
SUE SCHULER: Great, thanks. Okay, Kristine.

KRISTINE DORRAIN: Thanks, everyone. Good morning, good afternoon, good evening. This is the Tuesday call of the Registry Stakeholder Group DAAR Working Group for November 26th. We have our core group of people on the call, so thanks to everyone who's able to join. For those of you in the United States, we're all leading into our Thanksgiving holiday so I imagine some people are traveling or busy today.

So we have our agenda. This is our first meeting post Montreal so you'll notice from the agenda that we have a little bit of opportunity for recap. It sounds like John and Samaneh are not going to be able to make it, so there are any kind of comments or parts of the agenda that relate to Samaneh and John, we'll just skip through. But we still have some things we can debrief on. We maybe have a little bit of ambiguity about what sort of we're working on next, so I think we need to formalize that a bit. We have some suggestions here. And then thinking about our agenda through December.

I think that we're going to get, and we're going to talk about this in a minute, but I think one of the things we're going to find is that until we start seeing harder, more concrete updates to DAAR reports which were tentatively projected for January, our work may be at a little bit of a standstill because we need to sort of see how some of this works. But we have some suggestions and certainly some things we should think

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about and next steps. So plenty of work to do, maybe a little bit more administrative than we normally like.

Thanks, everyone, again for joining. I'm just going to open up the queue for a minute to talk about sort of what happened in Montreal, if there was anything that anybody wants to read into the transcript or to discuss. So we know that there were a lot of sessions about DNS abuse. We've got the plenary. It was taken up in a lot of different groups including the GAC, including the SSAC, including the report preceding Montreal from the SSR2. It came up in our own stakeholder group conversations. I know it came up in other stakeholder group conversations as well. So there was a lot going on and so I thought it would just be helpful to kind of pull together any key thoughts just remembering that our working group is not specific about DNS abuse, but specifically thinking about where DAAR sort of played into those discussions and how that may or may not have been framed or have framed that DAAR conversation.

So Jim, I see your hand so you go next.

JIM GALVIN:

Thanks, Kristine. I want to focus my comments on our working group and our specific activities here for the moment. You ask a much broader question, but I'm just going to focus in one particular comment for us. I actually thought we had a really good meeting with John and Samaneh when we got to meet during Montreal. I found it very helpful and useful to be able to look at a new slice of the data that Samaneh had presented to us and we talked through that actually for quite some time

and I thought that discussion was really useful. For anyone who's here, wasn't there, I actually would commend your attention to the transcript just to catch up on all the details there.

But it brings to mind the following question for me and this is sort of what you were commenting about. What are our next steps? What are we doing? And how is our work going to proceed? I was a little disappointed in the sense that Samaneh only had one additional cut across the data to show us, but it made it clear to me that there is some opportunity here for us to really think about different ways that the data could be presented and we need to be able to have a much better, it seems like a much higher frequency of interaction between what are the different ways to look at the data, what does it really mean, do we want this, do we want to tweak this a little bit and do something different. We had almost as many questions as we did kudos for what was presented to us the last time.

And I'm just sort of raising here the question of how do we make this move along a little more quickly? I'm concerned about dragging out this changing of what the reports actually look like. I really want to get to where there's something new up there on the DAAR site, not all of this old stuff and I don't have a suggestion at the moment, what the answer is, maybe just some commiseration with others about, "Yeah, we're on a good path here. Let's seek to speed it up. Maybe we just need a different discussion with John and Samaneh about how we might move forward. I'm open for suggestions. Do people agree this is an issue? I'd like to get some feedback on both the problem statement and potential solutions. So thanks very much. That's it for me.

KRISTINE DORRAIN: Thanks, Jim. I agree completely and that was sort of what I was trying to get at is this dragging out. We took a little bit of time to ramp up, but there's a lot of initiatives that the stakeholder group and ICANN has and I think that we are going to lose people and continue to lose momentum if we can't really push OCTO to get moving on some of this stuff and maybe this means, and I think this is to your point and it kind of goes to the next section which we can dive into after the next hands are addressed, but which is maybe we need to be much bolder about our suggestions and come through with a list of A, B, C, D, these are the things you should try, go at it, give it to us in two weeks. Not that there's a whole lot of penalty we have if they don't. But Rick and then Kurt.

RICK WILHELM: Very good. Thank you, Kristine. And very much it's interesting that Jim sort of headed towards that topic also because that's sort of where I was thinking of commenting also. I agree that it was an interesting discussion. I was sort of, while it was interesting, I thought that the cut of the data that was shown did not bear quite as much fruit as I was hoping that a cut would show. I also, like Jim, was surprised that there was only one additional cut that was presented. I thought that given the time that had elapsed, that there might have been more cuts that were presented.

