

One of the issues that I anticipate coming up, and I'm wondering if there's a way to capture this at all, but one of the issues that I anticipate coming up is comments that our definition of abuse is too narrow, and I'm wondering if there's any thought about a recommendation about getting further community input on the definitions of abuse so that when we are making this call for more information, sort of as a predicate step, there could be some weigh-in on how this should be defined in the first place. So it's a thought and it may be that you think that that's the either premature or peripheral, but it's one of the things I anticipate coming up, so I thought that I would raise it.

DREW BAGLEY:

Thanks, Lauren. I think that's a very good point.

So the way I'm thinking about it for the purpose of this chapter and our recommendations is that we are using an actual operational definition of abuse that's driven by what the past legislature has recommended that we cited at the top, including the report that ICANN staff did back about a year and a half ago that Brian and Eleeza [inaudible] and then, of course, the data available in the black list.

And so, for example, Spamhaus has a specific definition of spam that is included on their lists and then, of course, the [Mauer] distribution and everything else used for this.

So I think that we are fine making these recommendations with this minimum, with this narrow definition of abuse, but perhaps we could add language that suggests as community consensus develops for a broader definition of abuse, these recommendations could be expanded to those forms of abuse too.

And I say that just because if we say that we want community – and with that said, hopefully we’ll get some great community input during this next public commentary on these definitions. But if we’re making our definitions contingent upon getting that feedback and getting consensus, then I’m afraid that we will be left where the community has always been left on this issue where no one can reach a consensus on every single form of abuse even though everyone can agree on certain forms and then therefore, the issue gets punted down the road.

And so that’s why I certainly would appreciate advice on how we can tweak the language to still account for the bare minimum agreed upon types of abuse and then also allow for tweaks in the future as consensus is reached in other areas because that, at least, those are my thoughts on it. What do you think?

LAUREEN KAPIN:

I think, I think you’re right, that we make our current recommendations contingent upon community input on the definition of abuse. I think you’ve been clear that you’re using an existing definition that, in part, is based on the actual contract language which is based on prior community development. So that makes sense to me and in no way am

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I suggesting that a recommendation should be delayed or contingent upon any future effort.

I think what I'm saying, perhaps, could be said even more simply, which is that there appears to be a lot of differences of opinion about whether or how to expand this definition. And I said "whether or how," so I'm not supposing that it needs to be expanded, but that is a topic for future community input. And to the extent that consensus is reached on that, then certainly our recommendations about further study could include the evolving definition of DNS abuse.

DREW BAGLEY: Thanks, Laureen. So then, are you thinking maybe this would be a third recommendation?

LAUREEN KAPIN: I'm thinking it would be a separate recommendation, that we realize that this is not a static definition.

DREW BAGLEY: Okay.

LAUREEN KAPIN: That this definition may change with stakeholder input. And as it changes, it should be studied to take those changes into account.

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DREW BAGLEY: And do you have in mind who you would direct that to or how we would go about that sort of initiative?

LAUREEN KAPIN: I think part of it certainly would be directed to the ICANN organization because this really is in the nature of information gathering and then community input.

DREW BAGLEY: Right. So I'm trying to think of a good way because, yeah, I think we can cite, too, the ever-evolving nature of DNS, of threats to the DNS. And I'm almost wondering if, with what you're suggesting, we would want that to be something periodically revisited every few years as to what constitutes DNS abuse, just thinking about future Internet of Things, threats and whatnot, that might not look like the abuse as you define it today and yet, it's utilizing the domain name system to perpetrate cyber crime, harm consumers, etc.

LAUREEN KAPIN: Exactly.

DREW BAGLEY: Okay.

LAUREEN KAPIN: You and I can discuss this further.

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DREW BAGLEY: Yeah, we can do that together. That sounds like a great idea.

LAUREEN KAPIN: [We can discuss when we're] offline.

DREW BAGLEY: Okay, that sounds great. And if you already have something drafted, send it over. Otherwise, I'll take the, I'll be able to take the first stab at that.

And then, Jamie, I see your hand up again.

JAMIE HEDLUND: Yeah, so I think that's a great idea. It might also be interesting to seek at least community view on what types of so far unidentified, or even currently unidentified DNS abuse, fall within ICANN's existing authority to [inaudible] under the contracts as well as under the ICANN mission to tackle. And for those items that may fall out of ICANN's mandate or outside of the contracts whether there are other fora in which they can or should be addressed.

DREW BAGLEY: Thanks, Jamie. So perhaps this definition or this new recommendation will shape up in a way to suggest that in addition to the CCT Review Team's current recommendations against technical abuse, ICANN should undertake efforts to identify currently existing forms of abuse

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with community input, of course, and then say something about “and ICANN should periodically undertake such an assessment with community input to identify future forms of abuse.”

And then perhaps we could, even though we want ICANN and the community to define abuse, maybe we could say, we could at least add some language about what sorts of factors with regard to how – I’m thinking of actual language that Carlton used the other day in our subteam discussion – we could maybe use some of that language that comes from the stability and resiliency language. Maybe we could use that in the definition.

JAMIE HEDLUND: Yeah, and again, there are two things. One is what are recognized forms of DNS abuse? And secondly, does ICANN have authority either under his contracts, Bylaws, or both to do anything about them?

DREW BAGLEY: Oh, right. Okay. So also calling on community input for that part too, as far as the consensus belief on what those legal authorities may be.

JAMIE HEDLUND: Sure. I think Jordyn has his hand up, sort of.

JORDYN BUCHANAN: Thanks, Jamie.

