ICANN85 Mumbai | CF – GNSO: IPC Membership Work Session
Monday, March 9, 2026 – 10:45 to 12:00 IST

DEVAN REED

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Thank you, and I will now hand the floor over to IPC President, John McElwaine.

JOHN MCELWAINE

Thanks, Devan, and welcome everyone to this Intellectual Property Constituency Open Meeting. I'm getting it started right on time, although I imagine we'll have some people filtering in because we have a packed agenda, as you can see here, and we're going to move things around a little bit, particularly with the fact that our counselors are not here. I'm not sure if Damon is online. Doesn't

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look like it, but first, let me just start by talking about how excited I've been recently because we've had a lot of growth, a lot of new members joining the IPC, which has been really great.

So basically, since the first of the year, I don't have a hard count, but we're at, at least 12 to 13, 14 new members. We took in 11 at the last meeting, and we've had a number of people interested at this meeting, so I think it just shows that what the IPC is doing and ICANN is relevant, and people are hearing our message and wanting to be part of it.

But as we bring in all these new members, one of my concerns, because it can be a little bit daunting to join any constituency at ICANN, is trying to make sure that we have a connection with them, and so I will be probably during this meeting sending out an email to IPC members trying to set up a very informal sort of mentoring program where we can take some of these new members and have them assigned to an old school member, perhaps, and that person can help translate the acronyms, tell them about what's going on, and then help answer any questions that they might have.

And the way we can look at it of those of us who've been doing this for a while, it's kind of finding our own replacement, and we can then take some of the load off of our shoulders and doing the work of the IPC and share it with the new members, and I think it'll be a great way.

So, look for an email. I imagine it will be a very light lift, but really just reaching out to these new members, making sure that they're

integrated. Bart, you want to get in the queue on that? Paul, over to you.

PAUL MCGRADY

Hey, John, Paul here. You know, we got a ton of money sitting around. Have we ever thought about doing our own, like, young people program to get young people funded and get them here?

I'm asking because I know of a brilliant young associate in a small law firm, and they would love to fly her around everywhere. But you and I may have conflicts of interest in relationship to our question, but in all seriousness, we should think about, we've talked forever about getting a secretary out. If we're never going to do that, we might want to bring in the younger troops with the money. Thanks.

JOHN MCELWAINE

Yeah, Paul, that's a great idea, and I think it's even more relevant now as again, as we're seeing the growth, making sure that we are providing those opportunities. Because to Paul's point, if you really want to get involved in ICANN, the best way is to just jump in and attend one of these meetings, and that can be somewhat daunting financially for anybody.

I spoke with one interested potential member, and he was under the impression that if you're going to be an IPC member, you had to attend all the meetings in person, and I assured him that was not the case. Then he was also concerned about the cost of attending

just a few meetings, and I let him know, if you're involved, we can do some travel grants.

So, great idea, and let's kind of kick that off as part of the mentoring program by having maybe an opportunity to fund some of these new members to attend meetings.

All right, well, I don't want to take up too much time because, again, we have a packed agenda, but I did want to announce that mentoring program that I intend to implement. So, I've delayed enough for Susan to get here. So, Susan, just a brief update on the Council, maybe. Thanks.

SUSAN PAYNE Hi, it's Susan Payne. So, super brief, but first of all, talking about finding our own replacements, just flagging again that I am terming out from GNSO Council at the October meeting and need to find a replacement, and my replacement cannot be from North America, unfortunately. So those of you who are non-North American, if you've got any interest in this, come talk to me or reach out to Damon as well, who you would be working with. It's honestly one of the most interesting things I've done.

Definitely, it's a way to really throw yourself into what's going on, is being on Council. It's incredibly, sort of, interesting, and you get to work with a good group of people and make sort of, friends across the aisles. It's, yeah, plug, plug, plug, do come talk to me.

Council, we had a full working day yesterday, and I'll circle back to that in a minute. We have our regular Council meeting. We have them monthly, so we have one in person when we're at an ICANN meeting, and we only have one vote. It's on the consent agenda, unless anyone asks to take it off. It is basically to confirm the appointment of Paul over there as the Chair of the DNS Abuse PDP.

Paul hasn't persuaded me that I should vote him down yet, so our assumption is that our IPC instructions would be to vote to support him. In the interim, he's actually been doing the lifting on being a Chair. In fact, by the time we vote to appoint him, he'll have done all of his DNS Abuse meetings at this meeting, but so that's our only vote, and then we'll be discussing some other items, including things like how do we find a mechanism for prioritizing our workload, and that will lead into, then, what should be the priorities, and we certainly had a bit of a discussion about that in our closed meeting in the context of the UDRP.

The thing I wanted to circle back to was something that came up for us yesterday. We met with two members from the Board Caucus on data protection and privacy. That's near enough. So, Wes and Greg came, and essentially, they're looking to get the GNSO Council steer on how to address the Urgent Request issue.

It's been a long-standing sort of issue where all but one of the recommendations from the first part of the EPDP on the data registration policy were implemented. The recommendation 18, which was about the timeline for dealing with Urgent Requests for

disclosure of data, got pulled out because there was disagreement, and so that one is running on its own time frame.

There's been a recent Public Comment that's basically, I think, coalesced around the time frame being a sort of 24 hours with some opportunities to extend in certain limited circumstances, but I believe there's general agreement that in order for that timeline to be met, the request that's coming in as urgent does need to have some level of authentication, particularly if it's law enforcement, for the registrar to know that it's actually come from a genuine law enforcement, and we've got some separate work going on in the GACS Public Safety Working Group on how they might authenticate law enforcement.

We have what seems like a typical ICANN problem where recommend 18 talks about a timeline but doesn't talk about specifically the need for that request to come from someone who's authenticated, and so there's a bit of a tiny, what seems to me a relatively small gap to be closed to make sure that we're all aligned on that.

I sent round the three options that the Board put to us in an email just earlier this morning, not really necessarily thinking we'll get to a solution here, but I think we are being asked in fairly short order to kind of give our steer on do we, do we need full new policy work, do we want the Board to un-adopt a recommendation they previously adopted and sent to implementation in order that it can be sent back to the GNSO. I think no one wants that.

Do we think we can just do it by sending a note that says, hey, it all seems to be an implementation issue to us? I mean, I think some of us around the room would probably think that's a good option, but I don't know that that's where we're going to coalesce as a group.

A sort of halfway house between the two is probably where we'll coalesce with the registration data update, including the 24 hours and so on getting published, but I think it includes a note that sort of says something to the effect of this will need to be authenticated per the policy kind of to be determined and then when we're working on revising the policy regarding the RDRS, we'll also sort of put this one in the mix.

