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BRENDA BREWER: Hello, everyone. This is Brenda speaking. Welcome to RDS WHOIS2 Subgroup Call for WHOIS1 Rec #4 Compliance. This meeting is meeting number eight on July 20, 2018 at 16:00 UTC.

Attending the call today is Susan, Carlton, Alan. And from ICANN Org, it's Alice, Brenda, Jean-Baptiste, Steve, and Lisa. I do notice that Thomas was not able to join. We are still expecting Erika.

I'd like to remind you the call is being recorded. Please state your name before speaking for the transcript. I'll turn the call over to you, Susan. Thank you.

SUSAN KAWAGUCHI: Thanks, Brenda. Can we get that document I sent you up on the screen? I did, with Lisa's help, go through and tidy up the draft for the subgroup. I sent it out yesterday and I don't know if anybody's had time to really look at it, but if you do get a chance, it would be great to put your own edits in.

There were several things that came up that we definitely needed to discuss. So, I thought I'd just put that all into a document that's on the screen. Hopefully, you can give me some input and we can finalize some things here, hopefully, get closer to being final.

On the leadership call the other day, Alan, we had gone over the document – Stephanie's document where she disagreed. I think she was disagreeing against the use of the term enforced. But, when I started back into that document, I couldn't remember what I agreed to, which

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is nothing new. So, I was hoping you could help me remember from Wednesday and whether or not it was recommendation one or was she objecting to the use of the term “enforced” overall?

ALAN GREENBERG:

She was objecting to the term enforce because she said, in some cases, one might not ... There’s a judgment call involved, and therefore – I don’t have the document in front of me. I can pull it up, unless Lisa or somebody remembers. I can find it over the next couple of minutes and we’ll go back to that, if that’s okay.

SUSAN KAWAGUCHI:

Yeah. I should have gone back to that, too, and I didn’t, unfortunately. So, we do need to maybe come up with different language that ... I think her point was, yeah, you don’t always enforce but you may review. There is a requirement or something. I don’t know. I sort of fumbled when I got back to drafting the report. If anybody has any input on that ... We’ll come back to that.

Then, recommendation 7 is Lili’s recommendation. Lisa had made a good point in the report, which I copied up there, and I don’t know that this really fixes this recommendation but it’s getting closer. So, I think what Lili is looking for is if there’s a pattern of abuse or failure to verify or validate, I would get those terms confused. I was wondering ... I added Lisa’s language in there. It’s highlighted in blue. So, what do you all think about adding that language to that recommendation?

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ALAN GREENBERG: I think it's fine. Part of the comments were we need to verify with the registrar that it's not due to some other reasons that are out of their control. But, I would presume the only way you can recognize the pattern is by having interactions of the registrar. So, I have no problem with it. Someone may come back and want some additional words to it, but I think this is a good start to indicate that we're not doing this on a single complaint.

SUSAN KAWAGUCHI: Okay. So, maybe we can discuss this recommendation on Monday if we have time, and if not, in the full team, if that makes sense, then.

ALAN GREENBERG: Yeah. If anyone is going to note that there's a substantive difference, [inaudible] they were asking for and what we have ... Volker certainly will if he's going to be on the call.

SUSAN KAWAGUCHI: Okay.

ALAN GREENBERG: Okay. If you want to go back to recommendation one, I can give you the wording that she used.

SUSAN KAWAGUCHI: Oh, okay, that would be great.

ALAN GREENBERG:

Okay. The summary we had in the minutes of the face-to-face meeting were all policies implemented should require metrics, measurement, auditing, tracking, reporting, and enforcement by compliance. Her comment was this needs to be qualified. It is reasonable to require enforcement if that means total enforcement. Would suggest inserting 'as required' and relying on the recommendation to do risk-based enforcement.

Anything is going to involve judgment calls here. I didn't object to the original words. Enforcement obviously implies a level of judgment call of which ones do you pick and which ones do you not. But, I have no problem with the "as required" either.

