
RECORDED VOICE: This meeting is now being recorded. [AUDIO BREAK]

SUSAN KAWAGUCHI: Are we doing role call or anything like that, Brenda?

BRENDA BREWER: I'd be happy to do a roll call. Thank you, Susan. This is the first meeting for the RDS-WHOIS2 Subgroup 6, Topic number 7: Compliance. The call is taking place on December 1, 2017 at 15:00 UTC. On the call today we have Alan Greenberg, Carlton Samuels, Chris Disspain, Erika Mann, Susan Kawaguchi, and from ICANN Org we have Jean-Baptiste Deroulez and Amy Kramer, and myself, Brenda Brewer, and I'll turn it over to you, Susan. Thank you.

SUSAN KAWAGUCHI: Thank you. And Carlton, thank you so much for joining. I thought this didn't work with your schedule, but we sort of needed to move forward, so thank you so much for taking the time. And Erika and Chris, too.

So, I just want to take a few minutes before we start talking about what the real topic is for this call just for Chris and Erika. The three of us volunteered to review the overall workplan for the review team, so we probably won't discuss that today, but if anybody has thoughts on that work plan and wanted to talk about it, we could take a few minutes for that. [AUDIO BREAK]

And I don't see any hands. So just a reminder then. We need to get that work in.

CHRIS DISSPAIN: Sorry, Susan, just to take two seconds before you start with everything else. How do you want to do that? Do you want to set up a call for the three of us? What do you want to do?

SUSAN KAWAGUCHI: I really think we just individually if we just did it on an email thread, you know.

CHRIS DISSPAIN: Okay, cool. I'm happy to do that. No problem.

SUSAN KAWAGUCHI: Yeah. Just point out whatever we individually think is an issue and then hopefully be able to just do that. But we do need to get that done, probably by the end of next week. And let me see, I was going to email -- sorry for not being quite as organized this morning as I should be.

What our real topic is today, then, is compliance, and as I stated a few minutes ago, this team is not looking at the recommendation from the first review team and reviewing that. We're actually looking at current status of compliance and need to come up with a work statement and work plan, which as soon as I get this email over to Brenda, she'll put up on the screen.

So, anybody have any thoughts about how we should go about that, what problems we're seeing with compliance in general. Erika and Chris, tell me your thoughts. [AUDIO BREAK]

CHRIS DISSPAIN: Sorry Susan, I lost you for a little bit there. What was your question?

SUSAN KAWAGUCHI: I just thought maybe we should have a short discussion in general, and Carlton too, I'm sorry Carlton. I forgot you were on the phone. We're reviewing the current status of compliance concerning WHOIS, so do any of you have thoughts about where we start and how we go about this?

CHRIS DISSPAIN: Just to make sure I understand just so we level set properly, our goal is to report our review of where compliance currently is with WHOIS, so is it right, if I remember correctly, that the last review team did work on what the level of compliance was? And so, presumably, it would be useful to use that as our starting point and see if anything happened since? Does that make sense?

SUSAN KAWAGUCHI: Yes, but we shouldn't review the recommendations from the first review team.

CHRIS DISSPAIN: If I remember correctly, I may be wrong about this, but I think they said, and I'm making the numbers up, but I think they did a sort of survey and said, you know, 40% accurate of it it's accurate, or 100% of it it's accurate or whatever they said. Right?

SUSAN KAWAGUCHI: Yeah.

CHRIS DISSPAIN: So if that's what we're talking about about compliance, making sure that the data is accurate, then we use their numbers as a bench mark and see what they're like now. We at least got some sort of path, but maybe I'm passing the wrong end of the stick here.

SUSAN KAWAGUCHI: Okay. Go ahead, Alan.

ALAN GREENBERG: Sorry. Compliance is not responsible for ensuring accuracy, though. Compliance is, as I understand it, responsible for if they get complaints and that now includes internally through ICANN's new tools to look at potential accuracy or at least validity of the formats to act on those.

CHRIS DISSPAIN: Okay.

