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ICANN86 Seville | PF – GDS: Subsequent Procedures IRT  
Thursday, June 11, 2026 – 11:45 to 13:15 CEST

KRISTY BUCKLEY

Greetings, everyone, and welcome to meeting 175 of the Subsequent Procedures Implementation Review Team on 11th June 2026 at 9:45 UTC. My name is Kristy Buckley and I'm the remote participation manager for this session.

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ELISA BUSETTO

Thank you, Kristy. Hi everybody, this is Elisa for the record. So here's our agenda for today and as usual we'll start with an SOI update. Anybody? And the only agenda item is Independent Objectors for today, so we're going to spend the next hour or so discussing the approach with IOs. But Anne, in her capacity as GNSO Council liaison, actually has to add an additional agenda

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item which I will show now on screen and I will hand it over to Susan.

ANNE AIKMAN-SCALESE

So this is a little bit corny, so please bear with me. This is called 'Call Lars'. Okay, need to solve a problem in the middle of the night, call Lars. Unsure how policy will come to light, just tell Lars to take a flight, to LA that is. Which conference room in LA bears his name? We can't say yet, but just the same, that day will come because he's not dumb. So put up your thumb and vote for Lars. Are you feeling off, man? Call the Hoffman. He'll cheer you up, he'll fill your cup with positivity. He's got a proclivity for sensitivity. So calm your fears, dry up those tears, because the Hoffman always hears you.

Although we know he's going away, let's kill our pride and beg him to stay, because there's bound to come a day when the SPIRT needs the Hoffman to lead the way. Alas, this change came too soon. Feels like it happened at high noon, like watching a shootout in a bloody saloon. Feels like we're sending Lars off to the moon. Well, let me tell you, honey, we've all been relying on this Energizer bunny. Now he's moving up and that ain't funny. Still, Lars, we trust your future is bright and sunny. So please don't be a stranger, at least not any stranger than you already are. It's all true.

LARS HOFFMANN

Yeah, I honestly thought you were joking when you said you'd roast me, Anne, but I appreciate this. Look, it's been, I think, a wild ride

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for us all. It's been an honor and privilege to work with you all. I'm sure in my new role, our paths will continue to cross also. I do need some coffee, Karen. I know that the team that has been working with me is absolutely amazing. So me stepping away gives them the chance to shine even more brightly, I'm sure. And I have no doubt that the SPIRT will be handed very well by Elisa, Jared, Kristy, obviously under Marika's leadership.

So I will keep an eye on you. You better don't step out of line, or if you do, then do it gracefully. And I wish you all the best. I'll be right here in the background sending you early warnings. That is right. Whether it's by myself or from the GAC Codex is to be seen. It's been an absolute pleasure. Thank you so much for this. Thank you for being you. And I think for, I think it was three great years that we had. I will never forget that. Thank you all.

SUSAN PAYNE

Hi, it's Susan Payne, everyone. I didn't prepare anything like Anne, which is why I wanted her to go first. And I'm also not good at speaking off the cuff, so this was really a very bad idea of mine. But I did want to just say, thank you so much for making being the council liaison to this group such an easy job. Frankly, we hardly ever had anything we had to worry about. You had things well under control. You know, the projects come in on time.

And I think we're all really well served, knowing that you've now moved on and can be supporting the GAC in helping them understand what their rights and obligations are. Because we all

have built this program and we kind of love it. And so it's really, really good to know that the GAC side of things are in really safe hands now. And I think for many of us, we've come to, from working with you so closely, come to feel that we've formed a friendship. And I'm really pleased that you're staying around, but just in a different role. And look forward to what you do next. Thanks.

ELISA BUSETTO

And Jeff's hand is up.

JEFF NEUMAN

Yeah as someone who very rarely participates, I thought I would get up to Mike and thank Lars. You know, I'm not always the easiest person to deal with. I understand that. But you've always been there. You've always answered all the questions and done everything you can. And I know you're really trying to do good for the community. I think that's what's important.

And that's really what we're recognizing is not just your leadership and your hard work, but also balancing the needs and wants of different interest groups and also what's in the best interest of the community. And I think that's really what I admire about you, Lars. But you say you've been promoted. And is that really a promotion to the GAC? I'm just, I'm waiting, just waiting.

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LARS HOFFMANN

It's a lateral move, technically speaking.

JEFF NEUMAN

I'm waiting for the day that Lars has to, on behalf of the GAC, come to us and say, what the hell was that person thinking that wrote that provision? Thanks, Lars.

ELISA BUSETTO

Well, and I would love to wrap up the meeting now, but I'm afraid we can't. So we'll let Lars go to his new team. And I'm not sad about it at all. So thank you, Lars. I'm sure he's going to cry now, but I actually hope he's going to cry now, but we can't say this to him. And now sadly, we're talking independent objectors, I'm afraid. So let me just share the screen. And first of all, Anne had a follow-up question, which we haven't addressed yet, but we hope we will be able to go through it as part of the discussions.

So we recently shared our proposed language for two separate documents. The first one is the high-level guidelines, we call it information pack, that we're going to provide independent objectors. And the second one is the rationale, the template for the rationale that independent objectors will have to fill out. But before we go through the documents, we also have an update concerning the expression of interest for independent objectors. And for that, I will hand it over to my colleague, Daniele, who has recently joined our team. Daniele, over to you.

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DANIELE CHOMIKOVA

Hello, everyone. I'm Daniele, and I would like to just provide you with a quick update regarding the call for expression of interest. In March, we opened a call for expression of interest, or EOI, to identify three individuals to serve as independent objectors, including one who will act as chair. The deadline to response has subsequently extended, and EOI was open to firms as well. As you might know, we experienced a couple of technical issues which have been now resolved, and we are also experiencing some challenges with intake.

In this context, we determined that it's preferable for the EOI to stay open until the positions have been filled. In the chat, you will find a link to the overview with all requirements. And we would also like to let you know that we will post an announcement tomorrow or early next week to inform everybody that EOI is still open. Now, over to you, Elisa.

ELISA BUSETTO

Thank you. And Kathy, please.

KATHY KLEIMAN

Yeah, if I might, can I give a quick update on how many difficulties the independent objectors have had submitting their materials? Questions that were submitted timely were never answered. The website, the portal, on the extended date for submission was closed 24 hours early, and then no one was around to answer questions, as you had people from around the world trying to

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submit for their expressions of interest for the independent objector. You had people waiting in the middle of the night from around the world to try to, until California came online.

And finally, I mean, it's as if we're not a technical organization. These were basic problems going through, so I'm kind of wondering. And then when they were staffing -- people were reporting. We went out to share with the world that this opportunity was available, and then two of the three people were on vacation or something like that when they said, if you have problems, contact these people. And there were bounce-backs going on. You've got people all over the world that were trying to participate that were really frustrated. I just wanted to let you know. It was very sad.

ELISA BUSETTO

Thank you, Kathy. And we really are really sorry for what happened. It was really technical issues that we encountered, and we tried to address as soon as we realized that we had technical issues, because initially we actually did not realize. And I understand that you've been trying to reach out to the email address, but the issue is that we were not receiving emails on that email address, so that was a technical issue on our end that unfortunately happened.

