
SUE SCHULER: Great. Thank you. Okay. Go ahead, Brian.

BRIAN CIMBOLIC: Thank you, Sue. And I'll follow Jim's lead in being on video when he's leading also. If you feel like joining me, please come, the water's fine. So, today we've got three agenda items but really 90% of what we're going to talk today about is the SSR2 draft and the remaining comments.

We got about halfway through last week but we—and I think we can press ahead and likely finish off the initial conversation around it today. But first, just a quick update on the Workstream updates. The choice of action document has gotten input from the small drafting team.

I'm going to try over the weekend to consolidate those changes, have a more polished draft, have that team have one more look at it before it comes to this group. But since SSR2 has eaten up all of our time, certainly this week and last week, I hadn't been pressing it so hopefully you'll see something from us on that next week.

Also next week, I just got an e-mail from Gabe Andrews and Ryan Lashinsky on the FBI to help—asking for time next week to map out the framework to address malware and botnets at scale.

So, please let me know if you'd like to join that call. They tentatively asked for Wednesday, 11:00 AM Eastern Time. If that's something you're interested in joining, please reach out to me and I will make sure you're on the invite.

This isn't really the first meeting of that drafting team though. They have had less formal discussions on there as far as what that looks like with mapping the rest of the PSWG in. But still, I think it's going to be a worthwhile session that we can hopefully map out what this thing looks like.

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The outreach, as you all know—Donna said she'd like to join. That's great. The outreach sessions have gone relatively well. I actually had to drop from the ALAC call halfway through—and Jim is on video. So, Jim, I don't know if you mind just giving an overview as far as how you thought that call went?

JAMES GALVIN: Sure. I mean, I think in general it was a good call. Really it was successful. I thought that we had some good conversation. It was interesting that Jonathan Zuck in particular, he really did seem to be a little more aligned with us as compared to historically the way when we were kind of imagining the way that ALAC would come across.

I think it's pretty clear though that even ALAC doesn't have a unanimous position. Joanna, in particular was certainly representing the more expected ALAC presentation where they're generally of the form that more can and should be done. And they're just trying to figure out what that needs to be.

To me, Jonathan seemed just a little more open to at least working together and having a dialogue. So, I don't know really where all that's going to go with ALAC but we'll cover more details about all of that, I guess when we meet next Tuesday.

BRIAN CIMBOLIC: Sounds great. You mean with the CPH team, Jim?

JAMES GALVIN: Yeah.

BRIAN CIMBOLIC: Not for the outreach? Okay, great. If anyone else has any other thoughts they'd like to share on that, I'm happy to take you now. I'm not seeing any. Okay. Donna, go ahead please.

DONNA AUSTIN: Yeah. Thanks, Brian. Thanks, Jim. I wasn't able to join that call on Tuesday so I'm hoping Sue has some notes for us. But just a question as to whether ALAC has started doing their own—they were looking at developing content around for the end user DNS abuse and I was just wondering whether they'd actually started any of that content development or done anything in that regard.

BRIAN CIMBOLIC: I have not heard it. But again, I dropped early. Jim, did they mention that in the second half?

JAMES GALVIN: Yeah. I mean, no. They didn't mention any specifics, Donna. They generally referenced the idea that they were doing education materials and stuff like that. And Jonathan only did that in the first half that I can remember.

But we didn't get any kind of schedule for them or plan about specifics. So, that would be an interesting open question to keep for a follow-up with them. Thanks.

BRIAN CIMBOLIC: Yeah. Thank you, Jim. Thank you, Donna. The only other thing I would contribute is that, Jonathan mentioned, I think at least once but I think he mentioned it twice that there's not consensus in the ALAC on the definition of DNS abuse which I think is really important for us to keep in mind.

It seems all of this was just reading tea leaves but it seems that there's a subset of ALAC that is willing to accept that it is DNS abuse as we define it sort of technical abuse. But then there are those in the ALAC that want to push for a much more expansive definition of DNS abuse. Keith, I see your hand up. Go ahead.

KEITH DRAZEK: Yeah, thanks, Brian. I'll agree with that for sure. I think ALAC at some point may come together with a common understanding. But they're a very, very diverse group through the RALOs and it's going to take them some time to wrangle that down.

I put up my hand initially just to note that we have now two invitations out. One to ccNSO and another to the ISPCP and the ccNSO chair indicated that they're going to be talking about it this week during their monthly meeting.

So, I hope to be able to report that we've got a couple more external engagements on the horizon but I don't expect anything for next week. So, I think we'll have that call back to ourselves rather than having that be an engagement session. So, that's the update on the outreach. Thanks.

BRIAN CIMBOLIC: That's great. Thanks, Keith. And if I could actually, Keith, put you back on the spot, I don't know if you'd had mapped out when we would do outreach to SSAC and BC/IPC but I do think it's important that we probably have those conversations with them or at least offer to have had those conversations with them in advance of the next ICANN meeting.