It's not perfect, but I think that possibly seems to be where we're coalescing, but love to have the opportunity to talk to people who are more in the weeds on this here or after the meeting, and so that's, I think, one of our particularly live issues for us at the moment, and I will pause there, but anyone, please ask me any questions on anything.

MARGIE MILAM

Thank you, Susan. Margie Milam. When we heard from the Board representatives yesterday, they made the statement that they thought that their preference would be the implementation route, and I tend to agree with that because after sitting through the GAC session where Gabe walked through the various options for authentication, it seems like they have a reasonable path forward

to getting that done, and I'm just worried if you send it back to the mix, if you will, into the SSAD work, you're just going to delay it a lot longer than needs to be because it sounds like they had two approaches.

They had a short-term approach and a long-term approach, and the long-term approach, the short-term approach was something like getting a list of the legal email addresses where you could receive a request from law enforcement and that that could be an interim step while they develop a more robust system that would include some sort of token so that the registrar knows they are dealing with law enforcement.

My worry is, if we wait until it gets thrown into the SSAD, then it deals with all kinds of other issues, and you're talking years down the road when you can simply solve this problem, looks like law enforcements got a good approach, the PSWG, and that could get implemented much quicker. So, that that would be my recommendation. I think it hurts us to have it be delayed and thrown into the policy process.

SUSAN PAYNE Thanks, Margie. I guess that process could still be used in the interim, but I agree that the timeline wouldn't have kicked in and therefore it's very much more voluntary unless and until we've got that agreement. Okay, thank you, that's good to know. Yeah, that's me unless anyone has any other questions.

JOHN MCELWAINE

Okay, not seeing anything else. Any hands up? We can move on. We're going to, if Sophie is ready, we're going to move on to Sophie. We thought after speaking with Margie it would be good to have Sophie's presentation on the Review of Reviews because it'll be part of the policy discussion that Margie will have. So, Sophie, over to you.

SOPHIE HEY

Thank you very much, John, and thank you all very much for your time on this one. I appreciate you giving me time here and then also on Saturday as well. So, has moved along a little bit since we last spoke, so I'll try and update on where we're at.

Next slide please. Okay, so you'll probably, you may even remember this slide for those of you who were here on Saturday. So, this is showing whereabouts we are in our work. So, the Review of Reviews, we're a group that's trying to come up with a refreshed system of reviews from what we have in the ICANN bylaws.

The way the reviews came about, they go back to 2009, 2010. Then when we had the IANA transition in 2016, they were sort of picked up and moved across into our new structure without necessarily considering if they were still fit for purpose in the new governance system.

So, now, here we are trying to decide, okay, what would an effective system look like moving forward? So, at ICANN84, we did some

consultations with the community around what the purpose of the review system would be, and so we had some good discussions there. Since ICANN84, we've been working on trying to come up with a proposal for what that refreshed system might look like.

This is very much a first attempt by the group, but having said which, it has been relatively consistent over the last few months when we've been pulling it together. So, what we've got here, we've got this initial draft version that's put to the community at this meeting to get input on that.

So as you can see, we're actually right on track for our work, by the way, at ICANN. I want to highlight this. When we started our work last year, we actually said we want to have a proposal to present to people at ICANN85, and we've done that. So, yay, we can meet deadlines at ICANN. It's possible.

I did want to make sure that people were aware of that, because personally, I'm quite proud. Even though I'm not chairing the group, I'm just a member. In terms of next steps, we're hoping to have a more finalized version to discuss at ICANN86 in June, and then I understand there's also going to be some Public Comment on that at some point, but I'm not sure exactly when. But basically, by August, we're hoping to have this in front of the Board.

Next slide, please. No, that's okay. This is why I'm trying to not heckle you. I'm trying to give you time that I can filibuster. Okay, there we go. So, what we've got here for the draft proposal, we've

got a table which you can access on the wiki, and I'll drop it into the chat afterwards.

I understand it has been circulated around, but trying to make it as easy as possible for people to find it as possible. So, we've got a very long table, and we're proposing five different buckets of reviews. So, the table, it sets out the focus areas of what each of the reviews would look like, what sort of methodology intended outcomes might be, how often they would occur, what would prompt it, how you initiate it, the scope, of course, who would be conducting it, where those recommendations or outputs from the review would go to, so who would be responsible for actioning them. And then we've also got a row in there to set out sort of, is there a sort of origin story for the review?

So, has it come from our current bylaws program of reviews? Is it something that's come from a previous review recommendation, or is it something that's come out from somewhere else? So, it's, and we go through each of the five.

Next slide, please. Okay, so this is a very, I like color. So, I love ICANN staff's color on this, when they do this. So, this, and also it means I can make the pun of adding color. Okay. So, these are the five different buckets of the reviews generally that we're currently proposing.

So, we've got the first one, accountability and transparency. Some of you have been around for a while will know we currently have a review labelled that under the ICANN bylaws. To be clear, this

would be a readjustment of the scope for this. It would be more of a focus on how ICANN's executing against its bylaws, strategic plan, financial operating plan. So, it would be a bit tighter than what it currently is.

The other one, I forget who in the IPC was responsible and went to the continuous improvement coordination group, but assessing that continuous improvement program. This is sort of bundled a little bit with the structural review. So, the idea was that the current program of organizational reviews would be replaced with where each SOIC gets reviewed. Lori's saying it was herself and Glenn. So, thank you both very much for working on that.

So, the idea here is that we focus on Continuous Improvement through rather than having staggered large changes for it. But at the same time, then there was the gap of, okay, how do we look at wholesale structural change?

So, in this proposal, we've got off to the side, this assessment of Continuous Improvement, and then also this notion of a structural review. There's at the moment, again, this is where the proposal part comes in. It's a bit undecided about how broad exactly that structural review would be, whether it, but it is very much on the table.

The other one, we moved down to the bottom corner, Review of Reviews. So, reviewing the system of reviews originally, well, it currently is set out as something within the ATR reviews. However, there's been a suggestion that that would have its own separate

function. There's also been some discussions, and my personal view is that it might fit more sensibly into what is the fifth bucket, which is currently labelled ad hoc on-demand review.

The idea is it is sort of a catch-all and serves as a mechanism rather than pre-scripting a review. So, if there's something that doesn't, that so if there's something that sort of is missing from the overall reviews program as a whole, and what we're able to do in the current program, and it fits what a review should be, that there would be a mechanism to actually initiate something to a review through this process.