SUSAN KAWAGUCHI:

Okay. So, what I was thinking about, then, not just for this recommendation but maybe go through and use that language, sort of incorporate it into the full report. Sort of makes sense that you only enforce if there's an issue. So, if that clarifies it for people, then that would be ...

ALAN GREENBERG:

Sorry to interrupt. There are going to be other people saying we don't trust compliance to make judgment calls. You have to guarantee 100% enforcement, so ... We're not going to win on this one.

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SUSAN KAWAGUCHI: Okay. Well, [inaudible]. I'll go through and read the report again with this in mind. When I started to do that, I confused myself completely. Okay. Any other comments as the "as required" then? Carlton had a question on [inaudible] rec four and five. Is that the outreach one, Carlton?

CARLTON SAMUELS: Yes. That's the outreach one, Susan. It's outreach and publicize. Then, number five is the publicize [inaudible]. Maybe you could consider combining those.

SUSAN KAWAGUCHI: Yeah. That would make sense, but I also wonder if there's a larger recommendation on outreach subgroup that this should all be incorporated into.

ALAN GREENBERG: Is there something in the document on the screen or should I go back to the full document?

SUSAN KAWAGUCHI: You need to go back to the full document. I didn't bring those up because I was thinking we might just set these two on Monday, but it's good that you brought them up.

ALAN GREENBERG: Let me try to find it, then.

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CARLTON SAMUELS: We can wait until we there, Susan. I just put it in because, if you look at it ... I look at the outreach that Alan, the last document that was circulated. I thought of that, too, but I think it's very well covered in there what was outreach and what they [inaudible] were. Insofar as the outreach for the use of the tools and so on, I think that [inaudible] is covered well in Alan's [inaudible], but I'm just thinking maybe you could look at combining the two because the fifth one is just about publicizing the bulk WHOIS tool.

SUSAN KAWAGUCHI: Right.

ALAN GREENBERG: Okay. Now, tell me where we are. Now, I finally got the document up.

LISA PHIFER: I put recommendation four and five into the chat there.

ALAN GREENBERG: Okay. Thank you.

SUSAN KAWAGUCHI: So, we could do it over sort of more [inaudible].

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ALAN GREENBERG: Yeah. Certainly, four, I could add some words into my general recommendation that could include four. That shouldn't be a problem at all. Five I'm not sure about because that's really a decision of ... That is really a compliance issue, that they have to set up processes so they want a lot of bulk access. They have, in the past, been very reluctant saying they want to, essentially, authorize people to do it and because once they get it, they don't treat it as bulk. You submit them as bulk, but they treat them one by one. It's not clear they're geared up to do it, so I think very much is a compliance one that is not just published [inaudible] but ensure that they have the processes to handle it. So, that one I think ... Five stays as compliance.

CARLTON SAMUELS: That's true, Alan, and it fits into our recommendation lower down where Lisa [inaudible] guidance to start looking at reports as a group instead of viewing them as one to see patterns.

UNIDENTIFIED FEMALE: [inaudible] recommendation eight. The bulk WHOIS plays into the recommendation eight on proactively monitor enforce.

ALAN GREENBERG: Yeah. But, remember, bulk WHOIS does not necessarily say this is a pattern. You could be submitting 100 requests on 100 different registrars. So, they're not synonymous, although there may well be a very high correlation between the two.

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SUSAN KAWAGUCHI: So, do we want to then move recommendation four into your outreach recommendation and maybe beef up recommendation five?

ALAN GREENBERG: I think so. Yeah. I'm not going to make it a second recommendation, but I'll include the words that are there in the outreach part. So, yes, I think four can move into mine and five has to be perhaps clarified.

SUSAN KAWAGUCHI: Okay.

CARLTON SAMUELS: Okay. I can go with that. I could go with that. If you move four into that, then you can move [inaudible] bulk recommendation in five and tie it closer to the idea of looking for patterns in [both] reported as well as input.

