ICANN Transcription
RPM Sub Group B
Thursday, 09 July 2020 at 17:00 UTC

Note: Although the transcription is largely accurate, in some cases it is incomplete or inaccurate due to inaudible passages or transcription errors. It is posted as an aid to understanding the proceedings at the meeting, but should not be treated as an authoritative record.
Attendance and recordings of the call are posted on the agenda wiki page:
https://community.icann.org/x/igcdC
The recordings and transcriptions of the calls are posted on the GNSO Master Calendar page:
https://gnso.icann.org/en/group-activities/calendar

JULIE BISLAND: Good morning, good afternoon, and good evening. Welcome to the RPM Subgroup B call on Thursday, the 9th of July, 2020.

In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room.

I would like to remind everyone to please state your name before speaking for the transcription and please keep your phones and microphones on mute when not speaking to avoid background noise. As a reminder, those who take part in multi-stakeholder process are to comply with the expected standards of behavior.

With this, I will turn it over to Zak Muscovitch. You can begin, Zak.

ZAK MUSCOVITCH: Thank you very much. I see we have a rather light group but key people here, so why don't we just start off with the usual: any updates to statements of interest.

Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.

Seeing none, let's move on to the wrap-up summary from the July 2nd meeting. Ariel, is there a wrap you'd like to briefly provide us with?

ARIEL LIANG: Yes, Zak. Actually, Julie, are you displaying the public comment analysis document? Or you'd like me to display it?

ZAK MUSCOVITCH: Can you say that again, Ariel?

ARIEL LIANG: Oh, I was just asking Julie if she would like me to display the doc because she's sharing the screen.

JULIE: Sorry. Slow in coming off mute. I'm happy to display that document. One moment, please. Let me make sure I got the right one.

ARIEL LIANG: It starts from URS Recommendation 7. In last week's call—

JULIE: [Let me get to that point.]

ARIEL LIANG: Yeah. Thanks, Julie. The subgroup reviewed three recommendations last week and also one question. Most of the comments are that the recommendation will be maintained as is but the subgroup has also suggestions. Then, for Recommendation 7, there is a suggestion for tightening up the recommendation language. If you can scroll down, please, Julie, to Recommendation 8, please. For Recommendation 8, the main suggestion is for the working group to also look at the subgroup's deliberation on URS Question #5 because there may be some implementation guidance related to comments that the working group may want to take into consideration. That's mainly related to the question being asked in URS Question #5.

There's one action item for staff: to follow up with Tucows about their comment. Their comment is about that URS should not allow the inter-registrar transfer policy to be bypassed. So Tucows got back to us very quickly and confirmed that their comment is in response to URS Question #5 because, unfortunately, that question didn't have an open-ended box for them to provide further comment for their choice. So we [haven't] completed that action item.

We also noted to Tucows about their comments regarding removing the reference to registrars in many of their URS-related comments and also the subgroup's understanding that it's not correct because the registrars are involved in the URS process. They didn't really provide any further comments on that note.

If we can scroll down, please, Julie, to Recommendation #9, please … #9, please , for Tucows. They provided further notes on Question 5. So, for 9, there's also maintain-as-is, but then we

have noted a couple of comments from CPH, for example, that may be helpful for inclusion in the implementation guidance. The subgroup's recommendation is for the full working group to look at all the comments across the board.

Another thing I want to note is from yesterday's meeting from the full working group. I think there's a note from Kathy that one of the URS individual proposals that is actually related to this recommendation, so we may need to update this recommendation after we review the notes related to that particular proposal and maybe consider consolidation. So I just put a note there for further work.

That's pretty much it for the wrap-up.

ZAK MUSCOVITCH: Thank you, Ariel. What I suggest is that the subgroup members, if they can after the call and before the next working group or subgroup meeting, if applicable, share any thoughts about these summaries or questions on the lists so we don't have to spend time with it today because the main event features six different items: one recommendation and five questions. You'll recall that we start off doing two of these a week/a session, and now we're going to try to do six today, which is a tall order. And it may not be possible.

However, there's a bonus if it is possible. If we're able to compete all six of these items today, we do not have to have a Subgroup B meeting next week. That's an enticing offer, in my view, so we

should all try to roll in the same direction to get through these as much as possible.

To that end, of course participation is always welcome, as per usual, but keeping the comments and interventions and short and not duplicated can take us a ways, as taking a beverage to smooth you out during this upcoming call and trying to remember that our job as Subgroup B is limited. We don't need to solve the great issues. We need to just ascertain whether the recommendations and questions provide us with anything new and material or unexpected opposition that we should flag for the entire working group. So we have modest obligations in that respect, so we don't need to get terribly involved in all cases.

With that, let's kick off this escapade with URS Recommendation #10. We're going to have that on everyone's screen. It's a short recommendation so, as everyone is tuning in, I'm just going to read it out for all of our benefit.

Recommendation #10: The working group recommends that clear, concise, easy-to-understand information and materials should be developed, translated into multiple languages, and published on the URS provider's website to assist complainants and respondents on URS proceedings. Such information should include but not be limited to 1) a uniform set of basic FAQs, 2) links to complaint response and appeal forms, and 3) reference materials that explain URS provider services and practices.

So this is a URS recommendation made by the working group as a whole, so, by definition, it initially had the support of the working group. So what our task is right now is to characterize the public

comments and determine whether anything new in terms of a fact or argument or unexpected oppositions from different stakeholder interests should cause us to flag anything in particular to the working group as a whole or just punt this to the working group as is.

I'm just reading the comments. Rebecca, if you need anything repeated, just please ask.

Does anyone care to volunteer to characterize the public feedback from the comments here from our purposes? If not, I'll do it, but I'm looking for a volunteer. Welcome, Susan. Any care to characterize this for us?

Okay. Seeing no hands, I'll take a stab at this. Doesn't look terribly difficult. There's a lot of support by the numbers at least—support as written: 58% in the concept. 9.1% …

Let's go take a quick scroll down to the do-not-support and significant change aspect to see the feedback from there. We have George Kirikos who indicated that he believes that URS should be entirely eliminated. We have [Ted Chang] to drop the whole URS nonsense and then a few other people that didn't provide comments for their opposition. Then you have considerable support as written with some caveats. We see from the IPC that provider should be allowed to provide initial resources that may be useful. And the Chartered Institute—I'm just picking randomly; no particular favorites—of Trademark Attorneys said, "No translation needed as an obligation. If needed, funded by ICANN." The Tucows: "ICANN URS providers should together develop these materials. And then concern[ed] clarification from

The FORUM and Richard Hill. There may be issues with how these materials fit within the current provider's website. From WIPO: "[inaudible] #1. A uniform set of basic facts."

