
ICANN73 | Virtual Community Forum - Discussion Forum on Geopolitical, Legislative, and Regulatory Developments
Thursday, March 10, 2022 - 12:30 to 14:00 AST

BECKY MCGILLEY: This session will now begin. Please start the recording.

Recording in progress.

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With that, I will hand the floor over to Mandy Carver, senior vice president for government and IGO engagement.

MANDY CARVER:

Thank you, Becky.

And I'd like to, first, offer our CEO, Göran Marby, the opportunity to make some opening remarks.

Göran.

GÖRAN MARBY:

I really just want -- thank you, Mandy. And welcome, everybody.

I really just want to thank the ICANN community for this session. We have -- especially the planning committee for the ability for this one.

We have had over the last couple years a lot of questions about what happens in the world when it comes to geopolitics. And we have an excellent team for our support, but this is really based

upon the request from you. And I'm really happy for having this opportunity.

So that is my intro. Mandy, over to you.

MANDY CARVER:

Thank you, Göran.

As Göran has mentioned, this session is part of what will be now a regular series of presentations and dialogues with the ICANN community and a regular feature of ICANN meetings.

Can we go to the next slide, please.

I just briefly want to go over the topics that we're going to try and recover. We have a lot of material to get through today. We do have 90 minutes, so there will be time for questions and answers at the end. But I am going to ask that you hold your questions and answers until the end. Please go ahead and put them into the Q&A pod as they occur to you. But we're not going to take questions in between or during each of the segments.

We wanted to have these sessions so that we could have an opportunity to talk to you about what we see going on in the geopolitical space. We want to have the interface with the

community that we have agreed to, committed to, as part of the charter that was presented all the way back in 2019.

And this is really a collaborative effort. This is between the Org and the community because this is a very big space with an enormous amount going on and we need your cooperation, collaboration, and assistance in order to manage this. So, briefly, we're going to touch on challenges, impact, and mitigation we're seeing.

We're going to do a high-level summary of the other categories. These are by no means exhaustive; so we'll go through what we see going on currently in the IGO space, particularly the U.N. and the ITU. But we're also going to mention some of the other IGOs we track.

Then we'll have, again, a brief summary of some of the legislative developments we're looking at. And then we will get to community engagement and participation where we want to highlight the new government engagement pages that have been launched by the ITI project and the new functions that are available which will make it easier for you to follow what we're doing and to be able to engage with the materials.

And then, as I said, we'll have questions and answers and an opportunity for discussion.

Next slide, please.

All right. Challenges, impacts, and mitigation. There is a growing attention to the DNS in the global political space, including an ever-increasing tendency for governments to try and address social and political challenges that they see using technical solutions. And these are not always a good fit.

Governments and IGOs seek to represent and protect the interests of their constituents. And in the fulfillment of that mission and those interests, they look for solutions. Sometimes those solutions have the potential to directly disrupt the very structure of the Internet. We are monitoring evermore widely-dispersed discussions so the dialogue in "cyber," in quotes, and the discussions of the issues being raised in the Internet space are getting more and more disseminated, which, of course, increases the spaces that we need to manage.

Even when the regulations or legislation are not believed to be directly DNS-related, they can have negative unintended consequences on a stable, globally interoperable Internet, and on ICANN's activities and our governance.

Now, we try and manage and mitigate the space through active engagement. Those are bilateral meetings, targeted messaging. We offer Webinars, trainings, workshops. A lot of this activity, of course, has been virtual, which in a way, because of the COVID pandemic, has actually helped because it has broadened our reach.

We will get to our publication's pages at the end, but we do provide analytic publications to inform the community about what we're seeing and what's coming up. We also want to be able to notify you when there are opportunities for the community to participate in IGO public consultations.

All right.

Next slide, please.

I'm going to go to IGO activities at this point, and we want to -- again, this is a summary or a high-level excerpt. But I'm going to turn it over now to Veni Markovski to talk about -- to start us off.

VENI MARKOVSKI:

Thank you, Mandy. Can we have the next slide, please.

I'm Veni Markovski. I'm the ICANN vice president for U.N. engagement. I'm based in New York, and I cover the United Nations, the International Telecommunications Union, and some other U.N. agencies.

So the United Nations is discussing cybersecurity at the so-called OEWG. And there will be a lot of abbreviations and I will try to list them all, open-ended working group, that is, which will finish its work in 2025. And please remember that year, 2025. You will hear about it later in the presentation.

The U.N. AHC is the Ad Hoc Committee which is drafting the U.N. Cybercrime Convention. And more details on that will be given by my colleague, Alexey, who is also, like me, based in New York.

Alexey, please.

ALEXEY TREPYKHALIN: Good morning, afternoon, and evening, everyone.

This week and last week, the United Nations' Ad Hoc Committee is having its first substantive session in New York. It discusses the three following points: First, objectives and scope of the convention as well as its structure; second, preliminary exchange

of views on key elements of the convention; and third, the mode of work of the Ad Hoc Committee.

Because the U.N. General Assembly allowed virtual presence during the sessions of the Ad Hoc Committee, we have the opportunity to follow these deliberations. The GE team will keep you informed of any developments that might touch on ICANN's mission.

Thank you, and back to you, Veni.

VENI MARKOVSKI:

Thanks, Alexey.

So we follow both processes as we are certain that they both will be touching on ICANN's mission. Now, this is not an assumption. It's based on previous work done at the U.N. For example, see the so-called, quote, unquote, "Public Core Debate" in the previous editions of the OEWG as well as the GGE, or Group of Governmental Experts, as explained in one of our papers, number 008. And we're going to put the link to it in the chat.

And also, we've seen that in comments at other intergovernmental organizations which refer to ICANN and put

this in the context of the U.N. discussions. And there will be more on that in a minute.

The OEWG is open to discuss practically anything that relates to cybersecurity. So we will keep you informed on the development.

The next session of the group is, by the way, in a couple of weeks, from March 28th until April 1st, five days, in New York.

We are also participating in the Internet Governance Forum and follow the conversations at the U.N. level about a possible reform of the IGF.

We are also monitoring the conversation which lead to the WSIS + 20. WSIS is the World Summit on the Information Society. There will be a review in 2025, and that's only in three years.

There are a lot of interest around all these U.N.-based discussions which we have to monitor constantly and put a little thesis together in order to understand what's going on and to be able to provide you with the full picture.