SUSAN KAWAGUCHI: Okay. Alright. I'll work on that, then. Alan, I'll just let you work on the outreach one.

ALAN GREENBERG: Yeah.

SUSAN KAWAGUCHI: And then [inaudible] beef up and put a little bit more language in that. Noting Alan's comment that compliance needs a process to handle

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more bulk reporting and then tie it closer to recommendation eight on systemic [inaudible] Carlton.

ALAN GREENBERG: We may well want to, in five, publicize and encourage use of bulk WHOIS inaccuracy reporting to report systemic problems or something like that.

CARLTON SAMUELS: Right. That's exactly what I'm saying. I really think it's important for us to talk about how you report systemic problem and how it is reported out of the ... By the tool by the database. I think it's very important.

ALAN GREENBERG: Susan, let me ask you a question. In your previous life, I presume you made reports one by one. Is that correct?

SUSAN KAWAGUCHI: Yeah. Until recently ... I never used the bulk WHOIS tool, but I now have access to it. I applied to that.

ALAN GREENBERG: Okay. Would that have made a difference substantially in your life? In other words, do we want to push the bulk tool as it is, so it's just a convenience to the reporter, or do we want to push it only in terms of reporting pattern type things?

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SUSAN KAWAGUCHI: It would definitely have been much easier just when I was ... If I saw all the same data, inaccurate data, in multiple registrations, it would have definitely been easier just to report those as one because sometimes those were not with the same registrar.

And now, I think with GDPR and what I'm seeing, it's even more critical. I'm seeing just wholesale entries that do not comply with GDPR. They just redacted everything. Country isn't there, state isn't there, and registrant may or may not be there anyway.

So, I think it could become more valuable and that's why I applied for it. They gave me access. I haven't played with it yet.

LISA PHIFER: I have my hand raised, if I might.

SUSAN KAWAGUCHI: Sorry, Lisa. Yes, please.

LISA PHIFER: So, I think there are multiple reasons that someone might use the bulk reporting tool. It really conflates two issues, if you integrate that with the recommendation to compliance, for them to ramp up and refine the way that they look at the systemic issues.

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If you combine them, I would imagine it would be sort of a two-part recommendation so that it stands out and doesn't get lost amidst the bigger-picture recommendation of looking for systemic problems.

I put that recommendation in chat because I went and looked at the recommendation. I wasn't sure how it really fit with that, so I just want to let you know I put that in chat as well.

SUSAN KAWAGUCHI:

And thank you for putting that in. I'm not sure that we want to combine the bulk WHOIS recommendation with number eight, but I do like Carlton's idea to sort of tie them together a little bit more.

ALAN GREENBERG:

Yeah. I definitely would not link them directly because we're asking them to look for patterns, not worry about reported patterns. This is proactive work on their own part, not relying on specific patterns that are identified by ... Obviously, if a pattern is identified by a reporter, they should be able to react to that. But, I think eight has a different tone to it.

CARLTON SAMUELS:

I agree. I think all I wanted was to ensure that some of the language that comes out in [inaudible] five leads directly to eight, but I didn't think they needed to be combined at all.

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SUSAN KAWAGUCHI: Okay.

CARLTON SAMUELS: Because for the same reason that Alan says. Five is about being proactive and so on and trying to get them into the idea that there is systemic abuse and you should begin to [inaudible] to looking for systemic abuse.

ALAN GREENBERG: Yeah, that's eight, not five.

CARLTON SAMUELS: Yeah. Eight, right.

SUSAN KAWAGUCHI: Okay. I think that makes them both a stronger recommendation to make those changes. Okay.

LISA PHIFER: Susan, while you're looking, Alan could I ask you, in the recommendation that you'll be incorporating recommendation four and two in outreach, do you know offhand is that the first or second one? If you don't know offhand ...

ALAN GREENBERG: The first one is rewrite all of the documentation. The second one is do actual more outreach. Remind me now what four is again. It's in the

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chat. Hold on. Let me scroll back to it. Conduct additional outreach [inaudible]. That's the second ...