ALAN GREENBERG:

And specifically, what we put in our scope was assess the effectiveness and transparency of ICANN enforcement related to WHOIS, and identifying high priority procedural or data gaps. So, I think the first step is to at least get from compliance, and I believe that we have an action item to get a report from them, but I think we need to specify what we want in that report and I would think that we want to see statistics on how many complaints they have internally and externally generated, and identifying them that way regarding WHOIS information and what the outcomes are on those and how do they treat those, and for us to look at the public reports and say, "Are they being sufficiently transparent? Are they giving us this information?"

I guess we should do that first, and the question is, are they being open enough with what they are doing and what the outcomes are, which I think is what transparency is. So, I think the first thing to do is look at the reports. Can we get a picture of what's going on with regard to WHOIS from the publically available data and then get a briefing to go into it in more depth.

SUSAN KAWAGUCHI:

So, I agree with that to a certain extent, except I think we do need to go into it in more depth in my experience of submitting a lot of reports on WHOIS inaccuracy to compliance. It appears, and maybe this isn't accurate, but it appears from my personal experience that their responses and the actions they take are very inconsistent so that you can submit a very similar scenario.

The registrant is not listed in the WHOIS for example or this address doesn't exist and you'll get a different result. You submit 10 and maybe five of them will be treated the same way and the other five are just sort of out there in La La Land for how they're resolved, if they're resolved at all.

ALAN GREENBERG:

Susan, how current is that information? Certainly, two years ago that was an understatement. I have no personal experience in submitting requests in the last year and certainly not less, so I don't know to what extent that may still be true. Is your information current, or is it [CROSSTALK]?

SUSAN KAWAGUCHI:

I don't do that as much as I used to, but I do, you know, once I left Facebook. But we do routinely, on a monthly basis probably -- we only submitted them when we found an inaccurate WHOIS, but we probably submitted anywhere from 25 to 50 a month, and so that experience would have ended in April. But I've definitely been part of enforcement action since where those were submitted not by me, and I'm still seeing those inconsistencies. Erika, would you like to -- your hand is up.

ERIKA MANN:

I'm here, can you hear me?

SUSAN KAWAGUCHI:

Yep, I can.

ERIKA MANN: Good. I wanted to support [inaudible]. I think this is a new point. I agree that we need to do this, but I wonder there will be always a failure rate in WHOIS; even in the best system, there will be a failure rate. So, one would have to understand what would be the threshold of the most ideas scenario, and then one could judge maybe against the current rate of accuracy. So, I agree with you. And I'm not totally sure, Alan maybe can say this better, how much this would be in the remit of our work.

But coming back to the point, and I made a comment in the chat room, I would love to see as well from the compliance team at ICANN, not just their data; and I agree with Alan here, but I would love to see as well what they believe should be done in addition to what is done today to make the system even working better. Because typically, you will get good insight from compliance people because they have a pretty good understanding of what is working well and what is maybe not up to the optimal standard. So I would want to hear this as well.

SUSAN KAWAGUCHI: Okay. That would be a good question for them, actually. And Alan, you have your hand up.

ALAN GREENBERG: Yeah. Just so we're all working on the same ground, I think it's important that we talk about what kind of things we have seen in the past and that may still be going on to some extent, hopefully less.

One domain that I put a complaint in on, and this goes back two years or so, so put it in perspective, the email address, the part after the @ sign was a domain that was not live. The mailing address was in France and had a postal code which was illegal in France, and there were several other problems, and the initial response from Compliance is, "The registrar says everything is okay, so we're closing the ticket."

That's probably a pretty extreme one, but it's an example of the kind of thing that was happening on a regular basis and the question is, to what extent is it still happening. I understand that they have gotten from the internal tool that they're now standing with, they get lots of these, and hopefully they are not closing them like that, but I think we need to see the statistics, and that's when I said, "We will investigate further if necessary," I think it's a foregone conclusion.

In my mind, there will be work that we're going to have to do afterwards, but I think we have to go through the process of getting statistics from them of what they claim is the situation and then we can delve into specific cases a little better. And I think we probably want to go out to parts of the community that are submitting these requests on a regular basis today and seeing what they believe is the situation, and if possible, getting any examples from them of the kind of cases that they're seeing which are still being closed improperly, if indeed that's happening, but I'm guessing it is. Thank you.

