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ICANN86 Seville | PF – GNSO: DNS Abuse Mitigation PDP 1 (1 of 4)  
Monday, June 08, 2026 – 11:45 to 13:15 CEST

TERRI AGNEW

Hello and welcome to the DNS Abuse Mitigation PDP 1 Working Group Session 1 of 4. Please note that this session is being recorded and is governed by the ICANN Expected Standards of Behavior, the ICANN Community Anti-Harassment Policy, and the ICANN Community Participant Code of Conduct Concerning Statements of Interest.

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PAUL MCGRADY

Thank you, Terri. Thank you, everybody. Welcome. This is a working session of the PDP 1. We are not going to be doing a lot of background, although we'll do a tiny bit, because we had the pre-ICANN policy webinars. So we are just going to jump right in and

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get to work. If I can have the next slide. Zoom crashed. All right. All right. Slide two.

We're going to do a quick welcome. That's what we're doing right now. We are going to go into progress made and our objectives for ICANN86. And at that point, I will hand over the gavel to Nick on my left, who is going to take us through the rest of this session, discussing questions, Charter Question 8 and Charter Question 9 Straw Proposal. And I've been told to move closer to the microphone. So let's do that. All right.

So our progress made so far. Our goals were to establish a working plan, establish a leadership team, and to look at and gather the early input from stakeholder groups and constituencies. We've done all that. Check. So far, we've had 14 working group meetings. We have consistently worked in a collaboration document. We considered the early inputs for questions 1 through 9 that were sent from the SGs and Cs. We have already deliberated on each of the questions 1 through 9.

We have a Straw Proposal text for questions 1 through 6. We have preliminary Rec language on questions 1 through 7. And we are going to be looking at the scoped impact assessment document, which is sort of an interim step on human rights and data privacy impacts. So in other words, we are moving along with all deliberate haste. All right. We're going to move on to the next slide.

So for this week, Monday, we have this session. You're in it. It's the column all the way to the left. We're going to discuss Straw

Proposals. Well, we have a Straw Proposal on one of these. We have deliberations still on one of these. But that's what we're going to be doing today or this session. Later today, we are going to review language on all of these together, charter questions 1 through 9 in a cohesive bundle. By the way, we will miss you on Tuesday. We hope everybody enjoys their Tuesday. I assume everybody will be out in doing their tourism stuff because we're all here for this, right?

On Wednesday, we'll be back together and we will review and refine the language on 1 through 9. And we will be discussing cannot live with language and modifications. And then Thursday, we'll be going through the scoped impact assessment on human rights and data protection. And if we still have more cannot live with discussions, we will do that. All right. All right. And so we are now at where Nick is going to run with this. Thank you.

NICK WENBAN-SMITH

Thanks, Paul. So just to recap for everybody's understanding of where we got to, there are nine charter questions in the charter for this PDP. We have done a first pass through all nine. And we've got preliminary text for the first seven charter questions, which we've been through in the previous working group meetings. And the objective for this session, which is a 90 minute session, is to discuss the last two charter questions, charter question 8, which is essentially the metrics for the policy's effectiveness and charter

question 9, which is around ensuring compliance with the policy. So it's the final two charter questions.

So we've got until quarter past one local time. I think we'll try to balance more or less equal time for both of those charter questions. So we've got about 40 minutes more or less for each one. I'll try to make sure that we give due weight. And if we need a bit more time, perhaps for charter question 8, which we didn't make as much progress on as the other charter questions in our first attempts, then that's fine. I'll be guided by the working group requirements, and we try to do that in an empathetic and effective way to make sure we capture everybody's inputs to this process.

So with the charter question 8, the questions on the slide, what metrics will we use to evaluate the policy's effectiveness? We had already quite an extensive working group discussion on that. But we, as the leadership team in combination with the staff, did not come up with a preliminary recommendation text. We didn't feel that the discussion had matured sufficiently to come up with some stable language which could be used as the next basis.

So if we look at the discussion summary on the slide there, I don't know if it's easier for you to see it on the screen. For those of you not in the Zoom run, can we have the text on the slide? I've got it in front of me. Oh, Zoom crashed, didn't it? Okay. Okay, so sad times. Oh, here we go. I was going to say, you have to listen to me and read out the whole slide. But you'll see that we're talking about

policy effectiveness, not the effectiveness of an individual ADC per se.

So the discussions we've had so far have focused on the requirement for a periodic review of the effectiveness of the policy. This is a standard sort of iterative approach. You introduce a policy, you measure its effectiveness, then you decide whether the policy is fit for purpose, needs to be amended, cancelled, improved in some other way through a sort of a continuous improvement cycle.

So the suggestion was a two-year interval review after the implementation of the policy. And the sorts of indicators for whether the policy's working well would be a combination of quantitative and qualitative indicators. The issues of DNS abuse are quite complex in the sense that some small instances of abuse can lead to huge outcomes.

And then there's sort of large-scale attacks, which have probably minimal outcomes. The fact that abuse moves from one registrar or one type of scam to another, the criminals are dynamic. And therefore, it's hard to be too prescriptive when we're looking at the indicators for a successful policy and the implementation of the policy.

The policy requirements in terms of the ADC, the associated domain check, which basically we want to see a reduction in abuse and see whether the objective evidence can give us some indicators that the policy has had the effect of trending downwards or at least changing behaviors in criminals. So to protect our

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communities that we collectively represent and make the ecosystem a safer and better place for us all to be based in.

So we did have a number of suggestions. There already exist lots of industry-level data and analysis around how much abuse is going on, where it's concentrated. The ICANN's OCTO department does Domain Metrica. There's the NetBeacon Institute, which provides objective industry-wide statistics already. And that's the sort of thing that we thought that would be useful. And we also understood that abuse is quite a dynamic topic and the methodologies will change over time and abuse itself changes over time. So that was the sort of the discussion, but we didn't come around to a text.

So just to summarize and to remind people of the considerations here, this is a policy effectiveness sort of a macro scale as opposed to specific, oh that one thing didn't mitigate that specific instance of abuse. We're trying to look for a more industry-wide metric which can give us a true global picture as to whether the policy's working or not. And we came up here with some targeted questions which would help us, would help guide us assessing whether the policy has been effective.

So for example, are registrars actually conducting the associated domain checks as required by the policy? Can ICANN compliance determine that the ADC contract obligations, which would be baked into the ICANN accreditation agreement for registrars, whether that is being met contractually. And significantly in order

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to make the policy effective, whether there are sanctions available and ultimately teeth to enforce the obligations.

