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BRENDA BREWER: Welcome to the RDS WHOIS2 Compliance Subgroup Meeting with Compliance Management. It is taking place on February 1, 2018 at 5:00 PM Pacific Time. The meeting is being recorded, so please state your name for the record. Thank you very much. I'll turn it over to [Sue]. Thank you.

SUSAN KAWAGUCHI: Thanks, Brenda. Just to start off, thank you for meeting with us. It's a busy time for everybody, as usual. This is really [inaudible] meeting because compliance has changed a lot since I was on the WHOIS Review Team 2010-2011. So, we thought it would be good to just get an overview of who we should be talking to. What we don't want to do is come in and talk to members of your team that have nothing to do with WHOIS. It's a very narrow, just WHOIS, not even GDPR. All of that we're leaving aside for now.

I sent you that list of questions. It's really a matter of we did some of our homework on the ICANN website, but it doesn't say who does what, really. You have the document. Sorry, you just got it a few days ago. But, again, GDPR is making everybody crazy.

ROGER LIM: Did you not get Maguy's document?

UNIDENTIFIED FEMALE: I sent it last night to the MSSI Team. I asked them to forward it.

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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.*

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ROGER LIM: Brenda, do you know if the document that Maguy sent yesterday went out?

UNIDENTIFIED FEMALE: Oh, yes. I do have that. I apologize. I'll put it up right now.

ROGER LIM: If you could send it to everyone, that would be great.

UNIDENTIFIED FEMALE: I'm going to project in the room.

UNIDENTIFIED FEMALE: Is this the document you're speaking of? The questions.

SUSAN KAWAGUCHI: Yes, that's the document.

ROGER LIM: Dated January 31.

MAGUY SERAD: This is Maguy Serad, for the record. I'm VP of Contractual Compliance. Always a pleasure to work with you, Susan, and of course Alan and Carlton. I don't know if you're on the call or not yet. With me in the

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room I have Jamie Hedlund, senior VP; and Amanda Rose from the Contractual Compliance Team. Also, from the compliance team joining us from Singapore is Roger Lim. Roger is the director for compliance in Singapore office. One of his core responsibilities is all topics related to WHOIS.

Now, before I start addressing, we did receive your questions. The first round we received on the 27<sup>th</sup> of January contained about 19 questions, and then we received the revised version yesterday morning. It had 15. I went ahead and addressed all of them. More is better, in my book.

SUSAN KAWAGUCHI:

You would've gotten the other ones later, anyway.

MAGUY SERAD:

Exactly. I just want to ask a logistics question. You had said if you have future questions, who can you address them to? Brenda, maybe this is internal to the [inaudible] Society. My understanding is when there are review teams and working groups, the ICANN Org, the departments, will receive their questions via the ICANN department that's leading the effort. So, in my case, I receive it via the MSSl Team, someone on [inaudible] team or Larisa's team. But, of course, like I said, always a pleasure to work with you. I just want to make sure I'm following the process. [inaudible] can get clarity to who.

Now, to address your question on the [inaudible], if they say, "Talk directly to compliance," Roger and I will be your point of contact at all times. The best way, also, we have the generic e-mail address, the

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[compliance@icann.org](mailto:compliance@icann.org). if it's titled properly and the question is addressed, it will come to our attention. Our goal here is to be able to respond to everybody globally and have the right resources for them and provided in a timely fashion.

[JAMIE HEDLUND] You can also always e-mail or call me.

SUSAN KAWAGUCHI: Okay, I appreciate that.

[JAMIE HEDLUND] Hopefully, we will [inaudible].

MAGUY SERAD: I didn't want to offer you, Jamie. I'm glad you offered.

JAMIE HEDLUND: Absolutely.

MAGUY SERAD: Brenda, can I have presentation so I can move the document up and down? Oh, I do. You gave me presentation rights.

UNIDENTIFIED FEMALE: And I'm just going to take notes.

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MAGUY SERAD: So, the subgroup, basically the document you sent was a very – the first title was understand the structure of compliance and how we deal with WHOIS. I grouped the questions by category. I thought it would be very valuable to talk about the compliance department first – address your questions about us as employees, management, team members, how we work and how we function in that space.

As I mentioned in the document – and you have access to it – our head count is very much aligned with the approved and adopted budget. I've added the link here to share with you. Basically, we are totally approved for 27 head count. Now, if you go and look at our website, we list all of our employees by their names and their title. Like you said, it's not [inaudible] who is dealing with what. We do that on purpose, not to confuse you. We do that because our team, when we first onboard any new staff member to the compliance department, everybody starts their training in the basic foundation of WHOIS related matters.

UNIDENTIFIED FEMALE: That's good to know.

MAGUY SERAD: Because we think of WHOIS as the foundation of everything we deal with as it relates to the DNS. So, we are approved for 27 head count. If you count us on our website, you will see 25 because we have two positions – one in Singapore and one in Los Angeles – and the positions are open because we have one transfer to a different department

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within ICANN [inaudible] growth and we have a person who left us in Singapore to pursue different career opportunities. We are fortunate that with Jamie and Göran we are able to maintain those head counts and hire for them back fill. It's a back fill, not new positions.

Now, the compliance function – and I've been meaning to update our website to explain that and I will add a note in the near future on that. The compliance function, if you've followed us since 2011, you're right – it was changed a lot. We have structured the function to really focus on these three core areas.

What I mean by core areas is contractual compliance focuses on registrars and registries from an operational perspective, make sure we are enforcing the contract, we are doing what we call a proactive and reactive approach. Reactive approach deals with all the complaints we receive. Proactive approach deals with the monitoring and activities we do.

So, one leg of the compliance is the registrar and registry function. Another leg is the audit function, which you've probably heard us give updates on. We created a dedicated team of two and you can tell from the title, hopefully, that they are focused on audit.

Their role is also a full knowledge of both RA, the Registry Agreement and the Registrar Accreditation Agreement. So, they have in-depth knowledge of all, and they will direct you with the contracted parties for that function.