SUSAN KAWAGUCHI:

Yeah. And Carlton can't talk, so I'm going to read his comments in. At Erika, Compliance is making some changes ongoing. We know that from

the reports of the CCTRT, it makes sense for this RT to get updated by them. And Erika responded, so if everyone could just please read Carlton's input there, too.

So, one of my experiences, and it was pretty vocal, at an ICANN meeting, that this has been pretty consistent. I mean, I've had more than three or four examples of this, was somebody registered in the name of Facebook. Facebook's the registrant. I submit an inaccuracy report saying that this is inaccurate. The information is accurate, Facebook is an entity, but as the only person or managing the team that registers domain names for this entity, I can attest the team or I did not register this, so this is false information for this registrant.

So then it goes through the process and the actual registrant comes back and says to their registrar, "No, I am Facebook," and then Compliance closes the ticket and says, "We've gone through the process, they said they are Facebook." Done. And I was like, "Let's do this over again. No, they are lying. I'm attesting to this. Let me know what else you need for proof, but this is not accurate data for that registrant and I can attest to it." It's identity theft.

And so, it's like a circular thing, but because, what appears to me is, Compliance goes through a process of, this is inaccurate, sends it off to the registrar, as they're supposed to do. The registrar reaches out and says, "Is your information accurate?" And the registrant comes back, "Yes. It is accurate." And the registrar is like, "We're done. It's accurate."

ALAN GREENBERG: Okay. Susan, let me ask you a question. I'm presuming it's not only the name Facebook, but also your address or something like that, is that correct?

SUSAN KAWAGUCHI: Correct, yeah.

ALAN GREENBERG: Okay. Have you ever had the conversation with Compliance of, "What do you need? Do you accept that I am working for Facebook and I have the authority to speak on behalf of Facebook registrations. If not, how do I demonstrate that to you or what else do you need?"

It comes down to either we need a process to make those kind of WHOIS claims or we need policy that has to be written. One or the other. Because any rational person will accept the fact, if you can demonstrate you are an officer of Facebook in this regard and it's not Facebook registered in some other obscure country where they have that trademark but it's the correct one because they have your address. So, either we need a process or policy. One of the two. I'm not going to debate it. Have you ever had that discussion with them? What did they say?

SUSAN KAWAGUCHI: Yeah. I have had that conversation, and basically they said, "We followed the process. We sent it to the registrar. The registrar had the registrant confirm." So, if you get a registrar that is a good player and understands WHOIS policy, they'll just go ahead and suspend the

registration on their own, because they look at it and go, "Yeah, this is fake. They've put the same mistakes. We'll agree to that, we'll suspend that."

When you have a registrar that is either a bad player, which we have those in our community, or just a limited knowledge, then they go through the whole process of how they handle every single inaccuracy report because you send it to ICANN. ICANN sends it to the registrar and says, "You have 15 days to ensure that this data is accurate because we've had this complaint." And when it's now 15 days, the registrar comes back and says, "Yeah, it's accurate."

ALAN GREENBERG:

Okay. But the point is, we know there are going to be bad players and we know there are people who are not going to be paying particular attention. So the question comes back, what do we need to do either in terms of process or policy to stop that from happening?

SUSAN KAWAGUCHI:

I would say we need to review the process and how they handle inaccuracy reports to see if there is a consistency. And maybe it is consistent and it just doesn't appear that way to me, a consistent approach and a logical approach to a domain registration inaccuracy report.

That's what I would do. I would walk into Compliance and say, "What are your scenarios? What are your processes that are handling this?"

And is there ever a situation in which you instead of just passing it on, actually take an action?" Which I'm not even sure ICANN can.

ALAN GREENBERG: That's why I said, it's either process or policy.

SUSAN KAWAGUCHI: Yeah. So, that's one of the things I would like to look at. Let me just read Carlton's out, "We see many reports of false flag actions as what you're exempling. False information, accurate that date for the purpose of WHOIS. That registration will pass every accuracy check now in place, too."