When we're looking at this situation, I think that we need to be, one, focused on getting some sort of a change into the DAAR, and secondly, I

think that we need to be cognizant of the truism that the perfect is the enemy of the good and that right now, the way the DAAR is cast right now with the categorization of the TLDs is problematic in the way that the TLDs are portrayed and that we need to either change that or perhaps a more radical idea is to just throw out the concept of categorizing the TLDs at all and presenting the data in some other light other than these categories.

So it's something that we could think about, but I agree with Jim's suggestion of increasing the tempo because to date, the only change that we've gotten put forth is getting the month-wide data as opposed to the point in time data, which is a statistical subtlety that only a few very observant folks notice. And the notion of getting something else, a bigger change put in, is something I think that we should really concentrate on. Thank you.

KRISTINE DORRAIN:

Thanks, Rick. Yeah, that seems exactly right to me. Kurt, you're next. Go ahead.

KURT PRITZ:

Thanks very much, Kristine. I agree with what's been said and reflecting back on the meeting after I left, I was thinking about what wasn't said. And I sort of regretted not making a statement to the effect that we were kind of telling them how to do it and what not to do and what to be careful of. And we were saying stuff with which they agreed and it dawned on me, they understand that the way the DAAR is presented now is not actionable, that we can't make any changes in our

marketplace that would affect DNS abuse rates based on the DAAR report and they understand what has to be done. So what I regret is not giving them the charges. We don't want to tell you how to do it. We just want to tell you what to do. Make the changes you need. Don't be afraid. You were saying, Kristine, we need to be more bold. Samaneh is an absolute expert at this and she knows how to change the report in a way that makes things actionable. There's a concern, I am sure, that this will pinpoint various business models.

But I think in our charge to them, we would not only say, "You know what to do to indicate where action needs to be taken, but then take the next step to ensure any suggested actions aren't just pushing the problem somewhere else." I'll only talk for a moment. So I think we need to say, Yes. We need to accelerate. Go ahead and make the changes you think that will help us take actions based on data and when you, in fact, [change] their suggestion, make sure they're effective and not just pushing the problem down the street. Thanks.

KRISTINE DORRAIN:

Thanks, Kurt. And I put myself in the queue after that because I think that that's a really great segue into sort of we're kind of blending the topics together which is fine. This was meant to be sort of a live, organic discussion and I really appreciate everyone jumping in with their thoughts. Donna had mentioned in the chat that she's wondering in the context of the DNS abuse discussion, how important do we think it is to have an enhanced DAAR? My question on this directly comes from what Kurt was saying as well, is that if we have the wrong data posted, and I think this is sort of a theme we're seeing today, if the wrong data is

being shown and they're not making any major changes to fix it or they're making data, they're showing data that people are using to draw inaccurate conclusions, then I think it is a problem because you've got people pressuring the Board to adopt CCT recommendations wholesale, or just shove them down to the PDPs or the Council level and say, "You need to basically take what the CCTRT said in parcel," but the CCTRT basically says DAAR is the answer, it has all the data, do whatever DAAR says. But I don't think we can do whatever DAAR says because DAAR doesn't say anything accurate that's actionable.

So it's kind of circular but nobody gets that and that's kind of where one and two loop endlessly into one another. And I want to think about what some of these hard actions could be. Obviously, we want to pressure them to make a bold move and to make some of these cuts, right? I think we have a follow-up first question, which is how do we do that because we don't really have any leverage. So how do we pressure them?

Secondly, can we be really bold about saying, "Okay yeah, the category one strings, that was a bad way to cut it. We suggest cutting this way," and then maybe give two suggestions and say, "How fast can you do it? What else do you have on your plate?" I don't know how else to break the cycle. We have to fix DAAR but everything's going to be relying on DAAR and the GAC says no SubPro until the DNS abuse is fixed. I think it's all intermixed with one another. Oh look, I've got hands. Okay, first Jim, then Rick and I'd love to get some concrete suggestions in the mix as well. Thanks. Go ahead, Jim.

JIM GALVIN:

Okay. So maybe as a way to get us started, let me make a specific, concrete suggestion and see what folks think about this. We've been having a fair amount of discussion about the data values, if you will, the percentages, the numbers that are shown, what they mean, where they come from and we absolutely have to continue that discussion and really think about what the right way to derive the right number is that can be displayed.

However, in the interest of trying to say what's a concrete thing that we can do right now that might be helpful that I think would change this dynamic a great deal, my suggestion and it's one suggestion but it's a two-part thing here, which is absolutely eliminate this legacy gTLD versus new gTLD distinction. They have got to get that out of the picture and stop it because that is not helping anybody. That is abuse of the numbers that are there which we already question for any number of reasons, but I think to some extent, I can live with some of the numbers that are there if they get away from this distinction between new and legacy gTLDs.