KEITH DRAZEK: Yeah. Completely agree, Brian and wanted to get these next two out there and then carve out some time in early March, mid-March before the ICANN meeting. So, I agree that at a minimum, the invitation's out for future meetings if we haven't had the conversation. So, onboard with that 100%.

BRIAN CIMBOLIC: That's great. Awesome. Thank you, Keith. Okay. Anyone else, anything on the outreach updates or anything else on the existing Workstreams before we dive into SSR2? Okay. If not, then Sue, would you mind pulling up the SSR2 comment doc? I'm sorry if I didn't—

There you go. And if you could scroll down to recommendation 15 and I'm going to pull it up on my screen. And while I do, Sam Demetriou—who I mentioned before this so for all of you, I'm not putting her on the spot—could you give us an overview as far as what you were thinking? Some of us have had conversations around what this comment might look like both at the registry level, the registrar level and a CPH approach. So, if you could fill us in what you're thinking, Sam.

SAM DEMETRIOU: Yeah, of course, Brian. And no problem. I think when you stand up to be chair you volunteer to always perpetually be put on the spot for things so don't worry about that. Hey, everyone. I'll join Brian on video for just this intervention and then I'm going to finish my lunch.

This might be a bit repetitive for those who were on the bi-weekly yesterday. But what we've been discussing, what I've been discussing with Beth from a comments perspective, with other ExCom members, with Jim and Brian as the leaders of this group and then also with Ashley as the chair of the Registrar Stakeholder Group a bit.

And again, open to feedback and input, I'm just giving you the background for where we've been thinking about this. What we're thinking about right now is a two-pronged approach, right?

So, the first would be what we're working on here in this Google doc which is a comment from the Registry Stakeholder Group. Hopefully, the registrars are working on their own version of this to submit via the standard ICANN public comments process which we know is open through, I believe it's March 9th.

So, this is a point by point response to the individual recommendations that are contained in the final report. So, as the board is now—the general workflow is that the board now will get these recommendations and will have to make a decision on how to act on them.

And so having individual specific responses to the recommendations in there, either concerns, support, objections, things like that is important to have out there on the written record. Based on the input that we're gathering in here and people's thoughts about these individual recommendations, we are also separately planning a second communication to the ICANN board.

Right now we've conceptualized it as a letter that would come from the entire contracting parties house. And it would focus more specifically on the topic of where the review team made a lot of recommendations regarding changing our contracts.

And our concerns that we have with review teams trying to circumvent the ICANN policy development process and the established ways of updating registry and registrar contracts by simply issuing advice or recommendations to the board and hoping this would get around all the messiness of having to deal with a policy development process or contract negotiations.

So, it's a concern that we raised going back to the first version of the CCT, the Competition Consumer Trust and Consumer Choice review team in, I think it was 2017 and then a follow-up on the final report in 2018.

So, this is not new information. It's not a new concept for us. But I think in light of this report having a dedicated communication, making very clear what the concerns are here to the board probably makes a little bit of sense.

In addition to that communication from the registries and the registrars, we also have a face—no it's not a face-to-face. A direct meeting, like a one-on-one meeting with the ICANN board on March 15th. So, this is leading up to ICANN70, it's a recreation of what we would usually have time directly with the board with during the ICANN meeting. But we had a little bit of flexibility to

schedule it the week before which I think is good because that means we're going to be the first group meeting with the ICANN board during the ICANN70 meeting cycle, if you will.

So, what we had discussed a little bit is using that time with the board because the board this time around doesn't have a specific topic they want to talk to the community about.

So, using the time with the ICANN board to go through the highlights, the high points, if you will, about what's going to be in that letter which will cover not only the concerns about meddling in the contracts that I just outlined, but then also from a more positive and more proactive standpoint, talk about the good work that we're doing, both us and the registrars on the topic of DNS abuse and trying to advance that conversation and trying to give registries and registrars resources to take more action to mitigate DNS abuse instances when they occur through these working groups.

And use the time to showcase that a little bit and show the board as they're hearing that DNS abuse is a problem and things aren't being done, we need to do more. Show them that work is being done on this and we are taking this seriously and it is something that we're working towards.

So, that's the broad strokes outline of what it is that we're planning in addition to this specific comment right here. And I'm happy to take any questions or hear any feedback that folks have.

BRIAN CIMBOLIC: I'm not seeing any but I think it's a great plan. I like it. I think it makes a lot of sense. So, thank you for that, Sam. I appreciate it. Go eat your lunch now. Thanks. So, digging in then, so we've got on the screen picking up where we left off last week. Recommendation 15 and this is the other side of the coin from where we left off last week where we're not too keen on the notion that ICANN just issue another Temp Spec for DNS abuse.

So, this is the ICANN launch an EPDP to create an anti-abuse policy basically for the DNS. And so I actually have a question. Obviously, we're not in favor of this. But I have a question that I don't know if it's Keith or Donna or Maxim actually—I'm glad you raised your hand—my question is about the EPDP process itself. I understand that obviously a Temp Spec can trigger it but I

think it'd be helpful to understand—which I don't—when can an EPDP be kicked off for grounds other than for a Temp Spec? I know you raised your hand prior to me asking that question, but if you have that information handy when you make your intervention, that would also be helpful. So, Maxim, go ahead.