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DREW BAGLEY: Your hand's not up in the – there's no icon. But I will call on you.

JORDYN BUCHANAN: Yeah, well my... I don't know, Adobe Connect on the phone sucks. I tap on the icon and it does nothing.

In any case, this is Jordyn. I was going to make a few comments, one which was before this most recent conversation, but so maybe I'll address this recent conversation first and then jump to the second one.

I guess I don't understand what we're trying to do with this. There might be other kinds of abuse. Sure, there might be other kinds of abuse. There's going to be a future CCT. There's going to be an SSR Review. They're all going to look at this. I don't think we need to apologize for the fact that, like, this is a particular point in time and a particular set of data that we have.

I think we can mention that and say that this is not intended to be 100% comprehensive and that future reviews and/or the community will obviously have additional – this is not a silver bullet being recommended here that's going to end all abuse. So I guess I would say we can say that, but I don't understand what an additional recommendation here would look like or what the value would be. And it seems like on the one hand, we're trying to say like we need to study more stuff, and then Jamie's saying, "But yeah, we need to see if that's even in ICANN's charter."

Like that can all happen without us... That can and will happen without us doing anything here. I think we have done some analysis of abuse as

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we understand it right now under the definition that Drew has laid out and with the data that's available to us.

And I think we've identified some interested phenomenon in the New gTLD Program that particularly, that it looks like bad guys really like to buy domains that are cheap and use them for nefarious purposes and it also looks like there may be some registrars that don't do a very good job of addressing abuse and maybe we want to have ICANN do a better job of policing those registrars.

I don't think we need to do a lot more than say, "Here are the problems we found and here's the actions that we suggest to remediate them." But I will say just with regards to the second recommendations about registrars and resellers, Drew, I do think we need to give some thought to exactly what we're suggesting here because I think as it reads right now, it'll probably end up back out in the community in a pretty... it'll end up being implemented probably not that much different from sort of the state of affairs that we have today, which is that registrars have a rule in that they're supposed to look at abuse and ICANN has some enforcement capability to verify whether or not they're actually responding to reports of abuse or not. That already exists, so I guess something we could say is like, maybe the threshold, maybe there's some sort of affirmative obligation on behalf of registrars to do something as opposed to just investigate but it starts to make me a little worried about unintended consequences.

Like, we know, for example, that a lot of malware and phishing is done through compromised domains as opposed to through [maliciously] registered domains. And it's not necessarily obvious in the case of

compromised domains, that what the registrar should be doing is taking the domain name down. Right? Like, there's a real registrant trying to use the domain for legitimate purposes in those cases.

And so the best course of action would probably be to reach out to that registrant and work with them to figure out how to get the site back under control. But I'm not sure how much ICANN can do about sort of saying, "Oh, a registrar who may not be involved in the posting of the domain or responsible for security apparatus about the domain at all somehow has some affirmative obligation to remediate a compromised domain."

And even for a maliciously-registered domain, I think trying to sort of say, "This is clearly maliciously-registered versus compromised," I think that puts a lot of burden on a registrar for a pretty cheap product, frankly.

So I just think, the second recommendation I think sounds great in theory. I think we have identified that there are some registrars that significantly... that host a lot, well, that register a lot more domains that are used for abuse than others.

But I guess we need to think pretty seriously about what exactly that remediation should look like, or maybe what we need to suggest here is just that this is a topic that the community needs to take a closer look at. Maybe there should be a new PDP on this topic. Maybe this is something the SSR should be taking a look at.

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I don't really know, but it doesn't seem like just saying, "Oh, registrars need to do more," in and of itself is going to be that helpful to the Board or to anyone else.

DREW BAGLEY:

Thanks, Jordyn. I will address the second part first and then get back to the... So address your comments on the second existing recommendation and then get to your comments on this potential third recommendation.

So as far as the second recommendation, I thought a lot about all of the things you said, especially the fact that even as the data shows in legacy gTLDs, many of the domain names used for cyber crime were, in fact, legitimate ones that were compromised. And so, what this aims to do is provide a way to address systemic abuse, but then also allow that registrar to have a presumption that they can rebut by showing evidence that they themselves were a victim of this type of abuse or they do take actions and yet despite that, this still happened to them.

And if you have 20 legitimate domain names and they're taken over on a particular registrar or the domain names are registered with a particular registrar, then this isn't going to register under this criteria for these extremely high levels of abuse whereas what we're seeing with the DNS abuse study showed where you have a registrar that has over 90% of their domain names associated with abuse or even if it's 50% or something, there currently exists no tools to deal with that except for this individual complaint-driven process.

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And this would then provide ICANN with tools to actually deal with a situation like that even though it could be something where it's rebutted and it turns out it is a mistake. But the way this is worded now is that ICANN wouldn't have to go and wait for an individual complaint about every single specific domain name that appears on that blacklist or that someone operationally is viewing, being used to attack their networks.

Instead, this would enable ICANN using their new, for example, their new [DAR] project or just the outside cyber security community using data that's already widely available to identify some sort of, a registrar being used for systemic DNS abuse and consequently associated with cyber crime and then therefore, for there to be an ability to actually do something about it and not just allow this to be business as usual, so I think this really does add a lot more [teeth] even if it is broadly worded than what we currently have. And sometimes in posing a duty to investigate or, on the other hand, a duty to suspend and kept the language of duty to mitigate.

So mitigating might be contacting the registrant if it's a bunch of legitimately compromised domain names or working with a hosting company if the same hosting company is used for 50% of the domain names assigned to or associated with a given registrar. And just take some sort of affirmative steps and not sitting back and allowing the services to be abused. So that the form of mitigation could take a variety of steps, but this would I think finally allow ICANN to do something about it while hopefully striking a balance for those who are doing the right thing to not get suspended over this.

