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ICANN Transcription

Registration Data Accuracy Scoping Team

Thursday, 18 November 2021 at 14:00 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 agenda wiki page: https://community.icann.org/x/3AC7Cg

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TERRI AGNEW: Good morning, good afternoon, and good evening. And welcome to the Registration Data Accuracy Scoping Team taking place on Thursday the 18th of November 2021 at 14:00 UTC.

In the interest of time, there'll be no roll call. Attendance will be taken by the Zoom room. If you're only on the telephone, could you please identify yourselves now? Hearing no one, we have listed apologies from Melina Stroungi and Volker Greimann. And the alternate for Volker will be Owen Smigelski.

Statements of Interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now. Seeing or hearing no one, if you do need assistance, please e-mail the

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GNSO secretariat. All members will be promoted to a panelist for today's call.

Members, when using chat, please change from Panelists and Attendees to Everyone, depending on your Zoom update, in order for all to see the chat. Observers will have view only to the chat. All documentation and information can be found on the Wiki space. Recordings will be posted on the public Wiki space shortly after the end of the call.

Please remember to state your name before speaking. As a reminder, those who take part in ICANN multistakeholder process are to comply with the Expected Standards of Behavior.

With this, I'll turn it back over to our chair, Michael Palage. Please begin.

MICHAEL PALAGE: Thank you, Terri. If I could have the agenda, Marika or Terri, on the screen so we could follow that. All right, perfect. Thank you.

So there is not a lot of administrative stuff that has taken place this week. The only administrative issue is whether we have a call or not at this time next Thursday. I understand that for a number of our participants in the U.S./North American region, they will be celebrating the Thanksgiving holidays with their friends and family, and I understand that they may not be able to attend.

Our goal is if we can formulate a list of questions in advance, we may suspend the call. If we do not have that list formulated for

ICANN staff, I will be showing up and moving forward to get our work done. So that is it as far as administrative issues.

What I'd like to do is before … Obviously, within the last hour there was an exchange between Sarah and Steve on the issue of purpose. What I'd like to do, again trying to keep us on our agenda, I want to get to the homework that was completed. So there was a list of questions that Alan submitted to ALAC, so I want to get to that.

However, I do want to kind of address this issue of scope. I know that we have had some discussion about this before, but I want to keep this discussion very structured. So what I'm proposing for is …

Steve, I will let you speak first. Sarah, if you would like to rebut. And then we'll go with one more exchange. So we'll have two speakers on each side of this issue. I would like to limit it to no more than three minutes each side. I do not want to spend the entire call arguing over scope, so we will have that discussion and then after we are done having that discussion, I will share with you my current best thinking on how the group, I believe, should move forward.

And then if we agree, that's great. If you disagree, we will figure out how to perhaps resolve that next week. But we need to get the current homework done that is before us. So unless there are any objections, Steve, I will give you the floor first to articulate. And then, Sarah, I would ask that you be next in the queue. Steve, you have the floor on your position on why you believe that purpose

needs to be addressed now as opposed to later in our assignments.

STEVE CROCKER: Thank you very much, Michael. And I think we can keep this on the lighter side. The memo that I sent out was just to share a kind of simple picture about what the whole thing looks like. And with respect to purposes, all I was asking for is a recitation of the agreed-upon purposes brought forth because in discussions in the side meeting that Lori run, I understood that there were some differences of opinion or understanding as to what the agreed-upon purposes were.

Much more interesting, I think, is related to the note that I sent back, just a few minutes before we started, to the group. But a sort of indirect response to Sarah's note in which … And Sarah, I don't mean to be putting words in your mouth, but I think you were saying let's just focus on the definition of accuracy. And my response to that was, "Okay." From my perspective, there's a whole bunch of data elements that get collected, and the level of accuracy that's required of each of them may vary.

I open up the possibility that the focus of this group is a single definition of accuracy and applying only to two particular data elements: e-mail addresses and phone numbers. If that's the case, I said then our job is really quite easy. We just agree on the wording of what that definition of accuracy means.

And further, it makes the future job of the Policy Development Working Group much easier because there's nothing for them to

do with respect to setting the levels of accuracy. They simply remain silent about all of the other data elements and the choices that are available for setting the accuracy levels for e-mail and phone numbers that have been determined by our definition.

And so that's a very clean, straightforward, simple path that avoids any of the larger issues and just says, "This is what the definition is." And then the question of whether or not this serves the multiple purposes which are unstated is out of scope. So there's the back and forth, at least from my point of view.

And with that, I yield the balance of my time, if there is any balance of my time.

MICHAEL PALAGE: Thank you, Steve. Sarah, would you like to respond to Steve?

SARAH WYLD: Yes.

MICHAEL PALAGE: I know you had started an e-mail. Perhaps if we could move this to a verbal exchange for the benefit of everyone who may not have been able to read the e-mails. You have the floor, Sarah.

SARAH WYLD: Thank you, Michael. Good morning. I hope I am reasonably audible. Before I actually answer, I want to say I don't feel like this an argument. I don't feel like this a question of sides. I feel like this

a thing where all of us as a group are trying to figure out the best way to proceed here. So on that, I don't really see why the definition of accuracy would or should apply only to two particular data elements within a registration data set. It's not something I think I suggested.

The definition that is currently in use which the registrar, or maybe it was CPH Team, provided the text—and we've looked at that a few times—does apply to all the data elements that are collected as part of a registration data set and not only two of them. But regardless of what specific fields it might apply to, my point is more that we should follow our instructions.

I believe that we have a plan. Our plan was to take these instructions in order and do numbers 1 and 2 first and then numbers 3 and 4. In numbers 1 and 2, I don't think that examining, in whatever level of detail, the purpose of collecting or of having this data or the aims that accuracy intends to achieve … I don't think any of that has anything to do with numbers 1 and 2. Right?

We're supposed to figure out, like, how does ICANN monitor accuracy? Is there a definition of accuracy? What does compliance mean right now? How can accuracy be measured? Those are all really good questions that do require a definition of accuracy, but do not require specific examination of many different data elements to confirm what is their purpose. Thank you.