So somewhat mild, but criticisms, nonetheless. But if we also look at URS Question 6 it's related because this question comes up. [inaudible] result of Recommendation 10. If materials are to be developed, URS Question 6 asks, "Who has the responsibility for developing the uniform set of basic FAQs?"

So I can impose Julie just to briefly put URS Question 6 up on the screen so we can just see how it interplay with Recommendation 10. Who has a responsibility for developing the uniform set of basic FAQs for URS complainants and respondents? So this is where we have a discussion of, should it be ICANN Org, ICANN community and providers, etc.? So bear that in mind when we're discussing URS Recommendation 10, which isn't so much a discussion of who's responsible. It's about rather just that materials should be developed.

So I would characterize this as subject to objections or complainants or different characterizations from our subgroup members that this seems to have considerable support such that it be maintained as is and referred to the working group. Perhaps there are some caveats which should be added. So, if people believe there are some caveats that should be added to that, by all means.

I now see Phil Corwin has his hand up, so I'll invite Phil to briefly opine on this. Thank you, Phil.

Phil is double unmuting himself.

PHIL CORWIN: Sorry. I forget to double unmute. I unmuted my end but I don't do it twice sometimes. Sorry. Let me go back. What I was saying is I'm agreeing, Zak, that there's broad support for some basic materials. We'll get to who should develop those when we look next at Question 6. But all the responses to Question 6 pretty much say ICANN Org should be involved [and then as who else]. So we're talking about uniform materials prepared by ICANN in collaboration with others. I think some of the suggestions are helpful for fleshing this out, for sending it up for a consensus call. I think the IPC suggestion that these materials should be not exclusive and shouldn't prevent any provider from providing additional materials they think may be useful is a good one. I think ICANN's translation resources at putting this in their standard U.N. languages is not going to be difficult or particularly costly to have those resources, so those concerns are overblown. I think Tucow's suggestion that the English version be the authoritative one from which the others are translated is consistent with ICANN practice and useful for fleshing this out.

Other than that, the only question, I think, is that some people are concerned about the set of basic FAQs. We might say it's up to debate whether we should keep the language "should include but not be limited to," which was broadly supported, or whether we should make it a little looser and let the implementation team decide what the most useful materials should be. But with just a little bit of definition and detail added from the comments, I would think this one clearly goes forward to consensus call. Thank you.

ZAK MUSCOVITCH: Thank you, Phil. If I can just follow up with you, if, in your view it's clear that it goes forward as is for the purposes of the consensus call but there's aspects to some of the comments that should be considered for implementation, is it as simple as flagging that to the working group such that it's as is but Subgroup B recommends the working group take note of all of these various minor suggestions and pass them along to the implementation review team, or did you have something more specific in mind? [There's a lot of them].,

PHIL CORWIN: Well, those were the ones I thought were helpful, Zak. If anyone in the subgroup thinks one of them that I named isn't helpful, that I missed something … But I think we know that staff can capture the discussion and provide us with a somewhat more fleshed out recommendation based upon community comments for consideration at the final stage. So I think that's all we need to do at this point.

ZAK MUSCOVITCH: Okay. Anyone else care to provide a view on this URS Recommendation 10 before I take a stab at wrapping it up and moving on?

I see Griffin agrees with Phil. And Ariel has her hand up.

ARIEL LIANG: Thanks, Zak. I just want to quickly note that CPH has made a comment asking the working group to consider consolidation between Recommendation 10 and Recommendation 6. That was noted when the subgroup was deliberating on Recommendation 6. So I'm just wondering we should mention that again in the context of Recommendation 10: consider possible consolidation with the other recommendation.

ZAK MUSCOVITCH: Thank you, Ariel. Thanks for reminding me of that. That seems to be the answer to your Recommendation 6. Let's see. It's up on the screen now. "A uniform set of educational materials be developed to provide guidance, etc., etc. As implementation guidance [inaudible] checklist, templates, and FAQs for all the different parties [inaudible] procedure." So it makes sense to me to consolidate these.

Does anyone have any—oh, I see Kathy has her hand up. Kathy, please go ahead.

KATHY KLEIMAN: Can you hear me? I may have a board connection on my back porch.

ZAK MUSCOVITCH: Yeah.

KATHY KLEIMAN: Oh, okay. Good. You're going to hear some sawing in the background. Sorry about that.

ZAK MUSCOVITCH: Good.

KATHY KLEIMAN: As we interpreted URS Recommendation #6, it was really guidance for the examiners and talking about the clear and convincing burden of proof. This Recommendation 10 seems to be much more about FAQs and background for parties/practitioner—general information for participants in the process, not those who are deciding. So I think we have to not lose some of the nuances here, that, really, when we talk about 6, I think it was much for education for examiners and this is much more about broader background. So, as long as preserve all of that, I'm happy.

ZAK MUSCOVITCH: Right. Indeed. Kathy, thank you for pointing out the different emphasis between the respective recommendations. Perhaps the solution is to maintain their distinctions but consolidate them just sequentially. In other words, they're grouped together rather than dealt with entirely separately.

KATHY KLEIMAN: That sounds really good.

ZAK MUSCOVITCH: Yeah? Okay. Anybody have any further thoughts on that?

Okay. I'm just reading comments to make sure I catch up. "Perhaps they follow each other. [Joint in] sequence." Okay, good. So it looks like we're on the same page.

Now, just in terms of providing some guidance to staff on how to encapsulate these deliberations, I'm going to take a stab on that based on what Phil had suggested and received some support in the chat on, which is that URS Recommendation #10 be referred to the working group as is, subject to the working group reviewing certain proposed changes and concerns involving translation, the non-exclusionary aspect of these materials, and having regard to the cost issue, which is more specifically dealt with at URS Question #6? Yes.

The second aspect of the encapsulation for deliberation is that URS Recommendation 10 and URS Recommendation 6 be consolidated sequentially while maintaining their distinct emphases.

Okay. That wasn't exactly Wordsworth, but did it more or less capture what you had intended, Phil?

PHIL CORWIN: Sounds good to me, Zak. Thank you.

ZAK MUSCOVITCH: Okay. Thanks very much. All right. Let's put Recommendation 10 to bed and bring up URS Question #6. Who has the responsibility

for developing the uniform set of basic FAQs for URS complainants and respondents? Although cost is not specifically, expressly dealt with, I believe that who develops it necessarily involves a burden of cost.