MAXIM ALZOBA: Do you hear me? It's Maxim.

BRIAN CIMBOLIC: Loud and clear.

MAXIM ALZOBA: The thing is the only difference is that the initial report is not prepared. And I think we need to say that no EPDP this time because there are no clear set of documents and initial report is a must. Because since the first EPDP suddenly everyone started thinking, yeah, it's a fast way. We will have the same pace, etc. No, just no.

And I'm not saying it as a typical Russian who said it instead of maybe not. And the reason is there are no clear, I'd say set of papers, which could be taken as granted for the beginning of the process. So, I also don't see the reason why EPDP, maybe they just like the word, I don't know. Thanks.

BRIAN CIMBOLIC: That's helpful. Thank you for that, Maxim. And so I think certainly if it's fair to say that without a Temporary Specification, the EPDP as suggested would violate GNSO policy procedures, that would be a helpful thing to contribute to the document. Marc, go ahead.

MARC ANDERSON: Thanks, Brian. Just responding to what Maxim said. Maxim said initial report but I think he meant issue report. So, the step that the EPDP skips is the creation of the issues report, not the initial report.

But beyond that, I agree with Maxim. The language around an EPDP is when—there's a couple triggers for it but the one that Maxim was referring to is that the issues to be discussed are already well-known and understood. AKA creating an issues report isn't necessary because everybody already knows what the issues are. And so other than just slightly tweaking what Maxim said there, I agree.

BRIAN CIMBOLIC: Excellent. Thank you, Marc. I made a note that the EPDP would skip the requirement for an issues report, circumventing GNSO policy procedures that we can turn into some text. But also, especially it's understood that if it comes from a Temp Spec that the EPDP can naturally flow from that. But without that you need a different foundation. So, Maxim, go ahead, and then Donna.

MAXIM ALZOBIA: I'd say it's more like that it's up to GNSO Council to say if it's EPDP or PDP. So, I don't think CPH is going to vote for this. So, the reason is we will explain well that since nobody has a clear explanation what we're talking about, obviously we don't have any ready set of papers, I'd say.

So, it's not about violation but about not agreement to omission of an important step in the development like an initial research which should be done and must be done. Thanks.

BRIAN CIMBOLIC: Thank you, Maxim. Donna, go ahead.

DONNA AUSTIN: Yeah. Thanks, Brian. Personally, I don't understand from the SSR2 report what the Temporary Specification would actually say. So, with the one, the Temp Spec on the gTLD registration data, so the EPDP was triggered from that because there was a—there's a 12-month period that the Temporary Specification is only relevant for 12 months unless the gap is filled by policy. And that's where the EPDP came into play is that the EPDP [inaudible] only had 12 months to complete its work.

So, the thing that I struggle with here is not so much about the EPDP but it's what does the SSR2 intend the Temporary Specification to say? Because I've got no idea what it would actually say. So, I think what they're attempting to do here is they'd be a Temporary Specification that's put in place and that would be for a 12-month period.

And then during that 12-month period, there's an EPDP that would look to solidify what's in the Temp Spec which was what happened with—as we know, with GDPR. So, that's what I'm not seeing here or understanding. Maybe somebody else does.

BRIAN CIMBOLIC: So, I don't know that I have it right. Sam, you have your hand up. If you'd like to explain, go ahead.

SAM DEMETRIOU: I mean I don't know that I have it right either, Brian. I was kind of hoping you would buy me some time. I'm kidding. I hope I have it right. I think this Recommendation 14 and 15 because they're very clearly linked, I think these are evolutions that come from the CCT report. In the draft report version of the SSR2 report, they recreated the CCT recommendations almost wholesale and it seems here that they've just edited it slightly. So, what it seems like they're trying to do is the point of the Temporary Specification would be to establish threshold levels of DNS abuse, and contract to parties who exceed that threshold level would have a short

window to remedy it or otherwise would be put on a path to be found in breach of their contracts and then all the attendant consequences that come from breaching your contract with ICANN.

I don't know if this has been said, so I apologize if I'm repeating someone else. In our registry agreements and the registrar accreditation agreements, part of the provision around Temporary Specification says that a policy development process must be initiated as a response to them.

It doesn't have to be an expedited policy development process. That was used the last time around because as Maxim pointed out too, there was plenty of material in place and a separate issues report was not necessary.

I could see there being the same grounds potentially in this scenario because if you have a Temporary Specification, that can almost fill the role of an issues report. And so from that standpoint, an EPDP could be the answer here.

And then to go back to what Donna said, the EPDP then would have the task of determining whether the individual specifications in the Temp Spec should become policy or should not become policy as written or as altered. That's how the last one played out.

So, hopefully that's some context that is helpful as we're thinking about this. But again, the recommendations themselves are somewhat vague and open so there's probably a little room for interpretation on some of that stuff.