MICHAEL PALAGE: Okay. So, I want once response here. So, Scott, can you provide …

STEVE CROCKER: I think you said you were going to allow another round. I hadn't planned on it, but I do want to insert one little thing. The way I understand what Sarah just said is a single level of accuracy, even if it's applied appropriately to multiple data elements. My understanding is that the level of accuracy will vary in practice. For example, operational validation might be the appropriate level for e-mail and phone numbers. I don't think that that makes any sense with respect …

Well, it's an opinion here, but I we can ask the question, does that mean that we want operational validation to apply to fields like Names or Organizations or many other fields that are collected? So at least from my perspective, it's important to have a few different levels of accuracy for the policy development process to choose from in applying them to different data elements.

MICHAEL PALAGE: Okay, so I'm reading the chat. What I am going to do now is … Scott, I'm going to give you two minutes. Go. You're on the clock.

SCOTT AUSTIN: Thank you, Michael. I am trying to avoid getting into the deeper dive on that, but I do think we're focusing on, we're seizing on the item of purpose, of the term "purpose." And I don't think that's necessary. One of the things Sarah said in response to Steve was that we're undertaking an analysis of the accuracy levels measured and analysis … And we're talking about at data analysis.

At least my understanding—and this is from working with trademark surveys—is that analysis of accuracy implies that there's an outcome measurement that is objective. So if the term "purpose" is what's troubling people, [and it's] scope creep, then perhaps within the term "data analysis"—which is what it is—we really should replace that with seeking an objective outcome because I think that's inherent in any kind of data analysis. That's all I wanted to add.

MICHAEL PALAGE: Thank you. Beth, you had your hand up. You had it up and then it went down. Do you want to speak?

BETH BACON: I saw the queue is getting along, so I was just going to put some things in chat. But I'm happy to hop in the queue.

MICHAEL PALAGE: You have the floor, Beth. Go.

BETH BACON: Oh, and everyone rejoices, I'm sure. Thank you. I think that it's not necessarily the question of use of the word "purpose." I think, here, the desire is really to say that we've done our work. We've almost finished our work on defining this current status quo, the state of play, what we do for accuracy under our current agreements and requirements. And step two is to measure and

understand how ICANN measures that, how they enforce it. Is it meeting the goals?

So I think that they have been established, and I think the concern is that when we talk about the different data elements and should different types of authentication or accuracy apply at different data elements … That's something that's down … I think that's down the road. It's not something that we maybe do now. That's thinking about things that could improve later. That's not evaluating what the state of play is now, and that is what step two is.

So I don't think it's a question of, is it big "P" purposes? Is it little "P" purposes? Are we saying "purposes" and we mean "goals"? I think it's that we just want to do the steps because they're logical and it lets us build, to them, understanding. Is what we're doing effective?

So I think that's the question. It's not vocabulary. It's just process.

MICHAEL PALAGE: All right, thank you. Alan, you have the last floor. And then I will try to distill what I've heard and I will put forward a path for the group that hopefully is amenable to all. So Alan, you have the floor.

ALAN GREENBERG: Thank you. I can differ identifying the purpose or purposes for which we need accuracy, but not if we are supposed to have an aspirational definition of accuracy in two weeks because that does require knowing what we're going to use it for and why.

MICHAEL PALAGE: Okay, Alan. So I want to go back to … All right, so this is what I've distilled down. And hopefully I've gotten it right and I've listened to everyone. I tend to agree with the point that Sarah and Beth have raised about following the process set forth in our charter and addressing steps 1 and 2. So the current legal construct of what's set forth in the agreements impose a certain obligations requirement. And I think what the registrars did in synthesizing that and with some of the other input that I and others provided, I think we came very close to a working agreement on what those obligations are.

Now, that being said, I think the questions that Scott and Steve have raised about other purposes and the bigger definition of accuracy—I'm sorry for using the "D" word—of what that aspirational definition is, is something that, as Sarah said in her e-mail, is appropriate, I think, within the scope of the later assignments.

However, the way that we have been instructed by Council to move forward is to move forward linearly. We need to do 1 and 2, and then we get to go to 3 and 4. So anything that is said here today, I do not preclude.

And let me address, Alan specifically, your concerns here. I believe that it could be possible to come up with an aspirational definition as part of the original assignment with what you believe are the potential aspirational purposes that may or may not be met. So I know there was a lot of discussion and it was a hotly debated topic within EPDP Phase 1.

So part of that aspirational definition that we will be discussing and potentially we'll be looking at in assignments 3 and 4 after we begin do our analysis and see whether the current state of play needs to change or is there a gap between what EPDP Phase 1 had done and what the current state is now for purposes. And then we identify that gap and we bring that to the attention of Council. And then Council can choose or not to choose to address it.

Again, I think it's always important for us to step back and remind ourselves as a goal that we're scoping team. Our job, I think collectively, is to ask questions, gather facts, and then present that to the Council so they can determine whether to move forward or not with the next steps in a potential policy development process.

So I am going to stop there. And I already see people with their hands up, so hopefully I got it close, Stephanie. And if not, I'm sure you will tell me where you think I may have misfired. So you have the floor.

STEPHANIE PERRIN: Thank you very much. First of all, if you could do me a great favor and remind me—blame it on old age—where on earth this notion of an aspirational definition came from. It is a bit ridiculous to be talking about aspirational definitions. Sorry to whoever coined the term.

Number two, I asked a question in the chat a while ago and it relates directly to ICANN Compliance's role. If we are talking about the purposes of ICANN Compliance, we have to discuss the

role that ICANN and its staff are playing in terms of controllership because that is relevant.

I know some people would not like to discuss and reargue data protection issues, but if you're talking about the purposes of gathering and grooming data—"grooming" not the appropriate word, but it'll have to do for the moment—then you have to discuss controllership and what they're doing and what their role is because if it's a secondary role, then their purposes are not relevant to this discussion. Thank you.

MICHAEL PALAGE: So, I do not disagree with your statement there. I think potentially asking those types of questions about what ICANN's compliance role is would be one of the things that were originally tasked for with our homework assignment. So seeing that type of specificity, is there a data processing agreement with the contracting parties? Does it exist? Does it not exist? Why does it not exist? How does the non-existence or existence of said agreement impact the ability for ICANN to carry out its various roles?

I would say, Stephanie … Oh, your hand is back up again. And I see Thomas. So we're going to go with Alan, then Thomas. You have the floor. Alan.

ALAN GREENBERG: I don't know how my hand got up again. I didn't raise it.

MICHAEL PALAGE: Okay. Thomas, you are next in the queue.