So, we apologize for that, but please rest assured that this is also part of the reason why we are further extending the timeline, and we hope that this will work. As you can imagine, our vendor

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management team, but also the team in general, is working really hard to make everything work out, and there has been an oversight on our end that we tried to rectify as soon as possible. So, we are sincerely sorry about what happened.

KATHY KLEIMAN

But it seems like a whole cascade of problems, including closing the portal early. But then all the technical problems and no one around to support it. I actually educated the global support help desk and said, you are going to start getting questions about this. They didn't even know what was going on. So, I don't know. This is a whole cascade of errors, not just one. It was multiple, and I don't quite understand. I hope someone will do a debrief on this so it doesn't happen again.

ELISA BUSETTO

Yeah, there have been a number of things that happened all at the same time, and unfortunately for this specific expression of interest. And once again, we will try our best to make sure that this doesn't happen again. And again, please believe us, everything was done to -- we really tried our best to rectify the issue as soon as possible and as soon as we realized it. So, we are really sorry that this had to happen with folks that were trying to apply.

Once again, now the DOI will reopen. I don't know if it is reopened in the system. In any case, our teams will look into that, and there will be an announcement going out shortly so that there's going to

be some additional time. We are lesson learned. We will make sure that this does not happen again, and we will do some testing before. But yeah, please believe us, it was really an oversight on our end, and we didn't mean to, of course. We did not mean for this to be so complicated for potential candidates.

And I think also, Daniele, not everybody could hear what Daniele was saying here in the room. Just so what happened is that we are further extending the deadline for submitting expressions of interest for independent objectors until the roles are filled, and the announcement will go out tomorrow. And back to you, Kathy.

KATHY KLEIMAN

Do we know what the new deadline is?

ELISA Busetto

So, as of now, we will try and keep it open until the roles are filled, because given the experiences that we have had, we will try and make sure that as soon as we have three candidates, three suitable candidates, we will close the portal. So, we will invite everybody to, of course, submit their applications as soon as possible. And once again, if there are issues, now the mailbox is active, so we will be able to receive emails and try and address the concerns. And go ahead.

KATHY KLEIMAN

Will questions that weren't answered be answered?

ELISA BUSETTO                      So, you're saying that there are some questions that were submitted that were not answered?

KATHY KLEIMAN                      That's my understanding.

ELISA BUSETTO                      Okay, I will have to check. I personally don't have access to that mailbox, so I will check with the team and make sure that these are answered. And I think what we also recommended is that because of the initial issue that we had with the mailbox, is to send emails again, because we didn't necessarily receive them initially.

So, I will also inform our vendor management team and ensure that they send an additional follow-up. And in the meantime, if you're in touch with somebody, please do let them know that they can reach out to us and we'll try and address the questions as soon as possible. And once again, please accept our apologies for this.

KATHY KLEIMAN                      Well, a lot of time was wasted. And just for clarification, I'm not, and nothing I'm affiliated with is submitting an EOI, but I was a contact point for many groups that were thinking about it and wasted a lot of time. Thank you.

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ELISA BUSETTO

Yeah, thank you, Kathy, for raising this. And thank you for speaking up as well. I mean, lesson learned for us as well. We will do some more testing on the mailboxes, so we make sure that this does not happen again. So, thank you for letting us know and for reaching out, because it's also thanks to you that we realized that there was an issue. So, thank you for this. And I'm just checking if there's anything in the chat.

We can start going through the documents then that we will share with independent objectors. As you know, the guidebook has been published, so this is to complement what it is in the guidebook. And in particular, we wanted to focus on something that we sort of parked there late last year as well as early this year when we discussed the topic, which is what extraordinary circumstances mean, and we'll go through that later, as well as the approach with conflicts of interest. And Anne had a couple of questions around conflicts of interest, and we'll try to address them as part of the discussion.

So, if you had the chance to see the document, the first part is just a high-level overview on the role of the independent objector, pretty much verbatim from the applicant guidebook with, of course, some tweaks. Here we included the list of tasks that the independent objectors are supposed to perform, and these are coming from the expression of interest itself. So, we did some thinking around what exactly their remit of work is, and we wanted to make sure that this is included here so that it is clear to them

what they're expected to do and what they're not expected to do, so to say.

I'm just going to quickly go through the various points. If you see there's something missing, I hope not, please do let us know. So, first of all, independent objectors will have to review the applications, as well as monitor comments, objections, and other inputs related to potentially controversial applications. Perform research, of course. Coordinate with the other IOs to ensure that conflicts of interest issues are addressed. Coordinate with other IOs also to ensure that there's no duplicate objections, because as a reminder, it's ICANN that's going to pay for these objections, and we would rather not have to pay twice for similar objections.

Also, they will have to file limited public interest and community objections where relevant in line with the specified deadlines and procedures. Also, they might also participate in mediation and settlement processes where appropriate. Develop detailed rationales outlining the reasons why each objection was filed for publication on the program's website, and the rationale template is also something we want to go through.

Engage with the applicants and the DRSPs in case there's a request of a three-person panel and or consolidation of objections. Provide additional written statements where necessary, as well as evidence. Participate in virtual hearings, again, where applicable and if requested by the DRSP, and communicate with ICANN on a regular basis on issues and updates.

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And we would like to stress this, of course, the communication with ICANN would be merely administrative and not necessarily substantive. And I will hand it to Anne. I see your hand is up.

ANNE AIKMAN-SCALESE

Yeah, thank you, Elisa. This is just a question about the bullet point that says participate in mediation and settlement processes where appropriate, and my understanding is that's only after filing and that they cannot participate in any way in any other, so I wonder if it should say after filing, to be perfectly clear.

ELISA BUSETTO

Yeah, thank you. I will add this here already. Yeah, thanks Anne, well spotted. I don't see any other hands. So as we discussed, we will also have a chair. So one of the independent objectors will act as the chair and they will have some additional tasks, which is ensuring that conflicts of interest concerns are addressed in a timely manner and in line with like our conflicts of interest policies and also the program's conflicts of interest policies, and also they will have to ensure that no duplicate objections are filed. And I see Kathy's hand is up. Oh, sorry, I also see Jeff. I don't know who came first, Jeff or Kathy, sorry.

KATHY KLEIMAN

Okay. Actually, I was wondering if you could go up to the prior bullet points, but it actually has to do with the bullet point we're looking at, but this idea of not filing duplicate objections in both

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sections. Jeff, help me out with this. Last time, or anybody who was in the last round, I don't think they published the objections until they would decide it, and then the decision came out. I thought it was like the UDRP. I could be wrong. Is that going to change? Do we know that the International Chamber of Commerce will publish an objection, who the objector is and who the parties are up front?

ELISA BUSETTO

So the objections will not be published, but there will be some -- I'm not sure I understand your question.

KATHY KLEIMAN

How does an independent objector know they're filing a duplicate objection?

ELISA BUSETTO

So this is something we discussed with the group, I think, early this year, and what we're going to, we actually made a change to the guidebook as well. So the independent objectors will have access to objections as they are filed. So they will, extraordinarily, because the rest of the public will not be able to see the content of the objections, but they will have access to them prior to the administrative review. So they will be in touch -- I mean, we're still in the process of selecting IOs, and as soon as we do, we'll put them in touch with ICC so that they can coordinate on that.