Another critical area in contractual compliance is everything about performance measurement and reporting. As you recall, one of the big

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things I was tasked in in 2011 when I first met you is to bring transparency to the compliance function and reporting of data. So, we created a dedicated resource to that function, and she reports directly to me. In that function, this person works across the compliance team because when we're pulling metrics, we work with them to [inaudible] or validate that [inaudible].

So, that's what the compliance function consists of. Like I said earlier, one of your questions is how many people work on WHOIS inaccuracies? I am pleased to tell you, God forbid if we are slammed with some critical urgency on WHOIS inaccuracy related matters, the entire team can get in a war room and can roll up their sleeves and work on WHOIS inaccuracy. They have all been trained. [inaudible] to process.

SUSAN KAWAGUCHI:

Do you cross train the team for any other core functions?

MAGUY SERAD:

Absolutely. WHOIS inaccuracy is one area of the contract that we follow and we follow and we take seriously. But, the contract consists of many other areas. So, we start training in WHOIS inaccuracy and the team starts building their skill sets in other areas like transfer WHOIS, [inaudible] services, everything else. And if you want to learn what are all the complaints that we have, it's published on our website under the complaint submission every area.

Now, there is no way possible everybody can learn everything on day one or day two or day three, so we have—

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UNIDENTIFIED MALE: [inaudible].

MAGUY SERAD: Exactly. I'm still learning after almost seven years at ICANN. We have a development path for the compliance department, and the development path is dependent on the knowledge required. We can't [inaudible] somebody to start looking, for example, at PIC DRPs immediately. You have to learn the foundation. We start in the registrar space, grow the team across in the registrar area, and then start training them in the registry space.

The reason we do that is very, very simple. Scalability is the first thing. There's no way we can hire just specific to a function or a complaint type of one area in the complaint. But, also, in addition to scalability, we also want to keep the team to continue to grow and learn and develop in their skill sets to become what we call fully knowledgeable in the full scope of the Registrar Accreditation Agreement, the policies in the registrar space, and then eventually in the registry space.

Now, you do need to have a focus oversight and management of a different area. We've taken the different contracts and split them up, like WHOIS inaccuracy. Roger from Singapore is the director. Now, in his capacity today, he is leading and he is what I call accountable for compliance WHOIS related matters. Before him, it was Owen.

Again, our goal is to rotate by bringing more knowledge and skill sets to the different team members. Roger is a functional lead for all WHOIS



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related matters, has subject matter experts that are overseeing the quality reviews and the management of the complaints and escalation points amongst the team who are [inaudible] process.

So, when a department member or team member becomes [inaudible] to process, the complaints that we receive in the system, it comes into the different buckets and if you are [inaudible] process, the person is employed to just go and take the ticket. Our goal is to have the team able to go and select. By taking a look, they can see there is a lot of activities in the WHOIS inaccuracy queue, I need to focus and start processing here. Or there's a lot of activities in the transfer queue and I'm trained here and [inaudible] process. They should, without us micromanaging the activities.

UNIDENTIFIED FEMALE: That makes sense.

MAGUY SERAD: What we want to manage is the escalations, the exceptions, and the qualities. So, the subject matter experts are different team members like Amanda sitting here with us today. She is a subject matter expert in the LA office for all WHOIS inaccuracy related matters.

Now, before her, it was another person. Again, these positions we try to rotate within a year or two so the team members develop skill sets across other areas. We have subject matter experts also in WHOIS inaccuracy in the Istanbul office and in the Singapore office. The three individuals work directly with Roger in dealing with exception, in dealing

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with big pictures, and dealing with quality reviews and making sure that they are aligned and they are supporting the rest of the team when they come to them. Make sure I have addressed ...

So, the only question I have not addressed here is number six now. How are issues brought to the attention to other team members? I shared with you how we are structured as a team. How issues are brought to the team members is communication. We have several communication means. It depends on the urgency of the matter. Do people pick up the phone, or Skype, or FaceTime? It depends what time zone we're in. That's how we establish in this structure. Many of our areas are established in the structure to be able to provide the service worldwide without waiting on Singapore to wake up or LA to wake up because if you singly just locate the expertise in one area or one individual, we're hurting ourselves.

So, communication starts basically e-mail or phone call. It depends the issue we're dealing with. But, the compliance team also has what we call structured stand-up operational meeting. We call them stand-up, but we do sit down. It's the team, the ops team, the entire ops team, gathers. It's like 15 minutes. It's like in manufacturing. People tell me. I don't come from manufacturing, but ...

UNIDENTIFIED FEMALE: Like engineering.

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MAGUY SERAD: Engineering, yes. We have: what issues are you seeing in your area? Which registrar? What flow is happening? What are the exceptions? It's just keeping everybody informed verbally. The call starts with the Singapore team and we capture everything through our collaborative tool online. Istanbul comes on. They check the notes from Singapore and they hold their own operations meeting. LA comes on hours later. We do the same thing. We look at the ops meeting minutes from Singapore, from Istanbul, and we say, "Okay, is everybody clear on these issues? Have you seen anything in LA related to that?" And we update notes.

So, worldwide, the communication is clearly communicated. And it's not only through inaccuracy. It could be what's in the pipeline. What are the trends we're seeing? Or, hey, head's up – I'm calling these registrars today. Is there anything else going on that I can combine in the call? It could be whatever discussion the team wants to talk about.

UNIDENTIFIED FEMALE: Okay, that makes sense.

MAGUY SERAD: Amanda, anything else you want to add in there?

AMANDA ROSE: The WHOIS [inaudible] or the subject matter experts also have a standing meeting about one a month just to discuss recent trends and anything that we've seen in various tickets. That gives us an opportunity

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to bring up any issues that we've seen that might not be discussed in the operational meetings.