BRIAN CIMBOLIC: Thank you very much, Sam. Jim, go ahead.

JAMES GALVIN: Thanks, Brian. Sorry, I'm just trying to reframe my thoughts here after listening to Sam. I guess what I'm getting out of Recommendation 15 is that the goal is to create

an anti-abuse policy. And while we want to reject that out of hand, the reasons for the objection in my point of view are just that they don't offer any insight as to what they want in that policy.

So, what kind of elements do they think it should cover? And frankly, there's no support in the overall SSR2 report about why an abuse policy is the right mechanism to solve any particular problem. So, I mean, I see Recommendation 14 as a way to quickly establish a threshold mechanism.

They believe that that's important. That's what's being asserted here. And then there's some details that go around that. And then built on the fact that you now have this threshold that's out there and by the way, you're going to be obligated to it and compliance is going to come after you if you get it wrong kind of thing.

They want this broader abuse policy with no context as to what's supposed to go in it. I mean, you can infer a bunch of things because there's some text obviously in the document.

So, there's just a lot of details missing here that it does not at all hang together. And I hope I'm just putting a slightly different spin on what everyone else is saying.

This is going back to what Donna said before about [what should something] say and things like that. That's the distinction that I see and what's really going on in these two things and I hope that helps.

BRIAN CIMBOLIC: It does, Jim. And I don't know that I made the best framing of this. Because my question around that EPDP in 15 was actually working on the premise that we'd already rejected out of hand the notion of a Temp Spec.

Because the way that Recommendation 14 is written is literally antithetical to what is allowed under—allowed to be a Temp Spec under our registry agreements and the registrar accreditation agreements. The terms are the same.

So, I guess what I was getting at was short of the Temp Spec, what would be needed to trigger an EPDP? And it sounds like it's this issue report which without either of those a Temp Spec or an issues report, it sounds as though the EPDP would be built on pillars of salt and sand. So, Jim, I assume that it's an old hand, but if not, Beth, go ahead.

BETH BACON: Yeah. You said exactly what I was going to say. We said the Temp Spec is not very clearly and well-articulated by Brian in the previous comment. It's not a viable option so therefore anything building on it, not viable.

But I do think we can easily make that point. Use this as an opportunity to reiterate that point and then also say, "For these several reasons, we continue to have concerns with an EPDP or PDP approach to this problem considering there's still no clear statement of the problems that you are solving with this issue. It's very vague, it's not substantiated in the report." We noted in our previous draft comments that we really wanted more—much clearer problem statements.

I mean, that's still doesn't exist. And then we can also use this as an opportunity to say, "We are working on these things as a community." So, is this a distraction? Is it a repetition again, I think as Sam, I think noted of that work out of the CCTRT recommendations, I think 13 through 14 and 15 where ICANN Board already punted this to the community? We're working on it. We can use it as a way to say this doesn't build well and it's not viable.

BRIAN CIMBOLIC: Well said, Beth. Well, I think we have what we need on 15. The only other thing that I would add is 15.2 in particular already has predetermined outcomes for the EPDP that aren't actually even linked to the scope of the defined Temp Spec in 14.

Things like timeframes for contracted parties to take action on abuse, specific countermeasures and remediation by types of abuse. That is a very specific, in the weeds of a weeds type thing, that doesn't seem appropriate as the framing for an EPDP. Marc, go ahead.

MARC ANDERSON: Sorry. Just real quick. Brian, there's two Temp Specs being called forth. There's one in 14 and then in 15 they're saying, after you do the Temporary Specification 14, create a Temporary Specification for evidence-based security improvements. So, there's two Temp Specs they're calling for, not just one.

BRIAN CIMBOLIC: I missed that. That's even—

JAMES GALVIN: No. Those are the same thing. Page 14 is a Temp Spec for evidence-based security improvements and they're just using the name and the title there. It's the same thing.

BRIAN CIMBOLIC: That was my understanding, Jim.

MARC ANDERSON: Okay. Thanks. Sorry, my bad.

BRIAN CIMBOLIC: Okay. Let's move on down to 16 then, Sue, if you don't mind. This is about privacy requirements, and I'll let everyone take a look at this. My initial thought was 16.3 in particular was—made me throw up in my mouth a little bit.

As far as ICANN enforcing a registry or registrar's own policies against them, that is completely way outside the scope not just of an SSR—of a review team but of ICANN itself. Jim, you made a comment on 16.2, could I ask you to articulate that?

JAMES GALVIN: Yeah. In principle, I probably don't object to ICANN creating something to work with law enforcement to help them understand privacy laws, rules, regulations. I don't know, it's not immediately obvious to me how that's a bad thing. And then they try to link this to access to CZDS data. And I'm like, I don't get it. That makes no sense to me. So, that's all [inaudible].

BRIAN CIMBOLIC: Beth, go ahead. You've got your hand up.

BETH BACON: You can respond to Jim, go ahead.