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Since your hand won't pop up again, if you have your hand up in your head, then just speak.

JORDYN BUCHANAN:

Yeah, I guess my reaction is like, and my reaction is also why we end up with not very useful rules, so I'm conscious of that fact. But having this, it would actually be interesting to get Jamie's perspective, but I agree to having the mitigation sort of thing, a duty to mitigate is like a more reasonable standard.

If you were a small registrar and some bad, bad person... or let's say you were a brand registrar even and one of your big clients' website got compromised or something like that, and suddenly you were showing a large amount of abuse because a huge swath of domains had been compromised in your portfolio. To some degree, I guess you could reach out to your client, you could reach out to the hosting company. There is not really that much you could do though, other than just sort of letting them know this bad thing has happened.

It's going to be hard for ICANN to be able to tell the difference between a registrar doing a good job of that sort of mitigation when the domain is not the vector of the attack and where the hosting is with the third party and we're talking about a compromised domain. It's just not that clear what the registrar can really do about it short of disabling the domain which has a lot of significant side effects.

So, I do think we've identified an important problem here. The community always talks about – we always talk about it at ICANN meetings, the bad guys aren't really here. I think there needs to be

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some real discussion amongst and including, well, at least including registrars about sort of like, “Okay, what is a reasonable standard to put in place.”

I think it would be helpful for us to identify this as like a significant, real problem and show there are some bad actors, there are some registrars that are responsible for large amounts of abuse and ICANN needs to have tools to be able to address them. But I would worry that just sort of like trying to come up with the solution looks like, just from the Review Team, at least when it comes to imposing affirmative obligations on registrars is pretty challenging.

DREW BAGLEY:

Thanks, Jordyn. Yes, so the first point about if it was a corporate registrar and one of their customers was compromised and then therefore, percentage-wise, they were showing high rates of abuse. Under this current language it would still have to be un-updated, abnormal, and extremely high levels of technical abuse.

And so then if their client compromised and then these domain names are like that for the same period of time without being mitigated, then that’s not good for the Internet, that’s not good for anyone. And so if their customer is not doing anything and the domain name is a key way to stop, for example, a WannaCry-style, Botnet and Ransomware outbreak or something like that, then suspending the domain name might be the way to do it even if it’s just on a temporary basis to stop that from going on.

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So the, I understand that you want to make sure we're not biting off more than we can chew for this. On the other hand, we were asked to examine all the safeguards put in place for the New gTLD Program and we found, from the data, that those safeguards alone do not prevent and mitigate abuse. And with our eyes forward to what can mitigate that sort of abuse and what also could help build new safeguards into the DNS going forward. I still think it's very important for us to make a strong recommendation here because this is something where we have ample evidence of this being a problem and we know there's no tools currently to deal with this sort of systemic abuse. I think we should certainly work on wordsmithing the language, but I really would like to put this recommendation out to the community and get feedback because, perhaps, that feedback could help us get this language, make sure this language strikes the right balance.

And then... Oh, I see you have a question. Jamie, I don't know if you see the chat but Jordyn is asking, "Would this language be a helpful enforcement tool for ICANN?"

So, Jamie, if you want to chime in.

JAMIE HEDLUND: I'm sorry. Would which language be a helpful enforcement tool?

DREW BAGLEY: This whole second recommendation. Basically, we're proposing a second recommendation. Would this actually provide a helpful

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enforcement tool for ICANN to deal with this sort of systemic abuse we're discussing here?

JAMIE HEDLUND:

Well, it's kind of hard. I mean that, the recommendations, I see it as aspirational, right? It shouldn't have any of the specific language that would actually be in the agreements and without seeing with that language would be – it's hard to say whether it would be a helpful tool, or a useful tool or not. But in theory it would be helpful to have clarified that that power exists. I can tell you the registries and registrars [inaudible] strongly, but that's another issue.

DREW BAGLEY:

Okay, thanks. Yes, and it absolutely is aspirational language. We are putting factors that must be considered but we're not writing the actual contractual language in this recommendation as is.

So then I guess, Jamie, is this recommendation as is helpful for getting a useful tool to combat systemic abuse? Since this recommendation would be the way to direct the creation of that sort of language is if it's helpful, at least in creating that sort of tool as far as the way we're framing it where we are and imposing affirmative obligations, but then we're allowing for rebuttable presumptions.

JAMIE HEDLUND:

Yeah. I mean, I think, at a minimum, it's extremely helpful to get that conversation kicked off within the community. I mean, I think there are other pressures that will come to bear that will help move that

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conversation forward and it would be a challenge with the existing language and the contract as others have noted, it is ambiguous.

And so, additional clarity both in terms of scope and action, activities, would be very helpful. I guess it's hard to see how you can just mandate that as a change in the contract, but mandating or directing, consider recommending that the community seriously engage in this discussion is a great first start.

DREW BAGLEY:

Okay, thanks. I don't see any other hands, but Jordyn, did you want to chime in again? Otherwise, I was going to address your other point. But do you want to [inaudible], Jordyn?

JORDYN BUCHANAN:

I think that's fine for the moment. I'll see if I can think of any tweaks to the language. But I do think, if Jamie thinks that it's helpful to have something to address systemic abuse, like to a certain extent we can rely on public comments and then the implementation phase to perhaps tweak this.