On the ITU, in 2022, these are the four big events that we are monitoring as they all have the potential to touch upon ICANN. The WTSA stands for the World Telecommunications

Standardization Assembly. It finished its work actually yesterday, and the 222-page PDF with all the resolutions and other text was published today. So we will have something more to report on it on the coming ICANN meetings, but we can already say that some of the proposals which had the potential to touch on ICANN's mission did not obtain the required consensus among the delegates and did not make it to the final text.

We are now looking forward to the coming ITU Council meeting which is the last one of the councils before the ITU plenipotentiary conference. And it might provide some ideas on how the plenipot itself would develop.

The WTDC or the World Telecommunication Development Conference, is going to take place in Rwanda, Africa, and since we are a member of the ITU developmental sector, we plan to participate there.

The plenipotentiary is important not only with the so-called Internet resolutions, which as of 2010 mention ICANN and other Internet-related organizations, but -- and we expect that this will be renegotiated, but also with the elections for Secretary General of the ITU.

We follow the elections because there are two candidates, a Russian and an American, and the Russian foreign minister officials who are covering this election have stated that "The current multistakeholder model of Internet governance doesn't work," this is a quote, and there is a need to, another quote, "move the management of the DNS to the ITU." And so they also claim that the Russian delegate -- candidate for Secretary General will be able to do exactly that. Plus at least on one occasion we have seen a governmental official connecting the goal to move the Internet governance to the ITU with the year 2025, suggesting that by hosting the IGF in Russia in 2025, this somehow elevates the candidacy for Secretary General.

Last but not least, we have listed several publications of our team. There are more than that, obviously, and not only on China, the United Nations, and The Netherlands but also on the European Union, Russia and others. And please, I know you are all busy, but obviously I am not very objective saying this but highly recommend taking a look at those papers when you have the time. And if you have any questions or if you know of something that we have missed, please let us know.

Thank you, and over to you, Nora.

NORA MARI: Hello, everybody.

Next slide, please.

I'm Nora Mari. I'm based in Brussels with the GE team, and we follow various institutions here in Europe. One, indeed, is the European Union institutions but also we follow other institutions such as the Council of Europe, which is an international organization founded in 1949 that has 47 member states, members of the institutions, and a number of observers that are outside the Europe, such as the U.S., Canada.

The Council of Europe does produce international agreements that are not laws, but they can be ratified in the member country, member of the Council of Europe. Most notably, the most famous international agreement that was made at Council of Europe level is the European Convention of Human Rights, which is enforced by the European Court of Human Rights.

Specifically, we have been following the works related to a convention called the Budapest Convention on Cybercrime, and in particular, like an update of the convention, which is an additional (indiscernible).

The Budapest Convention on Cybercrime, it was one of the first convention in this specific field of cybercrime, and it was meant to provide a framework for harmonizing national laws and improve cooperation among state nations on these issues.

The additional protocols aims to address some specific issues, especially in the field of cooperation and disclosure of electronic evidence and also provides additional tool for direct cooperation among governments and service providers.

We have been following the works of this specific convention that has been prepared between 2017 and May 2001 because there are some provisions related to domain names, and specifically the convention provides some legal basis for a party to request information regarding domain names registration data tool, a given holder.

The works on the conventions are now concluded, and the protocol is expected to be open for signature as of May 2022.

Another institution that we follow closely is another international intergovernmental organization which is the OECD. You may know it, the Organization for Economic Cooperation and Development, which is an organization composed of 38 member countries in Europe and outside. And that was founded, again,

after the Second World War with one of the primary objectives of implementing the Marshall Plan. So the economic element of the organization is very strong, and the -- it is a space where member states meet to exchange good practices on policies, especially in the economic field. It is a very well respected organization, and, for example, the basic principles concerning data protection that we then saw in the Data Protection Directive of '95 at European Union level and then in GDPR, some of the principles were already in a OECD framework in 19-- in the 1980s.

We engage regularly with the OECD through a specific committee, which is the Internet Technical Advisory Committee, so called ITAC. ICANN is one of the founding members of ITAC, and we contribute regularly, and we exchange -- have regular exchanges with them, with the OECD, through two specific committees. One is the Committee on Digital Economic Policy and the other one is the Working Party on Security and Privacy in the Digital Economy.

In the past year, we have, in particular, have had, like, many exchanges with them, because they have been working on a report on the security of the domain name system and introduction to policymakers, and another one on security of routing.

The objective of these reports, it is to provide a high-level overview of the key challenges and opportunities associated with the security of the DNS and identify trends in Internet protocols that may affect security of communication.

We have been exchanging with them in the past year -- we have been -- found very cooperative counterpart in that respect.

And now we move to Laurent Ferrali that will introduce our work at WIPO and WTO.

LAURENT FERRALI:

Thank you very much, Nora.

I'm Laurent Ferrali. I'm based in Geneva, and I will introduce you to what we are following in Geneva in addition to ITU.

Next slide, please.

So in Geneva, besides ITU, we are following many organizations. But two of them are very important for us, the World Intellectual Property Organization, which is well known by the ICANN community because of the UDRP and because of the active participation of WIPO staff in the GAC as GAC observers.

We are following the -- the Standing Committee on the Law of Trademarks, Industrial Designs, and Geographical Indications, SCT. I will use SCT now.

We are following the SCT discussion, because as you maybe know, geographical indication protection is a sensitive issue of -- in different ICANN constituencies, including the GAC. And there are some discussions between WIPO member states on the definition and the protection of geographical indication, especially in the DNS, in this SCT committee.

And so this is why we are closely following the discussion.

For many years, the (indiscernible) is stuck, because WIPO member states are not able to agree on the definition of geographical indication and the protection of geographical indication.

In a nutshell, some countries are trying to align the protection of geographical indication on the protection of trademarks on the Internet.

And, of course, some countries oppose.

In addition to the SCT work, we are closely following the Lisbon agreement, which is an agreement between different countries which are trying to protect the geographical indications.

It's not clear for us how this Lisbon Agreement will impact the work of the SCT. But we are following both.

The next meeting of the SCT will take place at the end of the month in Geneva. And the geographical indications will be discussed again.

And the SCT secretariat will provide a briefing, an update on ICANN activities to WIPO member states and the WIPO -- WIPO members.