Consistency of operationalization, that's a bit of a mouthful. You know, is it a patchwork quilt or is it being applied consistently across the whole ICANN ecosystem and different geographies in terms of combating abuse? And fundamentally, has it made the world a better place in terms of effective mitigation of DNS abuse mitigation at the registrar level? So those were the considerations just to remind people.

So I think now I'm very open to further discussion and opening the floor around thoughts in terms of the answers to the policy question, what metrics will be used to evaluate the policy's effectiveness? And I don't know if I'm going to manage the queue. Are you going to manage the queue or I'm going to do it. So have we got any hands? I can't see any hands. I can see some hands up.

Okay. So Reg, I have a few first in Vivek. I will keep an eye on the queue. And if people want to speak in the room who are not in the Zoom room, then also attract my attention through the conventional method. Reg?

REG LEVY

Thank you. Reg Levy from Tucows and the Registrar Stakeholder Group. So if periodically the new policy is assessed and then found that it is no longer useful because the threat actors have changed their tactics, will we deprecate the policy?

NICK WENBAN-SMITH

This obviously is a hypothetical question. I think that would depend on further policy work in terms of can you reverse the policies and once it's an original policy. But I think effective policy evaluation should be a good practice in the sense that if the policy has been introduced and is ineffective, makes life worse for registrars in terms of overhead and compliance burden, and doesn't serve any useful purpose, then I think it's an entirely legitimate question to say should the policy continue in existence or should it be improved. That's an iterative thing which we'll only get through experience of implementing the policy.

PAUL MCGRADY

Reg, it's a great question and I think that goes to one of the primary reasons why the draft recommendations are drafted the way they are. It's meant to be a flexible policy. A lot of reside in guidance from compliance and so that's why we have some things that seem fuzzy at the recommendation level, but that's so that we don't draft a policy that's great for 2027 and is old by 2028. That having been said, if in five years' time, even the way it's drafted now, if it stinks, then we need Council to send it back through, right? But the goal is to draft something that's going to have a reasonable lifespan.

NICK WENBAN-SMITH

Yeah, and I think the further point I'd make is that this is supposed to be a swift policy process. It's got a very specific mission and a

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very tightly drafted charter and we should try to get through that and to implement a policy which is good enough and fit for purpose for today. Try to make it flexible and future proof. If that doesn't work out, then I think that's the purpose of these reviews is to feedback that and I know you'll love this, Reg, some proper evidential basis on which we can actually have that sort of discussion as grown-ups around the table, I hope. Yeah, Reg, you can reply to that and we'll move down the queue. It's more hands up.

REG LEVY

Thanks. I guess my question was more along the lines of should we not consider writing the sunset into the policy so that we don't have to go through all of the Council shenanigans. If it turns out, like why are we assessing it if we're not going to do something with that assessment? So if the assessment determines at a certain point that it is no longer effective, then perhaps we can write into the policy that at that time it should be sunset.

PAUL MCGRADY

Can I respond to that? So, Reg, it's an interesting idea but it's inherently circular because who would assess whether or not it's working, right? So you would then have a assess whether or not it's working team, which would be substantially redundant with a review team that the Council establishes or a new fresh PDP that the Council kicks off.

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It's an interesting concept. It's just that by us putting in a sunset, first of all, I don't even know if that would get past Council and get past the Board but even if it did, we would just end up with two working teams before we were able to fix it, which would actually slow things down. But it's a new idea. I'd like to give it some thought but that's an initial reaction to it.

NICK WENBAN-SMITH

Yeah, I think it is an interesting idea and I've seen that sort of sunset provision in some sort of contractual provisions. So it is possible to do that. I suppose, I know Tucows already does the ADC checks. So I guess what you're saying is if ADC checks are no longer serve any purpose, then registrars like Tucows wouldn't bother doing them, right? So I can understand that train of thought. There's more hands in the queue. So let me move that on to Vivek next, please. The floor is yours.

VIVEK GOYAL

Thank you so much. I'm Vivek Goyal of the BCN alternate and thank you, Paul, for allowing alternates to speak and take the floor. For any significant measurement to be done, we need to set a baseline. How do we agree if we do a review after two years and we come up with some metrics, how will we know whether that metrics is better or worse if we don't have a baseline? So while we're talking about how we will measure, we should also discuss setting a baseline now

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and then so that any progress is measured against that baseline.  
Thank you.

NICK WENBAN-SMITH

I think that's a really good point. And I think it's worth teasing out what the periodic review after two years. My reading of the discussion summary is not that you get to, let's say sometime in 2027, the policy is implemented, for example, and then therefore the two-year review sometimes in 2029. I don't think that that two-year review just takes a snapshot of 2029.

I think it would be a backward look through the entire two years of the policy implementation to try to see whether the policy had achieved its intended effect to trend downward the sort of cluster of malicious registrations made in a small number of non-compliant registrars and to see whether enforcement had managed to make those bites so that the standards were raised up to what most registrars already do.

We understand that the policy is there to try to catch a small number, maybe single digit number of registrars who do not already do ADC and to see whether they will be doing ADC and whether that does trend to depress the amount of repeat abuse registrations that you see in small associated clusters, if that makes sense. Please respond.

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VIVEK GOYAL

Just to add to that, the aim of all this work is to reduce DNS abuse, so I would say the metrics should measure effectiveness, not effort. So we are not going to measure that, yes, we did ADC abuse, didn't find anything, and that should not be the measure. The measure is, does doing this reduce DNS abuse or not?

NICK WENBAN-SMITH

I think the overall reduction in DNS abuse is an important, as we talk about quantitative as well as qualitative metrics. This ADC check is just for a single registrar on finding a malicious registration to make sure that there aren't any other malicious registrations associated with it in that same registrar. You can see that if the policy is effective, abuse is like the principles of conservation of energy, right? It doesn't necessarily get created or destroyed, it just moves from one place to another.

So we see that there's a problem at the moment, we fix that problem, and then obviously threat actors respond. So what you may see then is threat actors spread their activities more thinly across a larger number of registrars to avoid the ADC check. So you might get a different type of abuse, but you would fix the current problem where you get hundreds, if not thousands, of associated domains within a single registrar.

At the moment, all that the contractual policy requires is that one abuse report needs to be made for all of those. The whole point about the ADC check is that you can create a much more efficient process for the reporters of abuse so that that one single report can

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cover all hundreds and thousands of the same domains in that registrar without having to do multiple reports for the same essential phishing attack or whatever it is.

