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ICANN Transcription

Registration Data Accuracy Scoping Team

Thursday, 12 May 2022 at 14:00 UTC

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TERRI AGNEW: Good morning, good afternoon, good evening, everyone. Welcome to the Registration Data Accuracy Scoping Team call taking place on Thursday, the 12th of May 2022 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 no listed apologies for today's meeting.

Statements of interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now.

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 or hearing no one, if you need assistance updating your statements of interest, please e-mail the GNSO Secretariat.

All members will be promoted to panelists for today's call. As a reminder, when using the chat feature, please select everyone in order for all to see your chat. Alternates not replacing a member, please rename yourself by adding three Z's to the beginning of your name, and at the end in parentheses, use the word "alternate" which means you're automatically pushed to the end of the queue. Alternates should not engage in the chat apart from private chat or use any of the other Zoom room functionalities, such as raising hands or agreeing and disagreeing.

All documentation and information can be found on the wiki space. Recordings will be posted to 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 the ICANN multi-stakeholder 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. I will keep this quick as far as the administrative update section goes. As noted, we have submitted a change request to the GNSO Council. I believe Berry had discussed that. There is a link to that document that appears in the agenda. The

other, I think, important thing is that we have been designated a time for our ICANN in person session as well as virtual for The Hague. If I can just confirm with our ICANN Org colleagues about the logistics. I believe we were told you have to pre-register for the events from a scheduling perspective. Is that correct? Can you confirm that? Marika.

MARIKA KONINGS: Yes, that is my understanding. And I understand that details are going to be published about that soon.

MICHAEL PALAGE: Okay. And I guess what I would just ask from our ICANN Org colleagues is if we can identify and just make sure that people that are going to be there, we work to get those limited slots for the members to get first dibs on them before opening up to others. So if that's something we could just coordinate and push out to the group, that would be great.

So that is it as far as an administrative update. Any other issues, any other business that the group would like to raise now? If not, let's turn it over to the gap analysis document. Marika, do you want to just pull that up and help drive our discussions on the various proposals where we're at? And go ahead, Marika.

MARIKA KONINGS: Yes, thanks, Michael. So what you see up here is the gap analysis proposal review documents that hopefully by now should look familiar to everyone in the group. And as you may recall, we've

focused the work for now on those proposals that do not require access to a registration data. That is part of a separate track that we'll also be talking about later today.

And we have foreseen to speak today about all of those proposals that do not involve access to registration data. And first up is that ICANN Org registrar audit, and I'm welcoming two of my colleagues here, Amanda and Yan from our compliance team, and to provide a little bit of context.

One of the suggestions that has been discussed is whether it will be possible to obtain further data about the state of accuracy through an ICANN Org registrar audit. And so that would be an opportunity for you as part of the audits that ICANN Org runs, to basically review how compliance is met by selecting a number of registrars and having them provided a specific set of information.

So the group kind of explored that idea a little bit further as part of its deliberations and already asked an initial question to ICANN Org about how this could work, what kind of timeframe we would be looking at and how this could then inform the group's deliberations. And I'm hoping that Amanda or Yan will provide a bit of more detail to the information of a response that was already provided here that a small team of members of the scoping team already looked at.

But based on the follow up conversation that the small team then had, it was deemed that it was probably helpful to have a kind of a conversation about this with ICANN Org to better understand, would it be possible to do this as a kind of collaborative effort with the scoping team, to make sure that whatever information would

be obtained through such an audit would help inform the deliberations of the group, of course, understanding that there are limitations to what ICANN Org can audit, and that's very firmly embedded in the agreements. And as well, maybe have a bit further information or insight into the type of questions that could be asked as part of the audit.

And, again, I'm assuming that Amanda or Yan may touch upon that as well. And the ICANN Org response already indicated that as well that also in the context of an audit, there may be differences or different approach when it comes to either asking questions that do not involve access to registration data and questions that would involve access to registration data, which may make it more complicated for which further confirmation would need to be obtained that that's possible.

And so this is the proposal would like first to discuss, I think, with the group, taking advantage of having our ICANN Org colleagues here. And I think once we've had this conversation, we can probably go back to two other proposals that are also in the same category to obtain the group's feedback. And again, kind of an overall point to take into account, at the end of the day, at the end of the review of these proposals, we really would like to get a sense from the group whether you think it's worth for the scoping team to recommend moving forward with these, pausing consideration of these or concluding that it's not worth pursuing the proposal further, because either it's not worth the effort for the benefit it's deemed to deliver. Or maybe it's duplicative with other proposals that are already being considered.

So I hope that's helpful as part of the context. Michael, I don't know if you want me to hand it over to our ICANN Org colleagues to maybe talk a little bit about their response. And then I guess open the floor to see if there any questions or comments from the group.

