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1	Relevant Text From PDP Report	Specific Issue for Implementation	Specific Question for IRT	IRT Feedback	ICANN org response	Proposed Resolution
2	<p>"A uniform set of minimum mandatory criteria that must be followed for the purpose of reporting abuse and submitting requests (including requests for the Disclosure of customer information) should be developed." (Final Report p.13)</p>	How to implement this?	1. Is this approach to implementing this recommendation what the PDP WG intended?			<p>1. Compile all known requirements for each type of request from Final Report. 2. IRT to identify gaps, considering: (a) who can submit a request; (b) what does request need to include; (c) required Provider actions in response to request; 3. Jointly develop solutions based on other known requirements (registrar) and industry best practices and known Provider practices</p>
3				<p>Steve Metalitz (on list, 10 March): "I generally support the proposed resolution, though perhaps the development of these minimum mandatory criteria could be assigned to a subgroup. I also question the need to resolve "(a) who can submit a request." The focus should be on the "minimum mandatory criteria," which certainly could include a requirement that the requester identify him/her/itself, but I have a harder time understanding the need to define some group of individuals or entities as ineligible to submit a request."</p>		
4				<p>David Hughes (11 March, approx 17:00 on recording) I think this is in principle what we had agreed to in all our previous discussions and reflects the group's consensus as far as I know.</p>		
5				<p>Roger Carney (11 March, approx 17:20) I agree-this is what we agreed to. I'm not sure this will be too long of a process--we have been in business long enough and know all these issues and how they should be resolved so this should go fairly quickly.</p>		
6				<p>Steve Metalitz (11 March, around 19:00) My only question which I mentioned on the list was on--who can submit a request. We are not trying to restrict who can submit a request--are we right that we are just talking about classifying a request?</p>	<p>Amy Bivins--around 19:45--we are not trying to limit, generally, who can submit requests to providers. This was more focused on the types of requests that are designed for specific entities (IP and LEA).</p>	

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7				Steve Metalitz (11 March around 21:00) there has also been a lot of discussion in the RDS WG list--discussion about what abuse requests should contain and so forth so perhaps we can incorporate some of that into this process.	AB following up with Policy staff to try to identify communications related to this topic on the RDS WG list.	
8				Luc Seufer (11 March, chat): Regarding step 3, I briefly met with AFNIC (French registry) who has such system in place since years and thus data reg it and they would be ready to provide and present such data if asked.	AB contacted Luc on this and requested additional information. Luc provided contact at AFNIC. AB has contacted that individual for more information.	
9				Theo Geurts (11 March, approx 24:12) As Steve mentioned we already put a couple of things in place for IP requests; when we are talking about abuse, we need to define what abuse is. We don't want a situation where abuse gets reported to the wrong entity. Could increase uptime of such practices and we want to avoid that.		
10	"P/P service providers must maintain a point of contact for abuse reporting purposes. In this regard, a "designated" rather than a "dedicated" point of contact will be sufficient, since the primary concern is to have one contact point that third parties can go to and expect a response from. For clarification, the WG notes that as long as the requirement for a single point of contact can be fulfilled operationally, it is not mandating that a provider designate a specific individual to handle such reports." (Final Report p. 12)	Known criteria (from Final Report): Who can report? Anyone;				

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11	"The WG notes with approval the following recommendations from ICANN's Compliance Department (whose input the WG had sought) in relation to the practical workings of Section 3.18 of the RAA, and agrees that these recommendations may be helpful in developing guidelines and processes during the implementation phase of the WG proposals for this Charter question: (i) provide guidance to an abuse report requirement as to the types of abuse complaints allowed and types of actions P/P service providers should take about these reports; and (ii) consider alternative abuse report options other than publishing an email address on a website and in WHOIS output (to address increasing volumes of spam)." (Final Report p. 62)	How to Report? Unclear- -RAA requires abuse email but report seems to contemplate a form-based option	2. Can abuse reporting option be a form, or is email address required (mirroring RAA requirement?)			
12				Theo Geurts (36:30, 11 March) it would be really confusing to have a registrar abuse email address and a provider abuse email address, we should look at that when we get to it.		
13				Roger Carney (37:44) Just wanted to add on what Greg said. Definitely forms should be one of the options. I'm not going to not recommend email if someone wants to use email, a form should be allowed. As far as Theo's comment, is he suggesting that Rr abuse contact in WHOIS would be replaced by PP abuse contact if the reg is protected by a proxy?		
14				Theo Geurts--I'm not sure how that would work in reality but definitely interesting to explore.		
15				Sara Bockey--agree with Greg		