So there's some discussion that may be appropriate, but we see here that there's quite a lot of [blue] different answers. Some people are saying ICANN and providers should be responsible—twelve people. ICANN Org itself should be responsible—ten. And ICANN Org and the ICANN community—eight. Providers—three. ICANN community—one. Then 17 non-responses and some other small number of responses.

So the feedback runs the gamut here. We have, for example, Tucows saying, "ICANN and the URS providers should together develop the materials." We see Jason agrees with that, and we see that [Marks] says, "ICANN should cover the cost and actively engage with URS providers." We see the Domain Name Rights Coalition says, "Providers and ICANN should share the rather light responsibility for developing the set of FAQs but they should be translated into all languages—key ICANN documents." We see the Electronic Frontier Foundation: "ICANN in conjunction with URS providers." Then we see a whole bunch of individuals and other people saying that it should be ICANN that takes responsibility.

So we need to know characterize this. Does the feedback give us any insight or facts or viewpoints that we should pass along to the working group? Is there a way to characterize this, such as—I'll put this out as a strawman—that the public comments from URS Question #6 involved different perspectives ranging from "ICANN

and providers be responsible for preparing the materials" to "involve the ICANN community in addition to ICANN and the providers"? So that's how I suggest as a strawman it be characterized and leave it at that.

I see a comment from Griffin in the chat: "Seems to me for Question 6 that this could be done as part of the IRT with staff preparing materials with input from providers." Then I see Cyntia King: "I think this is pretty straightforward and I agree with Griffin that we should let the IRT decide the specifics."

So what we're hearing—I'll [go over] to Griffin momentarily—from these two individuals in the chat, possibly Griffin in person, is that, rather than decide who's responsible, that should be matter for the IRT alone to decide, rather for the working group to make any recommendation on it. I'll go to Griffin. Please.

GRIFFIN BARNETT: Thanks, Zak. Just to speak a little bit to the comment that I put in chat that you read part of, I think we saw from the responses to Question 6 that it seemed like there was a lot of coalescence around the idea that ICANN Org should be holding the pen, so to speak, but with participation and input in the development of these materials from providers in particular and then, to some extent, oversight and feedback and participation from members of the community. It strikes me that that's more or less exactly what the IRT that will come out of this working group or follow this working group is essentially composed. Its IRTs are typically led by ICANN staff, so that would be representing ICANN Org. We've seen in other IRTs that they're capable of holding the pen on some of

these types of implementation materials. Obviously, within the IRT, there are also obviously community members participating who help to guide those efforts. In this case, I think we would anticipate members/representatives of URS providers to participate in that IRT, just like they participate here in this working group in addition to many of the other community representatives that are here participating in this working group who would also be likely participating in the subsequent IRT.

So how do we capture that in terms of what we send up to the working group? Maybe we can say, “Based on the feedback that we received on this question, it seems like this could be a task that can be conducted by the IRT, “and potentially leave the door open for the IRT itself to hold the pen, essentially, to produce the recommended set of FAQs. Obviously, they would also have the flexibility and freedom to consult with additional parties outside the IRT itself if additional input were needed. For examples, if there were providers, for instance, that were not represented in the IRT, they could certainly send materials, I think, out to those providers for feedback. So hopefully that’s a helpful suggestion on a way forward here. Thanks.

ZAK MUSCOVITCH: Many thanks, Griffin. Cyntia, please go ahead.

CYNTIA KING: Hi. Can you hear me?

ZAK MUSCOVITCH: Yes.

CYNTIA KING: Oh, yay! My microphone is working today. I understand what everyone is talking about—holding the pen and so forth—but frankly the reason I think that the IRT needs to be the group that handles the specifics is that each one of the providers already has some materials. It seems like it wouldn't be necessary to reinvent the wheel here: with the groups sharing information, a short set of consistent documents could easily be generated, and all appropriate parties would have immediate sign-off. So, to me, it just makes sense that these folks use what they've already got and they know what that is. Thank you.

ZAK MUSCOVITCH: Thank you. Unless there is a significantly viewpoint than Griffin and Cyntia provided verbally—I also see there seems to be some agreement in the chat as well—I'm going to take a stab at encapsulating that for staff's benefit. I see another comment from Kathy here that the IRT should reach out to all parties. Okay. This is what I'm going to propose a strawman, subject to any objection, etc.: based upon the public comments in response to URS Question #6, Subgroup B believes that the IRT composed of ICANN staff and stakeholders and providers is equipped to develop the materials and that, if necessary, it may choose to reach out to interested parties.

Satisfactory? Looking for hands or comments.

Griffin: “Sounds good.” Anybody else? Jason Schaeffer: “Agreed.” Paul Tattersfield: “Fine.”

Well, this is overwhelming support. We’ll go with that. URS Recommendation 6 is put to bed. We are making good time, but we have some obstacles ahead, so we have some more difficulties. So we have to keep our eye on the ball here as we more to URS Question 7. I’m going to read this out because it’s relatively short.

URS Question #7: “What mechanisms do you suggest that allows a URS provider to efficiently check with URS and UDRP providers in order to ensure that a disputed name is not already subject to an open and active URS/UDRP proceeding?”

Just to put this into context, my understanding of the reason or the concern that has led to this question is that a party/a complainant would file URS by submitting its URS complaint to the provider. Then the provider would then, after administratively reviewing the URS complaint, ask the registry to lock the domain name. So, at some point, there was a concern that, well, what happens if a URS complainant is commenced when there’s already another complaint in respect to the same domain name? Sounds unlikely but it could happen. So the question that we’re trying to get at with Question #7 is, is there a mechanism for ensuring that there’s not some kind of duplication of complaints or there’s some way of providers knowing whether one has been commenced already?

We some answers to this question/concern in the summary of the public comments. For example, AIM, the European Brand Association, says, “While the parties must notify the arrest

provider of any concurrent proceedings, if a registrar received a complaint—it tries to lock a domain name—the registrar should inform the URS provider."

I think that might be referring to registry, primarily, but essentially the gist of this public comment—it's echoed in other ones—is that, well, when the registry receives the complaint from a URS provider, it will already have known that a complaint has been commenced because it would have been contacted by another provider and possibly already locked the domain. So the registry really is the party that is able to notify the provider.

Now, there's some other comments about how to deal with this issue, and that's to have a database of cases pending, maintained by ICANN and otherwise, so that parties can all check to see amongst all the providers if a URS complaint has already been commenced.