DREW BAGLEY:

Okay, great. Yeah, with all of these things, with each of their sections, I want to make sure we're at least making an effort in the right direction even if other processes will help us get the language perfect along the way. But I'd like to get the ball rolling with some of these things with where they are clearly within the Review Team's findings as to identifying a problem and being able to propose a solution.

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Thanks for all your feedback on that, and then to your first point, Jordyn, with regard to your comments about the fact that there are other mechanisms in place to deal with issues that will pop up in the future.

My thought was that, I still think we probably should go ahead with that third recommendation, but with everything you said in mind. I think those are great points.

I guess what I'm thinking is before the New gTLD Program was launched, the language was at the top of the chapter, I think in quotes or it was in the report that issues were identified that would be associated with the expansion of the DNS. And so similarly, we're now that group looking at those issues presumably before any further expansion of the DNS.

And so, therefore, I think it might be helpful to come up with a recommendation that is helpful for identifying at least future forms of abuse because to your point, you're right. If we're saying, "Hey, we're looking at the issues that currently exist, and this is what we've identified," then we've already done that and maybe we've got everything, maybe we've missed a bunch of things, but we were the mechanism to do that whereas I don't see any logical mechanism between us and the future expansion that would be able to do that in the same way, in the same context that we're doing it because obviously, SSR2 is going to look at certain things but not in the same context we are where we're looking at the safeguards put in place to mitigate these issues, and this is clearly part of our mandate.

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So I do think it would be helpful to come up with some sort of recommendation that we can figure out the best, who to direct it to, what's best. But something so there is an ongoing look a issues, one, but then, two, like what Laureen was suggesting, reaching consensus or expanding consensus on definitions of abuse because I still think that'd be helpful because, even though these discussions have been throughout the community, and especially now – abuse is now a very prevalent topic at ICANN meetings – there still are plenty of voices who will speak up to say, “We don't have a clear definition on all forms of abuse. Therefore, we can't do anything,” particularly when we're dealing with forms of abuse that may also coincide with intellectual property infringement or be intellectual property infringement and not technical abuse and not be both. Then you get into a huge gray area, obviously.

So with that response in mind, what are your thoughts on having a third recommendation, even if we shape it a bit differently than originally discussed on the call?

JORDYN BUCHANAN:

With regards to other forms of DNS abuse, I agree that the intellectual property people will say, “You're not dealing with my issue as part of this section on DNS abuse.” I think if we just consistently refer to it as technical DNS abuse, which I think is largely the case already, I think we can say, “That's right. This doesn't deal with intellectual property issues. There are other parts of the report that deal with intellectual property issues, and you should read those parts if that's stuff that you care about.”

I certainly don't think we need an additional recommendation to deal with the fact that there's going to be some people that complain that their particular notion of DNS abuse is not covered by the scope of the technical abuse discussion here. That seems like A) not that constructive, and B) pandering to people who aren't being particularly constructive in the discussion.

I guess I'm happy to wait to see what language you and Laureen come up with. I guess I remain pretty skeptical that saying that we need a recommendation to say, "ICANN should..." something-something vague, continue to think about what forms of DNS abuse exist and then eventually maybe think about whether that's in scope of their mission and then, if so, maybe doing something about it. I think there are already plenty of existing forms where that will naturally take place and doesn't require a recommendation from the CCTRT to make that happen. But if you and Laureen think that there's something that would be missed by the existing processes, I guess I'm happy to wait and see what the language looks like to see if it seems like it would be an improvement over the status quo.

DREW BAGLEY:

Okay, great. Thanks. And thanks for all the great points with this and with the other topic, as always.

Does anybody else have any questions or feedback?

Okay. Then, Jonathan, I will pass it back to you – oh, and everyone, the PSA, please e-mail me recommendations on how to improve this, even

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if you didn't speak up today. Feel free to send me word edits or just e-mails with thoughts on any of this stuff. Thanks.

JONATHAN ZUCK: Thanks, Drew. Can folks here me now? I logged out and back in.

UNIDENTIFIED MALE: Can we hear what?

JONATHAN ZUCK: Thank you. Staff, would you like to put up the final slide of the Rec 1? Or I can scroll through it either way.

So I'm just going to take these three documents in order of complexity, if you will, so starting from least complex. The new text for Recommendation #1 was designed to address what I believe was Jamie's concern with the last draft about justifying policy. I tried to wordsmith that a little bit. I wrote here in the middle – I don't know if I have the ability to grab a pointer myself, but it doesn't look like it. Down here, where it says, "Specifically where possible, ICANN should proactively collect data needed to validate or invalidate policy initiatives," I was trying to get away from this notion that ICANN's job was to justify [inaudible] policy, but instead say that we should proactively collect data necessary to either validate or invalidate a particular policy initiative.

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So I guess my question might be specifically for Jamie whether or not that scratched the issue of the “justify” language from the previous draft.

JAMIE HEDLUND: Yeah, I think that addresses – my concern was, as you say, that ICANN staff shouldn’t be put in position of justifying –

JONATHAN ZUCK: No, no. I agreed. We’re just trying to see if this text works.

JAMIE HEDLUND: Yes, it works. Thanks. Or at least it works for me.

JONANTHAN ZUCK: Right. After Jamie, is there anybody else that, reading quickly through this, has any other issues with this particular recommendation, or should we call this one done?

Okay. I don’t see any hands or hear any clamoring voices or text in the chat, so I’m going to call Recommendation 1 ready for the final report.

Okay. The next document is the update to page 46 with respect to pricing. So if you get that up on the screen.