BRIAN CIMBOLIC: Well, no. So, what I was going to say is that yeah, I'm in the same boat as far as like I don't have a problem with that but that already happens and that ICANN does facilitate conversations around this with between PSWG and registries and registrars.

And I don't think it needs to be some—certainly not some specialized subgroup within contractual compliance because I don't think that law enforcement has any direct say over contractual compliance. So, with that, Beth, go ahead.

BETH BACON: Thanks. Yeah. So, I think that this is, I mean, it's like the linking it to the contractual compliance where they already know how to do their jobs and they know what their scope is. 16.3 is clearly—made you throw up in your mouth. I think I actually did vomit a little bit when I read 16.3.

This is also something that we've—the role of contractual compliance with regards to privacy policies and other things are—we've discussed at length in the EPDP. And ICANN compliance has actively said that is not our role. We will not do that.

So, I think we can tie it back to the contractual compliance comments. Also the comments we—I mean, we're reiterating comments from the draft where we said they know their job, they know their scope, sit down and be quiet.

I don't necessarily have any issues with Org coordinating, I mean, as Jim said. I don't really have an issue but I do think we can say, "This is already happening." Again, it's a repeat of previous recommendations where it said go work on these things in the community and we are working on these things in the community.

And CZDS is silly, it has no PII. And again, this suffers from a lack of actual problem statement that we're solving. So, that's my diatribe on 16. And I plan to put in some comments in here, I just haven't gotten to the section yet.

BRIAN CIMBOLIC: I liked it. Anyone else? Anything on section 16 before we move down to 17? Beth, I assume old hand. Yes. Maxim and then Alan. Maxim?

MAXIM ALZوبا: I think we need to underline that law enforcement has just valid points of contact in their jurisdiction. And to be honest, outside of their jurisdiction, then at the best just third parties. At the worst, helping them might lead you to some extremely unpleasant sentences and things.

BRIAN CIMBOLIC: I appreciate the input, Maxim. But I think I have to disagree with you on that. I don't know that we necessarily need to shine a spotlight over jurisdictional concerns that I think can be left unsaid. Particularly, I think that it's fine to have an understanding out there that law enforcement needs are different than other needs.

I guess my point is, I don't think we gain anything by punching them in the nose a little bit on this. I think we can probably leave it unsaid is my own personal opinion but happy to hear different opinions on the group. Okay. Alan, you had your hand up and put it down. You don't have to chime in but if you want to.

ALAN WOODS: No. It was tongue in cheek more than anything and we can move on.
[Inaudible].

BRIAN CIMBOLIC: Great. Maxim, go ahead.

MAXIM ALZOBA: I'm not sure if it's a good idea to say [here] but one of the reasons of the poor performance of—I'd say the rate where that access granted is due to extremely poor performance of the portal. Because if I ask directly the CZDS portal users list, if they check how fast the access requests were processed before at the old platform comparing to the new one, and there is a strong correlation because for things on which I spent like 20 seconds or 10 seconds, I have to spend two minutes and it's beyond being, I'd say extremely slow, for the current standards. Because everything which is more than nine seconds is never. Thanks.

BRIAN CIMBOLIC: Okay. Thank you, Maxim. Anyone else? Anything on 16 before we move down to 17? Not seeing anything. Sue, if you wouldn't mind scrolling down. And thank you for emceeing, Sue. Jim, I'm going to hand this one right off over to you.

I admittedly don't have a lot of exposure on name collision and you have made comments. So, I think that is you raising your hand if you're at your screen.

JAMES GALVIN: Yeah. Thanks. Basically it boils down to one point. I don't understand—they mention NCAP in the full report. I mean, clearly, they were aware of it. They talk about it and they agree that name collision studies should continue.

And yet they put these two recommendations in here which don't at all say how they are different than what NCAP is doing. I just don't understand. I don't understand the objective of these things and maybe the second comment that I wrote down there—

Well, actually my first comment there about, I just worry that these recommendations, they create a conflict or at least some tension within existing activity. And so that just leaves an open question. And how and where is that supposed to be resolved?

Because I just don't know what the objective is of this recommendation if it's something other than why can't NCAP continue, and why couldn't they say that? So, that's all.

BRIAN CIMBOLIC: Fair enough. Thank you for that. Anyone else? Anything on Recommendation 17, regarding name collisions? I can hear my kids contributing to the conversation in the background, we don't need to have them in the transcript. Then let's scroll down to section 18, please.

And this is around informing policy debates. So, section 18.1 in particular, I also took great issue with is that ICANN should summarize third-party reports and basically editorialize them for purposes of implications that are relevant to ICANN Org or contracted party behavior.

This one also felt really over the top as far as contracted party behavior. I don't know if they're talking at the meta-level. It just felt that again, the SSR2 team got over their skis. But Jim, I see you raised your hand, and you had some comments there, so go ahead.

JAMES GALVIN: Yeah. Just to add to what you said. I think, we just need to keep in mind that OCTO essentially already does this. Well, what they do is they do research about emerging identifiers because we've had a number of things that ICANN may need to do that.