So, it's not necessarily about having, sorry, coffee break for a second. Okay, now I can think again. So, the idea here is it's, so we don't end up in a situation where we're not really quite sure how to fix the problem. There's a mechanism to spin it up for what the actual problem is at the time.

Next slide, please. So, that brings me to questions and comments. Does anyone have any questions about what I've, see, yeah, go ahead, Jan.

JAN JANSSEN There is something I don't quite understand. You have the Review of Reviews, and one section is the Review of Reviews in the Review of Reviews. I thought that this was really the purpose of the Review of Reviews, first one, was to check out whether there should be a

lightweight review mechanism to see whether the review mechanisms in place were doing all right.

Here I see a Holistic menu on the table that is even bigger than the ATRT review, which has been delayed for ages. And this seems like, to me, adding a layer of bureaucracy and making it even heavier than the bylaws mandated ATRT, which is delayed for, we don't know how long.

SOPHIE HEY

Okay, that's all good. And that's helpful. So, first of all, yes, we're very aware of the inception. And that's part of my, why the Review of Reviews bucket needs to go into the ad hoc. It's something that happens when it's needed. So, to actually assess whether the reviews program is working effectively or not, it's not something that you want to be pontificating about constantly.

The other thing I'll say with these reviews, the idea is, actually, I just want to clarify something. When you say holistic more heavyweight than the current ATRT, are you talking about the program as a whole as it's currently set out? So, actually, sorry, Devan, can we go back a slide, please? Thank you. So, when we're looking at this here, are you talking about ATRT as, well, we've got that bucket up there and then the rest of the buckets are suddenly so much broader than the ATRT or?

JAN JANSSEN

Sorry. I think the bucket A, Accountability and Transparency Review, that seems aching to ATRT to me, but pardon my ignorance if it's different, but I don't see it immediately.

SOPHIE HEY

No, no, no. And that's really helpful. And you've actually got me to the point that I forgot to say, we want your input on this proposal. So, if there are things that don't make sense, say it. So, if you're going, well, actually, this doesn't make a whole lot of sense. This seems too broad. We're not going to be doing it in bite size. Say that. We've got a mailing list. That's an option.

The other thing I will say, and this is a side effect of me presenting this as a bridge quick version instead of in details. When you go through the table, there is some discussion. So, at the moment, reviews are scoped by the review team once it's been formed. There's been some proposals and the direction we're moving towards is that it would actually be scoped afterwards.

So, not every single review would cover absolutely everything. In scope for that review. So you go, okay, what are we focusing on for this time? Once you've agreed that scope as a community, you'd get the people who have that expertise in. So to borrow a GNSO council term, bite size chunks. That's the idea behind it. But again, to your point, I don't want to sit here and say, no, your concerns or questions aren't valid.

The point is, if it's not clear, now is the time to actually give that input to the group. So, on Thursday's session, for instance, going, this isn't clear. This is how I think it needs to be improved. We've also got a mailing list you can send your input to. I'm not meaning to pick on you specifically, Jan. This is a general invitation for everyone.

And our co-chairs, you have a very flexible policy with observers. So, if you have some written input or you have thoughts to say on a call and you're an observer, they will let you speak and pitch to the group. So, please share. And not just to me.

JOHN MCELWAINE: Okay. So, I think Paul's in the queue and then Mike and then, okay, Margie.

PAUL MCGRADY: Thanks, Sophie. So, from what I understood is that this has the same branding, ATR, but it's very different, right? Or it's meant to be. Because the problem we had with the ATR is that nobody was in charge of it. The review team could review whatever it wanted to review. The Board felt like it couldn't even give them guidance. Has that changed? Because that's, I'm under the impression that that's where this is evolving and it's not going to be a free-for-all review team that gets to just cherry pick their favorite subjects anymore and grind us off to a halt. This is going to be, like, useful going forward. That's the idea.

So, maybe since it didn't change branding, can you tell us how it's going to change in substance, if at all?

SOPHIE HEY

So, full marks to Paul. Yes, that is what -- so we've got the same branding. And to be fair, we've had some fun with our names for these different reviews until very recently. This was bucket A. Did not have another name beyond that. And so we just, yeah, again, had some fun with challenges with it.

But no, you're absolutely right. The idea is that, and this is to the scoping point, that it's done by the community. It isn't the people on the ATR cherry picking their pet issues to go through. It's meant to be issues of importance to the time, at the time that are relevant to the community to go through and check.

The big focus, and I'm very conscious I've got a Board member in the room as well who will tell me off if I'm wrong, is, as you can see here with this description, it's focused very much on its commitments in the strategic plan and the bylaw. So, the idea is, what are those goals that are set out and those objectives set out in the strategic plan? Are they being met? So, that's sort of the direction it's intended to go in. But again, as I said to Jan, if that's not clear when you look at the table, please tell us.

UNKNOWN SPEAKER

Thanks, Sophie, for all this. It's good information. So, last summer, right, ICANN just full-stopped all the reviews. Obviously, that was

really controversial. Now we're reviewing them all. The question is, what happens next? We've been waiting for a structural review of the GNSO, for example, since I think 2010 or 2008, I don't know, a long time ago when I was on the council.

So, it seems like you guys are going to come out with this report with all these recommendations and now, boom, you're dropping 20 different reviews or five, even if it's five, they're all going to be subsets, right? GNSO, ALAC, blah, blah, blah. So, no, it would be a one review of all structures at once or?

SOPHIE HEY Yeah, yeah, yeah.

UNKNOWN SPEAKER That's the plan on that?

SOPHIE HEY Not all at once.

UNKNOWN SPEAKER So we would be, basically, whenever this work is finished and approved by the Board, all of a sudden, we're going to be going into three or four major reviews at once. Is that correct? Or what's the plan?

SOPHIE HEY

No. So, the plan is, so this is the other issue that we've had with reviews, is that they all started piling up on each other. And actually, Heinemann does a good job of explaining this from the IANA functions review. One of the problems they actually have proposed to change, and I think it's out for Public Comment now, with the timing, they change it from when the review team is formed to once that report is delivered to the Board for the counting of the five years for it.

So, under the current bylaws and the current reviews program, the timing is based on when the review team is formed, which leads to a lot of run-ins. So the idea is and the hope is that with this, and this is one of the details that we need to push out a bit more in the cadence, and it's a common point of feedback we've been hearing throughout our work, is we don't want to have that same pile up.