So, Carlton is agreeing that I guess on a CCT -- and is the CCT review out yet? Because there may be information in that report that would help us in our review.

So Alan, you had asked for some examples. I could give you examples all day long on issues with inaccuracy reports, but we do have our template and we need to create a work statement and a work plan. We need to come up with an objective, and then provide detail, so does anybody have a draft objective, scope objective in mind? [AUDIO BREAK]

And are there compliance actions surrounding WHOIS that would be different than just an inaccuracy report? Would we be looking at registrars who don't provide consistent Port 43 access? Is that something we would get into? Or they make it very difficult for a

registrant or user to find the WHOIS record in general? Do you think that's within our scope?

ALAN GREENBERG: Not sure we included that kind of thing.

SUSAN KAWAGUCHI: In some ways, that may be the compliance recommendation subgroup, because that was one thing that we were finding way back when is a) it was hard to find the WHOIS search on a registrar's site, and some just didn't provide any WHOIS. And I'm not sure that's the current state of affairs at all.

ALAN GREENBERG: Certainly, I don't know to what extent Compliance audits how easy is it to find a website. There are things in the RA saying you must point to it, and I think it even has words like clear, but I don't know to what extent they audit that at all.

SUSAN KAWAGUCHI: I would think that would be part of their audit, but maybe that's a question that we ask them is, is it part of the registrar audit.

ALAN GREENBERG: I certainly think one of the things we need to do early in the process is to put together a list of all of these things that we want to ask

Compliance of, are they currently doing it, what reports do they generate on and that kind of thing. [AUDIO BREAK]

What I would have put in the scope essentially, I think the keyword in my mind of what is in the scope is transparency and data gaps in terms of what they are making available, and the real question is, can we tell from the public reports, can we answer any of these questions? And if can't, are there any reasons why we are not publishing the kind of information we're looking at.

The whole reason being, it's important that Compliance is perceived as doing their job. Whether they're doing it well or not, it's hard to tell if they're not publishing results which indicate anything. So, I think we need to start off by putting together a list of questions, first of all obviously looking at what they're publishing right now, and I admit, I haven't looked at that in at least a year and a half or so. So, I'm completely out of date.

But I think that's part of our first task. Our first objective is to assess to what extent Compliance is publishing information which makes their operation transparent in terms of ensuring confidence in the community that they are in fact doing their job well.

SUSAN KAWAGUCHI: Okay. So I've been taking notes here.

ALAN GREENBERG: I noticed Chris has his hand up.

SUSAN KAWAGUCHI: Oh, thanks. Chris, go ahead.

CHRIS DISSPAIN: I just wanted to go back to what I just listened to you guys talking this through, and I wanted to go back to what I was talking about earlier. I wonder whether it would be at least worth -- it is an indicator, isn't it? Compliance is a completely different animal to what Compliance was back when the last two years report was done.

So having a look at whether or not accuracy has improved is actually relevant, isn't it, to what Compliance have been doing, unless you believe that it's only improved because people have suddenly decided to be more accurate.

ALAN GREENBERG: Part of it's improved is because ICANN is actively reviewing WHOIS records and effectively putting in complaints to Compliance.

CHRIS DISSPAIN: Exactly, I'm simply asking the question. I agree. I'm simply asking the question, and I don't know what the answer is. I'm just asking the question as to whether it would therefore be worthwhile doing a comparison of accuracy or not. I'll just leave it as a question. It just strikes me that it might be an underline. Might be worth considering something to do to at least help us in looking at whether or not Compliance is actually doing a job. But I'll leave it at that.

SUSAN KAWAGUCHI: So, if we can drill down a little bit on that, and Carlton has been making good comments in the chat, so you do a comparison about accuracy. So are you advocating to repeating the NORC study? Or evaluating reports from Compliance?

CHRIS DISSPAIN: I'm not advocating to be honest anything in particular. It may very well be that the answer is that it's just not feasible to do it. But I just wanted to make sure that we at least raised it and considered it, and then we can move on.