LISA PHIFER: Right. Okay. So, [inaudible].

ALAN GREENBERG: Although I may add one or two words into the first one to say beef up the actual documentation related to that, also. But, the implication is the second one because it's actually asking you to do outreach.

LISA PHIFER: Okay. So, I've included that in the notes. Susan I think, then, where the issue is discussed that led to recommendation four, instead of saying this resulted in the recommendation four in section whatever it is, you need to replace that with a reference to recommendation 3-2 in the outreach report.

ALAN GREENBERG: Yeah. Susan, when you get to the end of your list, I have a new one, something new to add.

SUSAN KAWAGUCHI: Okay. Sorry, I'm just taking my notes to make sure I get all the details here. So, the next one, I had gone through and asked a couple more questions that actually Lili pointed out to me. She had already asked those questions and they had been answered. So, I don't know if you

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want to go back to compliance and say, "Thank you. Sorry we missed that in the first review of the documents." Carlton, do you have your hand up? Is that a new hand or an old hand?

ALAN GREENBERG:

Carlton is talking, but we can't hear him.

CARLTON SAMUELS:

If you look at the results, there are probably a couple of things that came back into question that were answered by the compliance team. One, they did not routinely check on the line [PP] data for accuracy. Two, when it is revealed, if there is an accuracy complaint, they do follow-up on it. That is my understanding of what the response from compliance was.

SUSAN KAWAGUCHI:

Yeah. I do agree. What I was sort of stumped on is ...

CARLTON SAMUELS:

I think it's still important for you ... I think it's still important here to continue with the recommendation that we need ... I think make it a little finer. I believe that it is incumbent on the provider. All of the rules is incumbent on the provider. [inaudible] to ensure that there is accurate rules. So, I think what the recommendation wanted to say is that, at some point, we would recommend that the provider is asked to verify that they have done the checks, accuracy checks, and as far as

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they're concerned, the data is accurate. Something to combine the provider to doing an active check for accuracy.

ALAN GREENBERG: Yeah, but remember, they're only obliged to check a contact, either the telephone number or the e-mail. They're not obliged to check both. So, certification that they've done something does not mean all of the data has been checked.

CARLTON SAMUELS: I thought you wanted to ask them to do all of the data.

ALAN GREENBERG: I'm not sure I want to fight that battle with the registrars.

SUSAN KAWAGUCHI: I totally agree with you, Carlton. It should be verified or nonsense data shouldn't be accepted, but I don't think ... But, I do think that right now there is no verification of the e-mail address or validation. I totally get those wrong. So, we should think about ... What this recommendation should state is that the privacy-proxy vendor, provider will adhere to the existing RAA contractual terms on verification and validation [inaudible] data.

ALAN GREENBERG: Yeah. That's part of the privacy-proxy PDP I was told.

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SUSAN KAWAGUCHI: It is, but I ...

CARLTON SAMUELS: The [inaudible].

SUSAN KAWAGUCHI: But, one of my concerns and reasons I agree with Lili that we should have this recommendation is what if we don't get this accreditation? What if ICANN continues to stall and this doesn't go through? It could be that this recommendation would go through before the actual accreditation, so it would make a requirement.

ALAN GREENBERG: Yeah. I have no problem with that.

SUSAN KAWAGUCHI: Okay.

CARLTON SAMUELS: Yeah. That sounds doable.

SUSAN KAWAGUCHI: Okay, so I'll draft that up and propose it to the whole review group for discussion maybe on Monday. Does that work?

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LISA PHIFER: Susan, could you summarize what conclusion you guys just reached?

SUSAN KAWAGUCHI: Yes. So, on privacy-proxy registrant data, the provider whether it be a registrar or a connected vendor of some sort, must adhere to the RAA, the current RAA rule or requirements on verification of validation. I can't pull up which section that is right now, but ...