KATHY KLEIMAN

Okay, that was the follow-up question. The International Chamber of Commerce knows this. Okay, cool.

ELISA BUSETTO

Yeah, that's correct. So we're, we have already addressed that concern. And I think you actually raised it on the list, and we're like, yeah, that's right. And based on that, we have made a change to the guidebook and have discussed with ICC. Thank you, Kathy.

KATHY KLEIMAN

They'll need a special system on that, so thank you.

ELISA BUSETTO

Yeah, thank you. And I thought Jeff was next, but now I see Anne. So I think Jeff is next.

JEFF NEUMAN

Yeah, thanks. So I think just to also respond to Kathy, last time around, the independent objector published like a draft, or I forgot what they called it, but almost like an early warning of, but that was of who they were thinking about objecting to. I seem to recall that, and I recall, but that was voluntary. That wasn't something that was, I think that just independent objector decided to do that, and it was helpful, I think, but that wasn't a requirement. So that's what happened the last time.

KATHY KLEIMAN

That's interesting, and I didn't remember that, but that isn't a requirement, right?

JEFF NEUMAN

But again, that was totally voluntary. My question is, going back with SubPro, I believe the purpose of having multiple objectors was in the case of conflict of interest. It wasn't to necessarily give each independent objector the ability to file objections. So to me, this kind of goes against the policy, and it also, without having the independent objectors, I don't mind that it's a group, but they should agree that an objection is necessary as opposed to each filing their own independent ones.

So maybe I'm misremembering. I have to go back to the report, but the whole, I remember when the discussions came up and the recommendations were made, it was not to have multiple independent objectors each having the ability to object. It was to ensure that if there were conflicts, there would be someone that could take it up. So this all came as news to me.

ELISA BUSETTO

Yeah, if can I just react to that. So I believe the language in the SubPro final report said to address potential conflicts of interest concerns, one of the ways that the community, that we can address this is by having a standing panel of independent objectors. And I

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think the wording is literally EG, a standing panel of independent objectors.

And just, I mean, this just to, we had actually discussed this with the group and our understanding was that they would still all look at the applications or they would coordinate among themselves, but we won't have situations in which two objectors file an objection against the same application. This is just, again, they will coordinate among themselves and see how to address that. So you're saying that this would be, I'm not sure how can this be like not in line with policy?

JEFF NEUMAN

Well, I guess the thinking with the standing panel is that they would have to agree to file the objection as opposed to one independent objector in that panel feeling like there's an issue and then that controls.

ELISA BUSETTO

They can independently decide to file an objection. The only thing we're trying to avoid is a scenario in which two independent objectors --

JEFF NEUMAN

No, I understand, but that's what's different, right? That's what's different than what SubPro recommended. They recommended a panel, not so that each individual could file an objection, but it was more like an agreement of the panel to file something. I don't

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know, this just seems to me like you're essentially having, if it's three, three different sets of people. Yeah, only one can file the objection, but if one of the panelists thinks an objection should be filed, but the two others don't, it doesn't matter. The one will still file it. That's different than what was expected, but honestly, we can't do anything about it, but I do not believe it was to have three. So we had three different inputs and yeah, this is just different.

ELISA BUSETTO

Yeah. Thanks, Jeff. Actually, we had this discussion and I think this is what we had landed on as a group, but I'll hand it to Anne.

ANNE AIKMAN-SCALESE

Yeah, thank you. It's Anne. Jeff, I think one reason why I don't recall it the same way you do is that what you're suggesting about the agreement does not get rid of the conflict of interest problem because if there's a conflict of interest on the panel, that person shouldn't be able to vote on whether or not to file the objection. And so if you have, let's say one conflicted out, then you have one and one, and it's not administratively feasible. And it was not my understanding that that all three would have to agree because the problem we were trying to address was conflict of interest.

JEFF NEUMAN

I didn't necessarily say all three have to agree. It has to be sort of a majority. And if you have one conflicted out and then it's one that agrees and one that doesn't it's not an agreement. But it's too late,

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I guess, but this is just going to strike a lot of people. There's going to be a lot more independent objections. We'll need to prepare for that.

ANNE AIKMAN-SCALESE

I had a different question or a point from that one if, unless somebody else wants to speak to that.

ELISA BUSETTO

Could you please tell us where in the policy this would not be, like, how is this not in line with policy? And also considering that it's a question that we actually asked the group and I understood that that's what was meant by standing panel of independent objectors. Also considering that it was also an EG, if I recall correctly. So also this standing panel is something that we sort of agreed on as a group and it was not prescribed by policy. So if you can point us to the wording that you think we're not in line with.

JEFF NEUMAN

Again, when we as a community create panels, the panel acts as a whole, right? SPIRT is a panel that we've created. It's not like each individual SPIRT member can file whatever. You always have to have a consensus. The group always operates with consensus, right? And every group we've ever set up, every panel we've ever set up operates on a consensus. Here, we're just saying we're setting up a panel and it could be five people, let's say, and whatever that one person finds objectionable is going to be

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objected to. You're going to have five different interests. We're just going to have a lot more objections, but I'll just leave it at that.

ELISA BUSETTO

Thanks, Jeff.

JUSTINE CHEW

This is Justine. So Jeff, I personally don't remember that as a requirement for the panel when we discussed it. I think the policy, as far as I remember, says that we are doing with a panel of more than one independent objector strictly on the grounds of if one has a conflict of interest, then they pull back and the other two can take independent action to file their objection. That is what I understood, right? And I think the implementation team and the staff is doing it right. Personally, that's my opinion.

ELISA BUSETTO

Thanks, Justine. I think we will also look back and see also the discussions we had with this group, and I have Kristy here also looking at the wording of the recommendation. But I think that we tried to address the intent, which was, again, avoiding situations of conflicts of interest as much as possible and ensuring that if an objection needs to be filed, it is filed. And there is a chance we will get more objections, but I don't think it's necessarily going to be the case. But I'll hand it to Anne for, I think she had another question.

ANNE AIKMAN-SCALESE

Yeah, it's a little bit different question. I mean, just kind of for the record, I don't see how voting on that panel could work when what we're trying to address is conflict of interest. But this is about just clarification questions regarding the timelines for filing by the independent objector, because as I understand it, the independent objector gets seven days beyond the objection filing deadline in order to file. And I think you guys clarified for me that the IO could begin drafting long before that seven days, because you can't really put it together in seven days.

And the other question that I had about that, and I think the answer to this was no, is that, for example, in connection with community objection, as I understand it, the IO can only do sort of independent research on that subject of the community and how it's defined and is in no way authorized to contact the community or community members prior to a filing, which of course makes it kind of difficult to establish in a draft objection what the community might be.

And I think this, again, is just a clarification question. We are saying that the IO cannot contact, that everything to do with a community objection filed by an IO is to be based solely on independent research on the community. Is that correct?

ELISA BUSETTO

Thanks, Anne. And I think that ideally we would not want the IOs to be in contact with applicants because, again, that would create

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potential conflicts of interest concern. But I don't think, and I mean I would probably also need to check with the team, but I don't think that if the community is not an applicant, they're not supposed to reach out to them. So I think that would be okay, but we'll probably need to have some more discussions around this.