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16			If Provider is affiliated with a Rr, are you envisioning that they could have the same abuse contact? (11 March, approx 39:30 in recording)	Roger Carney (40:00) it would be a lot easier from a processing perspective to use one or more filters that it deals with a proxy issue. I would think it would prob be different abuse contacts if they were available		
17			To confirm, are you saying that Rr should have the option to use the same abuse contact for Rr and affiliated PP?	Roger Carney (approx 41:00) I'm saying that should be an option to have one or multiple for the proxy.		
18				Michael Flemming (11 March chat) Yes, one or more is fine, but just please make it easy to find.		
19				David Hughes (11 March approx 42:00) I want to note that abuse of the abuse process can be a problem--will a form mediate that problem?		
20				Greg DiBiase (43:00)--a form could be helpful (for at least some registrars) but a form shouldn't be a requirement-this should be left up to the Rr		
21				Jonathan Frakes (43:30) as long as there could be a threshold to determine what abuse of abuse is, where there might be a circumstance where a bulk abuser could be filtered or ignored, and a form may not be precluded from using captcha, those might be reasonable mechanisms for abuse of abuse		
22				Griffin Barnett (chat): Agree that use of a form or email POC for reporting abuse is OK; for a form, would want to see ability to upload/attach documents as evidence supporting a report		
23				steve metalitz (chat): commentt: agree that "easy for reporter to find" is critical -- whichever mechanism is used		

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24	<p>"Requirements relating to the forms of alleged malicious conduct to be covered by the designated published point of contact at an ICANN-accredited P/P service provider should include a list of the forms of malicious conduct to be covered. These requirements should allow for enough flexibility to accommodate new types of malicious conduct. By way of example, Section 3 of the Public Interest Commitments (PIC) Specification²¹ in the New gTLD Registry Agreement or Safeguard 2, Annex 1 of the GAC's Beijing Communique²² could serve as starting points for developing such a list." (Final Report p. 12)</p>	<p>Report Criteria: Must allege abuse</p>				
25	<p>Lists of "abusive" activity referenced in Final Report are nearly identical (difference noted in red):</p> <p>Beijing Communique: distribution of malware, operation of botnets, phishing, piracy, trademark or copyright infringement, fraudulent or deceptive practices, counterfeiting or otherwise engaging in activity contrary to applicable law.</p> <p>PICs Specification: distributing malware, abusively operating botnets, phishing, piracy, trademark or copyright infringement, fraudulent or deceptive practices, counterfeiting or otherwise engaging in activity contrary to applicable law.</p>		<p>3. Would adopting the list from the PICs Specification be consistent with PDP WG intent?</p>	<p>Theo Geurts (49:20) When I look at this, it looks like this should be reported to registrars. Hosting providers, but not to PPs. Most of the stuff in here a PP can't do anything about it. A third party PP cannot take down a domain that is distributing malware or a botnet, etc. Copyright infringement and piracy, that could be applicable. For the rest I think it's all up to the rr and hosting co.</p>		<p>PICs specification and GAC Beijing Communique's lists of abusive activity are nearly identical. Adopting the list used in the PICs Specification would provide consistency across ICANN contracts.</p>

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26				Steve Metalitz (51:00) (+1s in chat from Michael Flemming and Claudia Martunizzi) One thing that a PP can do is these are all going to be violations of ToS so they could terminate the PP service and publish the contact info for their customer so its potentially applicable to all these forms of abuse. I agree that from IP PoV that's really why we are here, not asking to take down the site, we are asking them to let us know who is registering the domain name and this could potentially apply to those other types of abuse as well.		
27				Theo Geurts (52:00) when we are talking about abuse and violations of ToS, that is a question we can ask after the issue has been resolved. Usually the customer has no idea what is going on and is not a fraudster or a criminal. When talking about a violation of ToS that cannot be defined within this proposed definition of abuse. We are still required to investigate what is abuse and what goes where in terms of reporting abuse.		
28				Griffin Barnett: Support using the PIC definition		
29				Michael Flemming: Perhaps add "Including but not limited to"		
30				Greg DiBiase (55:00) I'm ok with using this as a starting point knowing that as Theo mentioned that Rr might not always be able to respond to the abuse but if we are defining abuse, this makes sense. The "deceptive practices" I'm not sure about-- what does that mean? Is someone lying? That seems vague but general I'm ok with this as a starting point.		
31				Pam Little (56:00) why would we need this for TM infringement? You can get data through the UDRP mechansm. Deceptive practices is also concerning.		