ALAN GREENBERG: The problem is, Susan, with that, if the privacy-proxy provider is an arm of the registrar, such as with GoDaddy, then it's not an issue. But, if the privacy-proxy provider is a completely separate organization that then uses a registrar, we have no contract with that group. That's the whole purpose of saying privacy-proxy services have to be accredited, so we do have a legal link with them.

SUSAN KAWAGUCHI: But, right now, for the most part, the majority of those are linked to the registrar.

ALAN GREENBERG: Yes, there are, certainly.

SUSAN KAWAGUCHI: So, at least we would get some traction here.

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ALAN GREENBERG: But, in those cases, since the registrar ... This is a really fuzzy area. If you register with domains by proxy or whatever the name is for GoDaddy, you actually go into the GoDaddy website to buy the domain and tick off the box saying show it as being owned by the proxy provider. But, the registrar is still handling it.

But, once it's ... The registration is handled by the registrar, but once it's registered, it's not longer associated with the registrar directly other than by knowing what the corporate structure is.

SUSAN KAWAGUCHI: But, my contention would be if a registration is accepted by GoDaddy and they allow their ... At that point, they have registration information that's not [inaudible]. They can validate that e-mail address or verify, and in the same way they would do that was not [inaudible]. And what we don't know is whether they are doing that.

ALAN GREENBERG: Yeah. Certainly, a reasonable recommendation would be that if a registrar is registering a domain name by putting it under a proxy provider, that registrar has an obligation to do the verification. That, of course, then goes on to resellers who are doing the same thing.

SUSAN KAWAGUCHI: Right. Good point.

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ALAN GREENBERG: You're right. We're going to catch 99% of them that way and I think that's probably we do want to say. It may not have meaning if and when the privacy-proxy thing goes through and it's used. But, it still may have meaning if you have a small registrar who is not getting the privacy-proxy service authenticator not authorized because of the costs. So, I think that's a valid recommendation we can make.

SUSAN KAWAGUCHI: Okay. So, like I said, I'll draft some language and try to send it out over the weekend and then we can discuss and sort of refine it, so [inaudible] look at info or look at language and then rethink it.

Okay, so I have not come up with anything on the [inaudible] validation [inaudible] somebody else.

ALAN GREENBERG: Sorry, I've lost [inaudible].

SUSAN KAWAGUCHI: Oh. The next one is if you look at the document on the screen is 3.2.1.5, cross field validation of WHOIS information. Because it's ongoing but it hasn't really been implemented, I don't know what the compliance issue is here and maybe I'm just missing it.

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ALAN GREENBERG: Sorry. Maybe it's my lack of sleep. I don't know what cross-validation of WHOIS information means now that I read it. What are we talking about?

SUSAN KAWAGUCHI: There was a working group or [inaudible], too. Lisa, can you help with that?

LISA PHIFER: So, cross-field validation is a potential additional accuracy check that would make sure that, for example, the e-mail address corresponds to the entity that's identified by the postal address. So, as I understand it, one of the challenges is some registrations use particularly accurate postal addresses or phone numbers that belong to someone else and that include an e-mail address that does, in fact, go to them and allows for the domain registration to be complete. So, all the information is syntactically accurate and yet they don't match up. Postal address belongs to somebody other than the registrant. So, it's my understanding that cross-field validation would try to look at that.

ALAN GREENBERG: That's a hairy area, because for instance, I have domains that I have registered. They are registered on behalf of someone else. Their street address is in the US, but I have my phone number on it and my e-mail address on it sometimes.

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LISA PHIFER: There is a connection, right?

ALAN GREENBERG: Well, there is, but you can't tell by looking at my area code and the US street address.

SUSAN KAWAGUCHI: So, I would absolutely agree this is a very hairy area. I'll have to go back because one of the points is the registrar [inaudible] reviewing the criteria from ICANN Org. I'll look at that criteria again, too. I just remember looking at it and going, "Oh, wow, this one I'm not sure we should touch." Then, that was [inaudible] with it.