In addition to WIPO, in Geneva, we are closely following the World Trade Organization for -- because -- I mean, the World Trade Organization was involved in a global (indiscernible) trade discussion a long time ago. For the moment -- I mean, decisions are stuck for different reasons. The first one impacts the -- many member states -- many WOT member states, sorry, are asking for reforms, reform of the organization. And the digital sovereignty discussions are not helping countries to discuss a possible World Trade Organization agreement. And some countries are opposed

to this potential global trade agreement, mostly African countries, which cannot see any benefit on such agreement.

We are following the discussion because when you talk about global trade agreement and global (indiscernible) trade agreement, the collect and the transfer and the protection of personal data is key. So this is why we are closely following the discussions.

And we're -- and ICANN was involved in some discussion relative to the moratorium on custom duties for electronic transmissions. It's a very old moratorium from WIPO -- from W2, sorry. And it was discussed again three years ago, and we were involved in the discussion.

So this is WIPO and WT.

Thank you very much.

And over to you, Mandy.

MANDY CARVER:

Thank you, Laurent.

Next slide, please.

As you have just heard, when we talk about the IGO engagement, we're dealing with a lot of activity. It's also been a very compressed schedule because of the impact on COVID for many of these organizations' ability to meet.

Now I'd like to talk about what we're seeing at the national and the regional governmental level, specifically, some legislative developments that have been flagged as relevant to the DNS and ICANN's mission.

For this, I'm going to turn to other members of the team in sequence. Again, these are just an excerpt of the kind of activity that we see.

Next slide, please.

As you all can imagine, data protection continues to be an area of concern. A number of jurisdictions are either considering or have passed specific data protection laws. There are also dialogues about cross-border transport of data, et cetera. But this isn't the only area of activity and concern.

There are, again, as I said earlier, often a selection by governments of technical solutions to try to address social or political problems that they see in their communities. And an

example of this is the tendency to look at platform and content regulation, but often in a way that is about the broader Internet as opposed to specific applications. There's also, we've seen in some locations, reexamination of categories, who is considered a broadcaster, for instance. Who falls into what regulatory bucket. And as they make changes, this can also impact ICANN's role and mission and the DNS overall.

We've got some non-legislation that's outlined here. I'll go to the next slide and to my colleague, Elena, who is going to give you more detail.

Over to you, Elena.

ELENA PLEXIDA:

Thank you, Mandy.

I will refer to updates from the European Union.

The European Union, of course, is an international organization made up by 27 countries, the E.U. member states.

The reason we are discussing E.U. updates under legislative developments and not together with IGO activities above is that the E.U. is quite unique as an IGO as regards the fact that the

countries that make it up have ceded part of their national sovereignty in specific areas to the E.U.

But that means the E.U. can produce legislation that is directly applicable. It doesn't have to be through a treaty that then needs to be ratified by national (indiscernible) to become applicable, like with classic, if you will, IGOs.

Now, the E.U. as an organization consists of a number of institutions. Importantly, and as regards the E.U. policy-making processes, we have the European Commission, the Council of the E.U., and the European Parliament.

The European Commission is the institution in the E.U. system that has the so-called legislative initiative. That means that it is the European Commission that can make formal proposals for legislation.

The Council of the E.U. is the body that brings together the member states and addresses their political will.

The E.U. Parliament consists of members, parliamentarians, that are directly elected by European citizens.

Now, the Council, together with the European Parliament, are the so-called co-legislators. They examine, negotiate, of course, they can change if they wish a proposal, and they adopt the proposal at the end that come from the European Commission.

So E.C., European Commission, proposes (indiscernible), and European Parliament legislates.

Let us also know that all the E.U. member states and the European Commission are members of the GAC. We do not have representatives of the European Parliament in the ICANN community.

And with that short intro, let me dive in with some developments.

Looking now at the legislative initiatives from the E.U. that that's on the DNS, of course, NIS2 is at the top of the agenda.

First and foremost, with the proposal to impose regulation, specifically, cybersecurity-related regulations, on the root server operators, and, indeed, on the root itself and IANA itself, the way the original legislative proposal was drafted.

(Indiscernible) roots undoubtedly have had an impact on the approach to governance of Internet's unique identifiers.

I mean, you had the (indiscernible) in 2016, which confirmed that the multistakeholder model is the way to go about it and trust the multistakeholder community with it.

And imposing unilaterally legislation on the root server system would have put this commitment, if you will, in question. Let alone that, from ICANN Org perspective, we do not see what is the problem that this proposal would have addressed. Even the root server system has operated literally without a glitch for end users since the day of its inception.

I highlight that the proposal to impose regulation on the root server system is off the table now. Both the Council and the European Parliament (indiscernible) out of NIS 2 in the process of the negotiations, which are still ongoing.

We engaged on that front, together with colleagues from (indiscernible), from Netnod, ISO (indiscernible). Many root server operators did send input to the open consultation on NIS2 and more.

Then, again in NIS2, we have Article 23, which introduces requirements to collect, maintain, publish, and provide access to domain name registration data.

NIS2 recognizes that -- and I'm reading from the text now -- maintaining accurate and complete databases of domain names and registration data and providing lawful access to such data is essential to ensure the security, stability, and resilience of the DNS.

While Article 23 could potentially help clarify some of the legal ambiguities, as regards the application of the GDPR to domain name registration data and these legal ambiguities -- the community has been struggling around these legal ambiguities.

The other part of Article 23 is -- and this has started to become more apparent as the discussions in the Council evolved -- is that the way Article 23 is drafted and because this is a directive, when adopted, it will require E.U. member states to enact 27 different registration data policies.

So we can end up having 27 different policies plus the global ones made at ICANN level by the community. I mean, the global policy-making as it stands now is ignored. And in the same vein, so is the fact of country code top-level domains make their own policies by and with their respective countries.

Also, registries and registrars are treated the same way in Article 23. And there is an ongoing discussion as regards who are the

legitimate access seekers that can and (indiscernible) locally request access.

Another piece of legislation that we would like to bring to your attention -- and I'm sure that many of you already have your attention on it -- is the Digital Services Act, DSA, for short.

The DSA is about the liability regime of intermediaries for content that third parties are putting on their services. Negotiations on the DSA are ongoing, like with NIS2.

Now, DNS services are in scope, whether they are established in Europe or not, as long as they offer services in Europe. We have the same concept in NIS2, the same concept in GDPR. It is this concept that creates the (indiscernible) ill effects.

To qualify for the exemption from liability for content, you have to be either (indiscernible) or passing or hosting.

Now, this list of categories do not seem to reflect the technical realities of DNS services, and certainly not all DNS services.