SUSAN KAWAGUCHI: Okay. Alright, well I've noted that question. And I also noted the transparency, your comments. And just to read, so Carlton's saying, "Compliance is publishing more data for sure, but it's not clear if more reports actually offer more quality and qualified information." And in my reading of the Compliance reports, I would agree with that. Sometimes, it's very hard to actually discern any real information from the Compliance reports.

So, several things that we've talked about too is from asking the community on input on their view of Compliance. And then, obviously, talking to Compliance.

ALAN GREENBERG: In terms of asking the community, we're going to have to make it really clear that we are looking for current information. Compliance has such an ugly history going back that it's so easy to cite the old cases and we really need to make sure that they are current things that we are talking about, not things that go back several years.

SUSAN KAWAGUCHI: Okay.

ALAN GREENBERG: I don't know how we ensure that, but I think it's something we need to attempt to do. Because no matter how bad they may be now, they're better than they were before.

SUSAN KAWAGUCHI: Oh, yeah. I just think they have more state of the art tools to work with.

ALAN GREENBERG: Yeah, but you remember, they never took it as their responsibility to audit accuracy of WHOIS. They viewed their job as responding to complaints. Other parts of ICANN have now taken upon themselves to actually do audits, so the accuracy is bound to have gotten better, not necessarily because of what they've done, although clearly it requires them to diligently respond to each of the complaints, but the actual percentage accuracy presumably has gone up significantly because of the auditing, which I don't think is actually under the auspices of Compliance.

SUSAN KAWAGUCHI: I'm not sure. Is ICANN in general doing auditing of [CROSSTALK]?

ALAN GREENBERG: Yes. They put a program in place to actually go through all WHOIS records and look. Again, all they can do is check whether they're syntactically correct, but we know there were a huge number that weren't, so certainly Chris's gift was reported on that several years ago.

When I did the ATRT3, and that's now almost five years ago, they were starting that work and one of the Compliance recommendations essentially required them to do that. Although, I think they initially answered, "Sorry, we can't;" they eventually came up with some sort of methodology.

SUSAN KAWAGUCHI: Oh, okay. And it looks like we have Chris and Erika with hands up. Chris, is that a new hand? Or is that an old hand? Old hand. Erika, please go ahead.

ERIKA MANN: Concerning the issue about internal audit, it's in general a weak point at ICANN, so I'm not so sure how much Compliance did it. It would certainly be good to understand it, but the second question would be, of course, what is the standard this audit would be judged against, if it's a kind of [inaudible] which is used in other internet companies, or what is it comparable to?

Because it's good to do an audit, but if you don't have a benchmark, it's a little bit difficult to judge how good you actually are. So that's why I think it is important to talk to the Compliance team and to staff to get a better understanding about it, and as well as understanding the internal audit procedures.

SUSAN KAWAGUCHI: Okay. That makes sense, too. Just taking notes here. [AUDIO BREAK]

Okay, so it looks like we definitely have come up with some questions that we can fill in on our work statement and work plan surrounding the inaccuracy complaints, the process surrounding those, transparency in any of the work that Compliance does relating to WHOIS. We'd want to look at the reports and get a briefing.

Port 43 is probably an availability of WHOIS at the registrar level, is probably a question, but I don't know if that will be our focus. The audit of -- and if there's a benchmark to review those statistics. And, what else? Oh, have accuracy improved.

So, what I'll do is take a crack at developing the scope objectives for our work statement and work plan, put all these questions in just as a draft, and maybe take a crack at the complexity and breaking things. Then, once I get that done, send this out to the small team, and on the second page it says, "Request for ICANN briefing. Request for ICANN materials and interviews to be conducted." If we really were to look at the accuracy of WHOIS, do we feel like there's a need for an independent expert at this point? Alan, go ahead.

ALAN GREENBERG:

My hand was up for something else, but no, I don't think so. We may well want a recommendation saying, "Do another study," or something like that. I don't think there's any need for us to do one. But what I would suggest, and that's why I put my hand up, I think, although it would be purely anecdotal, I think we need to reach out to four or five organizations that routinely submit lots of complaints or a fair number of complaints to Compliance and get a sense, and if possible, statistics of what their recent experience is; recent being the last four months or whatever time frame is reasonable based on how long it takes for them to come back with answers.