What I'd rather them do, and this is kind of the second part of the discussion is let's find a way to create some interesting categories and have the TLDs represented as individuals and also represented as categories of some sort. We had a cut across categories in Montreal and we had a great deal of discussion about that. That might be a bit of a challenge for us to sort of come up with those categories but maybe if we keep it simple, this will work and by simple in my mind, I'm thinking about four things off the top of my head that I think really do make a big difference in abuse stats and so this becomes something for us to think about here internally.

So to be very specific, you have this notion of an open TLD. Anybody can buy a name. You do have something which is restricted in some way and maybe this categories of restriction. The only category of restriction I want to pull out is brand TLDs. I really do think that they are an extra-special case of restricted TLDs and then there are gTLDs. And at least, the way that I've seen the data that we have for ourselves, those distinctions seem to make a difference and the stats do seem to look different in that case.

So my suggestion, get away from new gTLDs and legacy. Let's create categories instead, represent them as individuals. Let's make a clear proposal on some categories. I've offered four for consideration but the details of which ones we choose are not important. Maybe the real suggestion here is let's try to find a way to create some categories and have them present data in that way. Thanks.

KRISTINE DORRAIN:

Thanks a lot, Jim. I've got those written down. I want to circle back to some of those concrete suggestions, but first we'll give Rick a chance. Go ahead, Rick.

RICK WILHELM:

Very good. Thank you, Kristine. I was headed very much in the direction of where Jim is headed, questioning about why the categories, if the categories are problematic, why do we have the categories at all? What Jim is talking about there, I think, are categories as they would sort of stratify the TLDs by registration policy which is something where, that's sort of my characterization, although Jim didn't say that, but that's sort

of my characterization of how those categories were taking shape which would tend to be a way to determine a way to categorize the domains in that way by registration policy. Another thing to think about, or perhaps we get rid of categories entirely. That might not be entirely the right thing too because there might be some with a rather restriction, even with a restrictive registration policy that have what is deemed to be high levels off abuse. I'm not sure that relative to an unrestricted registration policy, it might have low levels of abuse. But in general, any kind of a categorization where they are not entirely similar TLDs, the comparators are going to suffer relative to one another. So registration policy seems interesting as a way to divide them. But other than that, the categories might not really help that much and maybe we should consider just dropping the notion of categories. Thank you.

KRISTINE DORRAIN:

Thanks, Rick. You know, I think that's a really good part of this discussion and it's certainly one of the things that we've touched on in the past and I think we need to continue to talk about. And I hope we'll get a lot of input on that today.

I think it does make sense to think about categories, but I was just, as you were talking, I was thinking looking at Jim's categories, if I were to just hypothesize, just put out a scientific guess, open versus restricted brand, restricted other versus geos, and to Donna's point, it's a little bit open for interpretation but I think you can say you've got open basically versus restricted other. Brands and geos are fairly easy to determine, right? So I think what you'll find, this is my hypothesis, that most of the

abuse is going to happen in the open TLDs that don't have a lot of pre-existing criteria. I think maybe I'll be wrong, but that's my hypothesis.

So that doesn't really help because that doesn't mean all open TLDs are bad, right? There's a lot of other factors that go into it. So talking about categories, I think we like to think of that as a way to almost weed out things like dot-brands and say, "We can kind of tell from the data that those are clearly not a problem." But if you take the actual other TLDs and maybe they are a problem, but I'm just using this example, my hypothetical as an example. But then you're still left with a majority of open TLDs and thinking about how do you cross-cut amongst those – again, assuming my hypothesis is correct, to find out what the difference is between them, and that's where I'm looking at Kurt's suggestion that maybe one way is to say, "Well, let's look at all the data per TLD and see if a stratification makes itself evident. And there are people far mathier than me on this call and so I want to see if that makes sense to other people because it does seem to make sense to me. I see Kurt's hand. I'm not sure if that's old. Kurt?"

KURT PRITZ: It's an old hand but it's a current hand.

KRISTINE DORRAIN: Okay, go ahead, Kurt and then Jim.

KURT PRITZ: So I was going to create an example much like you did, Kristine. I don't know how to explain it statistically, but I can explain it maybe

empirically. So we do this weeding out and then we're left with all the open TLDs. So that would lead many in the community to say, "This is excellent. We just need to further restrict the open TLDs," when in fact, open TLDs represent a wide variety of business models that aren't codified in the registration policies. You know it could even depend on which region they're addressing or their pricing or their market targeting and how they do their advertising. It could be a variety of different factors and I think it's important to identify the causal factors for abuse and not just leave it open as too broad a category. So we're reviewing it as a weeding out of TLD categories with which we don't need to be concerned. The community will use it in the opposite way and say, "Oh, this open category, that's the category with which we need to be concerned then this is where we need additional contract restrictions."