So going forward, we have a concern that we will see situations like the QUAD94 case in Germany that is now going on. There, we

have -- we will see a resolver found involved with I.P. infringement with injunctions and fines issued against them.

Long-term effect, blocking content to avoid legal risk and fines, maybe it's a concern (indiscernible) to cultivate.

And EURALO, I would like to highlight, had hosted a very interesting session on this, highlighting all these issues quite some time ago. It was very interesting, and I would point you to that.

While still at the DSA, I would also like to note that in the process of the negotiations, the parliament considered the extension of the principle, know your business customers, to registries and registrars. That is not the case now. It seems it did not go through. But discussions are ongoing.

Turning to non-legislative initiatives. That's on the DNS from the E.U.

This is not legislation. It's a set of initiatives that the commission put forward for itself to execute, along with others, as appropriate.

On that front, we have the DNS4EU initiative. It's intended as a public resolver. And we just simply had the complication of the call for (indiscernible).

Now, that's not the first time we see an initiative from -- for a national resolver. So we see regions and countries making plans for their own infrastructure, and in some cases, for their own DNS, quote, unquote.

Overall, the more resolvers, the better. Same goes for national original ones, as long as those resolvers do not modify data without user consent or knowledge.

And the premise on which the DNS4EU is based seems to be the overreliance to open resolvers, which, by the way, are owned by U.S.-based companies.

And now, that premise kicked off a lot of interest to look into the consolidation of the resolver market in various parts. Our research, and my colleagues from OCTO has produced a paper, shows that while it is true that at a global level, Google and cloud (indiscernible) have sizable markets there, when you look into Europe, this is not true. The overwhelming majority of consumers are behind DNS resolvers managed by their local ISPs in their respective countries.

Another initiative announced in the same strategy, though, as the DNS4EU, which is the E.U. service (indiscernible) strategy. It is what is described as a contingency plan for the root. And there is some text on the strategy. I'm reading the text.

The Commission intends to develop a contingency plan supported by E.U. funding for dealing with extreme scenarios affecting the integrity and availability of the global DNS root system.

And it goes on saying that the Commission will work within the multistakeholder model and the E.U. DNS root server operators. Now, again, as I said before, the root server system is the more -- the most secure system we have today in the Internet, if you will. It is secure because it is (indiscernible). It has so much (indiscernible).

There is not more detail on these initiatives for now. We are looking forward to understand what are the concerns and what is the contingency idea, mean contingency in terms of the root server system is the hundreds of machines that exist worldwide. So the root server system is secure.

Also, our RIPE colleagues have issued a response to that. One came out highlighting that the root server system is secure and

assuring the ability of the DNS to provide stable and secure service for end users.

Finally, we have more such as the DNS abuse study that the European Commission commissioned and was discussed in a number of sessions during the week. I'm sure you are all aware so no need to expand.

I will finish with the E.U. toolbox against counterfeiting. That is in the making. The objective of the toolbox as announced in its inception note would be to clarify the roles and responsibilities of rightsholders and intermediaries with respect to mutual cooperation, data setting, and to enhance cooperation overall.

(indiscernible) is the domain name system. E.U. IPO Observatory has produced a discussion paper. This paper touches on a number of DNS policy issues, and it looks into actions and appropriateness.

Thank you for your attention. And I will now pass back to Mandy.

MANDY CARVER:

Thank you, Elena.

Next slide, please.

Okay. Now we come to the section on community engagement and participation with us as we take on these important tasks.

Next slide, please.

We often get the question: Well, what is the ask? What can the ICANN community do? We know that many of you are already active in this space. You are monitoring and following deliberations on legislative initiatives or regulations in your own jurisdiction. And we want to maintain an open dialogue and a communication channel with you all.

We also want to encourage you to offer positions or statements to the relevant entities in your locations.

You certainly should be providing feedback to us at ICANN and to your colleagues in the community and flagging where you see something you think we should be tracking, if we haven't mentioned it. You can work with your own GAC members as well, the Government Advisory Committee members, to keep them involved or to find out what their position or interest might be in an area.

We also want to encourage you to offer your expertise to your national delegations at these IGO meetings. We've had some

questions about what's the role of ICANN in these spaces. Please remember that these are multilateral organizations. It is governments that speak. It is governments that vote. Many governments recognize and value the knowledge and participation of their constituents. And many of these governments will send a multistakeholder delegation to these meetings, or they will hold domestic preparatory discussions with the community. So we encourage you to be engaged at home when you see these invitations offered within the technical community.

You also heard what a crowded schedule we have coming up within the ITU and within the U.N. Many of these are overlapping processes. And that has meant that everyone is stretched thin. In some instances, this has actually been a benefit, if you will. The WTSA that Veni spoke to, that was meant to be the 2020 WTSA which, of course, had been delayed two years by the COVID pandemic. And as a result, instead of four years in between the WTSA's, the next one will be in 2024. Now, that took a little bit of the pressure off this meeting because people could look forward and say, well, we'll address it two years' time. But that is one of the things that the community can do in collaboration with ICANN Org. And we will have these regular sessions to make sure that we have open updates and dialogues.

Next slide, please.

What I want to do right now is give a shout-out to the ITI and the comms team and the work they've been doing in the remodeling and the addition of new features to the ICANN website. And in particular, we have just launched new enhanced government engagement pages. These will make it easier for you to find and interact with the materials we're providing and also to engage with us.

Specifically, the new government engagement pages are now multilingual. The landing page you can select will be in one of the six U.N. languages.

In addition, the government engagement publications page, which is part of these, is also multilingual. And the specific documents will be posted in the languages into which they have been translated.

Another new feature is that there will now be a subscription function so you can sign up to follow the page and you will get an email alert any time new content is added. In addition, on the publications page, we now have keyword search. So if you are not inclined to wade through the entire document but you want to go

straight to a particular analysis or discussion, that function is now available.

We've also had some questions in the pod about submissions that ICANN makes to the IGOs. We now have a page for those documents as well.

The one thing I want to say here is these are ICANN's submissions to the process. They are not the links to the IGOs' own pages or the aggregate reports that they might put out on the basis of these materials, in part because the process varies from IGO to IGO, how they manage their system.

But, for example, we were invited to submit information about the Internet. And ICANN's role helped mitigate challenges brought on by COVID, for instance, and we submitted a document that addressed that. The final report that was put together by the IGO used that material and footnoted it in places. But when they publish their report, it is a reflection of all the new submissions they receive globally. This is similar to when ICANN as an ECOSOC-accredited NGO might submit a contribution to the UNCTAD process.