Here there was just a request, I believe, in the last discussion to just provide a little bit more explanatory text and examples. I just basically expanded it. In about the middle of the paragraph that begins with “Of

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course,” “This is not dispositive of the absence of price-based competition created by new entrance as the competitive price might be higher than the existing caps.” Here I added, “For example, if the new natural price for a TLD in a market without caps with \$20 as part of the New gTLD Program, and \$15 with the addition of new gLTDs and players, we would not be able to observe this competitive effect because of the price cap creating an artificial price ceiling.” That was I think Jamie’s request that I include an example that would help explain the previous sentence.

I guess I’ll stop there for a second and ask Jamie and anyone else, but I guess Jamie maybe in particular, to maybe comment to see if it works.

JAMIE HEDLUND: First of all, I want to thank you for doing everything you can to make me happy, but yeah, that works.

JONATHAN ZUCK: Oh, Jordyn. I’m sorry. I meant Jordyn. I know. I’m always doing that. J1 and J2. Sorry. Jordyn and others, obviously, does this satisfactorily explain the statement above about the notion of it making it difficult to look at because we can’t see what the competitive price might be?

Okay. Going further down, I provided a little more explanation about the artificial constraint associated with these price caps, beginning with the word “wild” down here. “While the marginal cost of issuing a new TLD is close to zero, the fixed cost of maintaining a registry when averaged over a small number of registrations is quite high. In addition

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to affecting the viability of new registries, price caps could represent a disincentive for new entrants in future rounds.” So that’s new text, again, that’s meant to be explanatory of the point above about a possible distortion being created by the price cap.

I don’t even know that anybody requested that, but since I provided an explanation to the first one, I provided one to the second point as well.

Waudu, you’ve got your hand up. Go ahead.

WAUDO SIGANGA: I can’t understand this part where you say the marginal cost of issuing a new TLD is close to zero. I don’t [know about] a new TLD there, or do you mean a new domain?

JONATHAN ZUCK: I mean a new domain, a new top-level domain, as opposed to a second-level domain. In other words, if you’re a registry and you’ve got 100 domains registered, allowing –

WAUDO SIGANGA: I understand. Jonathan, maybe you just need to add the word “domain” there to make it clearer. “While the marginal cost of issuing a new domain in a TLD,” or something like that.

JONATHAN ZUCK: Okay. All right. Does that update work for everyone else? Object if it doesn’t. I’m happy to make that change.

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Okay. I don't see any objections, so, Waudu, I'll make the change that you've suggested.

WAUDO SIGANGA: Okay.

JONATHAN ZUCK: So those were the big updates to this. This section was expanded as a result of recognizing that there have been some price increases corresponding to the availability of price cap increases since the New gTLD Program was launched. So that's the expanded text for page 46.

Are there any other comments or needs or concerns about this section, or do we call this wrapped, given Waudu's edit?

Okay. I'm going to call this done as well. Obviously, there are people who got this just today on the list that aren't on the call, so I'll wait a week for both of these documents before calling them final to give people an opportunity to comment online and to read them more carefully, etc. But we will, absent any offline comments, call this final as well. All right?

All right. The next circus of horrors is the parking paper. In this one, I guess I'm going to recommend that staff upload the tracked changes version just because there's several of them and it might help me to scroll to them to identify them for folks.

The changes in this document are the result of the previous plenary call and some thoughtful remarks from John McCormack, who's an observer

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on the call. Hopefully, I have for the most part addressed both sets of comments in this updated draft.

One thing I did – this might be the most controversial thing I did – was pull “parking” out of the title of this. So feel free to push back, but that was the first thing that I did. I called it the “Potential Impact of Unused or Underused Domains on Measures of Competition.” This is my attempt to sidestep the definitional issue about parking and really just explore what we observed, which is a whole series of reasons that there are domains that are registered but that are not used to point to a typical website.

Laureen, go ahead.

LAUREEN KAPIN:

One thing that occurred to me is that you may be inviting a sideshow reaction on your judgment here that things are underused. Unused is objective, but underused sort of has this qualitative judgment on it. I could see folks arguing, “It’s not really underused. There’s a very good purpose. This is a higher purpose.” It just seems like –

JONATHAN ZUCK:

I welcome suggestions. You’re right.

LAUREEN KAPIN:

It seems like you’re inviting an unnecessary storm.

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JONATHAN ZUCK: Go ahead. Suggest an alternative. Because obviously a speculative domain might be used or one that's just used for e-mail is no unused. But how would we describe it?

LAUREEN KAPIN: Yeah. I'm actually not averse to using parking. Or you could tie it to the definition you used in your discussion, which is that they're not the primary identifier of a website. I don't know if there's a pithier way to say that, but at least that's just factual. Then you don't need to invite all this debate about judgment. So I'm not averse to parking –

JONATHAN ZUCK: Right. Which I have no desire to do.

LAUREEN KAPIN: Yeah.

JONATHAN ZUCK: The problem is that parking is in and of itself a loaded term in the community, as we're discovering.

LAUREEN KAPIN: Then you may just want to tie it to domains that aren't used to identify primary identifiers of websites. I know it's not pithy, but that at least is an objective criteria that doesn't have a judgment attached to it.

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JONATHAN ZUCK: Okay. Thank you, Laureen. I'll try to come up with a pithy version if other people agree that that's the way to go. If anybody agrees that parking is still the best way to describe it, that's fine, too.

Drew, I see your suggestion. You want to just restate that verbally?

DREW BAGLEY: Sure. I kind of like this approach because then it takes us out of the weeds with arguing over what parking is or isn't and whether we're using a correct definition. Instead, like you said, we're actually just explaining what we have observed and the potential effects of it.