ANNE AIKMAN-SCALESE

Yeah, I think that would be good if that could be clarified, because I think it'd be pretty hard to draft, and I'm not speaking of contacting applicants, obviously, but it'd be pretty hard to draft a community objection without talking to members of the community or trying to develop the type of evidence that's required to establish a community objection.

ELISA BUSETTO

Again, we'll check internally, but I think that would be okay. I think the prohibition, the idea is that they wouldn't really communicate with applicants. For the rest, if they need to reach out to communities, I think that would be okay. Also considering that, so we are hiring independent objectors, but also firms, as mentioned, and they would also have the opportunity to hire researchers and reach out to others. So outside the applicant realm, I believe, they pretty much have free hands in case, but we'll revert on that.

And are there any other hands? Sorry, I don't see the queue. No, I don't see any other hands. Okay, but thanks for raising that, and we'll get back to you.

So here, as mentioned, as Kathy asked, we'll say that independent objectors will have access to the objections filed prior to the administrative review so that they can already start checking them as they are being filed. Of course, this information will be kept strictly confidential, and we'll not be shared to any third party. Each IO will have access to the objections, except those where a stated COI prevents a review by an IO, and we will not be involved in those reviews.

The objection filing window starts at the same time as other parties, but they have seven additional days. They can be involved in settlement and mediation where appropriate, and again, after the filing of the objection. And unlike, of course, other objectors, they will have to provide rationales outlining why each objection was filed, and we will provide a template, which we're also going to discuss later in this meeting.

We're planning to publish these rationales for everybody to see as soon as possible, and as soon as we get them. Of course, it will not be real time because it's some manual work, but we will make sure that they're published as soon as possible and within seven days of the closing of the objection filing window. The seven days, we're still trying to figure out, of course, but it's going to be soon after, in any case.

So, this is information that comes from the Applicant Guidebook, so I don't think we need to go through it. What's new and what we tried to address here is extraordinary circumstances. So,

independent objectors, as you know, will not have their objection considered if another objection on the same ground has passed the Quick Look Review, absent extraordinary circumstances.

The Quick Look Review happens after the Administrative Review, so we try to outline here how to address this from a timeline perspective, and we also listed what extraordinary circumstances might be. This list is not comprehensive, and independent objectors might have additional, I mean, depending on the situation, there might be other extraordinary circumstances.

So, first of all, we tried also to group them in terms of scope. It's independent objector does not believe that the scope of the objection that has already been filed is the same as their objection, despite it being on the same ground. So, by ground, we understood we're talking about limited public interest and community, so that's objection ground, but here we refer to scope as in the narrower, exact scope of the objection. Something else, another example of extraordinary circumstances is that the original objection is too narrow in scope. Anne, please. Is this an old hand or a new one?

ANNE AIKMAN-SCALESE

I'm sorry, I'm trying to understand, again, the timing. Because the timing on when material changes were proposed to the application, in other words, this is a time period that goes beyond

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the seven days. You're saying that such material changes to the application would have had to have been made in the seven days?

ELISA BUSETTO

Such changes might have to, could have been done, like, after extreme confirmation day, because applicants will be able to already file application change requests, meaning that in those, between the time the original objection is filed, and that can happen on day one, and the time the independent objectors have the chance to file that objection, if there have been changes in between, so it can be a hundred days later, so yeah, that makes sense. Thanks, Anne. And I see there's still discussions going on in the chat regarding the panel, if that's okay, I will look at those later, and in case, I'll send a follow-up.

So another, then we, the other group, or well, category of extraordinary circumstances is new elements, so material elements or arguments that were not traced in the original objection, or material changes that were proposed to the application, and as I just discussed, so because applicants, they might, they will be able to file an application change request, basically one day after extreme confirmation day, so if this happens, independent objector will be also able to keep that into account. Kathy, please.

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KATHY KLEIMAN

Yeah, under new elements, the second one, material changes were proposed to the application after the original objection was filed that may raise additional concerns or not address the underlying issues. Something like that, that the material changes aren't sufficient, even in and of themselves, but I'm not wedded to that, but additional concerns.

ELISA BUSETTO

Yeah, let me think, so material changes may raise additional concerns, yeah.

KATHY KLEIMAN

Or not address, yeah, or not address the underlying concerns. what do you think?

ELISA BUSETTO

Yeah, I need to think also of the timing for this one, but good point, thank you. I might have to make some tweaks to the language. Then Anne, is this a new hand?

ANNE AIKMAN-SCALESE

Thanks. Did we talk about that conflict of interest issue that I raised, or are we not there yet? We're not there yet.

ELISA BUSETTO

Then the third category of extraordinary circumstances is bona fide. So if the dependent objector believes that the objection that

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has been filed is spurious, despite meeting the criteria for passing the quick look review, this will be considered extraordinary circumstances.

And finally, the IO believes that the objection may not have been filed in good faith, having for instance the sole purpose of preventing the IO from filing an objection against the relevant application. So all these we believe constitute extraordinary circumstances, and if you have additional thoughts around this, please feel free to reach out. We try to make it as comprehensive as possible, with the understanding that there might be more. So we made it clear in the language that this is not a comprehensive list. And Kathy, please.

KATHY KLEIMAN

Are you going to include that language, that these are examples and not necessarily, not a fully comprehensive list?

ELISA Busetto

Yeah, we have actually, but are not limited to, and there's also footnotes indicating that this is not a comprehensive list. So I hope this addresses the concern. Thanks.

And then in terms of, this is where we actually require in our approach consensus for the panel, meaning that in case of extraordinary circumstances, we suggest that all three IOs, unless one or more of them are conflicted, should agree to go ahead and file this objection, because again, it's supposed to be extraordinary.

So when they, in their rationale, that we have to, if they file an objection, although an objection on the same ground was already filed, that we also need to indicate that there is consensus among the three of them to go ahead and file the objection. So we hope that this also constitutes a safeguard in this regard.

Then in terms of timing, and this is where it gets a little bit, where we had to put some thinking into making this work, because they will not have that objection considered unless another objection passes the Quick Look Review. So the DRSP will appoint the same panel to consider the objection filed by the IO and the objection filed by the objector on the same ground, so that we make sure that there is consistency and that they look at them together. And it will be up to the panel to make a determination as to whether such extraordinary circumstances apply or not.

So of course, the panels will be informed of all this. They will also receive this as part of the information we're going to provide them with. What is going to happen is that if the other objection fails the Quick Look Review, then the panel will consider the objection lodged by the IO, obviously.

If the Quick Look Review passes, then the panel will determine whether the extraordinary circumstances described by the IO apply as part of the assessment as to whether the IO has standing. In other words, if both objections could go on at the same time, if the panel makes a determination that extraordinary circumstances do

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apply. If the panel believes the extraordinary circumstances do not apply, only the original objection will go ahead. And Kathy, please.

KATHY KLEIMAN

Yeah. So the panel as a, so pretty much a lawyer, as the first thing that they're going to do as an ICC panelist is decide whether they should hear both objections or not. Do they know that? That's not in the current rules anywhere.