KRISTINE DORRAIN:

Thank you, Kurt. And that is exactly one of the recommendations that the CCTRT came to was that there should be pricing controls and that registries should have registry restrictions because that's what makes them safe. Jim, go ahead.

JIM GALVIN:

Thank you. Building on what Kurt was saying, I think that we have to face the fact that the largest amount of abuse does tend to happen inside of open TLDs. And we can view this negatively or we can view this positively. My concern here is that other people are already playing that fact against us. You look at what is going on in ccTLDs in particular who

are asserting how great they are with [inaudible] abuse and that's in part because they've gone towards registrant verification kinds of models. So they have essentially become a restricted registration policy of some sort. And yeah, that might be a direction in which open TLDs go or they end up being headed and that's something that we have to face and see it for what it is and decide how to deal with it. So I think we just have to be aware of that's what's coming.

I think from a more positive way, the way I view separating out other kinds of TLDs from open is because I think that these other TLDs, they ought to get some credit for the fact that they do have a good thing going on and I do think that's important and I do think that even open TLDs that have less abuse than some others, they ought to give credit for that fact because it's not about registrant verification. It's about the fact that they are reactive. They actually mitigate abuse. They deal with it and they address it. And we ought to focus on the fact that those guys are doing a good job and getting good things. We don't have to solve all of the problems here. I don't think that any of us at the table here have TLDs that are a problem in and of themselves. Those TLDs that have that problem in a lot of abuse, well, shouldn't they be called out in some way and known for that? And we should know that that's where it is because then we get credit for the fact that we don't have it. I'm sorry. I was a little long-winded there.

My second comment in all of this is we don't actually have to solve all of this at once. I think highlighting those that have less abuse is a feature and I think that's a goal and an objective we should go towards even though the vast majority of TLDs are open and maybe we're only going to find, it is going to highlight those that do have abuse. I think the next

level is going to be in the registrars. I think that what's going on with us here and this stratification, those that don't have abuse versus those that have varying degrees you can't control everything and it's going to happen, but you want to get credit for the fact that you do take care of it. Registrars are in the same place and I think that for those TLDs that have a lot of abuse. We're going to find that even that is going to get focused in on a few registrars where a lot of that is too and so I think that that's the way that the open TLDs are going to get handled is we're going to start to be looking at where it's coming from the registrars and they're going to have the same set of problems we're having here. But I think that all of that's a good thing. I don't see it as a negative and I don't see it as requiring us to drive towards registrant verification which none of us really want in an open TLD. But we should look for other ways to be positive about it. Thanks.

KRISTINE DORRAIN:

Thanks, Jim, and this kind of goes to my earlier question – I agree completely – that how do you tell? Let's say, for instance, on my hypothetical, we can call out restricted, brand, and [jazz] and we're left with opens. We look at them and we say, "As a percentage of domains under management, X% seem to be unusually high," so let's look at the people that have it unusually low. You've got the bell curve theoretically. Let's say there's theoretically a bell curve that's left, right? So you'll take the people with an unusually high percentage of abuse and an unusually low percentage of abuse and say, "Well, what's different between them?" and this kind of goes to Kurt's point.

Is there a way to satisfy it and say? Can we tell? Maybe the data can't tell but maybe we can objectively look at it and tell what's different between these two sets of TLDs and maybe it's their registrar pool, maybe it's the registrants they have. Maybe it's something else. But can we tell? Is that even something we should try to do? While we ponder on that question because that's a rhetorical question that I don't know the answer to, Maxim. And Jim, your hand is still up.

MAXIM ALZOBA:

Actually, yes. I think we need to spread the idea that speaking about more regulation in open TLDs, we might make one step closer to censorship because the next logical thing to demand is total identification by provision of passports or driver's licenses by every registrar which we do not want and which will limit ability of people to have access to basically DNS services because it will lead to a rise in prices because those checks, they come with a price. And we need to say that if you're giving us examples of really highly regulated and totally not cheap TLDs as something you want to have, please be aware that you're limiting the ability of third world citizens to have access to proper, enjoy access to Internet because for them, a change of one or two dollars in the price of a domain is a lot.

And the second thing, we need to bring attention to the picture which is totally not true about the magical DAAR which somehow predicts future cyber crimes, when in reality, it's just a dumpster for some feat with items they cannot deal by other means, etc. Basically it's a PR battle. Thanks.

KRISTINE DORRAIN:

Thanks, Max. I think those are really good cautions to remember too. I think that's one of the things we need to be concerned about as we think about any suggestions. We should really be guessing two, five or ten steps ahead. If we recommend X, what does that mean for us in the future? If we say we're going to use categories, and these are the categories, what does that mean? What's the likelihood that somebody's going to enforce all TLDs in the next round must be a next category then?