PAUL MCGRADY

Can I respond to that? The other reason why we want to measure effort is because that's what this is why we're here, right? If all registrars everywhere were doing ADCs, we wouldn't have this PDP, right? It's just the good registrars that are doing it now, right? And so we do want the metrics to reflect the effort of the other registrars who are not doing them now starting to do it. As for the issue of measuring a reduction in DNS abuse overall, the problem with that is that there's so many intervening factors.

If anybody thinks that in our current age of AI and as we move into different kinds of computing, DNS abuse is going to numerically stay steady and we will have a downward effect on that baseline 2027 number. I'm not sure that that's an accurate assumption. I think it's going to be the other thing, which is DNS abuse is it's going to be easier to abuse the DNS.

And so it's more from my point of view about how many people are, how many registrars are doing what they can do to reduce it, right? That's the thing that we should be trying to measure as opposed to some baseline number of DNS abuse. It's not going to steady. And I'm not trying to tamp it down. I'm just trying to get, first of all, we don't have that baseline number. And secondly, if we did, I think the internet's getting weirder, not less weird. And so it's hard to say

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that we failed or succeeded based upon what third parties come up with next.

NICK WENBAN-SMITH

Yeah, I was going to say, there's also this issue about correlation and causation, that DNS abuse might be trending up. And even with the implementation of this policy, it might be trending up. But if it was not for the policy, it would be trending even more up, if you see what I mean, in terms of how you measure it might be quite simplistic. So try to get a more holistic set of metrics in, not the quality, not just the quantity. So I have Farzi next in the queue, then Marc, then Volker, Mary, Ching, and Dennis. So that's plenty in the queue for the time being. Farzi, you're up first.

FARZANEH BADIEI

Hello, Farzana Badiei speaking. So I have a comment on the last slide before this. I am very unsure that we can actually come up with a method to measure the correlation between this policy and the reduction of DNS abuse. That is somehow like evidence-based. I mean, I'm not going to ask for scientific.

I think we should think more about it, because if we cannot, then I am sure that we are going to talk about, okay, so how many domains were suspended and stuff like that, and rely on those measures, which would have an impact on incentivizing registrars to take down domains. Another thing that I wanted to say, I don't

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think that we should not have suspended domains as a trick at all, but that's my opinion.

NICK WENBAN-SMITH

Great, thank you. Who's next in the queue? Is it Volker next? Oh, Marc, sorry. Marc, you're next in the queue. I apologize.

MARC TRACHTENBERG

No worries. I actually agree with Farzi that I think there's no way to correlate this policy with overall reduction in abuse. Abuse is evolving over time, and that's impossible, but that's not a reason to not do this, just because we can't correlate whether one thing results in an overall reduction of all abuse everywhere shouldn't stop us. What we're trying to do is have the maximum impact on reducing abuse, understanding that because of how complicated abuse is, we'll never be able to make any sort of correlation about anything, but we still have to move forward because abuse is a serious problem.

To Reggie's comments, I think how can we ever know whether the ADC will no longer serve a purpose or whether it's not needed? So let's say that because of the ADC that registrars shift to spreading related domain names over different registrars, which I agree some are already doing, but not all of them. And so let's say because of the ADC, it's effective, and so registrars change their tactics. Well, if we stop doing ADC or we get rid of that policy, the registrars are just going to move back to using the same registrar because it's

going to be easy. So I don't know how we could deprecate it because that just opens the door back up.

And again, the fact that we can't make this direct correlation in reductions of abuse, I think can't be the reason to stop doing this. And if the registrars shift to spreading the domains across different registrars, then I think in some ways that shows that the ADC was successful, actually. And it just means something we already know, which is that we need an intra-registrar or inter-registrar, rather, ADC.

That is clearly required if we're all agreeing that the registrars are already starting to shift their registrations of related domain names in a single scheme to different registrars. And we know that we need an inter-registrar ADC. And I know that's beyond the scope of this discussion, but we've noted other things that need further policy development work. And so this should certainly be one of those.

And then finally, I think in response to something Paul said about this policy being flexible to adjust as like abuse methods change, I'm not sure I really understand that concept. How could a policy be flexible and change over time? I mean, are the standards of what's in the policy going to change? And if they do, who's going to change them without further policy work?

So I think instead of having a really flexible policy, that we kind of need a maybe a more specific policy in some ways, understanding that it can't change over time and understanding that abuse

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evolves quickly. And this is like kind of one of my criticisms or not criticisms of one of my comments I made before this PDP even started, which was like, will this PDP, can it even be effective? Understanding that it's going to take a certain period of time and abuse methods are evolving so rapidly. Does this still make sense?

NICK WENBAN-SMITH

Just on the first point you made about the metrics for policy effectiveness, I want it to be clear here, the love in the room. Marc and Farsi in agreement on this. And I think what I'm hearing from that is that we shouldn't overthink the policy recommendations on the specific chart of question number eight. So let's not try to overcomplicate it and overthink some sort of perfect metric, because the landscape evolves quickly.

And there's talked about the correlation and causation and the fact that abuse moves to different places. So there are different indicators as to whether the policy is effective or not. That doesn't mean that there shouldn't be some sort of review periodically. So that's the first thing. I heard what you said about Reg's point about the sunset clause. And I think we already responded that we see some difficulties with that sort of provisional handover to Paul on the final point.

PAUL MCGRADY

Yeah, so Marc, you raised an issue that we talked about in our very first session, right, which was are we going to write a policy that's

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going to be old the day we get it out the door, or is it going to be flexibly applied, right?

And we've been operating, for those of you that don't attend our working group calls, we've been operating under the primary principle that a lot of this will be contained in ICANN compliance guidance, and that guidance will be flexible and evolve over time. It's not that we're going to be evolving the policy language over time. The goal is to write a policy that allows ICANN compliance to be flexible and to evolve their guidance over time as things change on the ground. So that's where we landed on that.

MARC TRACHTENBERG

Can I just respond to that point? I mean, I think that's like pushing the policy work to staff, and I don't know that we want to do that. I think that we have to have the standards. Otherwise, if we're just totally flexible, and that's kind of an issue we have that we put in the can't live with for this implementation guidance, I think too much stuff is being pushed into implementation guidance, which we don't know whether ICANN compliance is going to adopt.

We don't know what they're going to do. You know, registrars seem to have a lot of complaints about how ICANN compliance operates, and so do we really want to push what I think is substantive policy work to rely on ICANN compliance's determination of how to apply these things over time, which I don't know how they're going to do.

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NICK WENBAN-SMITH

Okay, I think I'm just a little bit unfair on ICANN compliance in a sense. I think we've heard quite a lot of very positive compliments from the registrar community around their interaction with the compliance staff.