ELISA BUSETTO

We discussed this with ICC. They actually looked at this language and they didn't have concerns. Because we do believe that this extraordinary circumstance, the check on the extraordinary circumstances can be incorporated into their checks for standing, basically. So, because this is kind of, it is to verify whether they have the standing to file an objection, because extraordinary, so it's clearly indicated in the language and it is in line with what we have.

So, ICC did not have concerns and if they don't, we don't either, and I hope it is okay with you. So, this is okay. Thank you. But yeah, this was just so you know, quite a tricky one to figure out because of the timeline and because of the different aspects that we needed to take into account, but we hope this works. But thanks for your question and I see Jeff's hand is up.

JEFF NEUMAN

Yeah. So, thinking about this from the applicant's point of view. So, the first question is, if both go ahead, do they go ahead together or

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do they go ahead separate? And I'm just wondering from an applicant's point of view, does that mean the applicant now has to spend the money to file two different responses over things that could be related but are determined that there's extraordinary circumstances? Help me go through that process because obviously there's nothing now, it's great we're looking at it from the IO perspective, but what documentation is there going to be from a respondent's perspective and what can be done to reduce the costs and burden of responding?

ELISA BUSETTO

Yeah, thanks Jeff. So, as you know, consolidation can be proposed by both parties. So, they can request to have objections consolidated, which would reduce the cost for the applicant. Also, it's going to be the same panel looking at both objections, which might further reduce the costs I believe based on what we discussed. But yes, because again, this is also why we're asking for consensus among the IOs. So, these are extraordinary circumstances. We don't expect this to happen a lot, and I don't think that we can force consolidation in this specific situation. Please, Jeff.

JEFF NEUMAN

So, I think it's probably going to happen more often than not simply because I would bet that we have lawyers for the IO and lawyers for the one who filed the other objection. They're going to disagree, the IO's lawyers are going to disagree that the other objection was

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filed on the same grounds. Right, they're going to fight over that and they're going to submit it and they're going to argue why extraordinary circumstances exist.

So, I do think it's going to happen to most of the independent objectors' objections. But again, I don't think it should be the choice of the two that file it for consolidation. It's going to be the respondent who says I only want to respond to this once and so it should be consolidated. They're the ones that are going to ask for it. Again, thinking about it from an applicant's perspective, they're going to not want to spend the money twice if it's pretty similar in nature.

ELISA BUSETTO

Yeah, thanks Jeff. But this applies then to all kinds of objections because we can see scenarios in which five objections are filed, not by independent objectors, but by other parties. And again, I think that there will be an attempt to have the same panel look at the same objections which might reduce the cost. But I don't think we're in a position to make changes to the applicant guidebook as to how consolidation can be requested. Also, to be noted that even if the parties suggest consolidation, it will be ultimately up to the DRSP to decide whether to consolidate or not.

So, even if the parties do not request consolidation, they might still go ahead. They might provide their feedback or thoughts, but it's ultimately with the DRSP. And I don't think this is something that we can change because it would open a whole lot different

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Pandora's box. But again, we also, the DRSPs are of course trying to, will of course try to consolidate even if not officially by nominating the same panel and ensuring that there is some cost saving.

But I don't think that we're really in the position to make changes on how this happens. And we're not in a position to say that, to ask the respondent to force, like to give the possibility to the respondent to force consolidation of certain objections. It's just a suggestion that goes to the DRSP. Yeah.

JEFF NEUMAN

So, as someone that's gone through this, not with independent objector, because nobody expected that you'd have to face an independent objection and another one. But again, when there's multiple objections, there's a huge burden on the respondent to then have to do at different times, right?

Because if one's going to go first and then the other one, if there's no like, reclusive effect, sorry, no other way to say it. But if the first one's not going to necessarily have an impact on the second one and you've got to respond two different times to very similar things, that's going to cost a lot for the applicant. And I just think that the applicant is not being considered in this process. And I think we need to.

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ELISA BUSETTO

Yeah, thanks, Jeff. I think this would be a possibly type to change for the SPIRT to consider. And I am not sure we would necessarily be in the position to make such changes. But I would also hand it to Justine who has her hand up. I don't know if this is a reaction to that. Sorry, Justine had her hand up. Okay. So if it matters, so Kathy, please.

KATHY KLEIMAN

As you mentioned, there could be multiple objections, Jeff, without even having the independent objector. But also, as you remember from last time, and we spent a lot of time on the consolidation rules to allow one side to request and the other side to say yes or no. I mean, it's a discussion process that we developed over time in this group on the consolidations.

But also, just in case it makes you feel better, the ICC was pretty easy on consolidating last time. They leaned towards that. So I think if good arguments are made, they're likely to lean towards that again. Including by different applicants, but on similar grounds, with the same string, there were consolidations. So thanks.

ELISA BUSETTO

Yeah, thanks, Kathy. And again, I think we can maybe refer you also in a follow-up email to the language around consolidation in the procedure. I don't think we're now in a position to change that. But it's something that can maybe consider for discussion in future

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policymaking. Because we're using kind of the same approaches in the last round, but actually now giving more possibilities than before to the parties to provide their input. So they can provide their feedback on the proposed consolidation of objections. And we thought that this could also help possibly saving costs. And yeah, Jeff.

JEFF NEUMAN

Yeah, so one thing Kathy said is important. Either side could request consolidation. But here, it sounds like it's only the one side. The independent objector could request consolidation. I'm just trying to make sure that it's either side that can request it.

ELISA BUSETTO

Either side can request it. And if we mention something here, we can rectify it. I don't think we have language around requesting the consolidation. So I might be wrong. Kathy?

KATHY KLEIMAN

Yeah, wouldn't that be a different section? Isn't that not what we're looking at here, Jeff? But I would think the consolidation rules apply as negotiated. You know, as exists in the applicant guidebook.

ELISA BUSETTO

The IO is a party to the proceedings. And they will act accordingly. I think the only big differences are the extraordinary circumstances

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and the additional filing window. For the rest, they will act as a party to the proceedings. So they will be able to jointly request a three-person panel. They will be able to, I mean, if the other party agrees. And they would also be able to request the consolidation. But then it will still be up to the DRSP to decide whether to go ahead or not.

JEFF NEUMAN

The respondent argued there are no extraordinary circumstances. Is there any mechanism for the respondent to say, I disagree that there are extraordinary circumstances and only one of these objections should be allowed to go forward? We didn't put that in here.

ELISA BUSETTO

No, there is no. This is part of the assessment to the standing. And there's no mechanism for a party or for the applicant to challenge the results of the quick look review. I believe that then in case the other party prevails, they will be able to appeal based on a clearly erroneous standard, I believe. And I'm not sure if this would constitute a clearly erroneous standard, but at this stage, no, we don't have any ways to challenge that.

JEFF NEUMAN

It's not a challenge, it's just filing a response. It could be built in that if one side is able to argue that there's extraordinary circumstances, it just makes sense to build into the process that the

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other party can respond so that the panel could consider both aspects. Otherwise, the panel is only considering the one side of the argument. I just don't think that's necessarily fair.

ELISA BUSETTO

Thanks, Jeff. I think that we might end up over-engineering this. We have safeguards in place. We put safeguards in place to ensure that such extraordinary circumstances, I mean, that the objection goes ahead only if there's a consensus among the IOs that extraordinary circumstances apply. And I think that adding a step where the applicant says that they do not apply, I think that can be part of their response. When they file their response, they can say this.