So I think you're right, Maxim, that we need to think about unintended consequences, both on censorship and also on third world countries trying to enter the emerging domain name market.

The other thing I would say, and I'm just going to set the stake in the ground. Other people can object, but I really think pricing needs to be off the table. Pricing could be – I don't know how it works in statistics – it could be a cross-functional metric. But ultimately, at the end of the day, dot-brand TLDs are essentially free. We pay the backend provider but because they're so restricted, there's no abuse, right? It doesn't have to do necessarily with price. There's a whole lot more that goes into it. You could be almost giving away domain names but if you've got really great other policies, maybe you're doing good reactive policies as Jim pointed out, maybe you've got frontend validation, whatever it is you've got as your mechanism, pricing is something that I think we, as registries, should not have on the table because we're so sensitive to having it discussed in other contexts as well. I don't see anybody raising their hand to disagree with me.

Maxim then says, “Could we ask for those TLDs which have AGP? Without it, there is no free try? [inaudible].” Maxim, can you explain AGP? I probably just have acronym weariness right now. Oh, the grace period for the lifecycle. I don’t know. What do we think? Is whether or not TLDs have AGP, is that meaningful? Maxim, go ahead.

MAXIM ALZOBA:

The [idea] is without AGP, hypothetical TLD doesn’t allow registrant to try. For example, they register something, do something not necessarily bad but sometimes bad, and then they say, “No, we don’t need it. Please return us money and kill that thing.” Yeah, why not? Effectively, it’s one of the thresholds where you cannot have your money back when you register a domain. Thanks.

KRISTINE DORRAIN:

Go ahead, Kurt.

KURT PRITZ:

Well, I think Maxim is probably right about AGP and that being a possible category. I want to make two points. I think, again, that we should let the data create the categories. So when DAAR is refined, there will be a spectrum of abuse levels across all TLDs and at the far left or whatever end where there’s not any abuse, you might have brands or highly restricted TLDs. Well, I don’t really care about creating those two different categories because we don’t care about any of that. We care about what’s at the far right. And so that’s where then the subsequent analysis will have to take place. So it’s not a one-step

analysis. It's a multi-step problem and we might find at the far right, there is a distinction between those registries that offer grace periods and those that don't or Kristine, that there's likely to be a correlation with price so even though we don't want to discuss it, others will and so it's important for us. It's a multi-step analysis so if somebody's charging pennies per domain name, so we put in price controls, well, what happens then? Well, then whatever the lowest price is will attract all the abuse. So how far do you have to ratchet up price? How many economists do you need to make that determination in our price controls at all feasible? And the same thing with bulk registrations.

And there's good reasons for having low prices too. I've been part of a promotion where domain names, they're sold for less than \$1 which would make your hair pull out until you realize the registrar was just trying to make more money so bundling your domain with hosting and website services. So in fact, the \$1 domain will be likely to be renewed because the registrant is putting up a website and buying some hosting services. So not all low-priced domains create opportunities for abuse.

So the point I want to make is one, where we can easily create categories, I don't know if it's really meaningful because that's at the far left end of the spectrum and we want to pay attention to the far right which is more problematic to parse. And two is, it's not a one-step analysis. It's what are some of the initial causes or direct causes, causal relationships with abuse, and then continuing that analysis, so determining if meaningful actions can be taken at the registry level which is hard in order to combat that or whether that would just chase the abuse somewhere else. Thanks. Sorry.

KRISTINE DORRAIN:

No, thanks. I think those are all really good points, Kurt. And yeah, I do agree that pricing is a variable. I just worry that that becomes the end-all, be-all discussion as it did in the CCTRT. They basically make the blanket statement without any data that low prices equal abuse without knowing. I could give domain names away, but say they come with some other Amazon service or something, whatever the use case is. That needs to be taken into account. You can't just look at pricing. So I think that's why it has to be on the discussion for now.

I see Jim's hand. Before Jim goes, I want to just jump in and recap a little bit because Kurt, you said we need to see where the data itself leads to conclusions. So I want to try to push even more and think even more about how we find that out. So we have three action items so far. Be bold and hold them to a timeline. Number two, recommend specific actions. One of them is to eliminate legacy versus new. We've actually done that but we're going to recap it. Then we're going to think about categories. That's what we're doing right now. Does it make sense to have categories, Jim, throughout open versus brand-restricted, other restricted and [geos]? And then the third one that I just heard and Jim mentioned it in the chat is thinking about the mitigation credit, which we've asked for, to be part of the DAAR report.

So is our next step then that we say we can't make any further recommendations per Kurt's point until we see the impact of the changes you've already made based on these conversations so that we can give you more steps? Or can we make more recommendations

given what we currently see in DAAR reports? Given that open-ended question, I'll now cede to Jim.