I think we really need to identify to what extent there is a problem today and what the characteristics of that problem are. Are they still rejecting what are clearly valid WHOIS complaints or has the syndrome changed in recent times?

So, to the extent I'm presuming you can identify a few companies that do this on a regular basis and will be candid with you, I think reaching out will be useful. We're not going to quote their statistics, but I think we need to be on rock solid ground that what we're looking at is a current problem.

SUSAN KAWAGUCHI:

That's always -- I think it's a good idea, but it's always difficult to get companies to divulge that, and I'm not sure how many companies really take the time to do it because the results sometimes are not worth it,

unless you have a specific enforcement target that you can't get anywhere else.

So, MarkMonitor might be a company that could put some high level statistics together if they're interested in providing that, and then there's a few attorneys that I could ask. I'll put that on my To Do list.

ALAN GREENBERG: I don't think we want something that they're going to have to stand behind, but I just want to make sure that whatever we put our efforts into, are problems that are perceived as real problems at the moment.

SUSAN KAWAGUCHI: Okay. I can definitely do that. I can think of a handful off the top of my head that might have a candid conversation. Okay, that makes sense. And Carlton says we do not need an outside expert for this, Susan. You know more about the WHOIS from the user side then probably all of us. Thank you, Carlton. I'm not sure that's true.

[Inaudible] embedded in the history of the problem than the surrounding issues. We can get useful information from people who have the problem. They're the ones who are self-interested in solutions.

ALAN GREENBERG: I think that last sentence in Carlton's notice is a key one. If we can make the world better for people who submit WHOIS complaints to

Compliance, they have a vested interest in giving us a better information.

SUSAN KAWAGUCHI: Yep, that's true. Yes, and Carlton, compliments will get you everywhere, right?

ALAN GREENBERG: Well, at least somewhere.

SUSAN KAWAGUCHI: So, any other thoughts on this? [AUDIO BREAK]

ALAN GREENBERG: Only that as we write the objectives, I think we not only want to focus on fixing compliance if indeed there are still problems, but in insuring that they are making enough information available to convince people that they are doing a good job. No matter how good a job they're doing right now, the perceptions are still that they are the old Compliance, and I think part of our job is making sure that problem gets addressed. I mean to the extent it's still the old Compliance, we need to fix that, but regardless, transparency and availability of information.

For instance, I'm sure they have statistics of how many WHOIS complaints are submitted, and I'm sure they give statistics on how many are resolved, but it becomes really important to know how many of them are resolved because the registrar changed something, or how

many did they close because the registrar said there was no problem. Those are two very different beasts and I don't know whether they're publishing that kind of information. My gut feeling without looking at it is they're probably not.

SUSAN KAWAGUCHI: I do feel like the policy change for the email validation, so, once a year you have to validate your email address, has improved the accuracy of the WHOIS. What it did is, a lot of domain name registrations were deleted, and you heard the registrars complaining about that. There was -- some claim that it was over a million, some maybe 10 million, who knows.

So, we may want to ask them specifically too about that policy and how that has affected domain registrations and the accuracy. Because that is a new policy since the last review team. I know that there's a lot of concern by the registrars on that, and to be honest, Mark Zuckerberg no longer had control of his Harvard email address that was on his registration, so I had to call in some favors to -- and I didn't know. I didn't manage Mark Zuckerberg's domain registration. That was not my job, but it became my job, and had to work with the registrars to validate it was really him and that he couldn't access that email address anymore.

ALAN GREENBERG: Given the number of people who have email addresses with ISPs, there's got to be a huge number of people whose email addresses are no longer accessible. It's not exactly a rare phenomena.

SUSAN KAWAGUCHI: No, and they had a process. It was a few legal documents. Okay, so what I will do is, like I said earlier, I will take the first whack at this work statement and work plan, and then send it all to all of you. Oh, we have a subgroup email list, and then hopefully we can get some comments back on that within the next week.

Do you want to schedule a weekly meeting? Should we talk again next Friday? Does that work for everyone?