So, they do consider it within their remit to keep up to date on such things and report out on that to the community. And to that extent, I don't have an issue with the first two recommendations. Although I agree with you, why are they doing this against CPH? Editorializing? No, no. That's a bridge too far. That's a bridge too far. So, that's my comment.

BRIAN CIMBOLIC: Great. You also had a comment on 18.3, if you want to chime in, unless anyone else had anything else on 18.3.

JAMES GALVIN: Yeah. When did ICANN become a research Institute? When did it become a broker for registration data? I'm just not getting it. That's really what that recommendation is saying that ICANN should go do. And that's just completely an end-run around everything that we're all about here. And somebody looking to get paid to do some research for ICANN, that would be my guess, but no.

BRIAN CIMBOLIC: That could be. Anyone else? Anything on Recommendation 18? Okay. Then let's scroll down to Recommendation 19.

MAXIM ALZOBA: It's Maxim. Can I?

BRIAN CIMBOLIC: All right, Maxim. Sure.

MAXIM ALZOBA: I suggest we add something like we recommend [SSAC] to complain for [all] cases related to behavior to ombudsman office. It would be nice to slap them a bit. Because if they mention behavior, we need to refer to the anti-abuse policy in terms of behavior and the ombudsman office so they might enjoy it. Thanks. And also it will not help us at all.

BRIAN CIMBOLIC: Yeah. I'll let the group mull that one over. I think that we're going to be saucy enough in our response without the direct thumb at the nose at them, in particular around some of the way outside what's permitted in our contracts.

But point well taken and yes, I understand it is quite frustrating what they've put in there as directed to us. Let's scroll down to Recommendation 19, Sue, if you could. Jim, this is another one for you. Complete development of the DNS regression test suite. Since you've already made a comment, I'll turn to you to kick it off.

JAMES GALVIN: Well, I mean, this falls in the category of maybe we just don't have anything really to say about this. I made a comment just to observe that, well, OCTO is kind of already doing some of this. The SSR2 report itself does reference the GitHub that OCTO has in which they've been putting some tools and they do some stuff.

And I don't know that we have to have an opinion about whether or not OCTO does this as long as they're just doing it and having some fun with it. Sure. Why not? It's certainly not out of the realm of a reasonable activity, understanding how the DNS works top to bottom even if they don't impact it.

But I guess what I worry about is that they're saying that this is a good thing and they should complete it and they should do it and they should also be doing functional testing of all kinds of configurations and software versions and yet there's no reason why.

What is the point? There's no objective here. So, my last sentence here, when did ICANN become the compliance police for DNS standards? I have no idea what this is tied to. I mean, on the one hand, we can just ignore this and not say anything except for this generally falls into the category of are they just proposing out of scope for ICANN? I mean, I just don't even know where to go with that.

BRIAN CIMBOLIC: Fair enough. Anyone else, anything to add on 19? Well, Maxim I see in the chat you say new hand. I don't know if that related to your last comment or this. I'll assume it related. Okay, great. An old new hand.

Let's go to Recommendation 20 then, unless anyone had anything else on this. Formal procedures for key rollovers. The only input to this point was from Jim which he has agreed but probably no comment. I think it's important that we have some of these. It's like, okay we don't have a problem with everything.

There's things that are out of scope and not permitted by our contracts. So, does anyone have any issue relating to the procedures for key rollovers? Not seeing any. Let's go down to 21 then. We're booking through things.

Recommendation 21. Improve the security communications with TLD operators. Jim, you have put a comment in. You want to share your thoughts?

JAMES GALVIN: Yeah. I just generally think this is a good idea. I mean, this might be something worth agreeing explicitly that it's a good idea. One of the things that they call out is using multi-factor authentication when they're dealing with TLD operators at IANA and PTI. Well, the RZMS basically.

And I think all of that's a good thing. Certainly, the risk to a TLD is pretty low. They do a lot of manual stuff behind the scenes to keep all this stuff under control which is good.

But automation is always good and if we're going to automate, let's not lose track of important things like multifactor authentication and encrypted mail. So, it just feels like a good, overly specific recommendation perhaps, but a good thing.

BRIAN CIMBOLIC: That sounds reasonable to me. I don't see why we wouldn't. But Maxim, your hand is raised.

MAXIM ALZOBA: Actually, this item is also related not to just cybercrime but also to potential misendeavor of a fired person. I know at least a couple of situations where the fired person from the TLD wanted to just make everything a pile of junk.

And the situation where two roles have to confirm the same changes in IANA, actually same situation. I can disclose but it happened in the past. So adding two factor to that might not hurt because currently it's two different e-mails for each person, one administrative, one technical. So, making it for example, a phone, SMS or something—or SMS or voice will not hurt, I believe. Thanks.

BRIAN CIMBOLIC: Great. It sounds like there's a general agreement for those that have thoughts on this, that it seems like a good idea. Does anyone else have anything to add on 21, positive or negative? If not, let's scroll down to 22 which Jim also, you were pretty supportive of. Could you kick us off?