THOMAS RICKERT: Hi, everybody. And thanks, Michael. I think that the aspiration term came into play because our U.S. chair wanted to ensure that we discuss all aspects of accuracy that are relevant or that are felt to be important by the respective groups. And I think that, probably, we do this more justice by collecting the features that the term "accuracy" should have according to the various groups so that we can make sure that nothing gets forgotten, and then hopefully converge on a definition that everyone can live with as the basis for our work.

MICHAEL PALAGE: All right. Marika, you have the floor.

MARIKA KONINGS: Thanks, Michael. I think I'm just going to try and give it a go to try and explain at least what I think, from a staff perspective, the idea behind this exercise is. And it's not about getting this group to agree on what a new definition should be. It's really focused on facilitating the conversation of identifying what gap people perceive there is, and hence why there should be, potentially, in the future, a different definition or a different approach towards accuracy so that the gap identification could then help inform what data needs to be gathered to be able to measure accuracy and confirm or disprove that that gap actually exists.

And that is really the idea behind this exercise. And maybe, indeed, the term "definition" is wrong here. It is not the idea that this group comes up with a number of definitions and then you settle on what the new definition should be, as several have said in the chat. That is, indeed, for a future effort in a future PDP. This is really about identifying the gap that people seem to believe or are convinced exists between how accuracy is currently enforced and the levels the currently exist and what they think they should be.

So we're really trying to work towards having that conversation. And our thought was by focusing on this aspiration but in combination with identifying what problem is it trying to address … Because if you have the idea that the requirements either should be differently applied or there should be other requirements, it's because you're trying to solve a problem.

So articulate what you think that problem is so then we can actually discuss, okay, so if you think that problem exists, what data do we need to actually confirm whether or not a problem is there. And on that basis, having a data-driven conversation about what the current state is and what, if anything, needs to change to basically move the needle on it.

I hope that helps a bit, but at least our thinking was maybe, as said, the terminology is confusing people here. But it's really about you that gap identification and getting clarity from everyone which problem you think exists and then quantifying that problem. So I hope that's helpful.

MICHAEL PALAGE:	Thank you, Marika. I attempted to say that earlier, but I think you did a much more articulate job. So thank you.
	Marc, you have the floor.
MARC ANDERSON:	Thank you, Michael. Thank you, Marika, for the explanation. I found that helpful and understanding, sort of, why we went down that path. I do have to disagree with the approach of identifying the aspirational definition.
	Owen spoke to this earlier. If we want to ask people to identify gaps or problems that exist before going into that study, that that makes sense. But I do think, and I think what we're clearly hearing on this call and last call and in discussions is that the exercise of trying to create an aspirational definition at this point in our work is not helpful and leading to more confusion than it's trying to solve.
	I really think that that aspirational definition is not the way to go at this point in our work, and we should maybe put that aside. If we want to focus on perceived gaps, identify what we think should go into an assessment of the effectiveness as we get towards exercise #3, that makes sense. But I think clearly what we're hearing in the discussion— both this week and last week too, really—was that aspirational definition isn't doing us any favors.
MICHAEL PALAGE:	Okay, so I'm going to wrap this discussion up. And I think since words have meanings and words have consequences, we may want to call it a gap analysis. Maybe that instead of a future state

or aspirational. I literally want to read through. I'm literally probably going to listen to this recording, reread all the e-mails, as well as last week's meetings. And then will probably send something to the list early next week on how we move forward with the assignment which is due. Previously called aspirational definition/tentative working definition/gap analysis. But we're going to put a pin on that.

And we now need to turn our attention to the original homework assignment this week which was to go through and to begin to propose questions to staff. So what we have on the screen is the document where these questions have been submitted. I believe Sarah and Alan have contributed.

So what I would like to do is, Alan, I will turn it over to you. Let you walk through your questions. As you are walking through your questions, could you specifically identify what you are trying to achieve from the question from staff? What is the point of clarity and how you think that will help with our specific tasks that we have before us? So Alan, you have the floor.

ALAN GREENBERG: Thank you, Mike. I put my hand up before this task was current. You said next week you're going to change the aspirational definition to some other terms and explain exactly why or what we're going to be doing with it. You're going to have to change the deadline, then. You can't change a target which involves consultation with our community and only give us a few days to come up with the results. So I'm just noting that the target date of December 2nd cannot be operational if you're going to change the

ground under which we're—the target of what we're doing a week before that. So I'm just noting that.

MICHAEL PALAGE: So I hear you. I would argue that the assignment has not changed. I would say that I am trying to be sensitive to the terminology of "aspirational definition." I would argue that the assignment that was given has not changed. Whether we want to call a gap analysis or aspirational definition, what is the delta that you believe is not being addressed? So I would push back with you. I don't believe the underlying assignment has changed. What we're calling it, I'm trying to be sensitive to the concerns raised by those on the call.

ALAN GREENBERG: Okay. I'll simply note again. We're being charged with representing our groups. I cannot do that when the last meeting I will have before the deadline is likely to be before you pass judgment and tell us exactly what we're doing. Wording matters in terms of how things are going to be phrased. So I'm just noting that. But I will go ahead with this.

MICHAEL PALAGE: I understand, and I am sure when [Berry] is on the call, he will point out the danger of us slipping and missing targets.

ALAN GREENBERG: And I'll point out the danger of us producing a product which has no value because of the shifting ground under us. Okay—

MICHAEL PALAGE: Well, wait, hold on. I see … Before we get to our homework, Marc you have a minute and Stephanie you have a minute. Marc, go.

MARC ANDERSON: Thanks. I agree with Alan. I don't want to miss dates and I don't want this to last forever, but what's worse than missing our targets is making our targets and getting it wrong. It's important that we do our job right, here. And I also agree with Alan. This aspirational definition exercise. That got changed to "future explanation." And now you're saying that the assignment is exactly the same—we're just calling it something different—is not at all listening to the feedback you received.

If the table is changed and the first column—future explanation— is still there and still what we're being asked to provide, then you haven't really listened to the feedback you've received. You've just put a new name on it and given us the same assignment and just called it something different. And I don't think that's being responsive to the input you're receiving from the group.

MICHAEL PALAGE: Well, that's why I said I was going to listen to this recording and last week's recording before sending something to the list next week. So hopefully, I qualified that and I am not … Yes.

STEPHANIE PERRIN: I would just like to point out that we are embarking on, as Marika said, identifying the problems and needs that need to be addressed in the face of a brand new policy produced by the EPDP over a couple of years—it feels like 10—and addressing an accuracy regime that has not been updated since that work and that never recognize the realities of data protection law.