ALAN GREENBERG: I'm not sure we should either. But, if there was a request for information, then we should be able to go back and look at that.

SUSAN KAWAGUCHI: Yeah. I'll try to put more ... I was hoping somebody else would have the answer.

LISA PHIFER: I think, in summary, this was a concern that was raised regarding how to look further at data accuracy. It turns out to be a really hard problem to solve and especially in light of all the work that is being done on GDPR right now. It got put on a shelf. The question I think you guys probably need to wrestle with is do you need to say anything or just acknowledge

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that it's on the shelf for right now and it'll resurface and probably be then reviewed by the next review team? As a matter of priority more so than anything else.

ALAN GREENBERG: Yeah, but remember, we're only looking at what was done with a capital R recommendation [inaudible]. The other comments that they make disappear into history. So, I think what you're saying is probably true, but I'm not sure we really can say it should be looked at in WHOIS3.

SUSAN KAWAGUCHI: Well, you certainly can create new recommendations that would be looked at in WHOIS3, right, if you thought it was an issue worth calling to the attention of the next review team. You can put anything on the table.

ALAN GREENBERG: That's correct, I guess. The implementation by ICANN is easy. Interesting thought. Hadn't thought of that. In fact ... All we can do is ask them to consider it, of course, but we could note things that we think might be right for WHOIS3. I mean, obviously, GDPR is.

CARLTON SAMUELS: [inaudible] anything new.

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ALAN GREENBERG: That would be their anything new, not ours. Alright, I don't think we need to put a lot of time onto it. I'd really want to see some evidence why we want to make a recommendation on this and I would only want to make a recommendation if we think it's something that's really implementable in the medium term.

SUSAN KAWAGUCHI: Okay. I'll take another look at it.

LISA PHIFER: And it's perfectly fine to just actually identify it as an issue that haven't reached the point where a recommendation is appropriate, right?

ALAN GREENBERG: Yeah. Sure.

SUSAN KAWAGUCHI: Okay. Alright. So, that [inaudible] my list. I'm not sure I forgot something. Alan, you said you had a couple of items.

ALAN GREENBERG: I have one. It came up in our discussion the other day. I'll give you the specifics here. When I was testing out the WHOIS portal to see what kind of response I got, I put in one of my own domain names. It's a domain that's registered with GoDaddy on dot-org, PIR. Now, when we did the thick WHOIS PDP, there was a presumption that the only time you're going to get a difference between what the registrar says and

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what the registry says is either there's a real error, which can happen, or something is in the midst of being changes. But, other than that, they should all be in lock step.

With GDPR implementation, we now have a completely different ball of wax. In the case of this particular domain, if you go to PIR, they say it's in Quebec, Canada. That's it. They don't even honor the temporary specification requirement of having an anonymized e-mail address.

GoDaddy, on the other hand, says I'm in Canada, GDPR doesn't apply, and they publish the whole damn thing. We're, therefore, depending on where you go you're getting two very, very different answers. I think we need to note that. I'm not quite sure how ICANN can force the two independent bodies to interpret GDPR implementation the same way, but I think we need to flag it as something that needs to be looked at.

SUSAN KAWAGUCHI:

I agree. Actually, to me, in some ways you get ... Not similar, but you get ... If I go to the registry, I get one view. If I go to Port 43 for GoDaddy, for example, I get that same view as the registry. But, if I go to their website and put it in the form there, then I get the full WHOIS, which is a problem.

ALAN GREENBERG:

Yeah. But, I think the bulk web access is a different issue, and right now, that is a compliance issue I think. I don't think we've given them any [inaudible] exemptions to not have a bulk service. I think they've just simply cut it off and [inaudible] anyone to do anything about it. No?

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SUSAN KAWAGUCHI: Compliance, BC ... Yeah, the BC filed a complaint about GoDaddy and they said, no, they're doing it for spam and they have every right to do it.