MAGUY SERAD:

In addition to the ops meeting, I hold a weekly [inaudible] meeting for compliance. It's not my direct reports only, the entire team. Our goal is to make sure everybody is informed of all compliance related matters, whether they are trained in it, knowledgeable in it or not. The reason for that is because, as you know, the contracts have touch points. The issues can have other impacts.

So, by keeping the team informed, then they can be more sensitive to what's happening in the environment, but also it's an opportunity for them to start learning new things as they grow and develop.

These are what I called structured communication of keeping each other informed. Of course, you always have people stopping in whether it's in our offices or whatever it takes. We're always accessible.

Another structure we've implemented is having this functional structure and subject matter experts – as you heard, the team also coordinates vacation leave and any kind of leave because we want to make sure we have coverage. We don't want the entire WHOIS SMEs and functional [inaudible] to be on vacation. Now, we're capable of handling, but we want them to always be ... Somebody be available. So, we have a very disciplined approach to the discipline of compliance [structure of the team].

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SUSAN KAWAGUCHI: Well, this a lot different than our discussions [inaudible]. I think we had a handful.

MAGUY SERAD: Yeah. I was in [inaudible] of the department.

SUSAN KAWAGUCHI: Yeah, it's just amazing.

MAGUY SERAD: And we didn't have the different functions. It was focused. You had a couple of people on WHOIS, a couple people here.

SUSAN KAWAGUCHI: And you had very little tools.

MAGUY SERAD: Yes. And when you think of tools, I think of tools in all aspects. I think me as a human being is a tool. My brain.

SUSAN KAWAGUCHI: Well, online tools help you.

MAGUY SERAD: We have online tools, yes. And we continue. If you're following the ICANN organization initiatives, we're launching the enterprise solution

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where we're going to have a central tool for all ticketing systems and registrars and registries. We're not there yet because there is a planned approach to it, [inaudible] first and then registrars and then compliance comes on board.

Have we answered what I call the compliance function questions? Employees infrastructure?

SUSAN KAWAGUCHI: Alan, or Lisa, or anybody, please jump in if you have questions. Basically, it's Roger and Amanda, and you said you had somebody in Istanbul?

MAGUY SERAD: Yes.

SUSAN KAWAGUCHI: And so, are there people underneath you that work on WHOIS?

AMANDA ROSE: Yeah. Everyone that does ... So I was ticket processing, then the audit team and performance and measurement, [inaudible] inaccuracies. I believe everyone processes tickets. So, generally, if there's any questions or unusual tickets, they'll bring it to the subject matter experts and then the subject matter experts also do any learning for new employees that are starting out. Like Maguy said, they'll start with WHOIS inaccuracies. Everyone is trained and able to take tickets. And because of the volume that's there, everyone usually has ...

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SUSAN KAWAGUCHI: So, you could have over 20 people focusing on WHOIS if things were really bad that day?

AMANDA ROSE: Yeah.

MAGUY SERAD: We've done war zones in the past. What I call war zone is we all work for food. Pizza usually is easier. We head all in one room and we have everybody doing nothing but WHOIS inaccuracy. Again, it depends on what it is we're facing and what we're dealing with. But, the team is very skilled and knowledgeable to go take the ticket and process them.

I know you're taking notes of Roger's name and Amanda, but in six months from now, if it's actually somebody else, I don't want you to be surprised because we do rotate because they are all skilled and able to do that.

SUSAN KAWAGUCHI: Right. That makes sense.

ALAN GREENBERG: How are the 27 people divided over the three offices?

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MAGUY SERAD: In Istanbul, Alan, we have four team members. It's on the website, unless it's broken down that way. In Singapore, I have I think five or six. Roger, I apologize.

ROGER LIM: Five, looking for one more.

MAGUY SERAD: Yeah. See, I was off on my numbers. Five currently and we have the backfill.

ALAN GREENBERG: So, ten between those two, which means 17.

MAGUY SERAD: Yes, 17 in LA.

ALAN GREENBERG: Thank you.

ROGER LIM: I did that without Excel.

MAGUY SERAD: Alan, I'm sorry. Did you say anything else?



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ALAN GREENBERG: I said thank you.

MAGUY SERAD: Oh, you're welcome. The next set of questions that I grouped, Susan, are you okay if we go through it?

SUSAN KAWAGUCHI: Sure.

MAGUY SERAD: You had two questions that I thought that went together and correct me if I'm wrong. Are there staff liaison assigned to, for example, DNS anti-abuse organizations? Are there MOUs or data sharing contracts with any, for example, organizations? Are there any in place or [inaudible]? I combined those because I thought they went together.

SUSAN KAWAGUCHI: Yeah. Carlton actually added those. I thought they were good questions to look into.

MAGUY SERAD: Yeah. All questions are good questions and always [inaudible]. Contractual compliance – like I said, I have a written response in this document – but we receive reports from all sources worldwide. Even contracted parties report on each other sometimes. Those are the best sources sometimes. But, we receive from individuals, from organizations. And on that point, based on questions like this, we

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started publishing a breakout of what kind of reporters we have, individual anonymous reporters and which bracket they come under. It's all on our metrics page, so that would help.

Now, we do not list if it's organizations or list. We do not name. But, for the sake of this question here you ask if we are assigned to. We are not assigned to any organization.

SUSAN KAWAGUCHI:

I think what he is getting at – and did he join at all? Because if Carlton is on, he should ... It doesn't look like he was able to join.

I think what he was getting at here, [inaudible] especially the first one. Would you participate in the anti-phishing working group or something, [HWG], or that might ... Because WHOIS inaccuracy shows up in any sort of fraud. So, were there any industry groups that you would, that any of your compliance staff actually participate in?

MAGUY SERAD:

So, anything that is held at ICANN meetings under the ICANN umbrella, like when we go to ICANN meetings there's a DNS forum or the security SSAC meeting and it's open, we might go in and sit just to be more aware of the issues or topics at hand, or even to learn and gain more appreciation of that area.