MARC TRACHTENBERG

I'm not trying to kick butt on compliance right now. This isn't a comment on the quality of compliance. It's more of a comment of are we going to push the substantive policy work to them? How could or do we want to rely on them to make the determinations of this flexible policy that should change over time? People may not agree with what ICANN compliance does, and I just, from a structural perspective, this seems to me very problematic.

That's why I think that whatever policy is created needs to be maybe more specific, understanding, of course, in alignment with my own criticism that it's really challenging with DNS abuse, which changes over time, but I just don't know how you do it the other way and have this flexible policy that will somehow change over time in ways that we may not like and may not fully align with what we decide here.

PAUL MCGRADY

Yeah, so again, we're definitely squarely in the space of re-litigation, so I don't want to take up a lot of our working group time together re-litigating this issue because we have talked about this quite a bit, and it is a bedrock principle of how the working group

has functioned to date. We are not at the point where we are, with these recommendations, also developing the section underneath about what we think the details of the guidance that we can get comfortable around sending to ICANN compliance, and we're not in a position of, we're not gathering, hopefully we have none, but if we have minority statements, we'll gather those as well.

The bottom line is that what may make sense now, and I'll use, I'm going to get in trouble for doing this, but what may make sense now and what we may understand now may change dramatically. If compute changes significantly five years from now, everybody in the room, when I use the word promptly, may know what that means in relationship to ADC and their own heads.

In five years' time, as we develop new tools, that, I mean, we may go from a time frame that we have in our head now that we believe personally is reasonable, and that may be reduced dramatically, or it may be increased dramatically depending on the volume of DNS abuse, right? We just don't know. And so as we paint compliance into a corner by being overly specific, we will hasten the need to replace this policy, and we'll be right back where we started.

So, Marc, I hear you. It's just that at this point, when we are closing in on draft recommendations, I know the request is that we change our entire methodology and go back to a more specific set of recommendations rather than the higher-level recommendations, but I'm just going to have to decline it.

MARC TRACHTENBERG            Okay, so let me ask a question for clarification.

PAUL MCGRADY                 Yeah, Marc, yeah, we can do that, but we do need to move on to other people.

MARC TRACHTENBERG         One quick question about implementation guidance.

PAUL MCGRADY                 Okay, one last thing.

MARC TRACHTENBERG         Just a level set so everyone understands, so everyone is operating under the same prescription.

PAUL MCGRADY                 Yep.

MARC TRACHTENBERG         So, for implementation guidance, what we put into this policy, are we understanding that compliance will be required to follow that implementation guidance, or is that a suggestion to ICANN compliance, which they will determine later whether they agree with it, and they can either apply it or not?

PAUL MCGRADY

Yeah, so, I mean, that's easy one to answer, which is there are recommendations, and there's implementation guidance. Recommendations, if adopted by Council, are Policy recommendations, capital P. Implementation guidance is not, and the IRT can take a look at those and implement. Okay, all right, let's move on.

NICK WENBAN-SMITH

Next in the queue, I have Volker.

VOLKER GREIMANN

Thank you. Yeah, I think we have a potpourri of topics that can need to be addressed now, and I think effectiveness of the policy is very, very difficult to measure, because, as we've said, abuse is going to evolve. Abusers are going to be abused because it's just too lucrative, because no matter what we do, they will find the way to make profit off of that, and will try to circumvent everything that we do. That is not a reason not to do it, though.

And from that background, we as registrars that already conduct ADCs will likely not be able to show much progress, because we are already doing what we are proposing that should be done by the entire community. Therefore, the numbers may be skewed from that perspective as well. This is not something that is entirely new.

Another point being that there are various factors that we're looking at with regard to the ADC checks that may evolve over time,

and that's why we have proposed to have the advisory document as a living document that we can pour our information and our learnings into, that we can provide to ICANN compliance to see when we have new patterns that we've detected, that we can show and share with other registrars that can go into the advisory document and therefore have that document evolve and bring the learnings that we as registrars see to the entire community and therefore benefit from that.

There's also a very reasonable approach that this may expand beyond the current scope of single registrar ADCs. I have been from the start of being a very big proponent of cross-registrar and even cross-contracted parties ADCs, but that's a different story for a different PDP and shall be deliberated at a different time, as I'm trying to allude to a very nice story from a German author.

Ultimately, let's try to keep this on topic. I think measurement is going to be very difficult. That's not to say that we shouldn't try to see if there's any effect, but the effects are mostly visible within the ADC work that registrars are individually doing. It's probably not going to be visible that much from statistics that are publicly available or can be gleaned from looking at views in general. I'm very much in favor of looking at what we can do, but I'm not quite sure that we will have a measurable effect that can be showcased as successful with this policy. The success of this policy will be measured by the growth of the advisory document, in my belief.

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NICK WENBAN-SMITH

Brilliant, thank you. The point about measuring something that you're already doing, if there's no change because you're already doing it for a large majority of the professional accredited registrars already in the room, then I can see that the delta of the measurement is probably going to be meaningless because you're already doing something. That's not really what we're looking at. The point is well made. I can see some other contributions in the chat in support of those positive comments, so thank you very much, Volker. Some valuable contributions there. Mary and then Ching, and then we'll try to move on to question nine discussions, please. So Mary first, then Ching.

MARY PENN

Mary Penn from the IPC. So if we're speaking about the effectiveness, that's necessarily data driven. So there have to be guidelines and baseline standards, and that requires logs on the part of the registrars. I mean, it's mentioned that it's difficult to measure, but that's impossible if there isn't any visibility or any sort of logs. So I think that must be discussed. And then also if we're riding in any sort of a sunset, I mean, wouldn't it be better to tie it to non-compliance or have it written in that we have to come back to the table? That just means we didn't get it right. Not to scrap it entirely, it just means we need to do it right the next time.

NICK WENBAN-SMITH

I think in relation to the logs and things, we've got a lot of question nine coming up soon in terms of the compliance effectiveness. I

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think that's probably where that is. And of course, that's an ongoing discussion, the points which have been made plenty of times previously. And I think, yeah, the point's well made on the sunset clause. Thank you. Now, Ching, please.

CHING CHIAO

Thank you, Nick. Ching from the BC,. So building on top of what Mary just mentioned, I think for the effectiveness portion, I think some of the logs definitely can be recorded. So I mean, we don't have to look far, but just those retro keeping logs, how many ADC groups, what are the ADC group size, those type of basic numbers can be kept tracks. That's something that's really good.