JEFF NEUMAN

They could say it, but why would they? Because it's not like the panel has the opportunity to then at that point say, oh yeah, we agree with the respondent, there are not extraordinary circumstances, so it would dismiss a party. That's not in the panelists.

ELISA BUSETTO

I mean, we're making this part of the assessment, the determination as to whether the party has standing or not. Then we would also need to give the possibility to the applicant to say that even if it's another objection, I don't agree with the fact that this party has standing, I don't think they have standing. And if we

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make it all part of the standing assessment, it's the exact same situation.

JEFF NEUMAN

That's normal judicial process, is that the other side can always argue there's no standing.

ELISA BUSETTO

But then that would apply to all objections and not only for the extraordinary circumstances, because the quick look review looks, among other things, as to whether the party has standing or not. So you're saying that we should add a step for the applicant to claim that the party that filed the objection does not have standing in our procedures?

JEFF NEUMAN

So in the last round, the parties could -- and this is how I know we prevailed on one, is we said that that party did not have standing to bring the objection, and the panel agreed with us. So it didn't even necessarily consider the rest. It wasn't part of the quick look, because the quick look was really just looking at administratively whether everything was filed. But in the last round, absolutely, and we prevailed on one of the objections. We prevailed because we said that, I think it was the ALAC one, didn't have standing to bring a certain type of objection, and they agreed.

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ELISA BUSETTO

But how did you communicate that to the panel?

JEFF NEUMAN

In our response.

ELISA BUSETTO

That's the exact same thing.

JEFF NEUMAN

But here you're saying something a little bit different. You're saying that the panel's already determined that they're standing.

ELISA BUSETTO

This is because we added the quick look review step that was not there in the last round, and the standard determination as to whether the party has standing is part of the quick look review. And now, after the quick look review, the party will have the chance, both parties will have the chance to question whether the party has standing, like the objector has standing or not. But I think that this goes beyond the independent objector's discussion, but it's questioning the whole process, as I understand, how we built it.

JEFF NEUMAN

So during the quick look process, I'm just trying to figure this out with the independent, because this is something different where an independent objector's objection can be heard in conjunction with the other one, or separate. So during the quick look, there is a

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response period. There's a period for the respondent to say it shouldn't pass quick look. Maybe there is, maybe it's something I just don't remember.

ELISA BUSETTO

Let me just open the guidebook. I will show you the guide, like the timeline that we have put together. Sorry, I didn't have it ready. I think it's down here. There it is. Sorry, it's very small. But the response happens, so at the point that the panel is appointed, then the panel performs the quick look review, costs are paid, and there is the respondent files a response following the quick look review.

Following the quick look review, yes. That's where the determination as to whether the party has standing. They can argue that as part of their response. In their response, they can say the party does not, that we do not believe that the party has standing. But yeah, this would open a whole can of worms if we were to revisit this at this point. And I'm just checking. I mean, we can look again at the language, but I think that this is indeed the case as we have developed the process. I don't see any -- Yeah, Justine, please, sorry.

JUSTINE CHEW

This is Justine. For words, I think you are right, Elisa.

ELISA BUSETTO

I appreciate that. I like hearing that.

JUSTINE CHEW

I raised my hand to ask, I don't know, it's a nit of mine, I guess. This document goes on to talk about whether the IO has standing. I'm just wondering whether we want to change that language a little bit, but just have the same intent. Because in terms of when you say IO has standing, now you can guide me here. When you say IO has standing, what are the conditions for the IO to have standing?

So you're saying that if somebody has already filed an objection on the same grounds, that would not give the IO standing to file? I understand the concept of it, right? But here I'm just suggesting that instead of when you say, for example, the end of the first paragraph, whether the IO has standing, can we instead say whether the objection of the IO can proceed and not use the word standing? Because I think standing is confusing a little bit. Same intent, just a change in the wording.

ELISA BUSETTO

Yeah, yeah, no, I understand. No, that makes sense. Thanks, Justine. Thanks.

Then, regarding conflicts of interest, also something we had to spend quite some time on to find a way to make sure that the community's concerns are addressed while also having it procedurally feasible. And this is where we're also going to discuss concerns that were raised on list. So we have two different steps to

ensure that the parties, that the independent objectors are not conflicted.

So first of all, as you know, all our vendors have to operate with integrity, impartiality and transparency. And this is the expectation for everybody we're having contracts with. And all service providers, they have to comply both with ICANN's conflicts of interest policies, but also the program's conflicts of interest policies, which are part of Appendix 7 and Appendix 8 of the applicant guidebook.

We have two steps as mentioned. Firstly, as part of the contracting process, what we do with our contractors is sharing conflicts of interest disclosure form that has the objective to facilitate compliance with disclosure obligations described in our policies. And this already helps us inform, it helps us identify potential or actual COIs. And this relates specifically to clarify to business and family relationships between ICANN directors, liaisons, offices, employees and contractors. So this is a first step that is part of our due diligence as part of having contracts with vendors.

So what happens is that as part of the contracting, they will have to fill in this form and send it to ICANN. We will review it to make sure that it aligns with our policies. And if there are any material changes in the current year or after that, they will always have to notify us so that we can check again. And this is part of our processes and I don't think we can really make a lot of changes there.

What we try to come up with is a process for what has to happen as of Reveal Day. So we're planning to compile a spreadsheet with all the information concerning applicants, parent entities, ultimate entities, directors, stakeholders, executives and all other information that could be useful in identifying conflicts of interest concerns with independent objectors. And the idea is to not to have them, so in this case it's also going to be the independent objectors themselves, identifying actual potential or perceived conflict of interest. So here when we talk about conflicts of interest in this paragraph, we refer to actual potential or perceived.

If the independent objector identifies a conflict of interest, actual potential or perceived once again, they will not review any application submitted by the applicants nor any applications that are, so if they're identical in this case, the strings are identical, or the IOs determined may become part of a contention set.

So of course we do not know at this point yet because string evaluation will be ongoing at that point and also string confusion objections will also be ongoing at that point, so we do not know if the strings will end up in a contention set, but the independent objectors will also have to make a determination as to whether they believe this might happen.

So we're trying here to play ahead of time and also give them some freedom there to determine, or they'll free hands to determine whether they believe this might happen. And once again there might be a situation in which two applications will not end up in a

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contention set, but will still want to play safe. And I see Kathy's hand is up.

KATHY KLEIMAN

Yeah, it's an interesting list and spreadsheet. Will it become public, or is this something distributed to the IOs, or does this spreadsheet become public to the world?

ELISA BUSETTO

So, this is on Reveal Day, all the applications will be published, so most of the information is public. I do not remember if some of this information is confidential. So some of this information is confidential, cannot be shared, but we will still share it with independent objectors for them to be able to identify COI. So maybe it's all public, but I would need to check. I'm sorry Kathy, I can't answer this question. I'm looking if somebody knows whether this is part of the public portion or not.

KATHY KLEIMAN

That might be something worth looking at, because part of me really wants to see it, and I'm sure everyone would really want to see it, but I'm not sure how much of that might be confidential. Thanks.