We work directly with the office of the CTO, which is under David Conrad's area. Most of the time when it relates to the security and stability, because they deal mostly with a lot of the organizations that

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talk about DNS abuse, so we work directly with them if there's any topic or issue abuse.

Now, it does not mean that if we receive reports from any of the other organizations, we will process the reports and review them. Our goal here is that we are able to provide what I call a neutral service. Our function is very clear. It's contractual compliance. It's based on the contracts and the policies.

I remember when I first joined. My first meeting was Bobby Flay and the security team. Well, you need to give us a special red phone just for us to call you or a special line. We're law enforcement. We're important. I said, "Thank you very much for that request. But, if we are here to cater to every specific area, there's not enough staffing in this world to do that." I was brought in to bring a really unified and structured disciplined approach to the compliance organization and we created that approach. I said to Bobby, "If you will give that a test, and if we fail you, I'll be your point of contact. Bring every issue to me."

SUSAN KAWAGUCHI: Unfortunately, a lot of people [inaudible].

MAGUY SERAD: No, but you remember, Susan, we had issues. We were growing. We had growing pains. But, today, we have the team who is very capable. We have SLAs we monitor. We have reports we look at. We call them THE reports, [inaudible] reports that the team has [inaudible] to. And yes, we're human. We may make an error and miss a ticket, but I don't

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see that because they're very focused on it. When it happens, guess what? We pay attention to it and address it.

So, we have that standard approach. We don't focus that much on who is the reporter. We focus on what the issue is. Do we have a complete, factual report filed with that? What questions do we need to ask reporters to give us more questions? Or, if we have enough information, then let's work with the contracted parties through the process and keep the reporter informed and try to resolve the complaint.

We don't have assignments, per se, but we have people who are interested in DNS abuse, we have people who are interested in the IP world. Our team is very diverse and may follow different groups based on their interest, also.

ROGER LIM:

So, just to emphasize one thing. We coordinate closely with David Conrad's team, particularly on DNS abuse, infrastructure abuse – botnet, CNS, malware, phishing – and working with them on DAR. I don't know if you [inaudible] and compliance follows that.

We also do reach out and have meetings with folks from MOG and APWG and some of the other security. It's not necessarily WHOIS focused, but that is a big part of ... Working closely with [inaudible], working with these groups and getting their input as well.

They'll come in on different types of complaints. I haven't seen them come in on WHOIS, but they'll talk about in the DNS [inaudible], not

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getting access to the zone files or they're not getting credentialed. We'll work with them there.

Maguey is absolutely right in creating a level playing field, but at the same time don't want people to think that we're not closely working with these group to know what's going on, and in other areas take direct action, like DNS abuse.

SUSAN KAWAGUCHI:

I think what he was getting at was making sure that you had a comprehensive view of the [inaudible] because it's very easy in every company to go, "This is my piece of the pie. I want to do this. I just don't even have time to look at the rest."

MAGUY SERAD:

We have visibility to who the reporters are and we have reports that come across from certain organizations, certain individuals or even companies. As you can imagine, with the growth of ICANN, there are a lot of different services now being provided. There's a lot of different reporters that come to us.

SUSAN KAWAGUCHI:

Do you look at those reporters and draw conclusions from those at all?

MAGUY SERAD:

I'll let Amanda answer that. You deal with it a lot more closely than I do.

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AMANDA ROSE: No. We definitely take an approach, like whoever submitting it, whether it's for DNS abuse, for example – whether it's LegitScript or some random individual, we're going to ask for the same type of evidence. We're going to follow the same process. It doesn't matter who it is. Or even other registrars, like Maguy said, do report on each other. We still get the same exact information that we would seek from an anonymous reporter.

SUSAN KAWAGUCHI: That really wasn't what I was trying to act. I'm not very clear here. It was more ... And maybe that's in your matrix.

MAGUY SERAD: If it's Susan Kawaguchi, do I jump on it immediately?

SUSAN KAWAGUCHI: No, it's more of just sit back and go, "Oh, this is interesting this one part of the world is reporting lots of WHOIS inaccuracy." Is that a new scam going on? Not that you could control that, but that kind of intel really helps sometimes with figuring out. If it starts here, uh-h, it's going to spread.

AMANDA ROSE: It's definitely something we track. That's one of the things that we would talk about. Like I said, we have monthly meetings about trends that we're seeing. Whenever something unusual pops up that even trends that the other team members see, they'll alert the SMEs and

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[inaudible] get together and discuss that. It's hard to draw an example out of a box, but we'll discuss whether actions need to be taken with respect to that.

MAGUY SERAD: That's, how I mentioned you've got the operational meetings. This is where the ops team, they say, "Hey, we're seeing a lot of complaints." I'm just going to throw an example. "A lot of WHOIS inaccuracy complaints coming about X region." So, the team will say let's take a step back. What's going on? Is it one registrar or multiple registrars?

SUSAN KAWAGUCHI: Exactly.

MAGUY SERAD: You have to do something like that, not just reactively look at it. We still owe a response to every reporter, but whether ... Again, you've got the operational meeting. You've got the functional leaders always looking through and QAing and the SMEs observing the queue and supporting the rest of the team. And the team also talks. It's like, "Hey, what's going on here?" They can ask each other.

SUSAN KAWAGUCHI: Just that gut feeling sometimes can be really important in combating abuse. [inaudible].

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AMANDA ROSE: They kind of connect.

SUSAN KAWAGUCHI: [inaudible] maybe if we looked at this – and maybe it’s the registrar. Maybe it’s just really a bunch of bad actors, somewhere registry domains with bad information. Because the bad guys are out there working in concert a lot, or has the registrar just been overwhelmed by bad actors?

ALAN GREENBERG: Who was talking before? A man. I think it was Jamie, I’m not sure though. Saying you do have discussions with group like the anti-phishing working group. Was that Jamie?

JAMIE HEDLUND: Correct. That was me.