Instead, why don't we use something vague? I put in the chat: perhaps the potential impact of domain names that do not resolve to a webpage.

JONATHAN ZUCK: Okay.

DREW BAGLEY: The potential impact on competition, because that's what we're describing at its core, domain names that don't resolve to a webpage. So some of them don't resolve to anything. Some of them resolve to a parking page. Well, so then that's webpage. Anyway, something along the lines of that. Maybe we have to modify that slightly.

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JONATHAN ZUCK: Well, the primary pointer to a web page? That's the text below. It's tough to turn that into a title.

DREW BAGLEY: Right.

JONATHAN ZUCK: Because it's about being the primary pointer or something like that. But I'll try to take a pass at an even more explicit – because I'm cognizant of the mine field that Laureen is pointing to.

Does anybody have a comment on that or suggestions about that? Otherwise, I'll just take another shot at that title. Like I said, it was a sort of flyer to see if changing the way we describe it overall would be useful.

And, Waudu, I hear you, as parking is a little of a loaded term. That's all. We have a fairly low turnout on this plenary, but I guess I'd be interested in a show of hands of who thinks we should just continue to use the term "parking." Or green check marks. Can everybody put a green check mark in if you think we should just continue to use the term "parking"?

UNIDENTIFIED MALE: Sorry. If we should continue or discontinue?

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JONATHAN ZUCK: Continue. The check mark is if you believe we should continue to use the term “parking” instead of searching for an alternative, as Waudo has suggested in the chat.

UNIDENTIFIED MALE: Got it. Thanks.

JONATHAN ZUCK: Drew, is that a new hand?

Well, if everybody is either neutral or against my attempts to be clever here, I’m happy to switch it back to parking. So that’s what I’ll do, based on the reaction here.

Okay. If we are moving down the document to [concede] that I’ve made reference to premium domains by registries because that’s another form of speculation in a sense that has occurred by registries themselves, I for one didn’t realize that those show up as registrations. So I’ve added that to the document.

Also, I tried to get at this notion of not passing judgment, so I have, “Far from passing judgment on any of these activities, the Review Team merely attempted to consider if the rates of these activities differed between legacy and new gTLDs, and if so, whether the difference suggests a need for further research. Our conclusion is that further research is necessary.”

Again, this is my caveat about the very high-level analysis that we were attempting to do.

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Jordyn is now saying in the chat that premium domains don't show up as registrations or that it's the exception rather than the rule. That's good information. Like I said, I had no understanding of either one of them. It was suggested by John in his document that there was a significant visual impact, if you will, or a quantitative impact of premium domains.

But that said, I'm not sure that either one of these changes the way that I would edit the text, unless somebody suggests otherwise since I don't specify that one way or the other.

Jordyn, do you have audio? Do you have a problem with how I've added that clause?

JORDYN BUCHANAN: It's probably fine. We just definitely don't want to give people the sense that most of – it's hard for me to work with the document because I'm on my current laptop, which does not support Adobe Connect, so I'm forced to do this all on the phone.

JONATHAN ZUCK: I understand.

JORDYN BUCHANAN: I'll try to take a closer look. I just wouldn't want to convey the sense that a significant part of parking was premium – to the best of my knowledge, there is only one registry operator that that's true for, where the registry allocates the names that would be for sale at a

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premium price. And I don't think it's even all of them. I think it's a subset; some set of domains that they intend to resell that would be registered to a particular registrant. I think that's a pretty uncommon practice, although it happens across of tens of TLDs, so it's not nothing, either.

JONATHAN ZUCK: Okay. And again, [all I was talking] about practices is that it was one of the many ways in which the registered domains are not always primary pointers of websites. But do take a look at it.

JORDYN BUCHANAN: Yeah. That's fine. I'll take a look.

JONATHAN ZUCK: Okay. Perfect. All right. Any issues with the caveat here about passing judgment and our overall assessment of what we're trying to do?

Okay. Do I have scroll control? As I'm scrolling here, is that scrolling for everyone else?

Yes, go ahead, Laureen. Sorry.

LAUREEN KAPIN: I'm not crazy about the "Far from passing judgment." We can take it offline. It just sounds very defensive to me. The tone is kind of weird to me. I would just go right into, "The Review Team attempted to consider..." and just go straight into it. I don't think any part of this

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passes judgment, so I don't think we need to be defensive about it. That comment gives a weird tenor to this. We don't use that sort of language [inaudible]. My two cents.

JONATHAN ZUCK:

Okay. All right. Thank you. All right. Do I have scroll control? As I scroll down... oh, yes, I have scroll control. Thank you. Okay.

I've added another caveat that says that future research will require analyzing each of these categories individually to determine the impact on the competition. This is to underscore the fact that each of them may have a different impact on competition. It might be a little redundant, but I just wanted to say this as clearly as I could.

Then I tried to give an example down here about the types of domains that might fall under the category of speculative and therefore not renew at the same rate. I have here, "For example, some early registrations in the new gTLDs are the result of land rush behavior by speculators. Furthermore, there was an initial spike in registrations from China in both legacy and new gTLDs, some of which is the result of speculation, some the result of regulations that may change over time. Finally, differential pricing between initial registration and renewal could have a significant impact on renewals." So that was just getting specific about some of the things that might – and I have a footnote about XYZ – that might have an impact on renewals.

Then I go into our little hypothesis and then explain it. "In other words, if speculative registrations are isolated and determined to be half as likely to be renewed, their numbers should be discounted 50% in the

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calculation of market share and market concentration. Of course, one must leave room for the possibility that this speculative behavior is fundamentally different between new and legacy gTLDs with established market expectations.”