And I have typed it in the chat, but I guess I have to read it out, that the data quality assessment involved in this has to be balanced with the various perspectives that one looks at when you are complying with data protection law. In other word, whether some third parties have aspirations for a higher level of accuracy and timeliness in the data— timeliness meaning constant update—than what is currently the case in the registrar's holdings, it has to be assessed in terms of burden on the data subjects, cost, administrative burden.

And that administrative burden also has to be assessed in terms of the roles of the controllers and co-controllers. And maybe I slept through something, but I haven't seen any controller/co-controller agreements. It's not clear to me what role the compliance branch is taking, nor the role they're authorized to taking until I see those agreements or at least the digest of them.

So really, I think … I'm sorry. I'm not trying to stall this. I'm trying to get the heck out of ICANN. So heaven forbid that I should try and stall this very important work, but for goodness sake, we have to get the broad principles correct here. You can't have us on this

forced march into the wilderness limiting the discussion of the key points. Thank you.

MICHAEL PALAGE: Okay. Beth, can you give us an update? I know you're running point on the discussions in the Registry constituency with ICANN. Could you give us an update on where that stands? Are you in a position to do that, Beth?

BETH BACON: Well, since you called on me, I guess I am.

MICHAEL PALAGE: Well, you can respectfully decline.

BETH BACON: Yeah. Well, since you called on me I'll also just kind of take a little moment. Stephanie, I think that you are correct in that we absolutely need data protection agreements and data processing agreements between ICANN and contracted parties. That is absolutely true. I don't know that, in this discussion, if we do need it. I don't know if we need to discuss that in this discussion. I understand how it's relevant in that we do need them. We need to know how that data is protected and processed and all of that and the roles and responsibilities of those parties.

But in our work here maybe in Section 2 and Section 3, I don't think we're talking about big "P" purposes. And for those of you

that were in EPDP, were saying big "P" purposes are the actual purposes for processing from the GDPR and all of that.

But I think we're talking about what are the goals of this. So I think maybe that's an offline conversation for Stephanie and I to get our brains together on that; see if we're on the same page.

But with regards to the work of the roles and responsibilities out of the EPDP Phase 1's recommendation to have that directed to contracted parties and ICANN to draft a data processing agreement between the parties, we have a somewhat draft agreement. We've gotten together for some concentrated chunks of time with staff prior to the last ICANN meeting to try and hammer out some kind of those last sticking issues.

And then we are expecting some edits/comments/proposals back from ICANN. I thought we would get it maybe before thanksgiving, but understanding that that's a really hard time after that ICANN meeting for staff, and then right when people are going into holidays. So we'll happily keep everyone up to date. And we'll do an update on this in the IRT as well.

So that's where we are right now. We don't have a draft to share yet.

MICHAEL PALAGE: Thank you, Beth. I appreciate that. 37 minutes into the call. We will now get to the assignment that we have. And qualifying this, we are going to follow the assignment based upon the template that was provided for last week. And that will not buy us any future decision on what we call it or what the next assignment #2 is.

Alan, you have the floor.

ALAN GREENBERG: We'll see how long I keep it this time. All right, I put together a number of questions. The purpose for all of them is to try to understand to what extent … How is accuracy interpreted by Compliance, to what extent do they get involved in things? And the things I'm talking about are levels of accuracy or determinations that are relevant to the people who invoke compliance services. So it's really just to try to understand what the ground is that we're standing on or that we're sitting on.

The first one is an issue that you actually raised, Mike, when you suggested that the word "strictly" be taken out of the current operational definition, or whatever we're calling it now, because you believed at the time that there were some situations in which case a registrar might go further than the numbered procedures of verification—or validation, rather—that are laid out in the RAA.

We then heard from a number of people that Compliance does that/doesn't do that/sometimes does that. And the first question is trying to understand to what extent ICANN Compliance will respond to complaints that, "This information just can't be right." It may be syntactically correct, but it doesn't necessarily belong to the owner. And we've heard from registrars that one of the larger problems they have is not that the data is syntactically incorrect, but it's not theirs. Someone's using someone else's data.

So this question is, will ICANN respond and what type of actions will they take. And we've heard from people who submit

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complaints that the answer varies depending on which day it is and who you get, and whatever. So this is trying to identify what is the formal responsibility that ICANN Compliance thinks they have.

#2 calls for—

MICHAEL PALAGE: So if we could, Alan … What I'm going to do just … Instead of getting to the end, if we could have anyone from the Registry or … Well, does anyone have comments on the Alan's question there, as currently proposed?

BETH BACON: Can I be annoying and ask that you zoom in. I'm on a teeny, tiny screen.

ALAN GREENBERG: Sorry, I didn't catch what Beth said.

MICHAEL PALAGE: She's just asking for our ICANN colleagues to enlarge it for elderly people like myself and those operating on smaller devices.

So hopefully that helps. Is that large enough, Beth?

BETH BACON: Perfection, thank you.

MICHAEL PALAGE:	Perfect, okay. No questions or comments? You can move to your second question.
ALAN GREENBERG:	All right. Let me quickly review it to see what it was I said. The RAA calls for a sequence of processes including verifying that one of the e-mails or phone numbers is operational and is responded to by someone who seems to think that they registered this domain name. And it's called for in certain times.
	The question is, if someone has changed information, must it be verified? For instance, if the phone number was previously verified and the registrant changes the e-mail address, is that verified again—or is that verified—because that's the information that changed? Or have they already complied with the fact that the phone number was verified, therefore we don't have to verify e-mail address? Or vice versa, of course.
	I don't know how registrars interpret it, and I don't know how ICANN interprets it if someone were to try to call them on it. So this question is trying to address that.
MICHAEL PALAGE:	Okay. Two hands up. [Let me] go ahead. Owen, I'm going to call on you since you have not spoken yet. So you have the floor.
OWEN SMIGELSKI:	Thanks, Michael. So I was lucky enough to be the guy who helped come up with the Compliance regime for the WHOIS Accuracy

Program Specification under the 2013 RAA when that went into force at ICANN. And so you cannot look at just one section of the WHOIS Accuracy Program Specification by itself. You need to look at the entire WHOIS Accuracy Program Specification.