ALAN GREENBERG: Okay. When you say we, is that your group or compliance? You’re a [superset] of compliance.

JAMIE HEDLUND: Yeah. That’s a good question. Brian, who is in consumer safeguards, has his own discussions, but they are different than the discussions that compliance has. Brian is not explicitly focused on the contracts. He’s focused on everything that happens around the contracts in trying to get discussions going in the community. He was at the FBI. He did



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security type work for Google and Microsoft. So, he's got some of those connections even predating and joining ICANN.

But, compliance also has their own. We have our own discussions with these groups. They often want to share information with us that they are seeing on trends and things. We have discussions about what it is we can and can't do under the contracts, or we'll have discussions. As I said before, there was discussion about access to centralized zone file data, which some registries had different criteria for granting than others. Some of these security guys did not want to disclose who they were. We wanted to make sure that we tell them, but they didn't want it printed anywhere for obvious reasons, so we work with them and the registries and that kind of thing.

ALAN GREENBERG:

If I can try to summarize, Maguy and Amanda made it clear that you treat reports all equally regardless of where they come from. But, you also mentioned earlier that you have meetings where you talk about trends and how things seem to be moving. Clearly, some of the ... I won't say more important, but the more prominent and trustworthy groups like anti-phishing working group also see trends. Sometimes it's very useful to get information from groups like that, which is not in the form of a formal report. It sounds like those kinds of discussions do happen. You may treat them all the same, but there are paths to get and trade information when it's appropriate from groups like that without cutting yourself off from them just because they're—

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JAMIE HEDLUND: Absolutely. It's both. When Maguy says we treat them all the same, she's talking about complaint handling and not showing preference or discrimination against or for any particular party or type of complaint. That's one bucket. Those groups do sometimes come in as complainants or reporters.

Then, there's the second batch which is just general intelligence gathering and sharing of information and relationship-building, frankly, which is totally distinct from handling individual complaints.

ALAN GREENBERG: Okay. So, the document saying there are no complaint compliance team members assigned to the organizations and you don't have formal liaisons, but there are communication paths with some of these more prominent [inaudible].

JAMIE HEDLUND: Correct. Right.

ALAN GREENBERG: Thank you. That's a really important issue because, otherwise, in the name of equality, you're cutting yourself off from important information. That's why I ...

JAMIE HEDLUND: Yeah, no, we would never – not at all.

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ALAN GREENBERG:

Okay, thank you.

MAGUY SERAD:

I'm going to turn the next set of questions to Roger or Amanda, but question number 11 I can address quickly. Do you contract with a vendor for compliance work?

The vendor that we contract work for compliance work is related to the audit function, and the vendor – and I provided the link – is KPMG. We've used them as a resource. There is no way we can hire that bandwidth of skills globally. If you read our audit reports, we receive over 20,000 documents in ten different languages. They have a model that exists globally and we work with them. But, the dialogue, the communication, the reporting, the quality reviews and the strategic reviews is all done by our audit team here. KPMG is our partner and they support the audit function.

SUSAN KAWAGUCHI:

So, in the audit function, you would [inaudible] a lot of things at the registrar, right? But, you would also be auditing a response to WHOIS or is there actually [inaudible] validating and all of that? Okay.

MAGUY SERAD:

The audit plan is published and every time we conclude an audit, we publish an audit report. We list who was in scope of the audit report. We list what was the decision [inaudible] and what happened. We list them by like the top five decisions [inaudible] report and it provides all that information. WHOIS is always part of an audit.

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SUSAN KAWAGUCHI: Okay. We should take a look. I'm not sure we've marked that on our document.

MAGUY SERAD: it's on our webpage.

SUSAN KAWAGUCHI: Okay, perfect.

AMANDA ROSE: Roger said he'll jump on the tool report.

ROGER LIM: You're talking about the tools? Okay, sure, thank you. So, regarding the tools, you had asked about what kind of tools we use, Susan. I just want to quickly run through some of the stuff we actually use on a daily basis.

You're familiar with the compliance ticketing system. You've probably used that before and you've seen our responses through that. We have the [compliance@icann.org](mailto:compliance@icann.org) e-mail address that Maguy talked about that's for communications with compliance team. We also have internal systems that we use regularly. For example, we have one that tracks the WHOIS availability of registrars, just to ensure that they are providing that availability to the public, so we'll be able to check that and see that.

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We also have information systems, like registry and registrar data that [inaudible] [portal] that's being worked on for the registries and registrars. Then eventually compliance will be on that as well and be able to share the same set of data to work on complaints and the contact information is all within one tool and be able to use that easily, quickly, and accurately.

We also have registrar information status where we can actually check the number of domains that are under each registrar, registered by each registrar. We also have the whois.icann.org website where we can use to check WHOIS information and we also are able to run [inaudible] WHOIS checks on domains that we have complaints about as well.

Sometimes we have situations where we need to check the WHOIS history. Like a transfer complaint, we need to figure out who was the previous owner of that registered name holder of the domain. We sometimes use tools, domain tools, where they actually have a WHOIS history to look at and we can use that as a reference.

We also check websites that belong the ITU, for example, to [inaudible] the formats of the WHOIS information that are published by the registrar, just to make sure, "So, this country, the telephone number has 11 digits," and we reference that against the ITU formats and make sure that we have the right formats for the country.

Also, the [UPU] that's for addressing. We check the [UPU] websites. Sometimes we use the country equivalent. For example, we use the China host system to verify if the address format is correct. So, we do

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use multiple sets of information when we do process the complaint especially regarding WHOIS and WHOIS formats, for example.

Any questions on any of these?

SUSAN KAWAGUCHI: What are you going to do when domain tools go away after the GDPR?

AMANDA ROSE: I don't really want to answer that.

MAGUY SERAD: [inaudible].

SUSAN KAWAGUCHI: Okay. So, you track that WHOIS availability of registrars so that they're web-based? If I go onto their website and Port 43 or one or the other?