JIM GALVIN:

Thanks, Kristine. So two things, I guess. First, I wanted to respond a little more directly to the AGP question from Maxim. I don't think that whether or not you have AGP is a big determining factor, at least not on data that I've seen. The malefactors, to some extent, they curate domain names. I don't see as much abuse based on names that are dealt with and used within the AGP as not. And in fact, I would just suggest that one of the ways to deal with that is you still get something out of it. If you arrange a restocking fee for anybody that tries to put too many names back, you just need a restocking fee kind of policy of some sort which we've done with some of our TLDs and the domainers tend to hate that more than anything. The abuse that we see during the AGP period is really from domainers moreso than it is malefactors in particular. Others may have a different experience, but there's that.

Just thinking some more about this price thing, I want to just say out loud what I was trying to say in the chat room and maybe expand a little bit. I think that if we focus on the getting DAAR to actually present something that's useful as opposed to the presentation that they have now which I really find objectionable on the whole and getting them to show the data differently so that you can actually derive sensible conclusions from it, that would be a good thing. And I think that pricing will become less of an issue if we focus on the fact that abuse exists and it's being attended to and we can demonstrate that it's actually being mitigated. We are good actors, most of us are. We can focus attention

on where the bad actions are going on or where all of the abuse is. I think that we all win and it really does take the pressure on discussions about price. There are a lot of people who seem to think it's an interesting thing but clearly, we know that it's not. Price is not in a panacea. It certainly can be a contributing factor but it can be addressed just like all abuse can be addressed and that's the point there. So let's focus on putting attention on the positive things which is the fact that there is mitigation going on and getting the DAAR representation to show all of that, getting credit to the fact that there's mitigation happening and I think that that'll take the pressure off of price.

I do want to say a little more. I apologize. I'll talk a little longer here about categories. I've been thinking a little more about this. Kurt made the comment, "Let the data show you categories rather than us trying to give them categories." I guess I'm not sure that I agree with that, Kurt, and I'm struggling to see the end of that. From my point of view, the data that DAAR shows is, is there abuse or is there not abuse. I'm trying to figure out how I would discern other categories from those facts that are there and maybe if you can walk through a bit of that, that would help me. This is why I'm focused on let's create some broad categories of ways to group together TLDs because I really do think, at least based on our minor cuts without a detailed academic, statistical analysis across the data that we see, these distinctions here that this grouping suggested, open, restricted, brand, geo, I think that it's useful to see what's going on there and I think that that will show some good qualities moreso than bad qualities and that's really what I'm looking for in creating categories. I want to actually call out and show the good stuff and I want to tell them where that is so that they'll start to put it

out there. It's not clear to me, and maybe if you can walk through an example, that would be helpful, how the data is going to show us good versus bad. Thanks.

KRISTINE DORRAIN: Thanks a lot, Jim. Yeah, I'm going to turn to Rick in just one moment. I wanted to just quickly see if Kurt wanted to respond to Jim's question.

KURT PRITZ: Sure. Thanks, Jim. And I'm not on firm footing here, but my view of the DAAR now is that there are two categories spelled out, legacy and new TLDs. And that's what we've told them to abolish. And we've asked them to do some further analysis so to better describe, to better indicate to us what or to create data that would enable some actions that would reduce DNS. And so when they parse that data or do some additional analysis, it won't be based on new versus legacy TLDs. It'll just be across the spectrum of TLDs and characteristics of those TLDs that have the greater amount of abuse will stand out and will say, "Okay, what are the characteristics of those TLDs where there's greater abuse?" And we'll hopefully be able to put together a set of criteria that would combine, make a TLD more susceptible to abuse and then, as I've kept saying, there's another level of the analysis then, right? Can something be done that will effectively reduce DNS abuse in total? So I think there's two categories in the report and we all agree those are the wrong two categories. And every time, to the extent we guess at them, like AGP, that could be one or could not be one of them, but by creating that beforehand, then we're kind of creating a presumption that that

might be it and for me, in analysis, that tends to skew the data. So I think your points are really good and that was probably a pretty poor stab at making some sense out of my position.

KRISTINE DORRAIN:

Thanks a lot, Kurt. I think, Jim, that's an old hand so I'll go to Rick and then, Jim, if you have a response, put your hand back up. Thanks, Rick. Go ahead.

RICK WILHELM:

Very good. Thank you, Kristine. I've got two topics. One I'm going to discuss about the mitigation credit and the second thing I'm going to bring up is one that Kurt brought up in the chat regarding the reduction in abuse in TLDs since May which was mentioned in the presentation in Montreal. First, related to mitigation, the TLD operators, registry operators attempting to seek what we might describe as "mitigation credit". I think that one of the things that we, as a group, need to be thinking about here is the second order effects of something like that in that if we go and talk about the things that we're doing for mitigation and attempting to seek "mitigation credit", that might invite a bunch of criticism related to the "Well, that's all you're doing?" or "You ought to be doing more" or something like that.