ELISA BUSETTO

I'm sorry, I would have to check. Thanks, Kathy. So then what's going to happen is that we will share this spreadsheet with the IOs,

and they will review it and notify the chair of any identified COI. The chair will then compile the information in the spreadsheet and send it to an email address that is designated by ICANN, and we are putting here the onus on the chair to ensure that all the independent objectors are informed of reported COI and ensure that applications are reviewed appropriately. If one of the IOs is conflicted, the chair will ensure that another IO is assigned to handle the objections to that application and other applications that could end up being part of a contention set.

And I think this is where some of the questions were raised, and it's around the conflicts of interest that's being identified or arising following the finding of an objection or an appeal. And in that case, again, if the objection is already being filed, somebody else will look at that objection. And the chair will, of course, have to notify us as well as the DRSP so that the contact point can be changed.

So one of the questions that Anne asked is whether, in case it is the chair who has a conflict of interest, and we think that it is clear here that even if it is the chair, a different IO will have to be appointed. I mean, maybe it's not that clear, but I think we have to discuss it internally, but I think that that concern is addressed. So if the chair is conflicted, then somebody else will have to be appointed. The issues that arises, and that's the question that Anne asked, is what if the chair does not believe that they are conflicted?

So first of all, I think that this is something that, once again, we can't necessarily over-engineer, and I don't think we need to have too

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many information here because this will be assessed on a case-by-case basis. And I think that also the other independent objectors will have the opportunity to contribute to this. But also the wording that we use, actual potential or perceived, we think that, again, if several concerns are raised around the chair being conflicted, we believe that if the chair perceives that he is a perceived COI, they will have to appoint somebody else.

So this is where we stand, and I think that by having a standing panel and by having different safeguards in place, we hope that this concern could be addressed with the current language. Also, I would like to stress, before I see there's a queue, I would just like to stress that we haven't contracted with independent objectors yet, meaning that we will also have discussions with them and see what their practices are to ensure that what we come up with makes sense and addresses the concerns of the community.

And once again, to reiterate that they have contractual obligations, we are expecting them to act with integrity, we have policies in place, so we believe we have as many safeguards as possible to ensure that this situation works out and does not arise, and too many conflicts of interest concerns do not arise. And sorry, I see Anne's hand is up.

ANNE AIKMAN-SCALESE

Thanks. After the filing of an objection, if a conflict of interest is alleged against the chair who is the one who is the IO who has filed, it shouldn't be the chair who determines whether he or she or they

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have a conflict of interest or not. Maybe should be the other two panelists, but I think there's some experience in the community regarding this in the objection phase, and so I can't see why we think -- and by the way, who selects the chair?

ELISA BUSETTO

Us.

ANNE AIKMAN-SCALESE

Okay. I can't see why we think that a chair should be able to make a determination on the chair's own conflict of interest. That doesn't strike me as consistent with any principles on conflict of interest. Thanks.

ELISA BUSETTO

Thanks, Anne. So you're suggesting adding a line to the language indicating that if it is the chair that might have a conflict of interest, then the other panelists will determine whether the conflict of interest is indeed real, or perceived or potential. Okay. I think this is something we can look into and potentially add a line or two. Thank you. And Jeff, please.

JEFF NEUMAN

Yeah, thanks. Where are the conflict of interest rules about having a conflict with respect to filing the particular objection, not with the string or the applicant? For example, last time, the independent objector had a partner who handled a case involving the same

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party that was implicated. In other words, I'll make up an example just because I don't remember the specific one.

Turned out that the independent objector had a partner that worked closely with the World Health Organization, independent objector filed it against .health, and there was no conflict with the string or the applicant. It was a conflict with a party that also filed a bunch of comments against the string. That was or should have been a conflict, right?

So, it's not just a conflict with the string or the applicant, but a conflict with an entity that may have filed comments or that may have filed its own objection, but on different grounds. I don't know if someone's in the health industry whether that's a conflict with .health or has worked in like there's just no real rules about that.

So, again, most of the conflict of interest issues that arose last time were not because they knew or had relationships with the applicant. It's because they had relationships or either they themselves or their partners or law firm or whatever worked for another party that either filed objections or filed comments.

ELISA BUSETTO

Thanks, Jeff. What would you suggest for the current language? Other relevant parties, but--

JEFF NEUMAN

That at the time and after an objection is filed, there's a conflict of interest check. Well, actually, it should be before it's filed, but I

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don't know if they're going to do it on themselves, but there should be a check to see whether someone who filed comments or another objection, it should be a similar kind of conflict check because if they're being paid by someone who also happened to be filing comments against something, that's a conflict. They're predisposed to filing that objection. Maybe, I know Ashley has his hand raised, so he might have another example.

ELISA BUSETTO

Yeah, Ashley, please.

ASHLEY ROBERTS

Yeah, Ashley Roberts. So, I agree with Jeff and just to kind of probe a little bit on something that Jeff said. That first paragraph there, all the things in the list are to do with the applicant and the kind of applicant entity. It does say other pertinent information, but you could maybe be a bit more specific on what that other pertinent information is.

So to use Jeff's example, the kind of health example, if it was .health and IO had a conflict with the World Health Organization, then I guess other pertinent information would be, not phrasing this properly, but something related to the actual string as opposed to the applicant. So, that needs to be the string and possible meaning of the string needs to be a consideration as well for potential conflicts. Does that make sense?

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ELISA BUSETTO

Yeah, thanks, Ashley. And I think this is something we can discuss internally, but point taken, we can look into making a tweak in this sense. But also, just to stress that IO, they have to disclose any actual potential or perceived conflicts of interest. So, I think independent objectors will have the chance to disclose this, but if we want to give more examples -- I mean, we need to discuss this internally. I don't think we can make any promises at this stage. We also need to look at their contracts and what's in the current disclosure form, but I think it's something we can get back to, point taken. Thank you. And Kathy, please.

KATHY KLEIMAN

Yeah, just a reminder, IOs cannot file comments. So, we've got that exclusion already. And so, we're talking about the IO coming in if a comment has been filed. But at a certain point, they have to adopt these are professional organizations with professional conflict of interest policies. And that's why there are three, so that one can recuse themselves if they are too close. But, if you're going way beyond what the Supreme Court does in terms of recusal right now, I think if I understand what you're saying, if you're talking about spouses casting a wide net.

JEFF NEUMAN

Just to respond, again, with a specific example, the World Health Organization filed a comment against a particular string. The IO had worked for the World Health Organization for a number of years and, therefore, is predisposed or could be predisposed to

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filing an objection based on its prior relationship with the World Health Organization. So, that's what actually happened. And fortunately, it didn't matter because the IO lost. But, we viewed that as a huge conflict of interest, that the only reason they filed it was because they worked before for that organization that filed comments against the string.

KATHY KLEIMAN

Which is exactly why I think we're going through all these hoops to make sure there are alternate independent objectors who can independently evaluate exactly, to get to that, Jeff.

JEFF NEUMAN

Sorry, you don't know the strings, right? And, strings is not even on there as something that they need to look at. So, certainly, as Ashley said, the word strings should be added to that. It's not just applicants, parent entities, ultimate entities. It's the string itself, and if it's in a particular industry, obviously, they should disclose that, yeah, I see this .health and I worked with the World Health Organization or the health industry for years. So, that's totally within normal conflict of interest rules.