So that's the gist of the comments and the issue as I see it. Does anyone else care to provide some further insight or corrections to that characterization?

I see Cyntia is going to help us out. Please go ahead, Cyntia.

CYNTIA KING: Hi. Thank you. I have a couple of thoughts here and I'd like to put them before this esteemed group and let you guys give me your thoughts. When I first saw this, I saw, "Wow, this is a slam dunk." Then I read the comments and I saw that there was a lot of nuance here. Frankly, it left me a little bit more confused than when I first saw the question because I understand that each

registry would be responsible for locking the domain. So it seems typical or logical that you could just to go the registry and say, “Hey, is there something going on with this domain?” But not all registries are equal. Some registries are very good about this kind of thing, especially with the expansions of the gTLD. There are others that may or may not be as circumspect in their recordkeeping and whatnot. The idea of a centralized database would not have been my first thought because it just seems like now you’re creating something that has to be managed and maintained because we know that the key factor in good information is the maintenance of the information. So that did not seem like my first choice.

But, after seeing how people were confused about registrars versus registries locking domains, expansions of the gTLDs, and recently gTLDs being moved between parties because some gTLDs are faltering and whatnot, it really just seems to me that we might have to go with something more centralized and easily manageable and something that can be enforced instead of a hit-or-miss, registry-by-registry approach. What do you think?

UNIDENTIFIED FEMALE: Zak, if you’re speaking, we can’t hear you.

ZAK MUSCOVITCH: Well, you missed some really good material. Thank you. Cyntia’s preference appears to be that there be a centralized databased approach. As David McAuley mentioned in the chat, there is, in addition to that—in addition to the registry’s note of fine [to] the

provider—there's a third option that's been presented by the public comments, and that's that the parties notifying the URS provider. So these are the three general options provided by way of the public comment feedback. However, our job really is not necessarily to determine this but to see what form of a referral to the working group we should make based upon the public comments.

I see Phil Corwin has his hand up. Please go ahead, Phil.

PHIL CORWIN: It's #7 here. Part of it is blocked at the moment. Can we show The FORUM comment in full? Yeah. The FORUM, which is the leading provider, is telling us that they discover current URS and UDRP proceedings upon verification from the registry or registrar, which is the standard part of the URS process, because the domain name will already be locked prior to the commencement of the second case.

So they're saying, "Hey, we [find it out] pretty fast, as a matter of course, because we'll be told the domain is already locked because of another pending case that's been filed." Then they say the pressing question is, "What should we do when there's a concurrent case?"

So we may be overthinking this. If providers are already finding out through a notification from the registry or sometimes the registrar that the domain name in question has been locked due to an open case, they're finding it out. Why do we need to create something more complicated to do it? Well, I guess they're saying

there's a gap in the current URS rules and procedures about what to do when they find it out. It would seem to me they would need to suspend the second proceedings until there's a resolution of the prior one—the one that was commenced [first].

So I thought we should focus in on that comment and discuss what that means for our consideration of the responses. Thank you.

ZAK MUSCOVITCH: Thank you, Phil. I see Renee has her hand up. Renee, you seem like a rather apt person to provide your perspective on this, so please go ahead.

RENEE FOSSEN: Thanks, Zak. I like to see where everybody is going with before I provide my two cents. I don't want to have too much influence based on being a provider. But as also stated in our public comment, the rule itself says that we're supposed to be informed of that, so that does put some of the burden on the parties themselves to do that research and figure that out—

ZAK MUSCOVITCH: Renee, can I just stop you there?

RENEE FOSSEN: Sure.

ZAK MUSCOVITCH: Because I just want to clarify for the group. When you're saying there's a burden or an obligation on the parties to inform, can you just explain that a little bit more? Because there were a lot of comments, as David pointed out, that suggested that the obligation is on the parties. Can you just explain how that works a little bit more for us?

RENEE FOSSEN: Sure. As part of the complaint for URS and UDRP, the complainant is to identify any other legal proceedings. That would include an additional URS and a UDRP [matter]. So there is somewhat of a burden based on those rules, which are cited in our public comment, that the complaining party should do some research on that and bring it to us and let us know. The second piece is, of course, that we are able to discover that pretty early on in the process, as Phil pointed out, by asking for verification from the registry or registrar, depending on how has the registration information. But we do have a third step, where we do a little bit of research on our own to find out if there is another pending matter. I think we talked about that through the course of our deliberations on these issues. So there are basically three steps there. It doesn't happen that often, but the question that I ask at the end is, yeah, I think it is first come, first serve.

But the other issue that happens is I think there is a strategy to bring the domain down quickly with a URS. Then some parties like to follow up with a UDRP. So, if it's already suspended as a URS and they want to transfer it now with a UDRP, that becomes very difficult for parties because it's the two different levels of registry versus registrar, and getting that suspension unlocked to the

UDRP—the transfer—is difficulties for parties. So I just wanted to bring that to the attention of the group. Thank you.

ZAK MUSCOVITCH: Thank you, Renee. I'm just going to recap some comments from the chat. Cyntia states, "Is the lock the result of a successful court action? Is it the result of an ongoing URS/UDRP still being [decided]? These issue could make a difference?" Griffin says, "Zak, I believe there is a requirement to make the representation in the URS and UDRP complaint."

So I think from what Renee was saying is that, in terms of the parties, if they had brought a prior proceeding, they would have to dispose of this part of their complaint materials. But that still leaves the possibility of a third party, not this particular complainant but an unrelated complainant, having already brought a URS proceeding. I believe Renee was saying that that would generally be caught by when the registry informed the provider that there was already a lock or, if not, then a diligent provider doings its own review of other providers' sites, for example.

So, getting back to Phil's point, which Renee emphasizes, it may be that the real issue is, should we tell the working group to come up with a rule about what happens if there's concurrent proceedings because the system already more or less identified prior filed proceedings. Maybe that's the issue that we refer.

I'm going to see … Renee, you can lower your hand, unless it's a new hand. If it's a new hand, please go ahead. Otherwise, lower it. Okay, it's lowered. I see from Paul Tattersfield: "If it's the same

party, URS and UDRP—[they should now surely].” That’s right. I think that the parties would include it in their complaint or at least are required to. Griffins says, “Yes, I think the issue is more that some unrelated party may have a pending action.”