One more thing on the effectiveness about if let's say we're doing fantastic ADC, a lot of suspicious names being grouped and then ultimately being taken down. But if that also leads to some of the registrar going out of business, I wouldn't say it's a very effective ADC. But so there's multiple aspects to measuring how effective this policy would be.

NICK WENBAN-SMITH

Thanks. Thanks, Ching. I think personally, we've been discussing this in leadership team, as you would expect. We know today that there's a small number of registrars which don't conduct ADCs and we want them to conduct ADCs as part of this policy. I think if in two years' time the ADCs are still not being conducted by a small number of registrars, then they should not be in business anymore.

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And I think that's kind of where we're at in terms of policy effectiveness.

So how you encapsulate that in terms of metrics and logs and things, I think is less easy. But I think quantitatively or qualitatively, that's where we want to get to in terms of changing behavior with some small number of registrars. And not forgetting, this is a very specific PDP with a very limited and specific mission to try and fix a known problem, which is not a problem in the majority of the industry. But there are pockets where it is a problem that this PDP is there to fix that. So we do have a little bit of time. Yao, I see you're the last hand in the queue. And then we'll move over to charter question 9. Yao, the floor is yours.

YAO AMEVI SOSSOU

Thank you, Nick. Yeah, I completely agree with Reg about those AD registrars that are already doing their jobs and maybe ran out of metrics to see what they are doing now. But I also want to point out, I put in the chat already, maybe we should distinguish between the policy obligation and the implementation guidance.

The addition should be, for my sense, should be set like stable principle. We must conduct when required and must be reasonable, proportionate, documented, and based on reasonable available information. And for specific metrics, indicator, and best practices should be reviewed and updatable for implementations, guidance, and adversary or periodic review, of course, then without

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reopening the whole PDP cycle again. So I just wanted to point it out to you.

NICK WENBAN-SMITH

No, great. Thanks very much. I think we seem to have reached a sort of a, at least amongst the speakers today, a bit of a mostly consensus on the policy is the ADC check must be conducted when there's a trigger event. What I think in terms of the guidance and the flexibility is around, well, what are the indicators which would reasonably lead a registrar to believe that other domains are associated?

Those association signals could well be changing over time. And that's the sort of thing that the guidance is there to handle flexibly so that we keep our policy current and up to speed with existing practices in the market and operations of registrars and how they respond to the various threat actors.

So I think that's an old hand, I guess. We can conclude that discussion. So just to close out the charter question 8, we will, with the staff, collect the inputs now and we will try to come up with some text around a proposal for the response to charter question 8, which we've been set as part of our charter task. So thank you very much for that. And thank you very much everybody for keeping your interventions on point and on time. Helps me get the timing of this thing right. And then we can finish having

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accomplished the agenda in time for our lunch break. So that's always a crowd pleaser.

Good. So moving on to the next question, charter question 9 around compliance. So I think this speaks on to the point that you raised Mary around the logs. How can registrars demonstrate their compliance with their obligations to ICANN and what types of evidence and information can registrars submit? We did come up with some, we felt we made further progress with this question in the previous working group meetings.

So we do have some text, I believe, if we move the slide on one. So the Straw Proposal for charter question 9. So compliance with the ADC requirement should be assessed based on evidence that a registrar conducted an ADC when the obligation was triggered by the DNS abuse, the charter question 1.

Registrars should be able to demonstrate through records and documentation maintained in their ordinary course of business whether the ADC was conducted, whether additional associated domains were identified as a result of the ADC and consequently any resulting actions to mitigate which are already covered in the registrar agreement as we've discussed several times.

So the assessment should focus on the reasonableness and proportionality the ADC process followed based on the information available at the time that the obligation was triggered and that the policy should not prescribe a specific format for documentation, not least if you think about the diversity across the whole registrar

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ecosystem, not even getting into law and jurisdiction but say language and all that other kind of stuff is all going to be different in terms of automation and that sort of stuff that will also be, I imagine, quite different today between different registrars and certainly evolving differently over time and we wouldn't want to prescribe too tightly what that should look like for fear of this policy quickly looking out of date and redundant in terms of business practices.

So I'm very happy to take any feedback or to have a discussion on this. At the moment there's no hands in the queue so it's going to be a shorter discussion than I thought early lunch. Oh no, Martina and Mary, thank you ladies. Martina first.

MARTINA BARBERO

Sorry for standing between everybody in this room and their lunch. We had one question, I had one question and it's just to understand a bit the very last sentence of the text where we say the policy should not prescribe a specific format for documentation.

I don't think we have a problem from the GAC perspective not to have a format but we were speaking about future-proofed policy making and here we are forbidding ourselves from having a format if the review in two years sees that it's useful to have the same format. We're telling ourselves we cannot have it. So, I was just wondering whether that sentence really adds a lot of value or we

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could live without it so we keep it even more open or it was just a question to the audience.

NICK WENBAN-SMITH

I accept that recommendation in the spirit of which it's intended. I think there's a tendency, not just within this group, but generally that more is better and sometimes more is not more in terms of the quality of the policy recommendations and the ease of implementation. And I'm a strong advocate in terms of drafting that if there are words there which confuse or make redundant, then we shouldn't include them in the policy text.

And I'm very happy to listen to any other thoughts on that specific point. I think we thought it was a helpful clarification. Otherwise we wouldn't have put it in. But if it's considered redundant or unhelpful, then for sure we will take a look at that with staff and other inputs. Thank you. Mary.

MARY PENN

I also had a similar comment to that that last sentence. So if there's not a specific format, but there I think there should be specific facts. So again, the baseline requirements. So there must contain this type of information rather than just leaving it completely broad. And then also what what's the visibility on this? So there are these logs presumably being kept with certain type pieces of information. Who gets to see them? Can you ask for it? So I think

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that that ties right into the compliance and making sure it's really effective.

NICK WENBAN-SMITH

It's a very interesting sort of question, and it's the philosophy of the compliance process and how transparent that can be normally in a commercial relationship where you have a bilateral contract between ICANN and the registrar.

Yes, we the community set the policies and they get enforced through ICANN, but in terms of the dialogue between an accredited registrar and the ICANN compliance team, that I believe should be a private matter between ICANN compliance. And yes, of course, we will see it pretty obvious if an ICANN accredited registrar loses its accreditation, that will be obviously on the public record.

And I think ICANN compliance will go through the escalation processes in terms of how they look at a registrar's behavior and try to improve behavior before ultimately sending breach notices and ultimately terminating accreditation. And those obviously have more public process. But I think the preliminary processes, I think, be judged by or guided by anybody with more experience of ICANN compliance in practice.