And I apologize for all of the acronyms and the alphabet soup.

But anything that ICANN submits in writing to these processes is posted there.

We've also had a question about letters. As you know, ICANN as part of its overall transparency is -- we publish all the correspondence and the answers. And those are on the correspondence pages.

Okay. Now, let me just quickly see if there is anything I have missed.

Oh, one other item, ICANN also -- the Government Engagement Team and our colleagues in Global Stakeholder Engagement regularly produce a report on government engagement activity that we submit to the Government Advisory Committee, the GAC. And the GAC publishes those on their own Web page. So we have added to the GE page links to the GAC and links to the reports that the GAC publishes that come from us. And then, of course, the last area that you would see a place you could go to for more information about our activities would be to -- to read the CEO reports because there is narrative in those three times a year. It gives an update, broad base, the activities for ICANN in the government engagement and IGO space.

All right. With that, I would like to turn over to -- oh, sorry, one more item. There are going to be additional tweaks and features added to these pages in future rounds because that's part of the ongoing ITI process. So, you know, there will be announcements of new features when they occur.

But, please, I do encourage you to go and look at the pages, engage with them. I'd love to have you all subscribe. And please do let us know what you think. If there's something different you'd like to see, please let us know.

All right. Well, now, with that, I really will hand this over.

Next slide, please.

Okay.

Becky, do you just want to repeat the process for asking questions? And then we do have a number of questions that are in the Q&A pod. We have been trying to answer them in writing as they've come up. But we do have some open ones, and we will start going through those in sequence.

BECKY MCGILLEY:

Yes, thank you, Mandy. Just to note, that questions or comments will only be read aloud if they are submitted in English in the Q&A pod. The questions and comments from the chat will only be in considered part of the chat. So please do enter them in the pod. Many of the questions have been answered in writing.

So the first question we will answer live is from Pierre: Hi. Is there any official position from ICANN regarding Article 23 of the NIS2 directive? From the feedback I have from E.U. officials, it seems ICANN is supporting this Article because it clarifies the ICANN status regarding GDPR. While most or all E.U. ccTLDs are against this Article that creates a new regime of responsibility on registries regarding the accuracy of the registrant's database, it's important for us to know if there is, in any way, any form of support from ICANN for this Article, directly or indirectly? And if so, this is an important topic to discuss with the ccNSO, the GNSO, and not directly by ICANN Org.

And I believe Elena will be answering this question.

ELENA PLEXIDA:

Thank you, Becky. And, Pierre, thank you for the question we have discussed numerous times already. I will repeat what I have said before and what I said earlier.

So as Mandy said, the engagement of ICANN Org in the context of legislative proposals and legislative initiatives we see across the globe is based on the charter that we made some years ago. That charter is very specific, and it says there that ICANN will only engage when we see an issue for the DNS -- the function for the DNS, when we see an issue that touches on ICANN's mission, when we see an issue that touches on the policy making that is ongoing within the ICANN community.

And it is in that light and in that context that we engage when it comes to NIS2.

Now, as it comes -- as regards NIS2 more specifically, lots of our attention has been on the root server system issue that I mentioned before.

On Article 23, we also engaged as part of NIS2. Our engagement when it comes to NIS2 in line with what I explained before is that we organize the Webinars for the parliamentarians, and we organize Webs for the people in the council who are working on these issues.

And our Webinars were about explaining how the DNS works, explaining what is a registry, explaining what is a registrar, explaining what is a gTLD, explaining what is a ccTLD, et cetera,

et cetera, explaining all the processes and the work that is going on within the ICANN community, the SSAD, and everything else, explaining the problems that the ICANN community has been facing as regards legal ambiguities for the application of GDPR, the registration data.

So, as I mentioned just earlier, ICANN Org does not have a formal position. We are not a lobbyist or something like that. We are just explaining. So putting that all together, as I said, while Article 23 can clarify some of the legal ambiguities that the community has been struggling with, with respect to GDPR, we also see a big drawback that is that the global policy making at the level is being ignored. And that will lead to fragmentation if the negotiations are finished, as they look like right now.

We also see that Article 23 as it is right now ignores the fact that the ccTLDs make their own policies as they are national issues.

I hope this answers your question, Pierre. And I'm happy to continue discussing this over and over and over. Thank you.

MANDY CARVER:

Okay. Next question, please.

BECKY MCGILLEY: Yes, thanks, Mandy. We have a question from Luc from Namespace. Does closely following the discussion mean giving feedback sharing expertise with legislators or solely a passive role?

MANDY CARVER: I can start on that one and then if any of my colleagues want to add in.

Luc, it depends entirely on the venue. So, yes, we do provide expertise when there is an avenue to do so. We have had both government engagement and our colleagues in Global Stakeholder Engagement in various jurisdictions work with different committees that have had public opportunities for people to submit information.

We also publish an analysis. We have papers on the GE page, for instance, that go to some of the dialogue that is taking place in some of the IGOs so that the larger community can know what the issues are and where there are discussions taking place.

So it depends. Some jurisdictions have very open processes and draft legislation is published and there is an opportunity to have public discussion. Some jurisdictions do not.

But we do regularly provide informational Webinars to the representatives of the permanent missions to the U.N. for instance, both in New York and in Geneva. So we try and make ICANN available as a neutral, technical source of information.

Do any of my colleagues want to add anything to that?

Okay. Other answers, I think, are coming in writing.

Next question.

BECKY MCGILLEY: Thanks, Mandy. Our next -- oh, excuse me, go ahead.

GÖRAN MARBY: No, I was just checking that my sound didn't go out. So thank you. Please proceed.

BECKY MCGILLEY: So our next question is from Fabricio: What should the response be from ICANN org, Board to reports, studies, and legislative proposals that mirror, support, anti-DNS abuse recommendations already proposed by the ICANN community?

To date, the reaction seems to often be to say that there's no opinion.

Should a more formal consideration occur and be in the public record?

GÖRAN MARBY:

Let me answer this.

Thank you, Fabricio, for asking this question again. I don't know how to answer it again. I don't -- So, I have asked -- we have asked this question -- you have asked this question several times during the last week.