ROGER LIM: That one is Port 43 based.

SUSAN KAWAGUCHI: Just Port 43. If they also offer it just a web-based search, one off, you don't check that because that's only required [inaudible].

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ROGER LIM: We do because we actually have to go to each registrar's website to do that. That would probably take up a lot of time. But, we do sometimes receive complaints that this registrar's web-based WHOIS is not working. Then, once we see that, we will investigate and we will try it out ourselves before we actually send a complaint to the registrar.

AMANDA ROSE: Well, sometimes [inaudible] or the registrar's [inaudible] page to check and see if they're listing certain information they're required to have because a lot of times, with a thick WHOIS we're trying to find out if the registry or the registrar's information that might be missing, so we use that for those types of situations. Once in a while they do differ.

SUSAN KAWAGUCHI: You said you use the [UPU] website. I didn't catch the name of the Chinese ...

AMANDA ROSE: It's in the document.

SUSAN KAWAGUCHI: It's in the document. Okay, so I won't go too far into that. So, when we do have a claim of inaccuracy, you receive a report saying this is inaccurate. You have tools to be able to verify if it is or isn't inaccurate data.

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AMANDA ROSE: Generally, what [inaudible] as a guide. Those aren't necessarily the end-all, be-all to the answer because sometimes that is in fact missing certain information. We will try and use those as a tool rather than ...

[crosstalk]

Right, exactly. We get some complaints, for example, there's not enough digits in the telephone number and I don't know how many telephone numbers there are supposed to be in Great Britain, for example. You can jump on the ITU website and they should have that information. It's not always really easy to read. Again, it's just a reference tool. But we have both of those available.

Then, generally, since the contract allows for any other standardized formatting for addresses, we'll reference whatever the registrar might [inaudible] what type of other standard are you using and then we'll go to that standard if it's an appropriate one. That could be anything. That's up to them. That's in the contract. We kind of wait and see what they say, and then we'll reference that at that point.

SUSAN KAWAGUCHI: Okay, that was helpful.

AMANDA ROSE: The only other thing I think we also refer to would be the RFCs – that's more of a formatting issue – to determine if certain things in the WHOIS are formatted correctly.



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SUSAN KAWAGUCHI: Okay. So you do enforce the formatting?

AMANDA ROSE: Right. It's more of a technical approach, but not so much as WHOIS inaccuracy.

SUSAN KAWAGUCHI: Okay. Alan, do you have any other questions on this part?

ALAN GREENBERG: Nope.

SUSAN KAWAGUCHI: Okay.

MAGUY SERAD: The question in the document [inaudible] was previously submitted, but you took it away. But, we already addressed it. It's how we address functional leads and SMEs, big picture question.

You had a question. What WHOIS issue has attracted the most complaints? I provided you an extract of the dashboard at the bottom of the document so you could see it. All WHOIS related matters, I just did a subset extract for you and provided that. You also have the monthly dashboard and different sources you can refer to.

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SUSAN KAWAGUCHI: Okay. I'll take a look at that.

MAGUY SERAD: Roger, do you want to take the next set of questions, 14 and on?

ROGER LIM: Sure, Maguy. For example, if a compliance ticket for WHOIS inaccuracy comes in, and while we read the complaints we realize this actually sounds like it's about an abusive domain – he's saying that I cannot reach the registrar, for example, because the contact is wrong or the phone number is not working or the e-mail is bouncing back, we realize the reporter is actually trying to reach their registrar's abuse contract and trying to file an abuse complaint report with the registrar.

When we figure that out – here, we've seen these type of complaints over time, we've figured out it's quite clear what they're trying to get at. We'll actually send follow-ups to the reporters to figure out what they're actually trying to complain about. Are you talking about abuse or are you trying to reach the abuse contact off the registrar, for example?

So, we try to understand more from the reporters before we actually start processing because sometimes they may not know what complaint type is the correct one to use, even though we put in a lot of information in the [inaudible] for the complaint type. We have [inaudible] for every single complaint type on our website. Basically, they may not have read it thoroughly or they may have misunderstood something because not every reporter understands English well. So,

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we're actually [inaudible] questions to figure out what they're actually interested in filing a complaint about before we actually process the complaint.

Usually, we may actually have a complaint – we end up moving it from one complaint deck to another to process because we realize this is not actually about WHOIS inaccuracy. It's actually another abuse complaint. So we do that after we follow-up with the reporter to get more information and a better understanding of what he is trying to get help with. That's something we keep an eye on.

That plays into how we train everybody to know the multiple complaints types because once you know all the complaint types, you'll be able to understand this is actually not something about the WHOIS inaccuracy of the domain. It's actually about something else. So, once you see that, be able to identify, ask the right questions before we actually process the complaint. Does that make sense?

SUSAN KAWAGUCHI:

Yeah, that makes a lot of sense because I can imagine you get all kinds of strange things [inaudible] the tool. Is the tool in other languages?

ROGER LIM:

The tool is only used by the compliance team. We do learn more for the reporters. We have multiple languages for those.

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SUSAN KAWAGUCHI: So, when I look [inaudible] WHOIS inaccuracy tool on your website, is it also in ... I was really thinking not your internal tools, but the complaint form. Does that come in other languages?

MAGUY SERAD: No. The submission is all in English when you come in here. We have the “learn more” available on the website. We provide translation of all the learn mores, so people can understand the topics. But, when you go to the form itself and you start entering, it’s in English.

SUSAN KAWAGUCHI: Are they forced? I don’t know how you would do that. Do you have to respond in English? Could they respond in their own?

MAGUY SERAD: Our team, collectively, we cover nine languages.

SUSAN KAWAGUCHI: Okay, that’s helpful.

MAGUY SERAD: Yes. So, while the complaint form is asking in English – and Roger is more of an expert at this than me – we’ve seen some complaints and some responses even from contracted parties and some documents come in different languages. Usually, we’ve seen it mostly in Russian they come in or Chinese and Spanish. A little French. We can cover. We [inaudible] a lot of French, but we’ve seen some French. But, when they

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come in like this, the team already knows who to go to and it gets translated.