So, the intent is that these aren't all running at the same time, so we're not having that mess. But cadence and when, again, that's a TBD. And if you have feelings, there's a mailing list, Mike. You can give us feedback on this.

UNKNOWN SPEAKER

Well, it sounds like we shouldn't be expecting the structural review until the other two go. And so, it's going to be another five years or something before we get to a structural review.

SOPHIE HEY

These, again, I hope I'm not speaking out of turn. The ABCDE, that isn't necessarily in order of when they're going to happen. But at the same time, if you think this needs to be happening, then that means the kind of feedback you want to be giving is on what the triggers and the initiation process for that structural review are.

So then if you want to say this needs to be a priority, you understand what it is. So, that is my suggestion of the kind of feedback you would want to give if this is a priority for you.

JOHN MCELWAINE

Okay. So, right now in the queue, we've got Margie, Karen, and Susan, and Chris. Do you want to say something now?

CHRIS DISSPAIN

Hi, everyone. It's Chris Disspain. I'm one of the co-chairs of the Review of Reviews. I just wanted to specifically answer your question because I'm answering your question with a question. And Sophie's kind of hinted at it, but I think it just needs to be a bit clearer.

One of the questions for us to decide will be what's the first thing that happens after we make the recommendations of the review. So, we're recommending that there are five, maybe four reviews. One of those is a structural review that has never been mandated by law review before.

One of the questions for the community is going to be, should that be the first thing that we do? And the answer to that may be yes.

Some people may say, yes, we should actually do the structural review first. Others may say, well, it's going to be big and unwieldy, and we should maybe do something else first. I don't know, but that is a question that we will need to get input on, and it's really, really important.

The second question on the structural review, which is as important, and I've had this conversation with the GNSO Council now and various other places, is what is the status of that review? Is it mandated that that review must look at every structure, or is it, it only looks at the individual structures if it's asked to do so by that structure?

Now, if you're the GAC, the GAC's going to say, well, you can only look at us if we ask you to. If you're the GNSO, you might want the review to look at you even if you don't ask us to. But what everybody really needs to understand is we can't build an ICANN-wide review system just to solve a GNSO issue. But we can try and figure out a way that the GNSO can leverage the system to fix its issue. That's kind of where we're at, but we're a long way from being done yet. So, input like yours and others is incredibly important. I hope that's helpful.

MARGIE MILAM This is Margie. I have a couple concerns as I've looked through the slides and think about the implications. In A, it sounds like, maybe it's just a summary, that the transparency side of it is less of a focus as the just commitment to looking at the articles and bylaws and

strategic plan. And I think that was an important compromise, that there'd be more transparency for the community on various things.

And so, my question is, is transparency technically being minimized in this? And is that intentional? Or is that something we should highlight? And I have some follow-up questions as well.

SOPHIE HEY

That's okay. So, I wouldn't say it's being minimized. I would say that the transparency is coming through more, not as a specific call-out, but more and through the actual language of the bylaws and those commitments and core values set out in the bylaws. Post-Dublin, we had a big discussion about whether or not we should be calling out things exactly. And then, because we didn't want to be over or under inclusive and platform things that shouldn't indicate that something was more important than others. But transparency is still included in that based on the bylaw's language.

MARGIE MILAM

Yeah, that's right. The bylaws do have transparency language. Okay, that's helpful.

My other question relates to the Ad Hoc reviews. And just so the IPC understands, currently, who is or registration data is one of the reviews. And that's really the only place in the bylaws where there's commitments related to looking at the accuracy and access of

domain name registration data, as well as safeguards for protecting the data.

So, my worry is if we go to this ad hoc system, I want to make sure that we are conscious that we're not deleting those commitments from the bylaws simply because we're no longer calling them out as a specific review. And if that's the case, then we actually do need to insist that there is a registration review component, because otherwise, you're taking that out of the bylaws.

And I think that's very dangerous for IP interests to no longer be something that's called out as a commitment from ICANN and in the governing documents. So, I don't know, again, is the consideration that the bylaws would now take that away. And then, if you go to the other ones that currently exist, the security and stability of the internet, that's another one that's a very important concept.

And obviously, we do have an advisory committee. But having review of security issues and having it be incorporated into the bylaws elevates the obligation to something that brings the whole community into the discussion. And it's not simply in the currently, the SSAC as an example. And so, I'm a little worried about that. Or the third one is the competition and the antitrust concerns.

We understand that the reviews related to the new rounds increase competition? But the notion that there's competition concerns in

the registration services is a very important one that needs to be maintained in the bylaws.

And so, that's my worry, is that by simply saying Ad Hoc and not being specific, that we're essentially taking out of the bylaws important commitments that have been in there for since the inception of ICANN. And I just want to make sure that we're cognizant that we as the IP constituency don't think that's a good idea to remove commitments related to accuracy, access to data, and all of that.

And so, I don't know, Sophie, your suggestion on how we should approach that when we do make comments, because I think that's a very important thing to flag.

SOPHIE HEY

Yeah, no, absolutely, Margie. And thank you. I was wondering who in the room was going to ask me about them when I came here. So, I hope that I can maybe reassure you, but at least share some of my thinking on this.

So I'm going to start with, first of all, it's been said in a couple of these review sessions earlier over the weekend by the co-chairs that these ad hoc reviews, they would incorporate the specific reviews currently in there. So that would be one avenue to bring them up. It's just that, again, depending on how they're implemented, there's one thing.

The other point that I would call out, as part of the fact-finding exercise, so in this phase, one of the works that we did in the lead up to Dublin, and then taking the community input in afterwards, staff pulled together a couple of reports. One was on organizational reviews, and the other on specific reviews, where they pulled out the status of the recommendations, and how they'd been treated by the Board, whether they were adopted, not adopted.

And so, one of the things that, at least I noticed from the data in there, is that the Board not accepting all the recommendations came in post-transition, and that was concerns about their remit in terms of policy, and where those policy points might come from. So, actually, the Board's approach was to then pass it along to the SOs and ACs for policy work, to the extent that any of those recommendations on policy issues that came from reviews were there.

So I would also say, yes, you, there might not be that standing review there, but there is very much still the policy process at ICANN, in the supporting organizations, of requesting issues reports for exploration, opportunities to provide Public Comment to those issues report, and then deciding whether a policy process needs to be initiated or not.

So in a lot of ways, you're cutting out some of the bureaucracy instead of having a review team looking at it past the Board, Board past the GNSO. I would encourage that this is perhaps an

opportunity to start thinking about how you can utilize the existing tools under the ICANN bylaws in the policy making process. Is that helpful?