ICANN org or the Board doesn't intervene in the sort of PDP work and the opinions from a multistakeholder bottom-up process. This is this is up to the community to take into account any opinion that comes in from any EU Commission study or from anyone else. We are here to provide the tools for the facilitation of a discussion.

I hope that answers the question. I think I answered this a couple of times before this week.

Thank you.

MANDY CARVER: Thank you, Göran.

Becky, next question, please.

BECKY MCGILLEY: Our next question comes from Rick Lane: Does ICANN and the contracted parties fall under different U.S. state data breach notification laws?

JAMIE HEDLUND: So this is Jamie Hedlund. I can take that.

Rick, as you know, we are based in the United States and headquartered in California, and we comply with all laws that are applicable and relevant to what we do, and that would include state data breach laws, data breach notification laws.

As for the contracted parties, I'm not in a position to speak for them. Thanks.

MANDY CARVER: Okay. Thank you.

Next question, please, Becky.

BECKY MCGILLEY: Thanks, Mandy, so we had accidentally -- I had skipped this one. I'm going back to it. Does the org have a risk mitigation strategy in place for the ITU issues?

GÖRAN MARBY: Let me answer that question. It's -- So as we talked about ITU and the U.N. issues, this is the place for governments. And our job is in this to be part of that conversation, capacity-building training, talking about how the Internet works, how the ecosystem works. And we do this together with other parts of the ecosystem: OECD, IETF, RIPE. All of them are often engaged in this discussion, but it's really a government discussion.

And so -- and I see it's Laureen who asked this question from the U.S. Government. I mean the U.S. Government is very actively involved in this as well because the ones who could protect ICANN and the rest of the ecosystem in those discussions are the governments. So it's a little bit away from having a mitigation issue for the ITU issue in that sense. We work with governments, and there's a lot of governments who supports the multistakeholder model, who supports what ICANN, and the other ones is doing when we stay within our frame and when we stay within our mission.

And often we have a very positive dialogue with them. And I think as Elena and Veni and Mandy sort of mentioned in this is that they're often reaching out to us.

Okay; sorry. Claudia. I thought it was Laureen posted that comment to the pod. Sorry.

That we often -- There's a lot of outreach from governments and what, so they are supportive of this model, to the fact that remember the 2016, a hundred and -- was it 140, 150 countries actually signed on to the transition and the role of ICANN.

So to answer your question, we worked with governments, but the ones who can protect us from this are governments. So, therefore, the call for engage with your governments about this is an important one.

MANDY CARVER:

Thank you, Göran.

All right. I'm not seeing any more questions in the Q&A. I know that there's been active chat, but it's difficult to tell if these are comments or actual questions unless they've been bracketed. So I'd like to encourage people, again, if there are questions you'd

like to ask, can we have you put them into the Q&A pod so that we can take them in turn.

GÖRAN MARBY:

May I -- While people are formulating more questions, and I hope we were able to answer the questions you had, the moment -- we posted a charter of how we do things in ICANN. And we went out to the community, I think it was three, four years ago, way before COVID anyway. During the period we also went to the ITU-D as a member. That we're clear that the time to really engage is not about a policy by itself. We don't have an opinion, for instance, about privacy laws in that sense.

What we do have is when -- there's a couple of things, and Elena sort of pointed to it as well. When something is taken away from the multistakeholder model, which we believe is in our mandate to say that we believe in much stronger than governmental interventions. And so that's one -- that's really the one.

So when things moves away from the multistakeholder model, as you've seen today, there are many solutions to problems that they might think exist in the ICANN remit and they make legislation not for bad will but they do it because they want to solve a problem. And sometimes they don't think about the

strength of the multistakeholder model and how well we actually have done things.

I said in an earlier meeting today that this week has been a testament for me of the strength of the multistakeholder model and the remit of what we do, and we should be really proud about it because the reactions we're getting from the outside world is that we're doing a good job and there's a (indiscernible) of trust in our system. But then again you see those proposals and we actively work against it.

The other part we're trying to do is inform you as a community about all those things that is happening around the world, so you are -- because I know you're interested in Internet governance, technical Internet governance, whatever you want to call it. You're interested in it. So I think that giving you this is interesting for you but also will maybe raise concerns and questions for you.

The -- So that is the sort of limitations of what we're trying to do in this. Anything that can have an effect on ICANN's abilities to make policies, that's where we interact. But we try to stay away, or we stay away from having opinions about the actual legislation. So we look at this from sort of a technical thing.

We added one more thing, really. Reality is that we receive (indiscernible). Legislative proposal can disconnect people from the actual Internet, (indiscernible) Internet, alternative root server systems, et cetera, et cetera, because we think it's important to point out that the alternative root servers is not a technical thing in that sense. It actually creates a completely different Internet. And if you, as us, believe in the importance of the interoperability of the Internet, being able to have one system to connect all people, then it's something that we -- you understand why we're doing it.

Then when it comes to the way we work with this is that you've seen, for instance, that the European Commission, which is -- are very much active in this space, we go down and we actually give proposals for recitals. We do interact. But we do that -- we actually post those things as well, so you know what we say.

There is a time thing. Sometimes we have to act very fast, and sometimes we have to ask -- you know, sort of do it afterwards because the political timing of a decision could be so. But we try to be transparent. And that's also one of the reasons why we wanted to do this session, is because we want you to know what we're doing.

And can I also mention that the people who is on Mandy's team are specialists when it comes to understanding geopolitics and legislations. And I'm really grateful for having them. And they're here to serve you. So thank you.

MANDY CARVER: Thank you, Göran.

Just an appeal on the part of the interpreters again, please, folks, slow down.

Next question, please, Becky. I believe we've got one about technical standards bodies.

BECKY MCGILLEY: Thanks, Mandy. Sorry. Which one is that? Oh, I do see it. Okay.

Our question from Mark Datysgeld: How does ICANN org cooperate with technical standards bodies such as the IETF, WHATWG and other similar organizations? Is the same level of representation present there or is it -- that seen as a community activity?

JOHN CRAIN: I'll take this one, if you'll allow me. I'm John Crain, ICANN's Chief Technical Officer.

So we are, from a technical standpoint, and I know this is a geopolitical discussion but things like the IETF are often very technical forums. ICANN staff are involved in -- especially staff within my own part of the organization, in the development protocols, work on RFCs. We follow them heavily. These are often different styles of organizations. If you're familiar with the IETF, it's very much working-group focused and areas of work.

We also have many representatives of those organizations or participants from those organizations participating in the ICANN discussions. So there's very much a two-way dialogue when it comes to the technical bodies.