Additionally, us getting out towards just talking about mitigation credit might result in us needing to disclose things that we might want to consider confidential related to methods and procedures related to how we're coming about these things or we might also be doing more things related to mitigation that we're not able to disclose because we don't

want to reveal methods and procedures, ways and means, things that we're doing to combat abuse. So I think before we go down the path of seeking whatever we might consider mitigation credit is, whatever that might look like, we just need to be aware of what the second and possibly third order effects of that might be because the question is, for certain audiences, would this ever "be enough"? So that's just something to ponder or maybe we can discuss on that.

The second one is related to something that Kurt brought up in the chat, related to reduction on abuse and new TLDs since May. This came up in a meeting in Montreal and we asked about this. I remember Kurt was on my left. I was on Kurt's right, not coincidentally. Those tend to happen in pairs. And we both saw this happen and I think that Kurt raised it and [Crane] turned it over to the gentleman from Spamhaus and then the gentleman from Spamhaus commented that this is impact because of impacts from GDPR. And the comment sort of hung out there in the air and I was surprised by this and a little bit skeptical and didn't quite buy it. But I didn't feel that it was interesting to push it in the discussion.

I later chatted with some of our security team members, folks that interact in or around and use the Spamhaus [feed] here internally and one of the things that this person observed was that – and Kurt, you would be kind of interested to hear this – Spamhaus's algorithm relies on WHOIS data. And so the way that this person reflected to me is that since May, when Spamhaus would lose some access to some WHOIS data, their algorithm was flagging fewer domains as being abusive which is sort of different than there's less abuse happening. And that, therefore, was impacting what the DAAR was turning up. And so that's a

way to link the graph to the comments that were made in the meeting to what we sort of see in real life. So hopefully, that helps connect some dots there. And that's all I have. Thank you.

KRISTINE DORRAIN:

Rick, I have a follow-up question on that if you don't mind. So are they saying, then, that the data that they get is more or less accurate or just differently accurate?

RICK WILHELM:

So I didn't follow-up personally with Spamhaus on this. This is a discussion with someone internal. But the way that the person I talked to internally phrased it, it really connected the dots for me. And so basically, the data, what it really amounts to is that the Spamhaus data source changed and had a different hit rate, if you will, after May because their WHOIS inputs changed and so their algorithm went through sort of a step function, if you will, because their either false positive rate would change or their accuracy rate would change or some other. Their hit rate basically changed due to it being impacted by WHOIS availability which logically makes sense to me and so therefore, since one of the inputs to the DAAR algorithm had a step function change in it, therefore, the DAAR algorithm and reporting had sort of a related change that showed up in the numbers sliding. Does that kind of help to elaborate?

KRISTINE DORRAIN: Yeah, I think it does. Thanks very much and I just want to address Maxim's comment that spam's outside of our issues. We don't think that spam is something that they should be monitoring but they are and I think discussing how the data is displayed absolutely is within this working group so I just wanted to address that.

RICK WILHELM: Yeah, and so to that end, regarding that, remember this is domains that Spamhaus tags as abusive. And so the reason, and so they use that as one of their indicators. DAAR uses it as one of their indicators in whether or not they tag a domain as being abusive regardless of whether spam, as Maxim says in the chat, is outside the set of issues we're responsible for dealing with.

KRISTINE DORRAIN: Correct. Thank you, Rick. I appreciate that. Jim, your turn.

JIM GALVIN: Thanks, Kristine. Quick comment to Rick's thing there. So I think if I tracked all of that carefully, registries win in this regard because they'll show less abuse than they otherwise would have. So yea for us, I think. Sorry about their luck. I don't know. Maybe that's kind of an overstatement. But that's sort of what it felt like. We got through all of that.

I wanted to speak to the issue of mitigation credit though, really. From my point of view, what I mean by mitigation credit, and I think this is kind of important, it's not that there is something that is displayed or

represented about each of us in particular. So it's not a value that's called out or otherwise assigned to us, I think is the way to phrase it. When I think of mitigation credit in this DAAR environment, what concerns me is the way that DAAR is presented today, one of the issues that we've talked about is the fact that you can have a certain kind of absolute number and even a certain kind of percentage and the domain names that are behind those numbers are different from day to day. That's the issue.