I know we have got some of the compliance team on site so they can maybe add some insight. I know Reg, who's next in the queue, which is a very happy coincidence, can also sort of speak to that sort of process in practice. But I think my understanding is that

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that's a bilateral private, especially at the early stages of, hey, we think you've got a problem, please fix it, to more muscular intervention as the seriousness is continuing and remediated by the non-compliant registrar. I think that's a fairly standard process. But Reg, you're next in the queue, which is perfect because you can answer the question which I am less able to answer.

REG LEVY

I was just going to say I like this. I like it as is. It covers all the pieces that I think should be covered. It says that we don't need to create anything that we wouldn't otherwise create. We already have logs of various things that we do and we know how to provide them to ICANN. I think that keeping it from being in a specific format is good because each of us probably do it a little bit differently and prescriptive is not necessarily good. Technology evolves. Yeah, good job.

NICK WENBAN-SMITH

And could you comment a bit more on the compliance question, which Mary asked me and I was ill-equipped to answer?

PAUL MCGRADY

I just want to take 30 seconds to bake in the sun of a compliment from Reg. So thank you.

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REG LEVY

Bask away. Yeah, so again, we often interact with -- I guess, because of my relationship with ICANN compliance, I don't really understand the question because we often interact with them. We provide what we have and it's. I mean, usually it's fine. Sometimes they come back and say, you got anything else for us? And so we have to give them something else. But like I'm not. I don't see an issue.

NICK WENBAN-SMITH

Great. Thank you. We have rescuing defeat from the jaws of victory in terms of an early lunch or moving on to further questions in the in the charter queue. So I have Ching and David and then Volker. So broadly speaking, what we're hearing so far is that this is a good proposal in terms of the text with a question mark over the last sentence. That's where I'd summarize where we got to so far. Ching, then David, then Volker.

CHING CHIAO

Thank you, Nick. Ching again, sorry that I stuck in between you guys and lunch. But yes, I mean, obviously, the first look on the straw proposal for this, for CQ9 looks good. But it kind of draws me to the attention to the sentence before the last. Yeah, so before the last one means that the ADC was followed based on the information available at the time.

So I think these three were at the time, I think it probably didn't really capture what BC or maybe what Gac is advocating. The time

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means that the time means that the path is present in the future, that the ADC should be captured. Probably I will still work on using the, I mean, the Google Doc to provide some input. But the second look, I think for this part, I kind of, I would like to make it more specific on this one. But thanks.

NICK WENBAN-SMITH

Thanks, Ching, I appreciate that. David, you're next in the queue.

DAVID HUGHES

David Hughes, IPC. So first, a tangential comment, which is, it's my understanding that in this neighborhood, none of the restaurants open until one o'clock. So if we rush out of here, there's no food. So we might as well use this time productively.

The second one is that, has anybody consulted with ICANN compliance about the idea of not having a specific format? Because if I was the receiver of this information, I guarantee you that my first thought would be, I don't want to spend the millions of hours or whatever that if everybody just did a little bit of work at each place and it came in. If I was the IRS, I wouldn't say, oh yeah, just submit in whatever format you want. So I would be interested to hear from compliance on that.

PAUL MCGRADY

Thanks, David. You've hit the nail on the head on the prior conversation, which is, this is why it needs to be flexible, right? Because what ICANN compliance today wants may not be the

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format that ICANN compliance two years from now wants. And so there is, I believe, somebody from ICANN compliance in the room. Hello. Would you like to talk to us about formats?

LETICIA CASTILLO

Hi, everyone. My name is Leticia Castillo. I'm Senior Director with ICANN Contractor Compliance. So if it helps, I can actually talk about how we enforce today. The obligations that exist and that any new obligation would typically follow some type of closed process. When we initiated an investigation with a registrar, we request an explanation of what they did and in evidence that demonstrate what was done and when. There's no, we don't require a specific format.

Now the evidence needs to be sufficient. The one I'm saying in a specific format is that if they took action to disrupt the DNS abuse because they deemed the domain name was compromised and they contacted the registrar and say, this is the URL, there's some malicious content in there, take action to mitigate or we will have to do it, that investigation when it's explained to us, it provide us, may provide us with a copy of that email and then they confirm the URL was disabled with a screenshot. They provide us a downloader ticketing system. Some cases they provide us with logs. The logs may not look exactly the same, but prove what was done when and that is supply with the explanation they provide and with any other that we can't review.

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So as of today, we don't require a specific format. The evidence needs to be sufficient and the facts need to add up. Hope that helps.

NICK WENBAN-SMITH

Thank you very much. David, is that good? Thank you. Volker, you're next in the queue. Then we have Rod, Vivek and Ching.

VOLKER GREIMANN

Yeah, I see the hands are popping up like mushrooms now, which is appreciated. I like the proposal because as we said before, that doesn't require us to store anything that we don't store, but in certain cases that what we store is really limited and I think to make sure that there's still some kind of trace or some kind of accountability for those registrars which have less logging for such things. There's one thing that I would like to put back into the stocking that I talked about earlier that we might want to add here.

So feeling a little bit like Santa Claus here. I still feel that we should have a registrar internal policy that should be reviewable by ICANN Compliance that serves multiple purposes. First, it describes exactly how a registrar goes about conducting an ADR.

That may change over time as the policy evolves, as their experience with this kind of process evolves, they may add certain things to their checks that they have learned are effective, change the sorting, change the process internally, and that will serve as an audit trail to ICANN Compliance to show that the registrar is

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actually doing something about that. It also helps keep the registrar itself honest, document the process that their team members can follow.

So I'm really, really a big fan of having one reference to a policy that should not be public, because if it's public, then bad actors can use that to learn, but should be something internal that can be checked by Compliance and referenced in an eventual Compliance check. So if we could add a reference to such a policy in here, that would be helpful. And that doesn't refer to the policy that we're developing here, but rather something that the registrar should develop on their own with guidelines from the advisor, obviously.

PAUL MCGRADY

Thanks, Volker. And the last point was just the clarification. When you say the policy, you mean an internal policy of the registrar, not the capital P policy. Thanks.

NICK WENBAN-SMITH

Yeah, thanks, Volker. Helpful inputs. And yeah, definitely my favorite, Santa. Thank you. Rod, then Vivek, then Ching. And by the way, we will continue the session through to the scheduled end, and we may make some forward progress on some of the stuff that we were going to cover in the later afternoon session today. So we will try to maximize the use of our precious face time together. So thanks.