GÖRAN MARBY: May I add something?

JOHN CRAIN: Please do.

MANDY CARVER: Please, Göran.

GÖRAN MARBY:

So life is not easy, is it? And one thing we've seen is that there is a politicization, a try to politicization not only of the identifier system who you represent but also the sort of protocol environment or the technical environment. That's why we came up with this notion of what we call the technical Internet governance to make that difference.

You have seen proposals from, for instance, a new IP proposal which is not really a new technical solution, I would say. It's more of a governance model for an alternative Internet, I would say. And of course we engage with.

We also look into other standardization bodies like, for instance, a discussion about 5G and the upcoming 6G where it could be things that sort of disconnects the interoperability of the Internet by using other identifiers. We have produced papers about this which you find -- see. But also hope, you know, they answered it.

So the answer is really, if I were a lawyer I would say it depends. Some of those settings we are not part of. Sometimes we work with other parties, like in the ITU -- ITU sessions where other members in the ecosystems are a member in the T part, which we are in the development part. IETF, we also think -- which we think

is the place where this kind of standardization be happening, we are actively supporting.

So unfortunately, the answer is it depends. But I hope you can -- and it's also very much from the community standpoint. If there are things that you would think that we should look into more, we are happy to do so. I know that there are many requests about alternative namespaces, and there is a paper I think coming out about that. We did a blog a while back ago. So because we think that it's important for you to get answers to your questions.

So please, please also ask us questions and we will probably look into it.

MANDY CARVER: Thank you, Göran.

Next question, please, Becky.

BECKY MCGILLEY: Yes. It looks like we had gotten a little bit out of order, so we'll get back to that. The next question was from Rick Lane, and I believe Jamie will be answering this one. If ICANN is following U.S. state data breach notification laws, then why did they seek a -- carve

themselves and the contracted parties out of the Senate-passed cybersecurity notification legislation?

JAMIE HEDLUND: Thanks. That's already been answered.

BECKY MCGILLEY: Oh, okay. Great. Sorry about that.

Then Michael's question is next. Follow-up to Göran's response to Fabricio. While I agree with Göran's statement that gTLD policy is properly vested in the GNSO per the ICANN bylaws, what is the fiduciary obligation of ICANN org when there is a systematic threat to the organization based on external legal threats? If there was specific action/inaction by the GNSO community that threatened ICANN's existence, would the Board do anything?

GÖRAN MARBY: I have to admit that I'm not really sure how the two questions actually do reference each other. At one point I talked about the -- and I always has to be corrected, the EU Commission -- EC commission report about DNS abuse, which is much broader than ICANN, my understanding. And then there's a question about the fiduciary obligations of ICANN org. I'm not really sure about what is the systematic threat. We have taken -- We are defending

ICANN legally a lot of times. I mean, I think that one of the -- an example is probably -- I think the most expensive one is the defense of the decision about .AFRICA.

So not really sure what the -- how those two things are connected. Michael, can you please -- sorry about that. Could you provide a specification for someone who has been up very early this morning so I can understand the question?

MANDY CARVER: Okay. Becky, next question.

BECKY MCGILLEY: Sure. The next question is from Oksana: We really appreciate ICANN support to Ukraine.

What can Ukraine do more to protect the open Internet and the MSH model? MSM model. We are working hand in hand with Ukrainian government.

GÖRAN MARBY: I guess that the question goes to me. And first of all, my heart goes out to the -- to the people of Ukraine. That's a personal reflection that I just did.

I think that this time shows more general the importance of protecting the identifier systems. And now I think I talk to all of us in the ecosystem because we are not alone. We set policies for the DNS; that to remember how important it is to defend the multistakeholder model and the role of ICANN and the role of our partners in this. Because I think in the long term, long term that's just going to create the stability that is needed. I know there are always call for short-term immediate actions to do things because everybody wants to help and everybody wants to do something, but to -- to continue to support the multistakeholder model in such a way that you're already doing it, and I'm very grateful for that support during very harsh times, it sends a message that what ICANN does should not be politicized. We're there to serve the world. We're there to create interoperability. We don't have the mandate or the technical capability to take anything down. And I think that's a positive and a good thing.

So thank you for -- for -- Thank you for the question, and thank you for raising it. And sorry for the sort of blended answer. I -- I, for once, don't find the right words to answer you.

MANDY CARVER:

Thank you, Göran.

Becky, next question, please.

BECKY MCGILLEY: Yes. Our next question is from Anupam: Is there an active engagement with standard bodies like the ISO or the IEC?

JOHN CRAIN: I can take this one again. Thank you for the question, Anupam. So there are many, many standards bodies around the world, as you may well be aware. We follow any of them that we are aware of, including ISO, IEC, NIST, obviously the IETF, and many, many others.

When we see or become aware of standards that have an effect on the Internet's identifiers, be that the Domain Name System or others, we do actively engage. We have regular discussions with many of the different standard's bodies. So we're not just focused on one standards body. We are looking at any standards or even new technologies that may have an effect on the Internet's identifier systems.

MANDY CARVER: Thank you, John.

Next question, Becky.

BECKY MCGILLEY: Okay. Our next question is from Phil.

How does ICANN make the distinction between DNS fragmentation, which threatens the global Internet, on the one hand, versus mere DNS alternatives, like alt root TLDs and perhaps also Runet, and the Russian sovereign Internet law on the other hand?

Thank you for any insight you can provide to help the community understand this distinction better.

JOHN CRAIN: You go ahead, first, Göran, and I'll join.

GÖRAN MARBY: Thank you, Phil, for one of the most fundamental questions you might ask yourself now.

I mean, many of those things that happens outside the joint identifier system, the I.P. addresses, the domain names, and the I.P. protocol, as such, are things that is within our control.

And, for instance, in the Russian paper we wrote about, we have been writing about things like -- we have -- we're talking about the legislation that Russia proposed and the actions that we're doing.

But it's really -- but it's the sort of thing, trying -- a little bit like these proposals come from other parts of the world. I don't want to say European Commission and Russian in the same sentence, but -- I didn't really want to do that. But we see -- we tell them what we think could be the effects of certain things to do. But it's -- but it's -- in the end, it's up to the governments to decide if they want to do those actions.

I believe, and I truly believe, and I'm naive in this belief, that to have one common interoperable system for people to connect to is something that is very good. I know that not everybody agrees with me on that. And that's fine.