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32				<p>Griffin Barnett: @Pam Little - it is helpful to be able to investigate the underlying registrant before reaching the point of filing a UDRP complaint</p> <p>Griffin Barnett: hence why using the abuse reporting mechanism is a helpful preliminary step</p>		
33				<p>Theo Geurts (58:00) Not too keen on deceptive practices, either. And if we are talking about abuse and Rr and PPs and third party PPs, we are going to mix up who the abuse should be reported to--this should be clarified as we move along with this</p>		
34				<p>steve metalitz: Comment: +1 Griffin. Also this process should be a faster and less expensive way of obtaining this information (compared to initiating UDRP).</p>		
35				<p>Michael Flemming: There are mechanisms that allow for the domain take down that this definition is tied to. But that does not include things like malware or phishing.</p>		
36			<p>(1:00 on 11 March)--does anyone like the inclusion of "deceptive practices" in the definition? If so, why?</p>	<p>David Hughes--I don't like or dislike it but deceptive practices is a legal term of art. Is that is what the group is looking for, we should further define deceptive practices, or we could rephrase to say fraud.</p>		
37				<p>Nick Shorey (1:10)--we had similar discussion in Spec 11 WG--might be helpful to uncover what came out of that.</p>		

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38				Steve Metalitz (1:02) this language came from the GAC and its in the PICs which means the vast majority of Rys have obligations based on this. So that's why it makes it a good starting point. Yes, if it can be clarified further we are open to that but that is the basis for this. here we are just talking about the type of abuse that people can try to bring to the attention of the PP. doesn't necessarily obligate the provider to do more than receive it or look into it (don't have to adjudicate it). WOUld expect many PP ToS to include similar language, bringing something to their attention that may violate their ToS. We should keep in mind that here we are just talking about what kinds of complaints can be received.		
39				David Hughes (1:05) so the question is, is this language good enough to move to the next phase?		
40				Griffin Barnett: I think I put it in the chat earlier, but I support using the PIC language as our definition, although would be open to trying to refine some terms if necessary (e.g. "deceptive practices") - we may be able to look at case law and agency guidance (e.g. from the US FTC) to try and see if we can refine legal terms of art like that		
41				Pam Little (1:06) that would depend on what the reporter needs to provide--do they need to provide evidence to support their report of abuse?		
42			around 1:06--do you see any other gaps where criteria are needed for abuse reports including submission of evidence, etc?	Pam Little--as a provider, I would like to see some supporting evidence; it is my customer's information that I was contracted to protect and now I am being asked to reveal it so it is incumbant on me as a provider to see what is being alleged.		

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43				Greg DiBiase--From a Rr PoV, the most important point is to let a Rr set its own criteria for what is a valid abuse report (for example, let Rr require a URL if the Rr wants to require a URL) not sure if we need to list everything--need to give Rrs flexibility to decide what they need		
44				David Hughes (1:11)--there is already an obligation to comply with this language in an existing contract. I don' thave a problem with defining what info is required, mostly just to make everyone's life either. I think we need to agree on this language--this is already something that parties have to comply with anyway.		
45				Greg DiBiase (1:12) for the purpose of moving on, if you could tweak the language to remove "deceptive practices" or to add fraudulent or deceptive practices that amount to activity contrary to applicable law (instead of separating these--if the deceptive practice is illegal), but if it is just deceptive, that should be taken out for clarity of abuse reporters.		
46	"The designated point of contact for a P/P service provider should be capable and authorized to investigate and handle abuse reports and information requests received." (Final Report p. 13)	Required Provider Actions for Receiving/Responding to Abuse Reports: Maintain designated point of contact who is capable and authorized to investigate and handle abuse reports and information requests received.	4. Where Final Report is silent on required Provider actions after receiving an abuse report, did WG intend for requirements to mirror RAA?	Greg DiBiase (1:15) I don't think we need to create any requirements beyond the investigate and respond appropriately requirement from the RAA.		
47				Darcy Southwell (1:15) The WG wanted to mirror the RAA.		