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ROD RASMUSSEN

So Volker stole my thunder a little bit there in that he brought up Compliance checking on what was done. I see there's a gap potentially in the way this policy is written now. Compliance just brought that themselves. They look at what was done for suspension of a domain, for example. So I would think we might want to have something in there about what actions were taken, at least at some level. Again, we're leaving it fairly vague as far as specific formats, etc.

A couple of reasons for that. One is self-improvement and learning from others, because compliance can help there. And the other is for some of those registrars that may not, well, probably aren't in the room and have continuous problems, they may do a check that isn't effective, just to check the box.

So you want to be able to note that as compliance and say, no, that's not good enough for what you really need to be doing here. Let's improve that. Thanks.

NICK WENBAN-SMITH

No, thanks, Roger. And I suppose I want to tease out a bit more specifically, the second sentence states the registrar should be able to demonstrate through records and documentation, whether they did the ADC, whether additional or associated domains were identified and whether any resulting actions were taken pursuant to existing contractual obligations to mitigate abuse when you've got evidence of it, essentially. You're saying that that's not specific

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enough in terms of actions that ICANN compliance can check, is that?

ROD RASMUSSEN

No, it doesn't get to the point Volker brought up, which is how did you do your checks, right? So did you simply look at a registration account or did you look at a pattern or what did you do? Right. That's, it's the what, the how. And so this, the way this policy is written, you don't have to have any idea of how to do that. Yes, yes, I did a check and yes or no, we got domains. It's a yes or no answer, not a, not a qualitative one.

NICK WENBAN-SMITH

Okay. Good point. Thank you. Good point. Vivek, Ching and David, then Brian.

VIVEK GOYAL

Thank you. Vivek Goyal for the record. And thank you Leticia for being here and answering this. We have been talking about ICANN compliance for quite a number of meetings. Good to have somebody here speaking on behalf of ICANN compliance.

My point is when reporters like me report on DNS abuse, we can see DNS abuse and we can see whether an action was taken by a registrar registry or not, and then complain to ICANN compliance that action is not being done. But in case of ADC, the reporter will never know whether an ADC was done or not done, right? So I think a lot more onus falls onto the compliance to do proactive checks

with registrars, whether an ADC was being done or not. That is the only way to figure out whether a registrar is doing or not.

Now, if suddenly your scope of work is increased to going from resolving complaints to doing proactive checks of every registrar out there, would you think having a standard format would make it easier for you to process that information and then you have to do it across so many registrars? Just a food for thought. Thank you.

NICK WENBAN-SMITH

No, I think, thanks. Thanks for that input. And I think, thanks also as you heard what the compliance team say around they don't prescribe specific formats. I think we shouldn't lose sight of the problem statement we're trying to solve here, which is around, there's a small number of registrars who do not form ADCs at the moment.

And I think maybe I'm optimistic or oversimplifying it, but I think it's pretty easy to tell in two years' time if that's still the case or not. I don't think it'll be obvious if that's still happening. You get a small number of registrars with tens of thousands of malicious registrations, unmitigated and expecting or requiring a specific abuse report for each of those thousands of maliciously registered domains before they will action them, bare minimum contractual compliance, essentially willful blindness. This is supposed to fix that.

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So I think it should be clear to all of the people in the community, because we know who the bad actors are at the moment and they should be changing their behavior in two years' time or be out of business. Right. So that's kind of where I am on that. I hope that responds to that point. David, you're next, then Brian, then Michaela. Oh, sorry, Ching, I beg your pardon. Ching, you're first. Sorry, I apologize.

CHING CHIAO

No worries. Thank you, David. And also thanks, Nick. This is Ching from the BC. Once again, build on what Rod and David was just saying. It seems to me that the more we look into this particular Straw proposal, I mean, also along with the previous one, it seems that the ICANN compliance, once this policy is put in place, they will still, I mean, number one, do whatever is needed on the 3.18.2, taking care of the abusive names, knowing that, I mean, where the registrar was taking action.

But it seems that without a specific requirement from the ICANN compliance, the ADC can be just randomly checked by any registrar saying, and then compliance, possibly if we actually use this particular wording, compliance basically won't really care about, for example, the ADC groups are supposed to be like one hundred names. But if the registrar only checked two or three names and compliance thinks that, hey, they've done the ADC, it's good. And then there's no contractual breach. So it means that, I mean, job done. But still, the ADC is, I mean, the size of ADC is actually

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somehow very different. And compliance has no way of knowing the registrar is doing the right job or not. Thanks.

NICK WENBAN-SMITH

No, thanks. Thanks, Ching. And if there are a hundred associated domains with a malicious registration and the ADC process only leads to two of those one hundred being mitigated, then I think that's a failure of obligation to follow the policy from my perspective.

That would be a compliance issue from how we are tending to build a policy to effectively catch all the one hundred, not just the two. And maybe that's a level of operational detail that is that is difficult to prescribe in policy text. But certainly that would be an indicator to me that the policy has not been implemented correctly or is not being followed by the registrars within scope. Brian, you're next.

BRIAN CIMBOLIC

Thanks, Nick. Brian Symbolic with the registries. So I think when we're looking at these Straw proposals, it's always good to look to see if there's any sort of natural comparison to the existing language of the contracts. And I think for the purpose of this, there are. And it's not actually in the registrar accreditation agreement. It's spec 11 3B of the registry agreement. Registries are obligated to periodically look for DNS abuse in their TLDs. They are obligated to keep logs and they're obligated to provide those logs to ICANN whenever ICANN asks for them.

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That feels very much like what we're doing here. And spec 11 3B I just posted in the chat doesn't require the how. It doesn't require a particular format. And I think we heard from ICANN compliance that they're comfortable enforcing the agreements as they're written today. So I don't necessarily know what problem we're trying to solve with that. And if we're moving away from the sort of precedential language in the agreement, I think we should have a really clear reason why. And I don't think I've necessarily heard that clear reason why.

NICK WENBAN-SMITH

Thank you, Brian. Clear points, I'm just going back to the queue. Michaela.

MICHAELA SHAPIRO

Thank you. Michaela Shapiro, for the record, NCSG. Maybe responding, just taking advantage that Brian just went, I think the question, the part for me that stands out and for the NCSG is that the whether any resulting actions were taken, but not about the what. And I think that could be, again, I don't want to open a Pandora's box here in this particular straw man proposal. If it's better to go in the implementation guidance, that's something that we could discuss.

But I think having a bit more clarity or transparency around not just that action was taken, but again, the specifics of the what, what occurred would be something that we would want to see. But

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again, open to the format that that could take. And again, wanted to be in line with without being overly prescriptive in terms of how that evidence or that information is collated and then what's useful for ICANN compliance. Thanks.