When we are faced with people that are communicating in one language – for example, with the Chinese registrars, we find it more efficient to communicate locally with them. So, what the team has done, all of our communication templates that guide the team in responding are now provided bilingual. Usually, it's managed by that local, by the region who is mostly fluent in that language.

Have we seen reporters in other languages?

AMANDA ROSE;

Yeah. We do get some. Generally, we can't ... If it's a simple enough complaint, we can probably use Google translate to figure out what's going on. When something gets more complicated, we go to the language person that we know to contact. For example, if we don't speak Spanish, we'll jump in and ask them to do customized responses so it's provided in English and Spanish. We do that in Russian as well, Chinese. But generally, if we're only unable to communicate or we see there's a communication barrier, a lot of the responders are responding and communicating in English or able to provide the information and we can work with that. It's just when we see there's an issue there, then we'll jump to the next step.

MAGUY SERAD:

Please, Susan, keep in mind you have the forms online, the complaint submission forms, and then the forms feed into the complaint system

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and the system that Roger and Amanda were talking about for complaint processing, it's only used internally by our team. But, it has the capacity to also generate the e-mail to go out to reporters to provide the update or closure and to the contracted party.

Then, once that process beings, then the responses [come in]. But, they do not log into the system. Our team is the only [inaudible].

SUSAN KAWAGUCHI: Right.

MAGUY SERAD: I want to make sure.

SUSAN KAWAGUCHI: We probably will want to dig in a little bit more on what type of templates you use and things like that, if we can. But, not tonight. We're running our time here. Unfortunately, answering questions also leads to more questions.

For a global service, it seems like even though you have the translations, it seems like maybe people should be able to find the form in their own language, too, beyond what you've got on the thing.

MAGUY SERAD: Yeah.

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SUSAN KAWAGUCHI: But, I also understand the challenges of [inaudible] answer all the domain [inaudible] e-mails. Or at least have to read them and reroute them, and it's like "Google this. Okay, this is what they're complaining about. Somebody else will be able to read this fully and forward it on." I understand that challenge.

MAGUY SERAD: The next set of questions I'll ask Roger to speak to them. It's 15, 16, 17, and 18. It relates to the road map, our preparedness and readiness to enforce the contract. So, Roger?

ROGER LIM: Thank you, Maguy. When we were looking at these four questions, we were thinking about what could potentially impact WHOIS in the future. We came up with four standard [inaudible] privacy-proxy area, the WHOIS, GDPR for example, and also RDAP which are areas that we thought might actually be impacting us in the future.

Then, basically, we tried to [inaudible] how do we change our workflows when things like these happen? I guess that's what you were trying to figure out in terms of from your question.

Usually, what happens is first thing is policy changes and we need to do certain things. First thing we do is review the processes that we have, the forms that we have, templates, reports – how we do our daily processing of those areas. Then, we figure out if any of these things need to be adjusted to meet the new requirements that have been set out in the new policies. We make the changes and then we try and test

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it. We usually [inaudible] everything once for a while before we actually implement it. That's part of our testing process. Then, once we are comfortable with it, we'll implement it.

Now, we'll also take in feedback whenever we do this or also see if there's any feedback from the contracted parties or reporters regarding these changes that we've made. Then, we'll take into consideration this feedback and try and figure out if we need to make further changes in those areas that we've changed recently to be able to better do our work.

We will also do outreach activity where we need to. For example, we are implementing a new change in the way we are doing certain processes. We may actually do an outreach during an ICANN meeting, for example, where we actually tell the contracted parties because we have the sessions with them. We update them. This is something that's going to change. This is what to look out for, what we're seeing, and because of that we may be changing some of our processes and asking for certain requirements. These are the types of things that we might do for that purpose, to communicate with the contracted parties and keep them informed about what we're doing as well.

We may also be able to get some feedback from them regarding those changes that we're planning to do and maybe take into consideration their thoughts from their perspective, because we may or may not have considered those while we were doing that.

As I mentioned earlier, we have what we call a continuous improvement cycle where we always have feedback from ... Every time we close a



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complaint we actually have a feedback service – feedback form – for them to fill out for the contracted parties and the reporters. We do get the feedback from them and we do review those instances and try and see if there's really something that we missed or is there something that we should have done better or communicated better. We take these feedbacks very seriously. It's reviewed by the ticket owners, the person who processed the complaint, the subject matter experts and the functional leads for the area that this complaint is about. We actually have very thorough reviews of these feedbacks, so we know areas that we need to improve or change, or really something that we cannot do anything about. That's something that we focus on.

Also, we participate in working groups and review teams, and we figure out if we have opportunities to improve our processes and we have a head's up on some of the processes because, for example, we [inaudible] participating in the [PPSCI] project and informing the team about progress and things that we need to be informed about and taking notes on.

SUSAN KAWAGUCHI:

That's really good and interesting. I will see ICANN staff on working groups. I'm not really understanding [inaudible].

MAGUY SERAD:

It depends which phase it's in, if it's a policy development or [inaudible]. For example, the [inaudible] reviews for the [inaudible]. It's in the implementation review team phase, so all those discussions, we need to understand them. What Owen does is he comes back to us, regular staff

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meeting or [inaudible] weekly calls. “Okay, here’s what we’re hearing. Here are the areas.” They are proactively, Owen and some of the SMEs in that area, proactively discussing it in anticipation of what might the policy be and what [inaudible] changes.

Now, we do not start implementing anything until it’s finally approved by the board. That way, once the board approves it, guess what? We hit the ground running. We don’t have to assess anymore.