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48			5. If answer to question 4 is yes,would it be consistent with PDP WG intent to repurpose Section 3.18.1 of the RAA here to require that "Provider SHALL take reasonable and prompt steps to investigate and respond appropriately to any reports of abuse."	Darcy Southwell (1:17) This is not an all-encompassing answer, because, for example, the Final Report has an IP framework that Rrs don't have.		
49				steve metalitz (chat): "Capable and authorized to investigate and handle" is pretty close to "investigate and respond appropriately".		
50				steve metalitz: Yes, RAA language is consisten.		
51			6. If answer to question 5 is yes, did the WG intend any greater specificity here beyond the RAA requirement?	Jonathan Frakes (1:20) the topic comes back to abuse of abuse and leaving some room or threshold to prove an abuse report if there is a requirement that PP shall take reasonable and prompt steps to respond appropriately.	We will keep this in mind when drafting proposed language on this requirement.	
52				Steve Metalitz--there may be more specific requirements for IP and LEA		

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53			7. If answer to question 4 is yes, would it be consistent with the PDP WG intent to repurpose Section 3.18.3 of the RAA to require that "Provider SHALL publish on its website a description of its procedures for the receipt, handling and tracking of abuse reports. The Provider SHALL document its receipt of and response to all such reports. The Provider shall maintain the records related to such reports for the shorter of two (2) years or the longest period permitted by applicable law, and during such period, SHALL provide such records to ICANN upon reasonable notice."	Darcy Southwell--I don't think we talked about this in the WG. To clarify what I said earlier, we don't want completely mirror the RAA in every case. I don't think we discussed this--we discussed more about ToS and being very transparent with registrants about how PPs work. If it's not in the final report I don't think the WG considered this. I think this is something that IRT needs to discuss. We put a framework in for IP. Not sure how the IRT would feel about creating something that the PDP didn't provide for. This is not necessarily a gap in what needs to happen.	Action item--IRT should discuss whether this should be addressed or not addressed	
54				steve metalitz: Agree with Darcy on this. Not specifically discussed. These look like best practices for providers to follow.		
55						
56	"Regarding Relaying of Electronic Communications: All communications required by the RAA and ICANN Consensus Policies must be Relayed." (Final Report p. 13)	Who can request Relay? No restrictions on requests, but if Provider elects Option 2, then they are only required to relay communications from LEA and third parties that contain allegations of abuse				

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57	(Final Report p. 13): For all other electronic communications, P/P service providers may elect one of the following two options:	<p>How can Relay be requested? Provider required to relay all electronic requests received, including those received via emails and web forms</p>				
58	Option #1: Relay all electronic requests received (including those received via emails and via web forms), but the provider may implement commercially reasonable safeguards (including CAPTCHA) to filter out spam and other forms of abusive communications, or	<p>Required Provider actions in response to Relay requests:</p> <ol style="list-style-type: none"> Relay all communications required by the Registrar Accreditation Agreement and ICANN Consensus Policies; and either: Relay all electronic requests received (may implement safeguards to filter spam and abusive communications); or Relay all electronic requests received from LEA and third parties containing allegations of domain name abuse. 	8. For option 2, should "abuse" be defined consistently with the abuse reporting provision?	Darcy Southwell (1:57) the Final report says "illegal activity" and that is defined in the RAA. I think that's the answer there.	(11 March, approx 1:57) We are aware of this reference--the Final Report says "abuse (i.e. illegal activity). We asked the IRT about this on a call in January--specifically whether "illegal activity" was intended to be an example or the only activity that would constitute abuse. The discussion on that call seemed to indicate that the "ie" was really intended as an "eg" so that illegal activity was one example of "abuse"	Defining these terms consistently would avoid any confusion that might arise from inconsistent definitions.
59				steve metalitz 2: Yes, abuse should be defined consistently (+1 Griffin Barnett)		