JAMES GALVIN: Well, I guess in a few different places, we've made comments. Other people have made comments. This doesn't actually phrase it in this way but I read these things and my interpretation was they just want ICANN to state what the service levels are that it's going to have and then it should be measured against them.

And that sure seems like a good idea to me. There's plenty of things ICANN does that we have no insight into, no way to track and broadening some of the stuff that they already do and making it a definitive objective just seems like a good thing to me.

And I've got an operational list for them if they're ready, but we don't need to get into that kind of detail here. Just agree with the overall concept, at least that's what I think. That's my suggestion.

BRIAN CIMBOLIC: I think it makes sense. My only thought as I read it, my eyebrow perked up a 10th of an inch was in 22.1, it says, "For each service that ICANN Org has authoritative purview

over, including root zone and GTLD related services,” registry services is a defined term in each of our agreements.

I don't think that's what the SSR2 team is referring to here. But to the extent we're supportive, we might just note the distinction. Because in theory then that would be putting out statistics potentially on every registry service offered by each different registry operator that is in exhibit A, for each of our registry agreements.

So, just a thought there. It's probably overkill. I don't think that's the intention here but probably a distinction worth making. Anyone else? Anything on Recommendation 22? If not, then let's scroll on down to Recommendation 23, the algorithm rollover, which I did not have any thoughts on, I'm not qualified to have any thoughts on, frankly. But Jim seemed to like it. So Jim, take us away.

JAMES GALVIN: No. It's just like the other things up above. Agree, but no comment. And it's just a way for us to latch on to something that we can take pleasure in. This really doesn't affect us. And it is true you should be allowed to change the algorithm and they should allow for all of that to occur at the root level and have all of that documented. That's the right thing to do.

BRIAN CIMBOLIC: That's great. Unless anyone has anything else, let's scroll down to 24. Which this one, actually in a sense, doesn't affect us necessarily but I think is a good idea. It's around improved transparency and end-to-end testing for the EBERO process in case of the registry failure. Jim noted, I won't put you on the spot again. You said pretty good idea. I don't see a problem with it. But Jim, you've got your hand up. Go ahead.

JAMES GALVIN: Yeah. And also one thing which has occurred to me about it which I didn't really want to comment on here but as long as we have a little time and no one else is raising a hand, we know as a practical matter that ICANN doesn't generally seek to move TLDs around.

They really do try to work to get to whatever issue is there resolved. And they have as a just a practical matter that moving a TLD through EBERO is a very difficult thing to do and very challenging, even just from a technology side and trying to make all of that happen and do it in a practical way.

So, my only concern here is I look at this and I think, well, yeah, from business continuity planning, certainly, they should make sure that they can execute this whole process.

But I worry a little bit about what one might learn if you get too into this and what might come from it. I mean, I don't have any good examples off the top of my head but it does occur to me to be a little cautious just for that reason in all of this. But nonetheless, it's probably still a good idea. So, thanks.

BRIAN CIMBOLIC: Great. Thank you, Jim. Donna, go ahead.

DONNA AUSTIN: Thanks, Brian. But Jim, based on what you just said, it seems that there is a good reason to support this because if ICANN is not doing this kind of end-to-end testing and they're actually in a spot where they have to conduct an EBERO process, then it may be flawed and there may be implications for registrants or something that ICANN hasn't worked through. So, is this that? I don't know. This seems like a genuine risk if there is a TLD that falls over for whatever reason and ICANN does have to do the EBERO. And if they haven't fully worked through the testing, then there certainly is a genuine risk there.

JAMES GALVIN: So, I will disagree with you, Donna. If you think about it an EBERO is almost always two movements, right? I mean, if you're really going to do it right, you'd probably have to figure on two movements. They're going to move it to an EBERO and then they got to figure out what's going to happen with the TLD and that's a whole separate process, right?

Who's going to take it over, who's going to get it, that kind of thing. And then you've got to move it back. And you have all of those discussions. But there were other issues that come with it.

If you're going to take it over as an EBERO, an interesting thing from my point of view, that's never actually really resolved anywhere. There's no real documentation on this. There's an assumption that it's going to move to another provider and so an EBERO is just a layover.

But consider the following, what if they just cancel the TLD? And that actually is—although it's been thought about and they have those thoughts, there's no real documentation on any of that. And what does that mean? How do you decide to just get rid of it?

DONNA AUSTIN: Are you talking about it in the sense of retiring a TLD like the ccNSO went through with ccTLDs?

JAMES GALVIN: Yeah.

DONNA AUSTIN: So that's a policy question. So that's not just a process or procedure, that's a policy that at some point has to be developed. But anyway, that's outside what we're talking about here I—

JAMES GALVIN: Even from an operational point of view, if you move it into an EBERO, okay, now suddenly ICANN is paying for the operation of that TLD. That's something for us to be aware of. I mean, if EBERO ever executes, then obviously now there's a chunk of money that's being paid to EBEROs.