And Section 3 of the WHOIS Accuracy Program Specification says that "a registrar is not required to perform the above validation and verification procedures" if you've successfully completed it and you don't have any facts or knowledge to show that it's incorrect. So in this scenario for ICANN as well as registrars, you would not need to conduct that validation and verification. Thanks.

MICHAEL PALAGE: Sarah, do you have anything to add to that?

MICHAEL PALAGE: Thank you, Beth. I appreciate that. 37 minutes into the call. We will now get to the assignment that we have. And qualifying this, we are going to follow the assignment based upon the template that was provided for last week. And that will not buy us any future decision on what we call it or what the next assignment #2 is.

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Compliance, to what extent do they get involved in things? And the things I'm talking about are levels of accuracy or determinations that are relevant to the people who invoke compliance services. So it's really just to try to understand what the ground is that we're standing on or that we're sitting on.

The first one is an issue that you actually raised, Mike, when you suggested that the word "strictly" be taken out of the current operational definition, or whatever we're calling it now, because you believed at the time that there were some situations in which case a registrar might go further than the numbered procedures of verification—or validation, rather—that are laid out in the RAA.

We then heard from a number of people that Compliance does that/doesn't do that/sometimes does that. And the first question is trying to understand to what extent ICANN Compliance will respond to complaints that, "This information just can't be right." It may be syntactically correct, but it doesn't necessarily belong to the owner. And we've heard from registrars that one of the larger problems they have is not that the data is syntactically incorrect, but it's not theirs. Someone's using someone else's data.

So this question is, will ICANN respond and what type of actions will they take. And we've heard from people who submit complaints that the answer varies depending on which day it is and who you get, and whatever. So this is trying to identify what is the formal responsibility that ICANN Compliance thinks they have.

#2 calls for—

MICHAEL PALAGE:	So if we could, Alan … What I'm going to do just … Instead of getting to the end, if we could have anyone from the Registry or … Well, does anyone have comments on the Alan's question there, as currently proposed?
BETH BACON:	Can I be annoying and ask that you zoom in. I'm on a teeny, tiny screen.
ALAN GREENBERG:	Sorry, I didn't catch what Beth said.
MICHAEL PALAGE:	She's just asking for our ICANN colleagues to enlarge it for elderly people like myself and those operating on smaller devices. So hopefully that helps. Is that large enough, Beth?
BETH BACON:	Perfection, thank you.
MICHAEL PALAGE:	Perfect, okay. No questions or comments? You can move to your second question.
ALAN GREENBERG:	All right. Let me quickly review it to see what it was I said. The RAA calls for a sequence of processes including verifying that one

of the e-mails or phone numbers is operational and is responded to by someone who seems to think that they registered this domain name. And it's called for in certain times.

The question is, if someone has changed information, must it be verified? For instance, if the phone number was previously verified and the registrant changes the e-mail address, is that verified again—or is that verified—because that's the information that changed? Or have they already complied with the fact that the phone number was verified, therefore we don't have to verify e-mail address? Or vice versa, of course.

I don't know how registrars interpret it, and I don't know how ICANN interprets it if someone were to try to call them on it. So this question is trying to address that.

MICHAEL PALAGE: Okay. Two hands up. [Let me] go ahead. Owen, I'm going to call on you since you have not spoken yet. So you have the floor.

OWEN SMIGELSKI: Thanks, Michael. So I was lucky enough to be the guy who helped come up with the Compliance regime for the WHOIS Accuracy Program Specification under the 2013 RAA when that went into force at ICANN. And so you cannot look at just one section of the WHOIS Accuracy Program Specification by itself. You need to look at the entire WHOIS Accuracy Program Specification.

And Section 3 of the WHOIS Accuracy Program Specification says that "a registrar is not required to perform the above

validation and verification procedures" if you've successfully completed it and you don't have any facts or knowledge to show that it's incorrect. So in this scenario for ICANN as well as registrars, you would not need to conduct that validation and verification. Thanks.

MICHAEL PALAGE: Sarah, do you have anything to add to that?

SARAH WYLD: Thank you, hi. This is a very interesting moment because either I am misunderstanding or I am disagreeing with Owen, and I don't know which one it is. It's early in the morning.

I thought the question meant that if the registrar receives a contact set in the process of a transfer of a domain—because this is the transfer of the sponsorship to are registrar. And so when a domain is being transferred in if it's a contact set that the registrar has never seen before, then that gets treated like a new contact set and then they have to verify the whole set and validate—no, other way—validate the whole set and verify either the e-mail or phone number.

So if Alan's question is "do they have to verify both" then I think, no. The requirement says you verify one or the other. Is that Alan's question?

ALAN GREENBERG: Almost. If only one field changes and they have verified the other one or, for instance, if that field changes and that's the one they verified before. I'm just trying to understand how this is being interpreted in these subtle cases where only one field changes. And Owen we may have the right answer, but Owen isn't representing ICANN today.

SARAH WYLD: No, and that's fine. But I do think Owen's information is helpful. So your question about only one field changing is unrelated to scenario two in the question you've listed here which is the transfer of the sponsorship over a registered name. Right? Because if a name is moving into a new registrar, that new registrar would need to verify the entire contact set. If only one field is changing, then that is scenario three.

ALAN GREENBERG: I may have gotten the case number wrong when I wrote this.

SARAH WYLD: Okay.

ALAN GREENBERG: That is quite conceivable.

SARAH WYLD: Yeah, and that's fine. I'm super glad that we're able to discuss this and just sort it out. I think we can answer this question without

waiting for ICANN to tell us the answer. So if only one field has changed, then the question is …

So that falls under the Inter-registrant change, the change of registrant process, which is part of the Transfer Policy. That's where that change belongs. And so that refers to what they call …

A change of registrant is material change. Right? So a material change is what triggers the change of registrant process. A material change is a change to the name, organization, or e-mail address but not the phone number.

So when a registrar receives a new contact set that has not yet been verified and validated, they will validate the entire set. They will verify either the e-mail or the phone number. Then later, if a material change is made, then that contact set must again, if it is changed to a new contact set that has not yet been verified and validated, then it will be verified and validated at that point. But in that context, the phone number itself might not get verified. Does that help?

ALAN GREENBERG: Okay. So number one, the reference the case two looks like it's incorrect there. And I am talking about changes to the registrant data, to be clear. I think what saying—but that's the reason I'm asking how ICANN interprets this—is that if you previously verified the phone number and I changed the e-mail address, you may choose to verify the phone number again, and that e-mail address never gets verified. Or you may not do anything because the verified field didn't change.