So I’m going to try to bring this back to where we started, bearing in mind this is one of the simpler issues that we’re dealing with today. I’m going to propose that—I’m more than open to objections and criticisms on this, please—as a strawman to this subgroup that the referral to the working group be as follows. Based upon the public comments in response to URS Question #7, it does not appear that there is a significant issue in identifying prior complaints either by way of the party’s disclosure of the to the provider or by the registry notifying the provider of [the same]. However, the working group may wish to consider a different issue, namely whether a rule should be proposed to deal with concurrent URS and UDRP cases relating to the same domain names. So that’s what I propose as a straw person.

I think Kathy Kleiman has her hand up. Please, Kathy.

KATHY KLEIMAN: Can you hear me now? Still having some Internet problems.

ZAK MUSCOVITCH: Yeah. Good enough.

KATHY KLEIMAN: While I think what you say makes sense, questions—

ZAK MUSCOVITCH: Sorry, Kathy. We're losing you a little bit, so just try again in case anyone had difficulty hearing you.

Take a moment, Kathy, in case you can go into range or something.

Okay.

UNIDENTIFIED FEMALE: Otherwise, Kathy, I'm happy to dial out to you if that's an option.

ZAK MUSCOVITCH: All right. Kathy, give it another shot if you could hear us, or indicate in chat to get a dial out. We want to hear from you on this. We won't live this right away, so you have a chance.

In the meantime, I'm just going to go to the comments. I see a comment from Cyntia. "In my experience, a successful court case against a [inaudible] infringer with many domains has locked their portfolio, but another party[s] UDRP has been domain-infringing their mark. This was the situation with [Jeff] [inaudible] [portfolio]." David McAuley [inaudible] Kathy's audio." Julie says, "Looks like we lost Kathy."

Okay. We're going to give Kathy a chance to respond to this, but in the interim, does anyone have any objections or criticism or improvements to the way that I had framed this as a recommendation/referral to the working group? Then we'll give Kathy a chance to revisit it down the road.

KATHY KLEIMAN: I'm back in, Zak.

ZAK MUSCOVITCH: Okay. Kathy, please. Okay, great. Go ahead.

KATHY KLEIMAN: Where did I cut off?

ZAK MUSCOVITCH: I was just trying to [inaudible] until you came back.

KATHY KLEIMAN: Thank you. I've come inside now. So much for trying to be outside and online. Oh well. Can I ask you where I cut off?

ZAK MUSCOVITCH: Just start fresh because we barely heard anything.

KATHY KLEIMAN: Okay. I apologize. And thanks for waiting. With a quasi-Co-Chair's hat on, I wanted to say that opening up the possibility of a new mechanism based on a question—questions weren't even recommendations … So to create a recommendation from a question is really weird.

Griffin, what I'm concerned about is that we're opening up a whole new mechanism for the working group to talk about that may lead

us … And we don't seem to have an evidentiary base for doing it. I'm not seeing a present problem here, and it may take us enormous amounts of time to debate the results of the question that wasn't even a recommendation and that isn't based on a problem. And we're going to try to find a mechanism, and we may be here until December or the new year if we do that. So I'm a little worried about opening up new recommendations and ideas based on new questions.

I like the first part of the recommendation, Zak: that there's nothing really coming from the answer to this question that shows there's a problem. Thanks.

ZAK MUSCOVITCH: Thank you, Kathy. Before you go, is your concern the second part of how I proposed it, which is that the working group may want to consider whether there should be a rule for dealing with concurrent URS and UDRP cases? Is that the thing that you don't want to get involved in?

KATHY KLEIMAN: Yes.

ZAK MUSCOVITCH: I see. Okay.

KATHY KLEIMAN: I don't because I don't see that it's something that we created as a recommendation and I don't see it being driven by the question

and the answers. I think it could take a long time. So, yes, thank you for narrowing it down.

ZAK MUSCOVITCH: Okay. So we have before us a modified proposal, which is to advise the working group that, based upon our review of the public comments in response to URS Question #7, it appears that, generally speaking, there are three means for a provider becoming aware of a prior proceeding, namely A) the complainant will respond [to] disclosing as part of the requirements to the proceeding, B) the registry advising the provider [of the same] based upon its own knowledge, or C) some diligent review of other pending proceedings at other providers. Based upon this, that does not seem to be an issue that needs further attention. [We'll] leave it at that.

Griffin Barnett? Okay. So we'll go to Griffin. Let's see if we're close to wrapping this one up and moving on. Griffin?

GRIFFIN BARNETT: Thanks, Zak. I don't disagree. In fact, I–Kathy invoked my name for a reason that I'm not sure about—think I would actually agree with what you said and I think what Kathy was saying, too: I think, ultimately, based on what I've seen from particularly The FORUM's comment here, it sounds like the answer here is that there is actually not a problem. Or, if this situation that I think we considered asking this question does occur, there's really already means by which to address it.

I guess the only caveat that I would had that we heard from The FORUM that they have basically a process for dealing with this, which is good. The only other potential question there is whether the other providers are doing the same. As long as that's being dealt with, then I think there's really no problem here that we need to address. So that's all I wanted to add. Thanks.

ZAK MUSCOVITCH: Thank you. It seems like there is some degree of agreement on how [I've] amended the framing of it, but I just want to turn back to Cyntia momentarily, if I might. Cyntia, this is a ten-second warning that I'm turning to you. You had originally raised an issue that you thought the databases may be required based upon your reading of the comments. Now, having heard from NAF and from your fellow Subgroup B members, does that remain a concern or do you feel comfortable with the new amended framework that we've proposed?

CYNTIA KING: I think the framework is fine. I realize we're allowing this question to go to the group on the basis of what happens most often and not every single case. For example, Paul is asking about the locking of the portfolio that I was explaining to him, whether it was a URS. No. The original lock was a court lock, something pursuant to a court case. Then other folks who were trying to URS or UDRP those domains in a portfolio did not know what was happening with those domains. I get that this is an unusual circumstance, but I've seen it happen more than once.

So I think we're just going to have to leave it to the wisdom of the crowd, of our group here, to make the decision. The decision that you guys have mentioned seems doable. Thank you.

ZAK MUSCOVITCH: Okay. Well, satisfactory is our objective. It's never much higher than that. So I think we can go with URS Question #7 and put that to bed. Staff, back in the transcript or in your notes, you'll see how the amended referral was phrased, so I'm not going to try to reconjure that one up now. Thank you.

We're going to lose Ariel shortly and it's going to be Julie who's going to be single-handedly doing this.

Now we can move on to the next [DRD], and that is URS Question #8. Just so you know, this is a question that I had no idea what the hell is meant, so I had to research this a little bit. I'm going to read this out to all of you liberal arts majors.