ALAN GREENBERG: In general it does. I'm not sure. I mean, any of us might have obligations. I think I'm actually busy next Friday at this time, but I think that's a reasonable plan. We can always cancel.

SUSAN KAWAGUCHI: Okay, so we'll schedule a meeting for the same time.

CHRIS DISSPAIN: I have in my calendar that we have a plenary session which would be running just before 3:00, probably at 1:30. Not that it matters, it just means it would have ended up going straight after the plenary straight into this. So have a think about whether you want to do that, but that's what is in my diary.

ALAN GREENBERG: It should be in mine, but it isn't. I don't mind that.

CHRIS DISSPAIN: Well, if we're in the mood, we might as well just carry on, right?

SUSAN KAWAGUCHI: Yeah, right.

ALAN GREENBERG: As long as I'm not running both of them, I'm fine.

SUSAN KAWAGUCHI: So Erika is traveling. Maybe we'll put out another Doodle poll too and see.

CHRIS DISSPAIN: What's success for this group? Is it just completing this work plan? And then seeing it through, basically? Is that it?

ALAN GREENBERG: I'm presuming there will be some consistency in the people who participate in the actual work of the group as well as the drafting the work plan, but yes.

CHRIS DISSPAIN: Okay. That makes sense to me.

SUSAN KAWAGUCHI: And I think to me this is the real core of the review teamwork in general. That was one reason I was interested. Compliance is something that is necessary to ensure WHOIS -- so GDPR is going to blow it up, but in the meantime --

CHRIS DISSPAIN: Well, that's a positive view of the world you've got there?

ALAN GREENBERG: GDPR is blowing everything up.

CHRIS DISSPAIN: I'll give you it's accurate.

ALAN GREENBERG: I asked the question the other day, does ICANN have a policy on how to publish email addresses on the website? In my case, if I want ALAC members to be accessible to people, how do we tell people what their contact information is? The answer that came back is, "We don't have a policy. There's a number of methods. They have varying degrees of goodness. But GDPR is going to blow it all up anyway."

CHRIS DISSPAIN: Exactly. Exactly. The answer is all the emails should be addressed to Göran and he can forward them to other people.

ALAN GREENBERG: That's correct, that's fine, but we need his permission to put his address on everyone.

CHRIS DISSPAIN: He has nothing else to do. Oh, he'll say yes, he has no choice.

ALAN GREENBERG: That's what I'm about to tell ALAC members. They can come up with a private Gmail address which is not used for anything else, but how are you going to elect people to positions and say they are your contact, but we won't tell you how to get a hold of them.

SUSAN KAWAGUCHI: It's all back to consent, right?

ALAN GREENBERG: Although, let me tell you before we break off what I think is a funny story. You might have heard the SSR review team has been paused by the board, and the shares decided to, in their activities, to try to restart it to do a survey, so how do you get the email addresses of all the review team members?

So I asked MMSI and the answer was, "Well, we're going to have to ask them because we're not allowed to give out their email addresses. We're going to have to ask them and they're going to have to come back and say, 'Yes, you can give them out to whoever is running the survey.'"

And this went on for four or five days, of how can we do this. Then, someone discovered if you look at the email archives, all of the email addresses are there. Publicly accessible. We do change the @ sign to the word 'at'. But they're all there in clear text so so much for privacy.

CHRIS DISSPAIN: There's no right to be a gossip in ICANN land.

ALAN GREENBERG: Until GDPR comes in and we're not going to be allowed to publish email archives anymore.

CHRIS DISSPAIN: Exactly, exactly.

ALAN GREENBERG: Folks, I've got to go.

SUSAN KAWAGUCHI: That will be interesting.

CHRIS DISSPAIN: Yeah, me too. Thanks, everybody.

ALAN GREENBERG: Lots of email archives mask the address. They put part of the before the @ sign and mask the rest. Something like that. It's not uncommon on bulletin boards. Anyway.

SUSAN KAWAGUCHI: Well, thank you all for all of the discussion today, and I'll send something out to you later today.

ALAN GREENBERG: Thank you, Susan, bye-bye.

SUSAN KAWAGUCHI: Thanks, all. Bye-bye.

[END OF TRANSCRIPTION]