Are people happy with that text?

Okay. I don't see hands of text – oh: “Do you have a citation [soon]?”  
Yes, Eleeza, I'm in the process of trying to figure out the best citation. There's a Domain Insights article that referred to another study. So I do need to support some of these things with citations. But thank you. I may ask for help on that, but I'm trying to find the best site to use for that. Thank you.

Okay. Then there's another hypothesis that pointers imply a transition away from existing domains. That's further expanded on. In other words, a pointer could be an indication of a provisional acceptance of a new gTLD by the market, and the old domain is being maintained in the near-term purely to smooth the transition. This, again, suggests that domains that fall in this category would mean that the domain to which the new domain was pointed would be discounted.

Of course, there are instances when redirects simply represent over-registration, either to capture typos and guesses or to protect brand identity. Future analysis of redirects would require determining which domain was being used for most of the site. That's one of the biggest difficulties associated with evaluating redirects, generally they get used for a number of different purposes. Doing some kind of sampling about

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what domain is being used is the primary advertised domain for a website becomes an important part of this analysis in the future.

Questions about that?

Okay. Down here on Page 7, we still have an open question about updating the data in this. This is something Waudo brought up in the previous call. Jordyn suggested it might just need to be updated with new data. Eleeza circulated [inaudible] new data and we just need to get a handle on that. So that still remains to be updated. I was mostly focused on the pros in the document.

Here at the end of this paragraph I just reiterate the notion that glomming all of these different types of parking together belies the fact that they all could have a different impact. So future analysis of geographic distinctions would need to be more granular as well.

Now I'm coming down to the relationship between parking and DNS abuse. Here what I tried to do was capture the discussion between Jordyn and Drew on the previous call. "In conjunction with this review, the DNS Abuse report found that, in general, in new gTLDs malware is less common than in legacy gTLDs. However, if you look amongst the new gTLDs and look at parking rates, you'll see that, of the malware that's occurring, it's marginally more likely to occur in ones with higher parking."

How does that language look to you, Jordyn and Drew?

Thanks, Jordyn. Drew, does that look all right?

All right. There may be some correlation between – oh, okay. Go ahead.

DREW BAGLEY: The second sentence is perfect. We just might want to be more specific when describing malware being less prevalent and talk about the nuanced way the researchers have described that.

JONATHAN ZUCK: Could you send me some sample text then?

DREW BAGLEY: Yeah, I could. No problem.

JONATHAN ZUCK: I do go in the final sentence here to say, "There may be some correlation between parking and malware, but that is not as strong as effective as the overall trend of lower overall malware distribution rates than in legacy gTLDs. Nonetheless, it behooves the community to further explore the correlation between parking and malware distribution." That last sentence was at Waudu's request to clarify which correlation we were looking at.

Drew, if you've got some same text, just shoot it to me and I'll incorporate it on the first sentence.

WAUDO SIGANGA: Question.

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JONATHAN ZUCK: Oh, Waudu. Go ahead.

WAUDO SIGANGA: I'm looking at this part where – I think it's on page 8, somewhere at the bottom. It says that previously [inaudible] studied over eight million parked domains and found that users who land on parked domains are exposed to malware [inappropriate causing and elaborate scams]. We come to this next sentence, which seems to contradict that. "In conjunction with this review, the DNS Abuse report found that, in general, in new gTLDs, malware is less common than in legacy." I think it's contradicted because somewhere, in another report – in this one, we're actually seeing that there are more parked domains in the new gTLDs than the legacys – 68 vis-à-vis 66, I think. So there's a little bit of inconsistency here, if I'm not wrong.

JONATHAN ZUCK: Well, that's right. I guess that's the central issue is the fact that there's more parked domains in the new gTLDs but there's still a lower incidence of malware, which again underscores the fact that the correlation between parked domains and malware is still very small – I think Drew's going to try to add some clarifying language – and not dispositive. So we still have a lower rate overall of malware in the new gTLDs, even though we have a higher rate of parking.

WAUDO SIGANGA: Okay.

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JONATHAN ZUCK: Waudu, is that your phone?

WAUDO SIGANGA: [inaudible]

JONATHAN ZUCK: Okay. Are there any other comments or questions about this amended text?

I guess we're waiting essentially for Waudu to come back, but what I have from this is go back to just calling it parking and then Lauren's request to remove the passing judgment text.

Waudu –

WAUDO SIGANGA: Sorry. [inaudible] Was there something you were asking?

JONATHAN ZUCK: Yes. Did you hear my explanation?

WAUDO SIGANGA: No. Sorry. I was distracted for a while. I went off the call for a minute or two.

JONATHAN ZUCK: Yes, I know.

WAUDO SIGANGA: This explanation about the relation of parking and the use of malware?

JONATHAN ZUCK: Okay.

WAUDO SIGANGA: Yes, I heard that one. Yes, thank you.

JONATHAN ZUCK: Okay. All right. Great. Any other comments or suggestions?

Again, I'm going to change the language as requested by Laureen. Drew is going to get me an updated first sentence on the other piece, and I'm going to change the title back to something related to parking.

With that, we may be close to final on this section, but again, I implore you because it is something we're going to try to release as something that is part of this interim report. Do take a look at it this coming week and give it a final gander. I will circulate a new draft as soon as I have suggested text from Drew. We will look to get in the calculations. Don't worry about the calculations. Just look at the prose and make sure that you're comfortable with what we have.

Okay. All right. Thanks, everyone. Waudu, I assume your hand is just still up. That's not a new hand, right?