MARGIE MILAM

Yeah, I understand that the GNSO is where a lot of policy work does, but the point of the review is where to have a larger or consideration from all the perspectives of the SOs and ACs, and it's kind of a check on the GNSO, if you think about it from that perspective.

So, you've now removed that oversight of the GNSO as policy processes, and as some of the review teams come up with recommendations, it still happens that work does go to the GNSO, but there's also aspects of domain name registration that are implemented through ICANN as opposed to through the GNSO, and back when I was at staff, I worked on a lot of these issues, and so the WHOIS lookup tool as an example that ICANN currently uses came out of the WHOIS review team recommendations.

That was not a policy thing. It was a very important kind of operational thing that transpired from that review team. That kind of recommendation wouldn't necessarily come out if you didn't have the review team because it just wouldn't naturally emerge from the policy process.

So, that's an example of why I don't feel comfortable saying that all policy work has to come from the GNSO, because it, or at least it

relates to registration data, because it's in the contracts, it's operational, there's other aspects of the organization that are affected by these review team recommendations.

SOPHIE HEY

And that's super helpful for you to add that nuance into the point, because that's not something that I'd been hearing until you explained it like that now. So again, that kind of feedback and explanation about the kind of scoping and input, so you can see like that yellow point there, that kind of feedback and really nuancing and going, okay, this is what we wanted to be able to focus on would be really helpful to the group.

JOHN MCELWAINE

Okay, quick time check here. I love this discussion. So, we've got about 30 minutes and 40 minutes of agenda left. So, Karen, you had a question you're in the queue. So, if you could make it quick, and then Susan, okay, thanks.

KAREN DAY

Yeah, I have two questions, one about bucket A and one about bucket C, and I don't need to know the details right now. So, if you could just answer yes or no. In bucket A, you've said several times that the way you're looking to tighten up this ATR is by removing from the review team the ability to choose what subjects are going to be reviewed and giving that to the community.

To my mind, that sounds the reverse of tightening, because it sounds like it's giving a whole lot more people an opportunity to throw in a whole lot more issues and stuff. Just quickly, yes or no, are you guys talking about ways to control that?

SOPHIE HEY Yes.

KAREN DAY So, there's some safeguards in there that this isn't going to be a free-for-all. Okay, thank you, Chris.

PAUL MCGRADY Yeah, so, hey, Karen, so it's so funny. So, we're having an intra-firm discussion in front of God and the world. I have the opposite view. I think that the community scoping it, telling us what the community thinks is important, results in some kind of charter, and that is the four corners of the universe for that team, and then they can have a work plan, and we can get done.

Otherwise, what we're doing is the world that we're living in now doesn't work, first of all, empirically, and then it's like the real choice assignment is to get assigned to this review team, because then you can bring your pet issues, regardless of whether or not that's what the community needs, regardless of whether or not it's urgent, regardless of whether or not anybody really wants to solve that.

It's your favorite thing, and you want to talk about it, and that's a choice assignment, but it doesn't work, and so, I actually think that what they're talking about is significant narrowing of the work scope of the ultimate review team, because what we're doing now, in my mind, is the opposite of that, and I think that history has shown us it's the opposite of that. So, anyways, see you back at the office.

KAREN DAY

Thanks, man. So, I just was asking the question, is that I just want to make sure the community, that the mechanism for defining what's in the charter is, there's some scrutiny there that you can't just walk in and get something in the charter.

On bucket C, to me, I would question whether or not doing reviews of multiple SOs and ACs simultaneously by the same team is appropriate. I'm interested in what discussions have been had about, should we try to have the same group of people reviewing the GNSO that are reviewing the RSSAC that are reviewing ALAC, should we not separate those out and have them even more narrow?

CHRIS DISSPAIN

If I may, that's a really good point. I'll be as quick as I can. If you think about it this way, the Continuous Improvement process is running all the time. That's the idea, right? Continuing Improvement process throws up, might very well throw up, looking

at the GNSO as an example, might very well throw up a thing, a report that says, guys, we've looked at all the work that you're doing, this review thing, and it looks to us like you've got some structural issues you might want to think about.

It's always open to the GNSO to start its own structural review at any time if it chooses to do so. Right now, there actually isn't really a mechanism for doing it, other than just for you to just say that you could do it, but there would be with this because you'd have your on-demand review and you'd be able to do that.

And you might then be able to say, actually, we think we'd like some help from the rest of the community to look at this, because actually, when we look at it as just as the GNSO, we never seem to get anywhere, and it may be sensible to do that. Now, to go back to your main point about the structural review, the purpose of the structural review is not, in the main, is not to review the individual structures.

The purpose of the structural review is to review the structure of ICANN. What does that mean? That means, should there be new SOs and ACs? What's out there in the big wide world? Should blockchain names be a part of the thing, just to pick an example that some people may think is silly? That's the main part of it. Is the Board structure, right? Is ICANN structure, right? All of that sort of stuff.

As a part of that, it is possible for the structural review to look at the structures of the SOs and ACs. The ISPCP have put in a comment

that says, we think that should be mandatory. You must look at the structures.

The other option is you look at the structure if you're asked to, which may be something that other people favour, but I think it has to have the ability to look at it. To get clear, it would be, at least in my head anyway, it would be a proper cross-community working group, as in the stuff that we do, because this is really about looking at ICANN.

That's why we say it's every 10 years, an absolute minimum, because you don't want to be doing it every five, 10 may even be too quick. I hope that gives you some idea, but the documents that Sophie has referred to, the deeper documents, really do contain a bit more of the detail. Thanks. Okay.

JOHN MCELWAINE Well, Sophie told me we would need 30 minutes. I'm going to move on the agenda because we do have some guests here. Chris, do you think you need 15 minutes? I just kind of assigned you 15 minutes. I'm going to turn it over to Margie now, who we skipped in the agenda to talk about some of the policy work and participation that we're doing.

MARGIE MILAM Some of the things I think we talked about in our earlier meeting, so I'll try to stick to some topics that we haven't talked about yet.

In our weekly meetings or biweekly meetings on the policy team, we have policy calls for the IPC.

Issues come up related to compliance with DNS Abuse mitigation takedown requests. This is Marc Trachtenberg, sort of raised some of his experiences, as well as others have talked about the registration data policy, the new policy, and some of the roadblocks they're seeing in actually making requests for information. We wanted to bring that up in the meeting here to see if we can get some input from the IPC and maybe some volunteers to kind of think about, maybe a work party to try to advance some solutions for that.