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60				Graeme Bunton: Screenshot of general abuse reporting guidelines: https://i.gyazo.com/094a48ae15df29c8a0391e33936871b6.png		
61				Darcy Southwell--I don't recall that. It says i.e. and usually i.e. means "specifically".	Yes, that's the exact question that we asked the IRT and the sense in the room seems to be that this was intended to be an example, not i.e.	
62				Steve Metalitz: I do recall this discussion and I think we in the WG had a problem with our latin abbreviations and this was intended to be eg not ie. To put in context, there are two relay options. One is automated--the other option requires the provider to look at all these relay requests and say is this coming from lea or alleging some type of abuse? I don't think that many providers would be likely to adopt that option because it requires to look at every request for relay, but if they do, i think the easiest way is to use the same abuse definition that we've already used. they will already be applying in context of abuse report, could apply here too.		

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63				Darcy Southwell--ie or eg--illegal activity is defined in the RAA and I think that is why we used that. When we have a defined term we are talking about it seems like we should stick with that.		
64			The challenge here is that we seem to be getting inconsistent feedback--some IRT members say this was intended as an example and others say this was intended to mean only illegal activity. If anyone else in the room would like to comment on that, that would be helpful to ensure we get this right because we have heard answers both ways.	Roger Carney (2:03) I don't know what the intent was but if we are going to use the term abuse we should define it consistently throughout the whole document.	Follow up required with IRT	

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65				Steve Metalitz (2:03) I'm not clear what the difference is between abuse and illegal activity. There are probably some types of malware activities and malware is not illegal in many countries (so maybe more restrictive)-- Darcy said the RAA definition. Is Darcy saying that they would not consider malware to be abuse because it is not illegal in some countries?		
66				Darcy Southwell--this is a PP service. We are talking about abuse of a PP service-not literally every single abuse activity related to a domain or hosting issue, but abuse of a PP services.		

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67				Steve Metalitz (2:05)--I think we had this discussion, too. There can be all kinds of abuse that are being carried out by someone who is using a PP. That is probably going to be in violation of the ToS and in that sense it is an abuse of the service, but I thought we were talking about something broader here.		
68				Darcy Southwell: The RAA defines "Illegal Activity" to mean conduct involving use of a Registered Name sponsored by Registrar that is prohibited by applicable law and/or exploitation of Registrar's domain name resolution or registration services in furtherance of conduct involving the use of a Registered Name sponsored by Registrar that is prohibited by applicable law.		
69	Option #2: Relay all electronic requests received (including those received via emails and web forms) from law enforcement authorities and third parties containing allegations of domain name abuse (i.e. illegal activity)		9. Do you see any gaps in required Provider actions on Relay where additional criteria may be needed?			

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70	(Final Report p. 14)"As part of an escalation process, and when the above-mentioned requirements concerning a persistent delivery failure of an electronic communication have been met, the provider should upon request Relay a further form of notice to its customer. A provider should have the discretion to select the most appropriate means of Relaying such a request. A provider shall have the right to impose reasonable limits on the number of such requests made by the same Requester for the same domain name.	Possible gap 1: Ensuring relayed communications reach Customer	10. Should Providers be required to test email forwarding to Customers to ensure forwarding is working properly?	Theo Geurts (2:08) if you are going to test forwarding this is going to be quite an interesting proposal--if email address is being changed each week I don't think customers would be favorable if we are starting to email them each week to test that it's still working. Not sure if we should do it but could create a lot of problems there.	JG-there are many other ways of testing that may not require sending an email	
71	"When a service provider becomes aware of a persistent delivery failure to a customer as described herein, that will trigger the P/P service provider's obligation to perform a verification/re-verification (as applicable) of the customer's email address(es), in accordance with the WG's recommendation that customer data be validated and verified in a manner consistent with the WHOIS Accuracy Specification of the 2013 RAA (see the WG's Recommendation #5, above, and the background discussion under Category B, Question 2 in Section 7, below)." (Final Report p. 14)			Theo Geurts I don't think there is a gap. A lesson from the WHOIS ARS project is that the only way that ICANN could really test is to send an actual email to the registrant. If that group is already struggling with how to test I don't see how we could come up with another method to test it.		
72				Roger Carney (2:11) I don't see a gap here. This may not necessarily even happen by email so I don't see a gap here		
73				Darcy Southwell: Agree with Theo & Roger that there's isn't a gap.		