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Okay, great. Thank you. All right. Any other questions about those? Anything else that was left in there?

All right. Excellent. Let's switch over the work plan. Folks, I circulated this work plan earlier in the week. I don't know if you've had a chance to look at it. What's important about it is that time has slipped a little bit because we weren't going to make our deadlines for the interim report or the final report because everything cascades.

There was an INTA Subteam call that took place yesterday. I don't know if anybody wants to give a brief [inaudible] of that, but there will be shortly circulated an issues document raised by that call that should be circulated by David [inaudible]. He's not on the call today but has confirmed that he's going to be trying to take that issues document and circulate shortly a revised version of the Rights Protection document.

Waudu, I don't know if you're interested in commenting at all on how the call with Nielsen went or if there were any revelations from that, but now would be the time to bring that up.

WAUDO SIGANGA:

Well, thanks, Jonathan. Not really. I don't think I'll comment because yesterday's call was [a part] that's been known for quite a while. So I'm not competent or an expert on the INTA report.

JONATHAN ZUCK:

Okay. Well, I didn't mean to put you on the spot, so thank you. As I said, there will be a new draft. There's a new issues document that was generated as a result of that call that I can get David to circulate more

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broadly. As I said, he's going to be circulating an amended draft about the costs of rights protection under the New gTLD Program.

If there was anyone else that was on that call – I was not on that call – that would like to speak up, please raise your hand.

Okay.

WAUDO SIGANGA: I think Jordyn. Jordyn was on the call. I think so.

JORDYN BUCHANAN: Yeah, I was.

JONATHAN ZUCK: Jordyn, were you on the call, and were there any revelations?

JORDYN BUCHANAN: No, I don't think so. There were just some points of clarification that came out from the issues doc. In general, I think there's some discussion around some of the financial elements of the INTA study and trying to make sense of the various numbers there. I think a significant part of the confusion is that the headline numbers in there – the \$150,000 a year spent on trademark protection on domains – is actually a number that isn't specific to new gTLDs and includes legacy gTLDs, as well. If you look at the part that's attributable to new gTLDs, it's just like 17% or 14% of that. David's talking with INTA and Nielsen to try to tweak that

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number to figure out what the right portion is. But it's not that far off of the population of new gTLDs relative to all gTLDs.

So, yeah, I think we spent most of our time talking about those numbers, but David has already had an in-depth conversation with INTA and Nielsen is just looking to firm up the findings from the INTA study based on that.

I intend tomorrow to [inaudible] writing, including updating the consumer choice section to just make the direct statement that we can get from the INTA study, which I think matches the directionality of the consumer choice study already – but basically to just say that, for big brands in particular, most of them view the New gTLD Program as a cost as opposed to an opportunity or a real expression of choice. So there may be some difference of behavior between how brands look at this versus other types of registrants, who may look at it more as an opportunity.

JONATHAN ZUCK:

Thanks, Jordyn. I guess the majority of the respondents of the survey were fairly large entities, given the complexity of this survey. So it's not even necessarily representative of INTA members.

Okay. If you look at the current schedule, we're trying to, on the next plenary call, have a presentation on the DNS Abuse study, confirm approval of the DNS Abuse study paper, and review the INTA survey first draft. We're going to be trying to send those documents for editing on the 14<sup>th</sup>. You'll see if you scroll down here that the 25<sup>th</sup> of September is the new deadline for the public comment on the new sections that

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we've talked about. So it's going to be basically the new sections of the report that were changed as a result of the INTA survey, the DNS abuse, and the parking that we're hoping to get public comments on. So it's just a subset of the report that we'll have a call for comment.

Then you can see that we have a series of competition and Safeguards Subteam calls and plenaries leading to a final report sent to the ICANN Board on December 6<sup>th</sup>. That's our new deadline. You can see the different increments within the agenda here. Please read through this and make sure that you're clear on it. But we're now looking at December 6<sup>th</sup> deadline to send the final report to the ICANN Board.

That said, we are still planning a face-to-face in Abu Dhabi the day before the meeting begins, which in this case is a Friday, to further finalize the [sense] of the report that we're putting out for public comment and to have further discussions on the updates to the final report that we're working on for finalization in December. So do plan on attending on the 27<sup>th</sup> of October if you can for the face-to-face meeting. Let me know if you have questions.

Let's make this the last slippage of this. Obviously, doing these reports later in our cycle has pushed things back. It's understandable, but let's make sure that we get the work done on the rest of the report as well and get to where – as Laureen has mentioned [on] a couple of occasions, let's standardize the format of our recommendations so that they all have the same format.

To answer your question, Laureen, I believe that we are planning to have an engagement session on Abu Dhabi as well in order to continue

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the ongoing discussion of the new sections draft report, etc., if people want to have those conversations face to face. I don't think we have a date for that yet or anything – that's' right, Jean-Baptiste.

Okay. Any other questions or comments or any other business? John McCormack, I see you've been e-mailing me. Go ahead, Jean-Baptiste.

JEAN-BAPTISTE DEROULEZ: I just wanted to remind everyone to, considering we have the presentation next week on the DNS Abuse study report [with deciding] researchers, I just want to remind you to send any questions that you have on the report by Friday this week by the close of business. Thank you.

JONATHAN ZUCK: Thanks, Jean-Baptiste. Any Other Business?

All right. We will close the call. Thanks, everyone, for your participation. Little by little, we're getting through it.

LAUREEN KAPIN: Thanks, Jonathan.

JONATHAN ZUCK: Thanks, folks.

**[END OF TRANSCRIPTION]**