And Marc, I want to give you the floor just to kind of give your observations of things you've encountered with respect to takedown requests and even reveal requests.

MARC TRACHTENBERG Okay, Marc Trachtenberg for the record. I think anyone who has submitted abuse complaints to contracted parties has found, and probably increasingly so recently, a number of what I kind of view as artificial barriers to the effective submission and processing of the abuse complaints. I don't think that all these obstacles are necessarily intentional.

I think maybe a lot of them are based on the contracted party's view that by putting in some of these restrictions on the process, that it makes it more efficient for them and filters out problematic

abuse requests. But these are things like requiring that you have a trademark registration to have your abuse complaint processed, which is kind of a departure from previous feedback that had been received by contracted parties who had always insisted that we don't want to hear about your trademarks.

We don't want to hear registration certificates. We don't want to know anything about that. That's not relevant. And in some cases, it almost seemed like when you cited your trademark registrations, it actually resulted in your abuse complaint not being actioned. So, that's one example.

Another example, which is usually related, they come together, is requiring a power of attorney in order to submit the abuse complaint. And this requirement is not anywhere in the RAA or anywhere else. And frankly, it means that the majority of abuse complaints could never be submitted because that only permits authorized counsel to submit. It doesn't permit somebody who might be a consumer who finds a problematic website or domain name to be able to report that domain.

So, those are two examples. Other ones include requiring evidence to process the complaint, but then not having the ability to submit any evidence. So, no ability to include attachments or only the ability to include a certain type of attachment, like for example, a JPEG. And so, if you have a multi-page PDF, it becomes very challenging to turn that into a JPEG, especially if they only permit the upload of one file.

Similarly, having character limits. So, you have a complex abuse situation, or even if it's not that complex, to try and describe what's happening in a thousand characters, which includes is really challenging. So, these are some examples. And again, I don't want to attribute bad motives necessarily to the contracted parties. I think they have their own problems.

And one of them, which we have to acknowledge as a constituency, is that the majority of complaints they get are garbage. They're bad complaints. They're low quality. They're not formatted well. People are not explaining what the rights are that are being infringed or what's even going on.

And this is a what's driving some of these, I'd say barriers, but they probably say process flow limitations in their process because they're trying to filter out all these bad complaints or find some way to ensure that what they're getting and reviewing actually makes sense and actually can be actioned by them.

So, we have to take that in mind as well. And when we're suggesting solutions to ICANN compliance and to the contracted parties, we have to be cognizant of that and be acknowledging that to them that we understand this and we're trying to craft solutions that help address that issue or at least recognize it, but also don't result in essentially an inability to submit high quality complaints.

And so, if anyone else has any examples, feel free to send them to me by email. I have a meeting with compliance on Wednesday to provide a number of these examples. And I don't want to say

they've committed, but they seem willing to potentially publish an advisory that would go out to the community, giving their view on some of these things, including that the first two I mentioned, requiring the trademark registration certificate and the POA, requiring that actually is not complying with the RAA and is a violation because that's not listed anywhere and obstructs the ability to submit complaints. So, feel free to email me.

MARGIE MILAM Is anyone in the queue that wants to share their experience?

JOHN MCELWAINE Just really quickly. So, what I think is such a good idea about this is that even when you do submit a compliance complaint, oftentimes what I'm finding is that the registrar will just end up complying with what you've asked for. You never actually get a written decision, opinion, whatever, something that kind of shows that they were out of compliance. And they just end up getting a ticket that says it's been closed out.

So, by communicating all this and keeping a list, I think we'll be doing a big favor to our members of the community by keeping track of things that are going on.

MARGIE MILAM Okay. So, in our future policy meetings, we'll follow up and start kind of documenting this. And if we can get some feedback from

you, Marc, on how your conversations go with compliance, I think this is very useful for the IPC to put this as a work item for us.

JOHN MCELWAINE All right. You do have the UDRP lock issue on your list, yeah, that we talked about?

MARC TRACHTENBERG So, that's kind of a separate effort that I've been working on with Brian Beckham, which is to try and clarify the obligations of registrars with respect to UDRPs. So, there's the lock issue. There's another issue of when you win a UDRP, they have the obligation to transfer control of the domain name to you. Registrars do it in very different ways. And really what I think that they should be doing is changing the registrant to the name of the complainant.

And that may not seem like a big deal. And the reason that's a big deal is because whoever the registrant is, is what triggers certain obligations of the registrar to remind you of renewals. And so that domain name may be expiring and they don't change the registrant to the complainant. What has happened in some cases is that when they start delaying and taking their time on giving you access so you can get the authorization code to actually transfer the domain name, that domain name can expire in the meantime. And so that's a problem.

The locking issue is also a problem. And they committed to actually publishing some sort of notice for the UDRP issues. They're

supposed to give Brian and I a copy before they publish it widely. But we haven't seen anything so far. And that's something that I will be following up on in the meeting with Jamie and Leticia.

SUSAN PAYNE Could you just clarify what is the lock issue? The UDRP lock issue?

LOUISE WONG Sure. Some registrars, once you file a UDRP, they take the position that they can't suspend the resolution of a domain name, even if it's a phishing site, clearly DNS Abuse. They say once you file the UDRP, their interpretation of the rules is that they have to lock it down and they can't take any further action. And at least Marc and I think that that's completely false and is obviously counterintuitive. If it's DNS Abuse, it should come down. You shouldn't have to wait another two months for the UDRP decision to transfer the name.

MARC TRACHTENBERG And I think here, again, I'm not going I'm not ascribing any malicious intent to the contracted parties. I think it's just no one has ever clarified really what this obligation is. I mean, I think it's somewhat clear in the language of the policy that really the lock relates to prohibiting transfer of the domain name to another party. But I mean, it could be a lot clearer. And so, this is one of those things where I think over time, registrars have just assumed that it meant this and no one has ever told them any different.

And so, we're hoping that someone does tell them different now and clarifies this obligation and several of the other obligations as well. And so, then we have something to rely on when we're facing these challenges with the registrars.

JOHN MCELWAINE I'm going to have to move on, but definitely talk to Marc. Okay, Chris, I'm going to turn over to you for a brief update, because I know I promised Manju at least 10 minutes here.

CHRIS BUCKRIDGE Sure, I'll keep that in mind as well. And I think it should be possible to keep it brief. Sorry, Chris Buckridge, for the record. Given that we've discussed a lot of the topics that I would sort of highlight from Board discussions anyway, through the previous part of the discussion.