ALAN GREENBERG: Okay. But, GoDaddy also has a way to, in theory, be put on their white list, don't they?

SUSAN KAWAGUCHI: Yeah, you try that.

ALAN GREENBERG: Yeah. I said in theory. That's interesting.

ERIKA MANN: I mean, I believe GoDaddy is testing the legal environment because they want to have a uniform global system and that's what they are doing. I would be very doubtful if this is not going to get challenged, if this would be challenged by a different entity around the globe that they can sustain such a system, but that's just my very personal view.

I think what different registrars can do, absolutely, they could distinguish between European data and between data the rest of the world because the only challenge in the moment to the WHOIS system comes from the GDPR and not from any other location. So far, this could

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be done. Should it be noted in what Susan is doing? I don't know. I have no opinion about this.

ALAN GREENBERG:

I think these are two different things and we need to separate them. One is how registrars or registries may be treating bulk data, either through rate limitations or something far more global like GoDaddy is doing. But, that's different from registrars and registries providing different information. The extent we want to capture the bulk data access one, we can, but I think it's a different issue than registrars and registries presenting different images of the domain. At that point, if we know that's the case, for instance, the ICANN WHOIS portal should give you both. And if they're not identical, it should [inaudible] both of them to you. That's a specific recommendation. If we can't force them to be the same, then we should be presenting both of them at the very least.

SUSAN KAWAGUCHI:

But, see, that gets back to the Port 43 then, right? Because that's where ICANN is getting that information.

ALAN GREENBERG:

I don't know if they're doing that [inaudible] web WHOIS. I really don't know which they're doing.

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SUSAN KAWAGUCHI: I think they are going through Port 43 and that's the problem. That's why they're getting timed out. The common interface is only designed to be sort of a pass-through, correct, Lisa?

LISA PHIFER: Yes, correct, and it's my understanding it uses Port 43.

CARLTON SAMUELS: That's my understanding of it, so that's why I'm a little perplexed.

ALAN GREENBERG: But, remember, the first problem is it's presuming that if it's a thick registry, the registry is authoritative. In this case, the registry authoritative, but the registry is providing far less data than the registrar would if you asked them.

CARLTON SAMUELS: But, the data comes from the registrar to the registry. All the thick WHOIS data comes via the registrar.

ALAN GREENBERG: Say that again.

CARLTON SAMUELS: The origination of the data, [inaudible] registrar, so you would naturally expect that the registry and registrar are displaying the same data.

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ALAN GREENBERG: Yes, but because of GDPR, the registry has chosen to redact it all. They have it, but they're not showing it to you.

SUSAN KAWAGUCHI: Is that true, though? That's one of the disputes.

ALAN GREENBERG: That is exactly true. Certainly, on my one domain, I can tell you to look it up yourself. You can see.

SUSAN KAWAGUCHI: No, no, no. Is it true that the registry has all the information but they're choosing ... I don't agree with that. I don't think so.

ALAN GREENBERG: Certainly, before GDPR, they sure as hell did.

CARLTON SAMUELS: It may be that they have not fully implemented the thick WHOIS [inaudible].

ALAN GREENBERG: No, but dot-org has been thick for ages.

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SUSAN KAWAGUCHI: But, one of the arguments and one of the things in the EPDP is whether or not the registrars will continue to provide that data to the [inaudible].

ALAN GREENBERG: But, that's an issue in the EPDP. It shouldn't be an issue today.

SUSAN KAWAGUCHI: That is actually the question to ask in the [inaudible].

CARLTON SAMUELS: I would [ask for it] because they are contractually obliged to provide the same data, in my view, because the [inaudible].

ALAN GREENBERG: Let's not try to guess how GDPR and EPDP are going to come out. The point I'm making right now is, right now, we used to presume for thick WHOIS the registry was authoritative but it didn't matter because they were almost always virtually the same as the registrar. Now we have situations where it is very different. So, if nothing else, the ICANN portal should give you both views.