SARAH WYLD: It really depends on what the change is. So once the context set has been verified …

And remember, also, just because I'm sending an e-mail to the domain owner saying "verify your contact" that doesn't mean that the domain owner is not required to provide an accurate phone number. It means that when they get the e-mail, they look at the whole contact set and say, "Yes, this is valid. This is accurate." That includes the phone number.

But then if they change the phone number to a new phone number, that does not trigger a change of registrant process and it does trigger validation if it's a new contact set. Right? Validate that phone numbers are in the proper format. That's a requirement of validation. But changing the phone number does not have to trigger sending a verification e-mail.

ALAN GREENBERG: Then the answer from Compliance is going to be very simple.

SARAH WYLD: All right.

MICHAEL PALAGE: All right, there we go. We're teeing up the next question. Owen, based upon that exchange between Alan and Sarah, anything to add? Or are you good?

OWEN SMIGELSKI: Nope. I'll all good, Michael. Thanks.

MICHAEL PALAGE: Excellent. Alan, question #4.

ALAN GREENBERG: Thank you. And on #3 I will suggest a change the wording that staff can put in because it's no longer something I can change to correct the error.

Okay, under the Temporary Spec … And I understand Compliance can't talk about future, but there's work going on in the Implementation Review Team which may or may not have addressed this. If a request is made to disclose all contact information and the registrar/registry chooses to accept the request—that is, they're not rejecting it—are they required to respond to all of the contact information requested or may they pick and choose? That is, they can provide some of it but not all of it.

This was a subject that was debated heavily in the EPDP Phase 2, but to my knowledge the final report never actually was very clear as to what the result of that discussion was.

MICHAEL PALAGE: So Alan, I think Sarah has raised a question about how do you view this question being in scope. Because I think your question

here is more about the disclosure of specific elements. And could you perhaps loop that into accuracy, if you could?

ALAN GREENBERG: Yes, I can. We know that right now only one field is verified, and the registrar can choose which field it is. The whole purpose—and I know we're not supposed to be talking about purpose today—but the whole purpose in my mind of having accurate data and having accurate contact information is to facilitate contact.

So are we in an environment where the registrar can—and I'll give an example—verify that the e-mail is accurate and someone responded to it, but then only provide the phone number? If they have the discretion of doing that, then the current definition of accuracy and the current process has no value whatsoever.

If, on the other hand, they must provide all of the contact information if it's requested, then we know that someone, the person getting the data, is getting a verified—at least one— verified field. And that is relevant.

MICHAEL PALAGE: Okay. I'm going to let Beth go and then, Sarah, you're next in the queue.

BETH BACON: Thank you very much. I think Sarah's hand was up first.

MICHAEL PALAGE:	I was just trying to balance the speaking time, but if you want to yield to Sarah first. Sara, you have the floor.
BETH BACON:	Yeah, thanks.
SARAH WYLD:	Thank you. Accuracy is not valuable only in the context of what data can be disclosed or would be disclosed to a requestor. Accuracy is necessary in order … Well, we're not talking about why. But that's not the only reason. Right? Accuracy, I look at, is in the context of, does the registrar hold the data that the registrants says is the right information for who owns the domain? That's accuracy.
	It has nothing to do with which parts of that data might be disclosed. Different requesters might get different pieces of the full registration data set or they might get the whole thing. But it doesn't have anything to do with whether the data is accurate or not. Thank you.
MICHAEL PALAGE:	Beth.
BETH BACON:	Thanks. Agree with Sarah. And I don't want to dig into the holes of talking about what the goals or purposes of accuracy are because I think that is, again, work for another day.

But I do appreciate a … Caitlin already put in the chat. We did discuss kind of the nature of what you return, but I think that this question is … I don't feel that it is within our scope to discuss this particular question simply because we have discussed it. There is more context around it, as Caitlin pointed out in the chat. I appreciate her dropping that in there.

And also, it's so subjective. You can't answer this question in a way that is in any way blanket. The different types of requests that a contracted party could receive for data, whether you disclose it based upon the nature of the requestor or the nature of the request or the nature of the data they requested, there's so much that you are evaluating that you can't say exactly which data elements you're going to respond to because you don't even know which …

You could only be asking for, "may I please have the home address?" Probably not. But it's just that this is a very challenging question to even really respond to in a consistent way because the inputs are so varied. But I think that, also, it's maybe not something that's worth digging into because we already have the answer in that we know which fields are verified as accurate at this point. Sarah just explained it. We have it in the definition.

So I think the question that maybe Alan is getting to is, are there other things that you want verified or is there some sort of confirmation that you want that a registry or registrar would say, "These have been recently verified." That's what, maybe, I think your question's getting to. And so I'm a little bit lost as to how we can address this effectively.

MICHAEL PALAGE: So I appreciate the logic, Beth, that both you and Sarah have stated. What I think Alan is trying to say, what he is concerned about is the potential gap analysis. And the potential gap analysis, as he says, goes back to a potential future discussion of purpose and assignments 3 and 4.   And what I am hearing from Alan is that right now registrars are only required to operationally ensure the operational status of either the e-mail or the phone. It's either. They get to choose one or the other.

And what Alan is concerned with is if, as part of the disclosure, the registrar discloses to the requesting party and the element that was not operationally validated or verified, he is concerned as to the reliability of that from the [purpose] who I think originally submitted it. So that is what I think I heard from Alan.

Alan, did I hear you right or did I swing and miss?

ALAN GREENBERG: I'm not even sure anymore.

MICHAEL PALAGE: Oh.

ALAN GREENBERG: Let me try to phrase this in a nice, clear way. I understand the complexity of the decision processes. I've been doing this now for over three years, and if I didn't understand before, I do understand now. So what I'm asking …

Remember, right now one field is verified. We don't know which one it is. The registrar knows whether they verified it. They're under no obligation to tell me which field they verified. So it's a black box from the point of view of someone outside of that registrar.

What I'm asking is if someone requests both contact fields, does the registrar have the discretion of saying, "I think you only need one of them, and here it is"? That's the question. Does ICANN believe the registrar has that discretion?

In other words, if I go to a registrar and say, "I want this contact in the two fields for some particular registration," the registrar says, "Here's one of them." And of course, the registrar doesn't tell me if it's the verified field or not. Is that something that's legitimate under the current policy [and] how it's currently implemented? And I'm talking about currently under the current Temporary Spec, not necessarily the SSAD because the SSAD doesn't exist.