"The working group recommends that public comment be sought from registry operators on the following question. 8A. What issues have you encountered with respect to implementing the HSTSP-loaded domain suspension remedy, if any? 8B. What would need to be done to help resolve the issues you have encountered?"

So you can see that there was only one public feedback, from George Kirikos, on this. He had indicated that he had identified this technical issue way back when. I did go back and review these comment. I hope you have, too. It's probably best … There's some notes here. [Ariel, in] context." So let's just read this out to the group. HSTSP-loading is a function built into the

browser whereby a global list of hosts enforce the use of HTTPS only on their site. This removes the opportunity an attacker has to intercept …" Well, this is fairly long. I'm going to ask you to read it yourself. But I have the original e-mail in front of me from George Kirikios, where he succinctly sets up an example of the problem, so I'm just going to share that with the subgroup. This is from his e-mail on Thursday, May 17th, 2018, which he referenced in his public comment—one of the three.

He says, "As members of this [community] appear where, after a complainant wins a URS dispute, the URS provider is supposed to create a suspension page for the domain name. For example, two of the three URS providers—the third doesn't seem to have any [activity] …" He gives examples of the suspension page. Then he says, "However, Google recently launched .app, which has a unique feature, namely that the entire TLD is on the HSTS[P] preload list. The .app top-level domain is included on the HSTSP load list, making HT[T]PS required on all connections to .app websites. This means that, unless the URS providers launch HTTPS versions of their suspension pages, the HTTP version won't be accessible for .app domains. Given the relatively high number of .app domains that were registered already, one would expect .app URS complaints to be forthcoming."

So that is the issue in a nutshell. I see Renee Fossen has her hand up. I hope she's going to navigate us out of this situation and explain to us what the issue is, if any. Renee?

RENEE FOSSEN: Thanks, Zak. Well, I think that George's comment where he mentioned me specifically was out of context because it had nothing to do with this question. It had to do with the provider's ability to publish those domains on the HTTPS protocol, which I shared with the group months back—the new technical specifications put forth by ICANN and adhered to all the providers, where we now have a shared plate where we're suspending these domains and it does support both of the protocols. So, from that respect, it is moot as far as the providers are concerned.

But this question goes to the registry operators and if they have any problems with implementing the suspension. So that would be the information that we're giving to them where they should point for the suspension site. So, if there was no feedback on that, I don't think there is any problem. So I still think that the issue would then be moot. Thanks.

ZAK MUSCOVITCH: Thank you, Renee. What Renee has said, if I may paraphrase, is that URS Question 8 is directed specifically to registry operators and asking them if they have had any problems with the implementation of HSTS preloaded domain suspensions. No registry operators provided any feedback at all.

So my question to this subgroup is, having reviewed URS Question #8 and having reviewed the feedback to URS Question #8, is there referral that you would like to make to the working group regarding this?

I see a note in the chat from Kathy. I see, “We need to put Question 8 to bed,” from Griffin. Philip Corwin has put his response into one of the U.N. official languages and said, “Nada.” A no from Susan Payne.

Any other contrary views that we should consider this or look into this further?

Okay. Thank you. Based upon the lack of feedback from the registries, it is Subgroup B’s view that no further action is required by the working group. Thank you.

We’re now moving on. URS Question #9. This is the second-to-last one. We have only 30 minutes left. Remember that our job here is not to solve these issues necessarily because we’re only the lowly subgroup. We are to determine whether, based upon our review of the public feedback for URS Question #9, there’s something different that arose in terms of a factor, perspective, or issue, or opposition that merits us flagging this to the working group as a whole.

Now, URS Question #9 says, “Are the non-refundable late responses paid by respondents reasonable?” You know what they are because staff has put it right into the question for our ease of reference. It ranges from 200 bucks, 100 bucks, 225, 200 euros, etc. Those are the fees.

Now, I’ll just remind you that the reexamination fee would occur when a URS respondent finds itself in a default, having not filed a response within the initial 14-day period. It goes to the default decision. Then the respondent has six months to ask for a

reexamination by paying the reexamination fee. The reexamination extension fee would be [occasioned] when the respondent needs an extension of the 14 days, for example. They would have to pay an extension fee that way or would have to alternatively, I believe, try to extend that six-month period.

So those are when these fees would come into play. The question is, are they reasonable? Let's take a look at the feedback. "Reasonable": 30%, numbers-wise, for what's it worth. "Reasonable but" gives it another 5.5. "Unreasonable": 12.7. So we have some comments primarily from the brand owners interests, which say, yes, these are reasonable, low fees, and very occasioned by the additional work that's involved by the provider. Then we have the other viewpoint, which is from non-commercial users and other groups, such as the Electronic Frontier Foundation. It raises concerns about the global south: someone registers a domain name for 10 bucks and they all of a sudden get hit with a $200 U.S. fee, etc.

So there seems to be very different viewpoints about this, so I'm now going to ask the group, what should we do about the feedback to URS Question 9? Is there referral we should make to the working group? Is there something we should flag to them? Were the results clear in any respect that we can identify for the working group?

Kathy Kleiman, please.

ZAK MUSCOVITCH: Thanks, Zak. Not with my Co-Chair hat on in any way, shape, or form, I think we need to look at the objections/concerns because actually, if you total them all up, even they all look like little pieces, it's about 30.9% that would be somewhere in a red area, and we've only got about 35% of a little more thinking it's reasonable.

So let's look at some of the concerns. I'm on a different page now, so I'll let staff take us down to the red. Unreasonable: to high for global south. So what we're seeing is a number of groups, like the Non-Commercial Stakeholder Group, Ethics in Tech, Yale Law School Initiative on Intermediaries, academics. EFF, Article 19 saying that, if you're looking at a fee of $180 or more, you're putting these responses completely outside the ability of most registrants in the global south to respond. I think that's something we should take seriously. When you go down to the blue—there's a blue line—there's some call to abolish late fees completely. Then there are calls under … There's a blue title that says, "Should be cap standardized or no additional increased fees," that talk about uniform fees.

But I'd like to talk for a second about these concerns that are raised from a number of different parties that you won't be able … The concern was initially when we were creating the URS that people aren't going to know about the URS proceeding until their domain name is suspended. Then they'd file their appeal. That'd be their notice. But, if they can't afford to file their appeal, then did they really have any rights? Have we cut off their rights?

Anyway, I'll stop talking. Back to you. Thanks.