I wanted to first acknowledge your comment, John, at the outset that you're seeing growth in the IPC stakeholder group or in the constituency, which I think is worth noting is certainly not uniform across even the CSG, but certainly beyond as well.

And I think the suggestions that Paul was bringing in about how to sort of bring young people in as part of that as well, is really interesting and very much aligned with some of the discussions we've had in the Board in looking at the Strategic Plan and particularly the elements in that where it's renewing the

community, it's making sure that the community is vibrant and bringing in new people.

So, to see that happening at the constituency level as well is really important and heartening. And I think if there's ways, we can support that, then we would certainly be keen to do that from the Board and org side.

I'll run through a few of the issues that we've discussed in the Board, which I think we've probably touched on here already. Susan covered the SSAD recommendations and the Urgent Request recommendation from phase one of that as well. It's very confusing that there are 18 recommendations in phase two and the one that's being reconsidered is recommendation 18 from phase one.

But once we get that all straight in our head, I think now we're in a good place to sort of try and find a way to resolve that. And I think Wes has really picked that up, having stepped into Becky's shoes in that sense, but also having Greg with his experience on the council has been really valuable and being able to find a sort of agreeable solution there with the council. Hopefully we'll be able to get moving with that.

On DNS Abuse, I think from the Board perspective at this stage, it's a bit of a sort of step back and say, okay, it's with the council. There are the PDPs, one PDP being worked on, another sort of in the wings, ready to come through. That needs to happen with the community, but we are seeing the council working at light speed so

far, and that's been really important to see. What I can say is that the Board absolutely sees this as a priority issue.

There's certainly been no diminution of our focus on that, but we do need to see the council complete the work that they're doing there.

On the Next Round, not a huge amount to say. I mentioned when I was in the session on Saturday that I was able to be there because we really went through the updates to the Board in our workshop very quickly, more quickly than we expected.

That's a testament to the team doing the work, to the sort of how concise and precise they've been and are able to be in their updates, and the fact that everything is really moving according to plan, that they're feeling very confident in hitting the open date and then being able to manage the application process that will continue beyond that.

I would imagine there is, well, I think, as you mentioned, the growth in IPC membership and interest. That's, I think, something probably that reflects the Next Round coming in. Beyond that, I think we as the Board are looking at any signs we can as to what this Next Round is going to look like, where the interest is going to come from, how strong that interest is going to be. But the team that is working on this within the organization, I think, is being very certain to accommodate a range of outcomes for this, and that's something we need to make sure is possible.

On the Review of Reviews, I could probably speak for much longer, but I think we've covered a lot of it with Sophie's presentation there. It's great. I think we're very happy as Board that we're able to have two Board members as full members of that CCG. It's not simply a liaison role. It's actually contributing to the process, and they've been very assiduous in updating the rest of us on the Board. We've had some very in-depth discussions in the Board about this, and I think really touching on a lot of the same issues that the discussion here today raised, particularly, I think, Jan's point about wanting to make sure that a process that was inspired by, perhaps, resource struggles doesn't produce something which requires even more resources, even more reviews.

But also, the question of the Structural Review is front and center, and I think, certainly not to jinx anything, but I think we're coming into a phase in these discussions where those very difficult questions about what a Structural Review looks like, how it will be implemented, how it will be reflected in decisions is going to come, and it's going to be difficult.

But I think it's important, certainly for me and for others, to hear from this group and, as Chris noted, the ISPCP as well on the importance that you ascribe to the structural reviews and making sure that that's something that's considered in this entire process.

Beyond that, John, you asked for anything I was seeking input from the IPC. I think Marc's update then, that was really useful, and I'm very keen to hear more about that and more about how the

discussion with compliance goes. I think those, in some ways, very detail-oriented issues can get lost in the bigger policy discussions, but, yeah, really important.

Well, they have impacts on how this whole system works, so I'm very keen to hear more and understand how that's affecting you. So, I'll stop there, but thank you very much for inviting me today.

JOHN MCELWAINE: Yeah, thanks, Chris. You're perfect timing on that. So, I might even offer that Chris is easy to find and easy to talk to, so if anybody has any issues going on afterwards, just come up and grab them. And with that, I'm going to turn it over to our next guest, who is Manju Chen, who's with the Trusted Notifier Network. So, Manju, over to you.

MANJU CHEN: Thank you very much, John. I'm trying to share my slides now.

Okay, so we are the Trusted Notifier. I actually was enjoying the discussion very much, because I think what we're trying to do really aligns to the concerns you're having. We are a not-for-profit organization, but we're not those kinds of charity organization.

We are registered in Hong Kong as a company limited by guarantee, but that's not the point, because I think it's more important for us to kind of share what we are trying to solve the problem we're seeing now.

I'm showing this only to show you that our boss is here also, Alban Kwan. He used to work for CSC, and now he's the CEO of our organization. He has already left CSC, and I'm also here. So, after this presentation, if you guys find this interesting, you wanted to know more, just come and find us. I'm quite, I don't know, identifiable, I think, and my boss, he's wearing a very bright blue jacket every day, so that's very identifiable, too. Just come find us if you find this presentation interesting.

So, this is actually, I think, very similar to what Marc was sharing. Now, this is when there's abuse, there's phishing, there's attacks. Usually, you go to the intermediaries, either it's hosting providers, registration registrars, they don't always respond. Responses are optional, and how they choose to respond to you, the criteria also vary.

As Marc says, sometimes they want this, sometimes they don't want this, and it's when they respond is best effort. There is no requirement of when they can respond, and a lot of businesses don't even have the energy to deal with this, so they kind of ask these take-down service providers to do it for them, but while their name is take-down service provider, they actually don't really have the authority to take down stuff, because they still have to go to the intermediaries, and that's a problem we're seeing.

We will see more in detail in the coming slides. And what we're trying to do, and what we think it could be, is really we turn the take-down service providers into trusted notifiers, and they will

send the request to TNN where we can help standardize the request, and we have agreements with the intermediaries of the request they want, the format they want, how standardized they want, to ensure everything goes smoothly, and everyone knows what each other's want, and make sure the interests are aligned.

So, for the trusted notifier, they have this incentive to improve the quality of their requests, and for the intermediaries, they have more confidence to deal with requests more promptly and prioritize the requests they receive from trusted notifiers.

And so, the criteria will be aligned, and take-down will be prioritized. We have actually experienced this kind of some experience of this concept since 2021, and we have very well feedback in the APAC region, and now we're trying to seek more global audience, and really just to see how people think about this, and how we can improve this, and just to work together in a sense to combat DNS Abuse.