That's why I think that organizations like ICANN, like the RIRs, like IETF, like ISOC are all important, because we share this underlying belief.

So anything that disconnects us from that is something we agree -- I think we all agree upon is not a good thing.

But it's really hard to sometimes make the distinction in a general (indiscernible). We often get questions on, you know, what we call alternative name spaces. And we say, that's interesting for someone, but it's not the Internet. And JC wrote a blog about that.

Here is something I also think we can engage better in the ICANN community. I hope this conversation could lead up to a conversation about that as well, because I'm also shying away from that this is a multistakeholder bottom-up process. And it's so important that we're all built out for the community of ICANN to have opinions and strongholds. And that's really where it should come from.

But that's how we're trying to make the distinctions. We -- that's how we engage.

I hope I answered your question.

MANDY CARVER: And, JC, do you want to add?

JOHN CRAIN: I'll add a little bit. But I think Göran covered much of the issue.

I think from sort of an old engineer's perspective, I often look at this and try and look at these from the end user perspective. And many of these things that we see out there -- and I may be a little bit cynical when I point out that anybody who puts something new forward will always tell you it's different and it's good and it's great. But often we need to look at this from the point of the end user and how it will affect them.

And anything that causes either confusion or the possibility that you don't have that single interoperable Internet, I.E., when you type something into a browser or you send an email, you do not actually know where it is going to go, those things are problematic.

In the office of the CTO, what we try to do is look at those from a technical perspective and try and shed light on what some of the real-world implications are. And then it's for the community, especially the ICANN community and the technical communities, to discuss those and see if there are solutions.

You know, innovation in and of itself is a good thing. The Internet was built in a manner, in this decentralized manner, so that we could innovate. But we still need to try and ensure, in my opinion -- and I believe this is fundamental to what ICANN does -- that

when the user goes on the Internet, they have some expectation when they use an identifier that it goes where they expect it to.

So that's -- for me, is that one single interoperable Internet.

Thank you.

MANDY CARVER: Thank you, John.

Becky, next question, please.

BECKY MCGILLEY: Sure.

Our next question is from Shiva Subramanian. Just as ACs, SOs appoint liaisons between them, and just as ICANN designates staff for government engagement to U.N., is there a design for consistent engagement with standards and other Internet bodies such as the IETF by designating external liaisons, coordinators to important external organizations by reciprocal arrangement or otherwise?

MANDY CARVER: John, do you want to speak to this?

JOHN CRAIN: Sorry. I'm just trying to reread it.

Yeah, I'm not sure at the moment how to answer this one.

Could you just quickly reread it for me?

MANDY CARVER: I think this goes to the question of whether or not we have designated liaisons or coordinator engagement with groups such as the IETF by (indiscernible) --

JOHN CRAIN: Yeah.

MANDY CARVER: -- or otherwise?

JOHN CRAIN: So there is an IETF liaison on the board, right? So we do have that. That's quite formal.

Many of these organizations are not formal in their nature. So, you know, if we look at the Internet Engineering Task Force, they don't have members; they have participants. And many of these

organizations are like that. So we have staff whose job it is to participate in those organizations. But it's not formal in the true sense of it. But they are designated to work on these things.

MANDY CARVER:

Thank you, John.

Okay. And we are running down -- we're running out of time, and I do see more questions being added in.

We're going to try and prioritize those people who haven't had a chance to ask a question yet.

Next question, please.

I believe it's from Ahmad.

BECKY MCGILLEY:

Yes. From Ahmad.

I am not sure if this question is appropriate for this forum, so please let me know if it isn't.

There has been a very heated discussion lately in ISOC, Internet policy forum, about the possibility that the U.S. government can

exert some hindering effects on ICANN's work due to political agendas.

The counter argument was that the way the U.S. judicial system operates is one of the security measures to prevent any such events.

Has ICANN formulated an opinion in that regard? And has there been an effort -- discussion -- on removing ICANN from under any specific government's jurisdiction and putting it under a sort of international treaty?

GÖRAN MARBY: Can I answer, please?

MANDY CARVER: Of course, Göran.

GÖRAN MARBY: And, of course, you can fill in or correct me.

I mean, without seeing the -- how -- I'm not even American, so how the U.S. government acts upon this is something that my other expert could say.

But to reverse it is that we have received a lot of support over the last couple of weeks from several countries around the world, the whole European Union stood up in support (indiscernible) the (indiscernible) of fronts. And remember, the European Union are the member states. The European Commission is sort of the civil servants of the E.U. So that was a very strong message. And several other countries, which I think also included the U.S. government, gave the support for the policies we're doing.

The jurisdictional question, in general, is, as long as we don't place ourselves on the moon or -- which I hear has -- is not a very good thing -- we are always under some sort of legislation.

The answer to treaty, that is the U.N. system. And we believe that the ICANN system belongs -- are peers to the system in those issues. And we believe we fight all the time to make sure that -- for the independence of this group. And we do that with the support of local jurisdictions, but also with other countries around the world.

Remembering that when the transition happened in 2016 -- and I don't know the numbers. Maybe Mandy knows how many countries that through the GAC undersigned the role of ICANN. And that is really a really strong mandate from countries around the world who chose the support of it.

And thank you for enlightening me on discussions within ISOC. ISOC and ourselves, ISOC is a very part of this ecosystem for these discussions to happen. So thank you.

MANDY CARVER:

Thank you, Göran.

We are at time, and so I really want to thank the community for the participation and the robust number of questions. I apologize if we weren't able to reach everyone's question, but we will -- I encourage you to write in. We will also, as I said, have these as a regular basis.

Just quickly, in follow-up to what Göran said, there are 179 governments, countries, and specific economies represented in the GAC currently, plus 38 IGOs. It is the multistakeholder model that enables us to do what we do. And that includes the participation of governments, but also all of us. And as Göran mentioned, the kind of IGO model to make us a treaty organization, those are multilateral. Those are only governments talking to and voting on issues. And so we maintain the importance of multistakeholderism rather than a transition to being a treaty organization. And as Göran rightly noted, it doesn't matter where you are, you're under somebody's jurisdiction.

So, again, thank you, all, for your participation. I want to thank the community for their time and interest. And I really want to thank the -- my whole team, plus all of our colleagues and the executives who participated here today.

Much appreciated.

And with that, we're going to have to close out the session, because I realize we're slightly over.

Thank you.

[END OF TRANSCRIPT]