SUSAN KAWAGUCHI: I would agree.

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ALAN GREENBERG: I think I now have a third recommendation for outreach. Or no, sorry. That comes under the single ... It's one of the other ones. I think it's one of Volker's – or is it Carlton's? The WHOIS interface.

SUSAN KAWAGUCHI: It's recommendation 11, common interface.

ALAN GREENBERG: Common interface. So, I think they have a new recommendation under rec 11.

LISA PHIFER: Okay. I'm not disagreeing with that at all, but I just want to raise that if you run a query through the portal now and you see the data returned by the registry, there is some text that's, I believe, required to be displayed that says to go to the registrar of record's WHOIS portal, which of course that's a data element, WHOIS for the registrar. Go there in order to see the authoritative data.

ALAN GREENBERG: Well, number one, the WHOIS element ... The URL in the WHOIS record is not necessarily a working record, a working URL. My experience has told me that. Besides, if we're trying to say this single interface should be useful, then dammit, it should be useful. That [weasel] words that you were just talking about, Lisa, was to cover real edge cases and that's not the case anymore.

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LISA PHIFER: So, it sounds like these are comments to be raised on rec 11.

ALAN GREENBERG: Yes.

LISA PHIFER: Should we raise this in ...

ALAN GREENBERG: Who owns rec 11?

LISA PHIFER: Volker. Should we possibly put this on the agenda for Monday's call?

ALAN GREENBERG: Yes. Let's do that, please. I think Volker will be with us.

CARLTON SAMUELS: Well, if you're going to recommendation it, at least tell him [inaudible].

ALAN GREENBERG: I'm going to have to leave sharply on the hour, by the way. Susan, are you still with us?

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SUSAN KAWAGUCHI: Sorry, I am. I'm just chatting away on mute here. That was a really good point and I'm glad we're going to discuss this on Monday, but that's a rec 11 or subgroup 11.

ALAN GREENBERG: Sorry. Red herring for bringing it up here.

SUSAN KAWAGUCHI: No, I think it was a good discussion. Lisa, you have your hand up.

LISA PHIFER: Old hand.

SUSAN KAWAGUCHI: Okay. So, is there anything else that we wanted to discuss today?

ALAN GREENBERG: Nothing else on my list.

SUSAN KAWAGUCHI: Okay. So, I'll go through and ...

CARLTON SAMUELS: I'm good.

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SUSAN KAWAGUCHI: Thank you, staff, for all of the [inaudible] very helpful. I'll go through and edit and draft what we discussed today and send that out to the group, and hopefully we can discuss it either Monday if we have time or next week in Brussels.

LISA PHIFER: Susan, could I ask you what your target then is for updating the compliance report? Are you expecting to have a new version by Monday to be incorporated in the full review team report or are you expecting to continue to work past that?

SUSAN KAWAGUCHI: It will be a new version. I wouldn't say it would be the final version because our work in Brussels, but I will try very hard to make the deadline so we'll have all of this information in the compliance subgroup report before Monday.

LISA PHIFER: Great, thank you. Alan, can I ask the same question of you? You have a couple of tweaks you're making to the outreach report. We do expect to have a new draft of that before the Monday deadline or is that ...

ALAN GREENBERG: You can easily expect it and I hope I'll meet that expectation. Does that sufficiently cover my something?

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LISA PHIFER: It does. It helps me with planning which sections to focus on with existing text.

ALAN GREENBERG: I really hope I will, but my schedule is just crazy right now.

SUSAN KAWAGUCHI: Well, my schedule got a lot better this week, so I had ticked off several things. It's not quite as crazy. Alright. I think that's it, then, I'll give you all back eight minutes of your day. Thanks very much. It was a good discussion.

ALAN GREENBERG: Excellent. Great meeting. Thank you, bye-bye.

CARLTON SAMUELS: Thank you, bye.

SUSAN KAWAGUCHI: Bye-bye.

**[END OF TRANSCRIPTION]**