Another example is I’ve been proactively [participating] the CCT Review Team. I don’t join all the calls. At ICANN meetings, I join the session. But, we review the script from the meeting minutes. We had the opportunity by reviewing some of this, [inaudible] of course talk to them on multiple occasions, I understood from them the need for additional granularity and reporting. So, we did not wait until the report is final. We went in and I worked with the SMEs, for example, who is inaccuracy SMEs. I said the CCT Review Team wants the breakdown by the three categories. What do we need to change for the team who are flagging them? The CCT Review Team wanting something [inaudible].

So, we are either actively involved ... It depends. Like I said, if it’s an IRT, we’re actively present. But, there are different team members assigned to follow it and [inaudible].

SUSAN KAWAGUCHI:

That’s really good news because every policy change, there’s always a complaint.

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MAGUY SERAD: I will just share an example here. Do you want to know which policies and which working group? You can review. We publish our quarterly newsletter and the annual report, and we list a lot of [inaudible], especially in the annual report.

SUSAN KAWAGUCHI: [inaudible] reports that are obviously [inaudible].

MAGUY SERAD: Look at the annual. We just published 2017 annual report. We list the level of engagement we did at the different groups, whether it's participation, whether it's awareness or solutions, presentations.

SUSAN KAWAGUCHI: I knew that you had gone to working groups or review teams to provide presentations [inaudible] taking in stock.

MAGUY SERAD: We're going to keep up with you guys.

JAMIE HEDLUND: Right now, we're pretty slow on [inaudible]. I don't know if you [inaudible].

MAGUY SERAD: [inaudible] CCT?

JAMIE HEDLUND: Yeah, [inaudible]. You had provided recommendations before the [inaudible].

MAGUY SERAD: Before the final, yeah.

SUSAN KAWAGUCHI: Which is pretty cool.

MAGUY SERAD: We're finishing the last implementation, which relates to [inaudible] and safeguards. Because all this work, Susan, takes time. What I mean by time, if you've got to continue doing your regular work and planning for the future, the planning is important so we can capture the data ... Now, some of the data we started reporting the granularity on. I cannot go back to previous years because we did not capture it in that format.

So, taking our transparency to the next level meant that the team behind the scenes when they are processing WHOIS inaccuracy, because the form doesn't distinguish which one it is, so they flag it which of the categories. So, you have to create the form behind the scenes for the team to flag it. Then you have to write the code to capture it. You have to write the interface to take that code and put it into the business intelligence tools [inaudible] reporting on it. We have to change the report to break that granularity. So, there's a lot of work.

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JAMIE HEDLUND: But, on this one, we were already aligned with the CCT RT [inaudible] in the community before the [inaudible] GAC and ALAC and others were already asking for more transparency. We are increasing that beyond what the recommendations and we'll continue to do that.

SUSAN KAWAGUCHI: Absolutely.

ALAN GREENBERG: If I may ask a question before we terminate.

JAMIE HEDLUND: Sure.

MAGUY SERAD: Terminate.

ALAN GREENBERG: Finish the call.

MAGUY SERAD: Termination for compliance [inaudible].

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ALAN GREENBERG: It's a good thing. You can go to dinner. You all know about on a job interview you get asked the question, "What are your bad points?" Of course, the classic answer is I work too hard or I'm too dedicated or something like that. I'll ask the same question, but I don't want that kind of answer.

You described a lot of the things you're doing and it sounds really good, and clearly I haven't been paying a lot of attention to compliance for the last couple of years and a lot of things have changed, and it sounds like for the better. What are the areas where you're still having problems and you're going to have to figure out how to address them?

MAGUY SERAD: You've known me, Alan, for seven years. I don't refer to problems. I refer to opportunities.

ALAN GREENBERG: Okay. What are your greatest opportunities that if you don't address you'll be embarrassed about?

MAGUY SERAD: That would be a problem, yes. What we have learned since the last [inaudible] program, and the [inaudible] going to the next level across many aspects of it is there is a lot of [creativity] on how policies are implemented or interpreted on both sides – [inaudible] authorities and ICANN organization which is a [inaudible] community. [inaudible] ask other team members [inaudible] around your [inaudible].

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What I think is my greatest opportunities as head of compliance is how do we take our game to the next level, not [inaudible] – it's more to understand and how to participate what [inaudible] have been. The contract is the contract, but how can we ... It's about meeting expectations, and as you know, there are many expectations. How can we standardize and stay with the community on that [inaudible].

AMANDA ROSE: One of the challenges that we're facing right now is [inaudible] GDPR and [inaudible] looking at [inaudible] transparent [inaudible] can't really react until there's something to react to. That's probably what, at least I think [inaudible].

ALAN GREENBERG: Roger?

MAGUY SERAD: Roger, do you have opportunities?

ALAN GREENBERG: I think I got most of what Maguy was saying. Her line became very, very garbled towards the end. I'm not sure what happened, but I think I got the most of the gist of it, if not the details.

ROGER LIM: The only thing I would add – and Maguy and many on the team have been doing this much longer than I have, but one of the things that I've

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seen that's a challenge not just in WHOIS is but across the board, particularly with DNS abuse, is the language in the contracts. Sometimes the language is clear and sometimes it's not. Sometimes the language doesn't cover things that we and others who are concerned about DNS abuse would like to see there.

It's not always clear to me, especially across communities, that that's understand – that the [inaudible] in the contracts are understand. [inaudible] we will do through enforcement and outreach is provide awareness of what the contracts and [inaudible] frankly cover and what [inaudible] so the community [inaudible] do something that's not in the contract.

BRENDA BREWER: Excuse me. I'm sorry to interrupt, but the audio from the room is very distorted.

ROGER LIM: Well, I just gave a great speech, so I'm not giving it again.

BRENDA BREWER: It was pretty good. Just try to speak closer to the microphone or speaker. Thank you.

ALAN GREENBERG: I think the [inaudible] was only good for an hour and we've gone over it.



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MAGUY SERAD: So, the last two questions [inaudible] submitted [inaudible].

ALAN GREENBERG: I can no longer make out anything anyone in the room is saying.

**[END OF TRANSCRIPTION]**