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74	"All third party electronic requests alleging abuse by a P/P service customer will be promptly Relayed to the customer. A Requester will be promptly notified of a persistent failure of delivery that a P/P service provider becomes aware of." (Final Report p. 14)	Possible gap 2: Timing of relay	11. Should there be a required timeframe for the mandatory Relay?	Steve Metalitz (2:14) This was discussed at length in the PDP and we ended up with the bullet that all requests alleging abuse must be relayed promptly. That was as specific as we were able to get. Right-this is only about abuse. We were relying on this to think that IP included--so they would be promptly relayed. If that's not abuse, then the question becomes relevant. If not, it's covered by "promptly".		
75				Theo Geurts (2:15) We need some flexibility (agreeing with Steve)--promptly works fine here.		
76	"All accredited P/P service providers must include on their websites, and in all Publication and Disclosure-related policies and documents, a link to either a request form containing a set of specific, minimum, mandatory criteria, or an equivalent list of such criteria, that the provider requires in order to determine whether or not to comply with third party requests, such as for the Disclosure or Publication of customer identity or contact details." (Final Report p. 10)	Who can request Reveal? No restrictions noted in Final Report				
77	[Terms of Service SHALL include] The specific grounds upon which a customer's details may be Disclosed or Published or service suspended or terminated, including Publication in the event of a customer's initiation of a transfer of the underlying domain name ¹⁶ . In making this recommendation, the WG noted the changes to be introduced to the Inter Registrar Transfer Policy ("IRTP") in 2016, where following a Change of Registrant a registrar is required to impose a 60-day inter-registrar transfer lock." (Final Report p. 10)	How to request Reveal? No restrictions noted in Final Report; Report seemed to contemplate that a form (or other non-email option) could be used.				

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78	[Terms of Service SHALL include] Clarification as to whether or not a customer: (1) will be notified when a provider receives a Publication or Disclosure request from a third party; and (2) may opt to cancel its domain registration prior to and in lieu of Publication or Disclosure. However, accredited P/P service providers that offer this option should nevertheless expressly prohibit cancellation of a domain name that is the subject of a UDRP proceeding." (Final Report p. 10)	Required Provider Actions: ToS Requirements in Final Report only	12. Do you see any gaps where minimum mandatory criteria should be developed?	No suggestions.		
79	[Terms of Service SHALL include] Clarification that a Requester will be notified in a timely manner of the provider's decision: (1) to notify its customer of the request; and (2) whether or not the provider agrees to comply with the request to Disclose or Publish. This should also be clearly indicated in all Disclosure or Publication related materials." (Final Report p. 11)	Possible gap: Timing of response to Relay requests	13. Should there be target service level commitments for request responses?	Theo Geurts (2:17) My impression was that we have very few requirements for reveal because it is rather complex and depends on the circumstances. I don't think there is a gap, I think this was intended by the WG.		
80				Darcy Southwell (2:18) I agree with Theo. We have to have flexibility from an operational perspective and sometimes that will include an investigation before a reveal so you can't just pick a number of days that will work in any given situation.		
81				Roger Carney: Agree with Darcy; Greg DiBiase: Agree with Darcy; Luc Seuffer: Same here		

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82			Preferred process for developing minimum criteria?	Steve Metalitz (2:21) I suspect that the Rrs are pretty advanced on this--for abuse reports generally--and that probably provides a good starting point. I think the Rrs are in a good position to take the lead on this and if there is anything non-registrars can do to provide input we can. Not sure if we need a formal subgroup but this shouldn't be a big task, but would be good to have a draft that everyone can look at. We have it in the illustrative disclosure framework but that's only a small subset of this universe.		
83				Graeme Bunton (posted screenshot- https://i.gyazo.com/094a48ae15df29c8a0391e33936871b6.png) Agree that this is a reasonable place to start discussion. Requirements for a report are not controversial. The part that is taking time to resolve is response. If we are just talking about the first piece we should be able to move relatively quickly.		