NICK WENBAN-SMITH

Well, thanks very much, Michaela. Thanks for that intervention. And please don't feel need to apologize. The whole point about this session is to properly kick the tires on what we've come up with, what we think is some good text. But I think crowdsourcing all the good suggestions and inputs. I think you are echoing a bit what Rod was saying in terms of the what was actually done and how could should strengthen this wording.

So that's the purpose of forging good policy recommendations is to get everybody's input. And there's a lot of wisdom and experience in this room. And we want to take advantage of our time together to capture that and to make it as good as we can. So thank you very much. And, yeah, really appreciate that intervention.

So hold on let me get my glasses. We have ICANN fellow next in the queue. And I guess, Brian, that's an old hand. And Maciek, floor is yours, please.

MACIEK PIASECKI

Hello, Maciek Piasecki with EURALO, the fellowship and also observer in this PDP; I wanted to share the perspective of someone

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whose main business model right now is helping users and small businesses that are affected by vendor lockout because of opaque procedures on the side of vendors, because I see that's a discussion here how much these should be transparent or we should protect them from possible criminals.

So in cases where these procedures are opaque, there's a lot of work on the side of legitimate users to prove there are innocent. There's a lot of work for the vendors who we pester my team with questions and asking for proof that there was some malicious intent because they only send us things like you have violated our policies. We usually win. We don't usually need to take it to court, but we are ready for that. And that will result with a lot of work for the vendors in this case, the registrars. And but also thank you if you want to keep them opaque, because that's my business model and I like money.

NICK WENBAN-SMITH

Thank you very much for that intervention. Appreciated it. And yeah, very welcome to accept those sorts of thoughts around the transparency. Obviously, all of these proceedings, including that intervention, is obviously recorded and public for everybody to stress test the processes that we've gone through and the thoughts behind how we got to a policy and the inputs that we have had in. So I think that's a point well made. Thank you for that.

Volker, the floor is now yours. And I think we have another sort of 15 minutes, more or less. So we'll see how we're doing with time.

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We may try to move forward a bit more. Otherwise, we may get a bit of time back. Let's see how we go. Volker.

VOLKER GREIMANN

Yes, thank you very much. And just to come back to my earlier suggestion of having this internal small policy for contracted parties and especially registrars, I think one thing that is very important to recognize is how ICAN compliance currently works. Its chief weapons are not surprise and fear, but rather investigations of compliance reports that they receive and the audit program.

They don't really have this initiative right to audit, but this kind of policy would give them another angle to look at the registrar and what they are doing. And then when the audit time comes around, then they can match the process both against any compliance reports that they receive, that the registrar might not have conducted ADC or when the time of the audit comes around that they check against that as well. So this is just another angle to give compliance a little bit more tools that they might otherwise not have.

NICK WENBAN-SMITH

I think it's a good point for the implementation guidance and advisories around this, which is, from my experience, say with an ISO audit, the easiest way to demonstrate, in fact, normally a requirement to demonstrate compliance with the ISO standards is

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that you need to have internal policies and procedures documented and then you need to be able to prove that you've followed your own internal policies and procedures. So that would seem to be the easiest way for a registrar to be able to satisfy ICANN compliance as to its compliance with this and for that matter, the myriad of other policies that registrars are already required to comply with.

We've heard loud and clear there are many different types of registrars in the world, lots of different geographies and jurisdictions, lots of different business models, some quite small, some sort of larger. And in terms of how they do that documentation and how they go to evidence their compliance, I think that's kind of a level of detail which is dangerous for us to make firm policy recommendations, but I think that's very fertile ground for the associated guidance and advisories that come out from time to time.

So I think that's the end of the queue on charter question 9. I'll hand over back to Paul.

PAUL MCGRADY

All right, terrific. We are coming up on time, so I doubt that we'll jump into the next session. Before we go, because everybody asks me, I get this question a lot. There seems to be about 20 or 30% of the working group that is actively intervening verbally. Is that normal? Well, it's normal. Is it optimal? No, but I'm hopelessly North American. And whenever I say hopelessly North American, I

get nasty emails. But I'm hopelessly North American and I do not know how to compel speech.

Okay. And so if you have not intervened around this table or in the room and you would like to balance out some of the voices, we have time. So let's take a moment. If you have not intervened and you want to get in the queue, you can do that now. By raising your hand or coming right here to this microphone. And I will go ahead and run that. But there is something -- Oh, Tom. Yes, Thomas.

THOMAS RICKERT

Thank you so much. Just to answer that question, I think the working method that we apply is that if you don't object, you're happy with what's being proposed. So I think it's not necessary to fill the queue just for the sake of plus one in what others have said. I did like the straw man language that we saw and not taking the floor on the microphone does not mean that you're not engaging. And if you look at the chat, you will see that there is a lot going on there as well with folks asking questions or indicating their support for proposals that have been made.

PAUL MCGRADY

Yes. Thanks, Thomas. And actually, I had the luxury of being in the chat this time because I wasn't running the queue. And the chat's a lot of fun. Not as fun as Volker with his shot. What was it? Surprise and fear, fear and surprise. I love that. That gave me a chuckle. But I totally agree with you. On the other hand, we do

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have you know, the world is divided between extroverts and introverts and people in between. And so I want to make sure that anybody that feels like they can't participate has a chance, whether they're around this table or not.

NICK WENBAN-SMITH

Yeah, I think just to add to that, it's helpful for the leadership team and staff to have positive affirmation rather than taking silence as support, because what we don't want to do is to go through this cycle of reviewing all the chart questions once, twice, three times, coming up with some text, think everything's fine and dandy. And then we get through to the purpose, the points where we are finalizing the text. So, ah, I really hate that section and the thing we looked at back in June.

And it's like, well, it would have been much more helpful for us to have had that input at the time rather than for it to come back and bite us in the ass closer to the point of execution. That's, I think, in blunt terms, what we're trying to get across here. And we're trying genuinely to be accessible and open and approachable. There's obviously the collaboration document, but it is much easier for us if we get positive support where that is possible at an early stage.

PAUL MCGRADY

And Terri owes me \$20 because we had a bet on whether or not Nick would say bite us in the ass in this session. So, Terri, you owe me 20 bucks. 20 bucks, Terri. All right. Anything? Anybody? Terrific.

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Okay, well, let's call this session to close. Enjoy lunch. We'll see you guys in a little bit. Thank you.

**[END OF TRANSCRIPTION]**