So, what we see the problem is, beware of this very fancy animation slide. What we think is really there's an unfair cost transfer, because the brands, business, they've been under attack of phishing, hackers, whatsoever, and for them, they want more attack, the better, because if there are more victims, there are more monies. So, money is basically flying out of the business, but for the business, it's not their main job to deal with abuse or attacks, right?

For them, they don't have the time or expertise to deal with this. So, for them, they really wanted someone else to take care of it for them, and that's the take-down service providers now we see on the markets. And for the take-down service providers, as I said, they actually cannot do the take-down, because they are not the registries or registrars. What they're doing, basically, they pass the request to the intermediaries, and it's free.

So, what does that mean for them? They are getting money from the brands for the business, and they're paid to send requests, but they're not paid for vetting them. So, in that case, what they want to tell whoever pays them is, we are sending so many, we're doing so much of our job, you should pay us more. And even if there are areas where they think, this request, probably, it's not going to be accepted, or it's a gray area, they don't really mind.

They'll just send it anyways, because it's free to send, and they can show whoever pays them that they're sending a lot. And for the intermediaries, really, they are getting the requests to take down things, and in the meantime, if they really take down things, sometimes those with the compromised domains, or those who are hacked, will be blaming them, because probably it was a wrongful takedown.

So, they are doing this takedown now, as a social responsibility, and for them, it's all cost. There's no benefit of doing this. And that's why, for them to kind of, in the effort of reducing costs, and minimize the risk of being held accountable, or being sued if it was

a wrongful takedown, is to just be very strict of what they want to accept, because that's how you reduce risk. And they also, once they made a determination, most of the time, there's not a process to kind of revisit this decision, because for them, they simply don't have the time, don't have the money, don't have the incentives to do this.

And this is what we think, like, this unfair cost transfer is making everybody suffer, and nobody's benefiting from this. And while this is happening, there's also governments who feel like they're overwhelmed by attacks, so their citizens are under attack, and yet this is an AI generator. Pretty nice, right? I was like, wow, good job. I didn't count the fingers, though.

So, what we're proposing as the solution is really, we have to reverse this unfair cost transfer. First, of course, we have to improve the takedown and detection processes. And by doing that, we can really reduce the cost and risk for intermediaries, therefore make them more willing and comfortable to accept more requests, and deal with more requests, proceed with more requests. And of course, because governments, if they feel like they're ignored, they probably will just come up with regulations, which is not a good thing for the industry. We all want a multistakeholder process where we can all have a say in this.

So, we really want to involve them in this network, therefore reduce pressure of regulations. And in the end, we know DNS Abuse is only part, it's only DNS, but abuse is actually everywhere online. It's not

really only DNS. So, what we're trying to do is really, we have to have a cross-industry cooperation. We've been talking to platforms, we've been talking to IP addressing registries, and all of them are actually very interested in this concept.

So, how do we reverse the cost? Now, TNN is coming into this diagram, and you see the service, takedown service providers have become trusted notifiers. How they become trusted notifiers? First of all, they will have to join TNN from a paid membership, but most importantly, we have a set of requirements for trusted notifiers.

For example, you will have to have at least 10 years of direct experience of dealing with takedown processes. So, for example, probably you will be notified if you're interested. And they will have to, for the first month of trial, they will have to maintain at least 95 accuracy rate in their requests sent to the TNN, and after the first month, the accuracy rate will have to maintain 93, because really by improving the accuracy rate or maintaining the accuracy rate, we really kind of create this incentive for registries or registrars to be more willing to trust the request they're receiving and to proceed with the request they're receiving.

And we will have contracts with trusted notifiers for this requirement. They will promise they're going to maintain the accuracy rate, and we will also have a contract with the intermediaries, because another thing is of the legal risks they're facing, right?

So, from this contract, we try to provide indemnity to intermediaries, which hopefully, again, provide more incentives for them to be less strict or be more comfortable of taking the requests they're receiving.

So, for the hackers, they actually making money out of the brands, but what they're doing also is they pay the intermediaries to pretend they're customers of registries or registrars, because they have to register domains to do this kind of attack.

So, they are paying the intermediaries, but because we are providing indemnity, and also by standardizing and improving the quality of the request, reducing the workload and liability of intermediaries, the costs were transferred back, in a sense, to us. And in our contract with trusted notifier, we are ensuring accuracy become the best interest for the trusted notifiers.

It used to be for service takedown service provider; the best interest is just to send as many requests as they can. Now, their best interest is to maintain as high as the accuracy rate of their request, because that means their notices will be prioritized.

And of course, then they can, brands will be less harmed by the attacks, because through this chain, the attacks will be notified faster. And they, in a sense, the cost will ultimately transfer back to the abusers, because whatever they're trying to do, since we have built this network of trust, the attacks will be very quickly nullified, and no more effective, and the money will then be flying from them.

So, another thing we, let me check the time first. Oh, okay. So, probably I'll just do, and then I'll show how it works, and then we can stop there. This is how we're thinking it should work. For the trusted notifiers, we have this requirement that you have to verify the request you send, and you have to provide indemnity in your request.

And all of the requests you send to TNN have to be non-automated and accurate. Accurate here is not the most accurate term. What we're trying to say is actually more like a due diligence, due process.

You do the due process to make sure the request has already been verified, and you know the authenticity of this request before you send it to TNN. And for law enforcement, because it's a different issue, we kind of cannot hold them as to the standard as we're doing with the trusted notifiers, but we also want to involve them so they are not going to bang us with the regulations.

They will be involved just automatically as trusted notifiers if they're interested, but we're going to check every request from the law enforcement because, and they will have to promise they know we're going to check it according to the industry standards. And like we said, all notices will be standardized and codified just to make it easier from both sides so we know each other's criteria and make it easier, smoother from both sides.

And from this, we really want to kind of restructure the commercial interest. So, for those who are sending notice, now their best

interest is to send the best notice as they can. And because of this, intermediaries are more willing and comfortable to take action according to the notice they send as fast as possible.

So, because I see we're out of time, I'll stop here. I already touched on this and I have more slides, but I'm willing to share it to your group. And if everybody has any questions we can discuss on emails or probably if people are really super interested, I can come back to another session. Thank you.

JOHN MCELWAINE: Ms. Manju, thank you so much. We have to wrap up, but Paul, if you could just ask that offline because we're getting told that our tech guys need to leave. So, thank you. Send it, Manju, if you send that to me, I'll get it out to everybody in the IPC. Thanks. See you.

[END OF TRANSCRIPTION]