ZAK MUSCOVITCH: Okay. Kathy, point taken there. There was considerable opposition and rationales provided for that opposition here. Similarly there was considerable support. But regardless of the number—one more than the other, perhaps—it seems to me that there's no clear thread from the public comments here to identify for the working group.

I think that perhaps our referral to the working group be that we reviewed the answers to URS Question #9 and there were a considerable number of supporters for the fees being reasonable and a considerable number of parties that expressed that the fees were unreasonable and/or should be eliminated and just leave it at that.

I see Phil Corwin—yes, Kathy, briefly.

KATHY KLEIMAN: Can I just modify that a little bit with [inaudible] for the global south, that they might not be affordable as is for entire classes of registrants?

ZAK MUSCOVITCH: Okay.

KATHY KLEIMAN: Thanks.

ZAK MUSCOVITCH: Thank you, Kathy. Group members, we are 2:06 and we have 24 minutes left. We have this one, and one other one. But we have two subgroup team members that want to make their voices heard on this, so we're going to go to Phil and then David. Briefly please, gentlemen. Phil?

PHIL CORWIN: Thank you, Zak. I'm speaking in a strictly personal capacity. I want to point out first off that this is a question not about policy but about pricing.

Second, I would point that a respondent can completely avoid these fees by responding in a timely fashion. So far as I know, the Internet operates just as fast south of the equator as north of the equator. So they would get notice at the same time as anyone else in the world.

Having said that, ICANN has made it's clear it's not a price regulator. I don't think we have the authority generally in this working group to address provider pricing policies or to mandate uniform fees, given that costs of doing business may be different in the places where the providers are located.

I wouldn't object to encourage saying something like, "Encouraging providers to create a process whereby a respondent can ask for the fee to be waived or to be discounted if they can provide a compelling rationale—

ZAK MUSCOVITCH: Aren't you getting into the meat of the issue rather than identifying whether what we're flagging for the working group as a whole?

PHIL CORWIN: Well, I'm trying to get into what we should take away from the responses and pass that analysis along to the working group. I think all we can reasonably pass along is that some parties … Nobody said there shouldn't be fees—

ZAK MUSCOVITCH: Well, some people did. Not a lot.

PHIL CORWIN: -- for some respondents, the pricing may be burdensome. So I think we can pass that along. Maybe that influences some recommendation we agreed to in consensus call.

But, beyond that, I really question whether it's both proper and practical for us to go any further than that.

ZAK MUSCOVITCH: Okay. Thank you very much, Phil.

I'm taking a look at the chat and I'm seeing some support for the concept of a waiver being referred.

I'm going to now propose as a straw person a referral to the working group as follows. "Having reviewed the responses from the public comments to URS Question #9, Subgroup B

determined that there are differing views about the reasonability of the existing fees, but the public comments did not disclose any clear direction on them. Nevertheless, Subgroup B suggests that the working group consider a waiver of fees in certain circumstances is appropriate."

Any objections or approvals leave in the chat. Or raise your hand briefly.

Paul Tattersfield says, "Sounds good." Kathy Kleiman: "Yes." Jason Schaeffer: "Good." David McAuley: "Agree."

Okay. Fine here. All right, we've reached "satisfactory," which is our objective. So we're going to leave it at that—URS Question #9.

Let's move on to the last one because we haven't had quite enough fun for the day. In the 19 minutes left, we have URS Question #10. Now, this question is, are penalties for a complainant respondent who uses the URS process sufficient? If not, should they be expanded? If they should be expanded, how?

This I think we must all recognize is a somewhat contentious issue. One's views largely depend on their perspective and interest as stakeholders in the community. We see a variety of responses on this. So, once again, I would caution myself and the working group members that we need not solve this or relitigate it. All we need to do, as we're Subgroup B members, is identify whether there was any new facts or perspectives or opposition that we should flag for the working group as a whole.

So I'm going to give you a moment to look through this. You'll see that, currently, the URS procedure contemplates penalties for complainants who misstate a fact or abuse the URS system. That doesn't contemplate specific penalties for URS respondents, aside from using the URS itself. We've dealt with the issue of cost and loser pays elsewhere in our discussions as well. So it's not like, by glancing over this, we won't have dealt with it elsewhere.

You'll see that some of the comments … Let's just pick one randomly from EFF. "The current penalties are more than sufficient." Non-Commercial Users Group says, "This is supposed to be quick and dirty. There's not much opportunity for respondents to abuse the process." Then we see other different viewpoints. For example, from WIPO: "Any penalty for abusive complaints should be accompanied by a penalty for repeat abuse of registration." IPC says, "Regarding the existing penalties for complainants, the IPC consider these to be more than sufficient. In order to bring appropriate balance and to encourage good behavior, there should also be penalties for abusive respondents."

I took some time to go through these comments before. There's a lot of them and opinions are strong. So I think we're going to have difficulty resolving this on the merits.

So I'm looking for some suggestions from the subgroup members, having regard to that A) we have 17 minutes left, and B) if we complete this we don't have to show up for Subgroup B next week, on how we can efficiently and practically refer this to the working group as a whole.

I see Griffin Barnett has his hand up with I hope a solution. Griffin, go ahead.

GRIFFIN BARNETT: Thanks, Zak. There seems to be two major categories here of comments where folks are suggesting there be possible additional bases for penalties, the first being situations where a respondent is doing certain things that are vexatious to the process. I think perhaps we can capture that. I think the second major category is the idea that council for certain parties—I guess primarily complainants—be somehow sanctioned for abusing the process.

Now, on substance, obviously I don't agree with that, but if we're trying to basically identify what the major contentions here are, I would see those as being the main two categories. Obviously, we're already aware of the existing penalties for complainants who abuse the system which are already baked into the URS. I don't recall seeing comments suggesting that there be additional penalties applicable to complainants.

So maybe we note that and then note the two other categories and then have the working group decide whether to take either of those categories of comments forward with any recommendations. That would be my suggestion, but I'm happy to here others' comments. Thanks.

ZAK MUSCOVITCH: Thank you, Phil. So Griffin's suggestion was a "flagging the general categories of the comments" approach for the working group.

Kathy Kleiman, please go ahead.

Can't hear you, Kathy.

KATHY KLEIMAN: Sorry. Coming off mute and looking for the comment I was going to respond to. I don't think we have anything to recommend on complainants and respondents. I think that balances a lot of strong comments that URS is a quick and simple system and that you've already got a high default or respondents, and any penalties—here I'm reading American University, which I did not write, by the way—would be uncollectable and create significant administrative costs and tracking, which may have to be borne by someone.