Because the EBERO operator has to be paid for maintaining all of those registration and the DNS infrastructure and all of that. And there's no clear—I mean, maybe all of this is a risk. I mean, I get it, you're right because there are some gaps here in the follow-on processes and steps.

And so maybe the observation here is this is just going to turn into there's going to be more work to be done here and I just want to make that observation more than anything. What happens next after you move to an EBERO is not well-documented and not well understood and there's just a lot there. That's all.

So, if we want to say something here, maybe we want to think that through. I don't know. I mean, otherwise, maybe we do agree just because we expect that there are gaps there. I'm not sure what you're suggesting, Donna.

Are you suggesting that maybe we do agree and we do comment about the gap that we see as the next step and lend support to making this happen? That's an alternative view.

DONNA AUSTIN: Yeah. I think, Jim, just from your comments, I got the sense that you didn't think this was, I don't know, an important thing to do. But I think there is some kind of input to it but all we need to comment on is we agree or support the recommendation. We don't need to qualify in any way. Thanks.

BRIAN CIMBOLIC: If I could Donna, and I don't—this is not my real area of expertise. Just, it may be worth saying that we support to the extent that this is a redundancy for the protection of

registrants in the end. We're supportive. I don't know. It seems to me it's not a bad thing to be a bit more positive about it, but I don't know.

DONNA AUSTIN: Yeah. I mean, it wouldn't—I guess it gives our comments a little bit of balance too. If we can be a little bit more supportive about and particularly the registrar angle on this might be a good one to highlight. So, yeah, if it provides some balance to our overall comments, that might be helpful. Thanks, Brian.

BRIAN CIMBOLIC: Sure. Yeah. Great. Unless anyone else has anything on 24, then we've reached the end of the road. So, what I would encourage everyone to do is please do, if you feel that anything we touched on here, you have thoughts you would like to add to, please get in there the next day and add whatever thoughts, additional contributions you have.

Because at some point, we need to start converting this from the raw thoughts into a comment that is ready to go to the stakeholder group, and that needs to happen pretty quickly. So again, if you could in the next 24 hours or so just take a few minutes, scan through and add your thoughts, even if they're sort of half-baked and then we can try and convert them and bake them, then that would be really helpful.

And Jim writes, and this is true, and it's actually a pet peeve of mine, if we're ever drafting a document together. Please write text, not comments to make the drafters guess what you wanted the text to be. That would be very, very helpful.

So, yes, plus one times a thousand, Jim so, yes. With that, we are in AOB and Beth, said looking like a trillion or quadrillion. So, I don't have any specific AOB. Jim or anyone else, anything you'd like to—? Graeme Bunton. You old so and so what are you doing here?

GRAEME BUNTON: Well, funny thing. Yeah. Who did invite this guy? Hey, everybody. I guess just a heads up. Hey, I'm here, I'm on this side of things now, which is strange for everyone. I'm still figuring out how the—I'm going to assume most people have seen the launch that we've done around this DNS Abuse Institute.

If not, wow. Okay. Send me an e-mail. But that's the thing we're now working on. We're going to be getting this institute up and running in the very near future and trying to contribute on work around DNS abuse.

So, hopefully it can be a pretty strong partner on these issues going forward and that heads up that we're going to be running a webinar in March, and stay tuned for that. I think that's it.

BRIAN CIMBOLIC: Jim is right. He is the number one PIR headgear aficionado. So, there you go, Graeme. Thank you for that, Graeme. Yes. And we're all very excited about it at PIR. Anyone else, anything they would like to bring up for AOB? Wim, please. Go ahead.

WIM DEGEZELLE: Yeah. So, just coming back on the comment drafting. I just want to say if you agree on all the specific dates that everyone drops in text, I'm happy to plan somewhere next week, say okay, I take an hour or two just to go through the document and accept the text and produce a cleaned up version that's easier to review for everyone. So, I just need to know when that moment would be, and that might be easier to maybe after our next call to work on a clean version instead of the colorful one.

BRIAN CIMBOLIC: I think that that's an excellent offer and super appreciative, Wim. I think, yes. Maybe Sam or Beth or the—actually [RySG mucky mucks] can figure out when they want this at a point where it's ready to hand off to you so maybe we can all figure that out offline.

But in the meantime, I would, again—it's not going to be before the next 24 hours, I can tell you that much because that's the window that we have to everyone please go in and add your actual comments and not—actual text and not comment bubbles.

And so hopefully sometime early next week, midweek next week, we'll be in a spot that will give you time to have something in clean form for us on Thursday which again, very appreciative of that offer. So, and you and Beth are going to figure it out offline is what Beth says.

Anything else? Anyone before we close with a whole three minutes to spare? Not seeing anything. Thank you, everyone for all of your work on the SSR2 and everything we continue to do. Have a great rest of the day and a great weekend.

SUE SCHULER: Thank you, Brian. Julie, we can end the recording.

[END OF TRANSCRIPT]