So the issue is that abuse is here to stay and we don't control abuse. There are things that we can do that might restrict abuse or reduce it, but mostly, the system today is a reactive system. It's not a proactive system. And what that means is abuse is always going to be there. It's always going to happen. We are always going to take action against that abuse or most of that abuse and do something about it. And then tomorrow, we're going to have the same score because it's a different set of domains that are being abusive tomorrow. And what's happening here is there's no reflection in DAAR that we actually are being reactive and mitigating abuse. The numbers happen and we can't control the numbers and that's the point that's not there.

So the mitigation credit for me is to change the presentation in a way or its explanation or something so that the community is keenly aware as much as we can make it show that, that there is not a broad systemic problem here. The fact that I've got a certain score or a certain set of numbers, oh well, but that doesn't make me a bad guy all by itself. You have to consider other things like the fact that it's a different set of domain names. So I just wanted to be clear about that. Mitigation credit, to me, is more about representing the fact that we do things, not

that there's some kind of score or something they're going to show for us and we haven't really resolved yet how to reflect that in the system. So thanks.

KRISTINE DORRAIN:

Thanks. I think the only thing I would add to that is I do believe in racking my brain, that at some point in the past, Samaneh has said that they are investigating ways to include, we can call it mitigation credit or whatever, but just a realization that domains are also taken down. And so what I'm unclear about is where she's at on that. Is there active work being done? Is she still in the thinking stage? Does she have a solution and she just hasn't published it yet? I think that goes back to our action point one of really not understanding where they are in their timeline even though we expressly asked them for a written timeline in Montreal. So I think it's about putting a little tiny bit of pressure on the to step up and actually commit to some of this stuff so we can figure out is this stuff actually happening. Maxim, go ahead, and then I think after Maxim, we will hopefully close and do a little wrap-up and plan for next week. Thanks.

MAXIM ALZOBA:

Speaking about these proactive ideas, I wonder how can that the experience of some ccTLD in Europe which has a lot of funds, basically, they can waste millions of dollars or Euros on what they find [fit] is going to be used outside of that region. Because they want us to have artificial intelligence. Basically it's a marketing term. There is no artificial intelligence at this moment on the Earth and demands that we prevent

crimes which is actually role of law enforcement. We don't have powers to do so. We don't have knowledge of the future and demanding this from us, basing on the results of non-functioning DAAR, I'd say the question is wrong on a few levels at least. So we need to be careful speaking about proactive and at least which kind of proactivity do you want us? Do you want us to file a police report each time we think that something is wrong? But please be aware that this is not very different from what you want, like not allowing people to register because some computers think something or some unidentified source of DAAR thinks something. Thanks.

KRISTINE DORRAIN:

Thanks, Maxim, and I think that's a great place to leave it. So I think Jim was really referring to reactive credit, so sort of thinking about things, once the abuse had happened, how quickly does it come down. I think you've introduced a new topic which is proactive credit and I think that is something we should explore. As I think going back to Kurt's idea of let's cut the data a certain way which I think we need to follow-up on because we haven't necessarily decided amongst ourselves how we want to see it cut. And then from there, let's see what shakes out. Does it make sense to then say, "But hey, these TLDs are doing reactive things. These TLDs are doing proactive things." And then Maxim, you brought in the CCTs which you can see is in action item number three. We were hoping to get to today, but we didn't. If John and Samaneh join next week, I highly recommend we ask them their thoughts about it. We have not internally discussed it. I think we all have pretty strong feelings and we may not necessarily agree. I know that one of our action items that we had in our letter to our issues report to DAAR, to OCTO

was considerations of ccTLDs. I'm not sure that this was how we imagined it was going to shake out. So we need to put a pin in it now but I would love to come back to that. I think that's going to be a really hot topic. I'm noting Kurt's comment in the chat. I'm going to copy that before we close the chat here.

Time is up. We're supposed to meet next week. I think we still have a lot to do. I would like to suggest that we really be thinking these hard-core questions and then getting some action items in place. What I might do if I have time today – I know it's kind of a long weekend for a bunch of us – is get these notes sent around so that we can firm up some timeline messaging. It would be nice if John and Samaneh are on the call next week to really kind of get them to commit to a timeline and then we really do need to nail down whether or not we're going to recommend categories and what we're going to put in writing. I think we haven't done a good job of communicating in writing to them what we expect and so I think it's time for us to not only ask them to commit to a timeline but for us to put some expectations in writing. So I think we need to set that down and then we haven't even really talked about what that sort of DAAR preamble document looks like either, which I think we're waiting to see what the changes are.

So all things that we have going, all irons in the fire. We should have plenty to work on next week whether or not John and Samaneh are on the call. Thank you, everyone, for joining. This was a really great discussion and I'm going to try to recap this in notes because this was extremely productive in my opinion. Have a wonderful rest of your day. Happy Thanksgiving to everyone celebrating and talk to you next week.

SUE SCHULER: Thanks, Kristine. Michelle, we can end the recording.

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