So I simply want to know, is the registrar allowed to have the discretion of returning only one of the two contact fields if both have been requested? That's the question.

MICHAEL PALAGE: So what happens here, Alan, is right now there does seem to be a lot of discussion going on. So in the interest of time …

I think your first two questions, there was, I would say, rough consensus that they were in scope. Right now there appears to be, I would say, a lack of rough consensus that this is in scope. So I'm not passing judgment on it, at this time, in the interest of time.

Perhaps this is something we can move to the e-mail list and have that discussion in advance of our call.

We are now at one hour. We're going to go into extended overtime. We're going to go into the extended overtime so that we can get through the rest of our assignments here. If you do not mind, I would suggest that moving on to question #5 would probably be in the best interest of everyone's time.

Alan, you have the floor to discuss #5.

ALAN GREENBERG: Sorry, I was muted. The question may not be relevant in the current work, but if we're going to go forward this is a really crucial pit of information to know whether there's a gap that both fields are not via verified. So I believe it is very much within scope and I will fight for that if it's deemed to be otherwise.

Okay, #5 is, when Contractual Compliance is given access to normally-redacted information are they told which of the fields is verified? And the answers are: yes, no, or it depends on the registrar. It's a simple question.

MICHAEL PALAGE: So perhaps on this point here, are there any of our Registrar colleagues that could provide insight? Or Owen, based upon your time when you were within ICANN, if you could answer that question to see whether we already know what the answer to that is or whether it's a valid question that needs to be posed to ICANN?

Sarah, you have the floor.

SARAH WYLD: Thank you, Michael. I do not have an answer to #5, although I think the answer is no. But I'm not sure.

I am very concerned about what I'm seeing in the Zoom chat. I see a suggestion from Steve that we should agree that the registrar must disclose the data that it has chosen to collect and verify. That is a policy decision. We cannot make a decision like that in this group.

And also, I just feel like we have a very fundamental disconnect in how we are understanding these verification requirements. So, yes, the registrar sends one verification request. And that would be sent to either the e-mail address or the phone number. So, indeed, we are ensuring operational functionality. We're making sure that either the e-mail or the phone number actually works and goes to a person who says, "Yes, I am the domain owner." But beyond that, they are confirming that the entire data set is correct.

So even though we have not both sent an e-mail and received a response and made a phone call and received a response, that doesn't mean that we could or should assume that the phone number is not correct. If we are doing the e-mail verification, we still expect that that phone number is entirely valid and I just don't understand why that's even a question. Like, the domain owner is verifying their entire contact set, which they're required to provide an accurate contact set.

But again, any change to requirements for what the registrar should disclose are well beyond out of scope here. Thank you.

MICHAEL PALAGE: Stephanie, you have the floor.

STEPHANIE PERRIN: I think that this question really underscores the uncertainty that this entire enterprise has over who's responsible for data quality. It implies that third parties have a right to question the data quality. And they're not controllers and they're not co-controllers. They are requesters of data, and the role that ICANN is playing in terms of guaranteeing data quality to third parties has not been made explicit.

We all know that ICANN is sympathetic to the needs of data requesters, but we need to unpack the arrangements that have been made in all of these controller agreements to see just exactly what level of enforcement ICANN is willing to play in this operation.

I hope I'm being crystal clear because there's quite a bit of lack of clarity going on in these discussions. Thank you.

MICHAEL PALAGE: Alan, would you choose to respond or are you done explaining your questions?

EN

ALAN GREENBERG: I'm done explaining This is our one kick at the can, at this point, of getting information for what Compliance currently does, which will guide us in whether we recommend to the GNSO that we need policy changes going forward. Clearly, what Compliance does is governed by the RAA and their interpretation of the RAA. And that is governed by either bilateral negotiations between the registrars or registries and ICANN, or the policy process.

And our task is to make a statement to the GNSO as to whether we believe further policy work is necessary. To do that, I believe we need to know what's happening today. And these are just little bits of pieces of trying to solidify the question of what is happening today so that we know whether to say that changes are required or not required.

I didn't think anything here was controversial, and they should all be … If I phrased the questions properly, and I'm happy to rephrase them, they should be really clear and get answers from Compliance so we understand where we are today. That's it.

I understand things in the chatter going on that may be out of scope, but that's not what I proposed. And going forward, maybe things need to change. Maybe they don't. We're just trying to find the lay of the land today. Thank you.

MICHAEL PALAGE: Stephanie, is your hand still up or is that a new hand? That must have been an old hand. Marc, you're next in the queue.

MARC ANDERSON:	Thanks, Michael. First I want to thank Alan for submitting the questions and explaining them all. I appreciate that and the discussion that went with them. I think, to his point , we have a clear task. I think this gets right to the heart of our first question. Right? Assess the measures. Include proactive measures used by ICANN Compliance to monitor, manage, measure, enforce, and report on accuracy obligations, and so forth. Right? Our first task, as Alan says, is understand the lay of the land which is important. I think that informs the rest of our work.

What I want to ask is what goes from here. Alan said something about "this our one shot" and I wasn't sure if he was referring to these questions or the Scoping Team in general, but that sort of triggered me to ask the question. What is sort of our next steps with these questions? As I understand it, we have we have an ICANN Org liaison. And one of the reasons we have the ICANN Org liaison is so that as questions for ICANN Org come up over the course of our work, the ICANN Org liaison can take those questions back to Org and get those responded to.

At least my understanding is that this wouldn't be our one and only chance to ask questions of ICANN Org. I think the liaison should be and is there to be able to do that throughout our work as stuff does or doesn't come up. So I wanted to make sure … Okay, thank you. Brian's confirming that.

So I wanted to make sure that I understood that right, and then maybe understand where we're going with these questions because, as I sort of understood it, I thought this assignment came about because, earlier—I think it was meeting #2, maybe— |

we discussed the possibility of requesting a briefing from ICANN Org.

And I thought maybe the purpose of these questions was to sort of tee up that briefing that some of us had raised and suggested that it might be useful to get a briefing from ICANN Org at one of our meetings as to what is the current state of play. So I guess my question …

I want to make sure I understand this exercise, the timing and what comes next.

MICHAEL PALAGE: Brian, you have your hand raised. You have the floor.