So I don't think we get a recommendation here. If we do, we've got to say that we've got strong comments saying that respondents already have their penalty: they lose the domain name through suspension.

But what Griffin said and what I found fascinating was this call for penalties for legal counsel. That's a new idea. Zak, I hope you don't mind if I read the Internet Congress Association comment on this. "The penalty should also apply to counsel/firm who abuse the procedure, particularly on multiple occasions, and where the counsel or firm has been so found they should be permanently prohibited from serving as an examiner or UDRP panelist." Then we see other comments along those lines.

So that's a new idea. I don't think raising the penalties for complainants or respondents is a new idea. This is a question. It's not a recommendations, so I don't think we get anything on that.

But this new idea on legal counsel is fascinating. That I think should go forward to the group. Thanks.

ZAK MUSCOVITCH: Thank you, Kathy. We have 13 minutes. I got the sense that we're getting close to an agreed-on approach for dealing with this, but we're not quite there yet and we have yet to hear from Susan Payne. So, Susan, please briefly state your views on this.

SUSAN PAYNE: Thank you. I agree with Kathy to some extent in the sense of the comment about the penalties for counsel, not that I agree with the actual proposal or suggestion, to be clear. But, if our exercise is to identify things that we should be referring up to the working group, then that's a new one and we should flag it.

But I don't agree that we should just be saying, "Oh, the possibility of sanctions for one party or the other is not new." I mean, that's the whole purpose of this question. We may not like the comments or we may feel that the comments are not going to take us to a position where we'll ultimately—and the working group—reach a consensus, but I don't think we can just go, "Well, we already knew that the possibility was there for sanctions for a party, and therefore that's not new." That's what we were specifically asking people to comment on. So, if we weren't going to do anything with those comments, then what the hell were we doing asking them?

So I think what we do need to is what Griffin was saying, which is just flagging to the working group that that there are some buckets of comments.

ZAK MUSCOVITCH: Right. Thank you, Susan. I'm going to try to recast the language of the referral basically in line with what Griffin's suggestion was but also taking into account what other people, such as Kathy, have mentioned over the course of this discussion as follows. "Subgroup B reviewed the answers to URS Question #10 and noted considerable disagreement and many differing strong viewpoints on the question of penalties for parties and the appropriateness of expansion of them. These viewpoints included but were not limited to noting that there were no penalties for respondents aside from losing the domain name, unlike how there are for complainants. That also included concerns raised that"—I'll pick one other one here … "There's no evidence to indicate there should be additional penalties for registrants, and such penalties may not be readily enforceable." That's two buckets.

Griffin, do you have a third bucket to give us? Griffin [says], "Why even editorialize like that, Zak?" That certainly wasn't my attempt to editorialize, but if you'd like to take a stab at it, please go ahead, Griffin.

GRIFFIN BARNETT: Sorry. I'm happy—

ZAK MUSCOVITCH: Just bear in mind that the purpose of this last little bit of the exercise is to give staff clear language from them to write down in the deliberations, so please be as specific as possible.

GRIFFIN BARNETT: I will try to do that, Zak. And I appreciate [inaudible]. I didn't mean [inaudible] at all. When you were saying you were editorializing in the sense of saying there's a lot of disagreement. While that may be true, I think all we really need to say here is that we ask this question about whether should be additional penalties involved in the URS for complainants or respondents. That was the question. And we identified, as I mentioned earlier, a couple of different buckets of ideas that had been provided here in the responses to that question.

I think all we need to do is say, in response to URS Question 10, is that there were several categories of responses suggesting potential additional penalties. We can say one category is additional penalties for respondents who abuse the process. A second category is—again, as I mentioned before—the category of penalties against counsel or law firms that are found to represent parties, I guess, that abuse the process. I think those were the two main categories [inaudible]—

ZAK MUSCOVITCH: Okay, Griffin. I see Kathy's hand up. We're really running out of time. But I think there was also some people, Griffin, that said there shouldn't be any new penalties in addition to people who thought there should be increased penalties on one side or the other.

GRIFFIN BARNETT: I agree. We can capture that as a bucket if we want.

ZAK MUSCOVITCH: Yeah. And Phil has raised in the chat, “A simplest and elegant solution might be”—those are my words, not his. But he says, “I think we should just report that we received strong and divergent views in response to the question and leave it at that,” which seems like a rather attractive possibility.

I don’t see any hands up right now, but I see in chat that Kathy agrees with Phil.

So, Griffin, what I’m going to propose to the subgroup then is that we go with that simple and elegant approach that has absolutely no editorializing and very little effort at trying to identify these different groups and boxes or piles, depending on your viewpoints.

So just to bring back Phil’s language here, I propose the following text. “Subgroup B, having reviewed the responses to URS Questions 10 A, B, and C, notes that we received strong and divergent views in response to these questions.”

Any objections to that?

Any suggestions for improvement to that?

Okay. I’m just going to double-check the chat here. Griffin indicated he’s fine with Phil’s approach, if that’s the route we want to go. “Nice and factual.” Paul McGrady calls the questions and answers to the working group’s attention. “Fine,” from Paul Tattersfield.

Have we reached the level of “satisfactory”? It seems that way. So we’re going to close off the last and final URS question--#10. Congratulations to everyone on this because we have now bought ourselves a three-day next week where we have no subgroup meetings. My apologies to Paul McGrady, who is gearing up to take us across the finish line on this, but we managed with everyone’s additional efforts and concentration to do that today.

With that, I’m going to turn it back over to Julie to see if there’s any closing remarks. If there’s any Subgroup B members that have any additional business that they’d like to raise, please do so now. Thank you.

JULIE HEDLUND: Thank you, Zak. I want to especially thank Zak and Paul for steering this subgroup so ably to an early finish. So thank you very much and thank you to all the Subgroup B members as well for all of your hard work.

I do see that Kathy Kleiman has her hand up. I don’t know if that’s a new hand. Kathy?

KATHY KLEIMAN: It is a new hand. I just wanted to share, as a member of the subgroup, my applause to both Paul and Zak for just an incredible job working through tremendous, difficult, and complicated material. Thank you both for your extraordinary efforts.

Back to you, Julie.

JULIE HEDLUND: Thank you very much, Kathy. At this point then, we will cancel. You'll see a cancellation for forthcoming calls. So there'll be time on your calendar for several days in July.

At this point then, this meeting is adjourned. Thank you again, Paul and Zak and Subgroup B members. We hope you have a good morning, evening, or afternoon.

[END OF TRANSCRIPTION]