ELISA BUSETTO

Thanks, Jeff. Anne?

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ANNE AIKMAN-SCALESE

Thanks, it's Anne. I know that there are a lot of regional differences in determinations of what is and what is not a conflict of interest. And I appreciate the fact that your language says perceived conflict of interest is also a disqualifier. And I wonder, for addressing Jeff's concern, if there might be sort of a sentence that says, in considering perceived conflict of interest, the IO panel should include reference to, and then a list of the types of things that Jeff is talking about so that it is interpreted quite broadly. I mean, it's covered in part by the word perceived, but maybe some factors that should be considered in perceived would be helpful to address Jeff's concern..

JEFF NEUMAN

One of the things that's easy is just add the word as a real day, I can well compile a spreadsheet including information on the string, applicants, parent entities, ultimate entities. That's a quick, easy fix to know that the string itself can cause a conflict. At least at that point, you can look at things like industry or whatever.

KATHY KLEIMAN

Can you read the whole sentence again, like with your edit?

JEFF NEUMAN

As a Reveal Day, ICANN well compile a spreadsheet including information on the string, strings, whatever. Yeah, that's it.

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ELISA BUSETTO

I think we were already planning on sending information on the string. We just failed to include it there. But I see your point, Jeff, and I think we can also make a couple of tweaks. We'll discuss internally and see where we can include something, but point taken. And I think also considering that they can file community objections, it might also be something to consider. But yeah, we'll look into this and see if we can come up with something that's agreeable. Thank you.

And then I think, are there any other questions or concerns? This was helpful because I think we can make some tweaks. Then the rest is just quite procedural or logistical rather. Fees and budget, I don't think this should raise any concerns. It's just for them to know what's the difference between the two and then what they're expected to do in the weeks following String Confirmation Day. Is that in your hand, Jeff? Okay.

And again, I shared the document a couple of weeks back. The only addition that we have made, I mean, the only thing that I still wanted to mention is the ALAC. So we included a paragraph on the ALAC, including information as to whether the ALAC has standing, but also to their procedure so that they can also keep into account these factors and be aware of them. I just wanted to quickly go through our --

KATHY KLEIMAN

Can I ask a quick question, Elisa?

ELISA BUSETTO

Yeah, go ahead.

KATHY KLEIMAN

Did ALAC have conflict of interest requirements? I mean, is there anything there? Because that could be enormous.

ELISA BUSETTO

I mean, they can -- Go ahead, Justine.

JUSTINE CHEW

Kathy, I don't think you have to worry about that because the standing issue is already a big hurdle for us. I said, I don't think you need to go to the extent of conflict of interest for ALAC members because the standing issue is already a big hurdle for us.

ELISA BUSETTO

And I think that conflict of interest for the ALAC, I mean, they have their internal procedures to file objections and they will follow them. As mentioned, I mean, the Board determined that there's no automatic standing for them to file community objections and they will have their own processes. And I don't think we cannot prevent the ALAC from filing objections based on conflicts of interest concerns. So I don't think this is something we need to look into. Jeff, that's in your hand.

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JEFF NEUMAN

Yeah. So the last time around the World Health Organization lobbied the ALAC to file its objection and they did. So I don't agree that there should not be sort of conflicts of interest, but I'm hoping that there are more tighter or tighter rules that an organization can't come in and just lobby through ALAC members. When I say the World Health Organization, they did it through a member of the At-Large, and the At-Large was the one who did the bidding for the World Health Organization. And then ultimately they filed an objection.

JUSTINE CHEW

I believe in our ALAC internal procedures for filing comments and objections, there is a conflict of interest provision. Insofar as we know there is a conflict of interest, then of course, we will ask that person to recuse themselves from participating in whatever process, depending on the string or what have you, right? And that's in as far as we know. So it's the same case for anyone in as far as we know that they have a conflict of interest, then action will be taken. If you perceive there's a conflict of interest in one of our people who are doing the objections, I invite you to inform ALAC of it.

JEFF NEUMAN

I did the last time.

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CHERYL LANGDON ORR

Different process this time though, Jeff. Hang on. If I may, Cheryl here. It is not the same objection process. It's been completely reworked. There's a huge amount of time and energy has been put in by ALAC to make sure it is a better process than last time. So let's look forward to working successfully with the new process. Thank you.

ELISA BUSETTO

Thank you, Cheryl. Go ahead, Kathy.

KATHY KLEIMAN

Cheryl, it's lovely to see you. Question about whether ALAC should get access to the spreadsheet of all of the directors and things like that.

ELISA BUSETTO

I don't think this is something we can do. So I just wanted to quickly go in the next three minutes or so. The template for the rationale that independent objectors will have to fill out and then which will get published. So of course there's information about the application itself and then they will need to indicate on which ground they're filling the objection, a rationale as to why they're filling the objection.

And then again, this is concerning extraordinary circumstances. This is the place where they can indicate, also for the public to know, why they believe that extraordinary circumstances apply. So if another objection was filed against the same application on the

same ground, they will have to indicate it here. And if they select yes, they will have to describe such extraordinary circumstances as well as indicate the objection ID of the objection that was filed. And then they will have to confirm that there was consensus amongst the non-conflicted IOs that extraordinary circumstances apply.

So this is once again a safeguard that we try to put in place to ensure that this is not used too much. And this is pretty much in line with what we just discussed earlier. And with two minutes left, so I think that there were some discussions around the processes themselves as they are published in the guidebook, which I do not think we're in the position to revisit, especially in terms of standing. Also as concerning what we mean by standing panel, I will go back to the recording of the session where we discussed this and I think that there actually was more than one, so that we can maybe share it with the list and see if there are any additional thoughts around that.

And I will also look at the chat, a lot was going on there and I haven't read a line of it and I apologize for that, and see if there's anything and if there are any other concerns. And with one minute left, any final thoughts on this IRT meeting? Kathy, please.

KATHY KLEIMAN

Thank you.

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ELISA BUSETTO

Thank you, Kathy. This was, please believe me, quite a challenge. The topic of independent objectives is indeed a very challenging one and interesting. Let's call it a learning experience for everybody. So, yes, Jeff, please.

JEFF NEUMAN

So I would ask this, I think I ask this every time, is this our last meeting? I mean, can this SubPro IRT be disbanded?

ELISA BUSETTO

I mean, we said goodbye to Lars, so I think it has to be, but I don't know. Are we closing this officially? I'm looking at the bar here.

JEFF NEUMAN

I mean, I think any changes from here really should go to the SPIRT, but I think this group needs to be disbanded. I love y'all, but--

KATHY KLEIMAN

I disagree. We're still doing the work that we started.

ELISA BUSETTO

So we are looking at this as implementation work rather than changes, because we're not making changes to the guidebook, Jeff, just saying, or at least that's not the plan. So this is more about how we're going to implement policy and kind of wrap up, yeah. This is on top of what's in the guidebook and a complement to what's in the guidebook rather than changes.

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But thank you everybody, and if this is the last time we're spending time with this group, thank you so much, and we'll see each other on other platforms probably. Take care, everybody. Bye. Thank you. We can end the recording, yeah.

**[END OF TRANSCRIPTION]**