BRIAN GUTTERMAN: Thanks, Michael. Thanks, Marc. I just wanted to reiterate here for the transcript what I've put in the chat. You're correct, Marc. My role as a liaison is to relay questions and answer them if I can. But really relay questions to get certified answers from my Org colleagues, whether they're in GDS or Compliance or Legal or other departments back to this group.

And of course, that being said, I think we're are all on the same page that this group of questions that we're looking at now is part of our first assignment and we're trying to sort of get focused questions; and again, questions that haven't been answered already in the background documentation so we can ask pointed, specific questions to Org colleagues of ours to then come back with either written answers or, if the group finds it necessary or

MICHAEL PALAGE: I think that does help, and I would concur with that. I believe the purpose of these questions were to tee up that discussion. Alan, does that answer your concern or questions?

ALAN GREENBERG: I'm sorry I used the expression "the one kick at the can." But my experience with ICANN processes is that sometimes if you don't do something when there's an opportunity, the opportunity doesn't come back again no matter how much everyone hopes it will. We're time constrained. People are exceedingly worried about scope. And this seemed to be an opportunity that if there were questions we have today, that we should ask them. And that's what I tried to do.

Yes, there may be other questions that come up later. And hopefully we'll get an opportunity to have them answered. This was just an attempt to at least lay the groundwork for clearing up some of the things that are unclear in my mind today. No one else chose to put anything else other than Sarah's first one, so I put in what questions that I have. Things that, despite a significant amount of involvement with Compliance over the last decade and a half, these are mysteries to me and I would like to understand them. That's it.

MICHAEL PALAGE:	And no need for apologies, Alan. As I said, I think your questions actually helped. You did the homework, so kudos for that. If we can go back up at the top. I think Sarah did add one. Yes. Was that a Sarah question? No.
SARAH WYLD:	That came up in a meeting from November 4th. So it was kind of a group question.
MICHAEL PALAGE:	Okay. Do you want to perhaps explain that group question? Or do you think it's self-explanatory?
SARAH WYLD:	I mean, honestly, I feel like it is fairly self-explanatory. Yeah, thank you.
MICHAEL PALAGE:	Okay, so—
SARAH WYLD:	Sorry, Michael. If I may?
MICHAEL PALAGE:	Please.

SARAH WYLD:	Thank you. I wonder if maybe some of these questions are at least answered, in some part, in our background briefing documents. So I wonder if it would help somebody if perhaps our wonderful staff team had time to just put some links in this document to indicate where that information is already provided if that is the case.
	Yeah, so I see … We've got those documents, and then the briefing assignment documents are very full of information, which is great. And I think at least some of these questions are answered in there. Thank you.
MICHAEL PALAGE:	Okay. So, yes. So the answer to your question, Sarah, is that one of the reasons that we have undertaken this process is to pose questions/net those questions to see whether they have been asked or answered previously before then going and asking for a briefing on them.
	So the simple answer to your question is that we will undertake that, and if it has been specifically asked we will respond to this document, see this already answered. If the individual or stakeholder group posing that question is satisfied, it will be removed or they will have the ability to perhaps revise their question or clarify it accordingly.
	So I am agreeing in principle with what you have said. We want to make most efficient use of our ICANN colleagues' time, particularly from Compliance if were to receive a briefing from them.

So with that, I would propose … Yep, there we go. I myself have a couple of questions that I have come up with. So I think there are some more questions that I think could be posed by the groups, other than just Alan. I would like to see those questions raised. Stephanie, I know you were talking about a number of questions that you would like. You had talked about the appropriateness of them being included.

I am all for being overly inclusive and then vetting those questions to make sure that they're appropriate. We do have a proposed deadline of next week—I think it was the end of next week—to submit these questions to ICANN. I would like to achieve most of this work via e-mail. If that is not possible, I will hold firm to doing this call next week. I know a number of people may not be able to attend this. They will be observing Thanksgiving. But, yes, we will have a call if we do not have the questions finalized in advance of our call next week.

So with that, before I wrap up and conclude the meeting today, any final thoughts or comments from the group?

And with that, Terri …

Marc, I was just going to Terri to stop it, but you beat the buzzer. Marc, do you have the floor.

MARC ANDERSON: Thanks, Michael. Sorry to hold everybody longer. For next week, can you give an indication as to when you'll make that decision on if we're going to meet or not and what criteria you will use to make that decision?

MICHAEL PALAGE: So I would say, by default, we are going to have the meeting. That would be the default. The criteria by which we would not have the meeting would be that the list of questions that appear in the Google Doc, there are no further points of contention. Everyone is happy. There needs to be no vetting. So that is my aspiration, that we can get that concluded by next Thursday.

However, I am planning on getting some of my pre-Thanksgiving cooking done, assisting Nelly, before the call so that I do not end up in the doghouse.

Beth.

BETH BACON: Hey, Mike. Thank you. I think that's helpful, and I'm fairly confident we can do that. We're all smart, nice humans. We can agree to things over e-mail.

But I will say it is concerning. I know it's a U.S. holiday, but so many people that are not U.S. based kind of take off or enjoy that quiet day. I will say that I anticipate that the entirety of the Registries Stakeholder Group representatives won't be able to attend that call. And that's a challenge when we come back the next week. There are maybe disagreements or there are questions. And that's not helpful to the smooth flow of the group.

And I'm not saying that we need to cancel for us. I'm not saying any of that. I think that we can actually get the work done on the e-mail, which is because we're, again, all smart, nice humans. But I

think that it's just something of concern, and keep in mind as we do head into the end of the year when there are several different holidays, globally, that we're going to have to navigate. And I appreciate that we want to keep moving, but I just wanted to flag that. So, thanks.

MICHAEL PALAGE: I appreciate your concern and, as I said, we will attempt to undertake as much of our work as possible, intersessionally. I think that is possible. But if, in fact, we are unable to meet, then we will recalculate and adjust accordingly.

So with that, Terri you can stop the recording. And I look forward to a healthy e-mail discussion on the list over the next couple of days in advance of next week's. Take it easy, everyone.

TERRI AGNEW: Thank you, everyone.

UNIDENTIFIED MALE: Thanks, Michael. Bye-bye.

OLGA CAVALLI: Bye, Mike. Thank you.

TERRI AGNEW: Once again, the meeting has been adjourned. I will stop the recordings and disconnect all lines. Stay well.

[END OF TRANSCRIPTION]