MICHAEL PALAGE: I think since we invited them here today, it would be only appropriate to let them talk and explain. And there you go, that would be the most efficient.

AMANDA ROSE: Thank you guys. Thanks for having us. So I did put together the written response, essentially, what we envision with an audit round with respect to the accuracy requirements. Several options, I guess, one being obviously not having the access to much of the registration data in public RDDS changes the scope of what we can audit without additional information obtained through the actual contracted parties themselves. So that initial audit would really be limited to requesting information and queries about the actual process itself on verification and validation requirements. So going through the registrars, what they actually do to do that, because the program specification allows for some flexibility in how registrars implement verification processes. So some might have validation processes for that matter. So we have had past mediations where those processes did not meet the criteria as a broader general sense. So that would be the initial type of audit that we could do now without access to registration data.

I think, for purposes of what's available in the public RDDS, that's kind of all over the place with respect to what registrars currently offer, and many don't have that. So we wouldn't envision that being part of a current audit. And then following that, really to start doing anything deeper with respect to underlying registration data.

As I noted in the written response, we would want to get some feedback from the EDPB as far as what is permitted, what's within our legal—forgive me, what we would actually be permitted to do and not violate GDPR and all that. So I know that's in the works with ICANN Org, so I won't speak on that just because I don't have the information from the compliance perspective. But beyond that, that's kind of what we're envisioning with how we would do an audit absent further information outside of what we have. I can answer questions. I'm not sure what exactly [inaudible] that.

MICHAEL PALAGE: Alan, they see your hand up, you have the floor.

ALAN GREENBERG: Thank you very much. Amanda, you just said that based on input you got from the Data Protection Board or similar authorities, you would then know what you're allowed to do. But I presume for you to do it in an audit, to access information, you not only need to ensure that it's legal, but then there needs to be provisions in the contract which allow you to do it. Right now, there is a provision that you can get the redacted data in response to a complaint. But that implies you couldn't get it in response to an audit. At least that's the way I read it anyway. So clearly, there would have to be

policy changes made, in addition to verifying legality. Is that your understanding as well?

AMANDA ROSE: Right. Under the RAA, [3.4,] related to a compliance inquiry. So to the extent that it's related to that, that would be the connection that we need to obtain that data in the sense of a registrar audit. So I know that that idea has been circulating this group, and we haven't really delved into that further from our perspective as far as what we would be asking for, and what would be within scope. So feedback from this group, obviously, in that respect is appreciated.

MICHAEL PALAGE: Stephanie, I see you made a comment in the chat. Do you want to specifically raise that? Okay, [inaudible]. Are there any other questions for—Yan, please go.

YAN AGRANONIK: Just a quick comment, the word audit is thrown here and there frequently, but I just want to make a comment that if we send an inquiry or questionnaire where we're asking for, let's say, description of the process or things of that nature, I want to say this is not like a true audit. The true audit is when you get a data that you are verifying against some other substantive information. So I just want to basically caution everyone, when you use the word audit, in this context, it would be more of a review or inquiry. And I'm trying to basically make this comment so you guys understand what this is all about.

MICHAEL PALAGE: Thank you, Yan Okay, I'm just acknowledging Stephanie [did hear] and she was just trying to augment in the chat, and if she does have anything of major concern, she will raise her hand and put that on the record. And again, Stephanie, I'm just documenting that for a lot of people that will listen to these recordings and not necessarily simultaneously be looking in the chat. So Marika, you have your hand raised.

MARIKA KONINGS: Yeah. Thanks, Michael. Just trying to probe the group a little bit more. So I think Amanda has basically shared that the information that would likely be obtained from an audit would be information about the processes that registrars use to validate and verify information, registration data. So I think question for the group really is, is that helpful information for you to kind of consider your assignment three and four? Does that help identify the state of accuracy? Does it help in identifying potential gaps? Is it worth pursuing? Because again, if this is something that the group wants to pursue and needs to come in the form of a recommendation, then needs to be going to the Council as well, of course, or from the ICANN Org site, we'd need to identify if the resources available to undertake something like this. So it would be really good to get a sense from the group whether or not this is an approach that you think is helpful pursuing, or whether at this stage it may not get the group the information that you think you need to kind of help inform the conversation for assignments three and four.

MICHAEL PALAGE: So Amanda, a quick question I would have for you and Yan is in doing these audits, right now, the does ICANN make any distinction into the respective business model that the registrar may be operating a retail wholesale reseller model? Yeah, let me rephrase this. Does ICANN send out audit questions tailored to the respective registrar's business model, or is there just one generic template that is sent out to all registrars? And if there is just one, how do you account for some of the more diverse business models that we all know exist within the ecosystem?

YAN AGRANONIK: I can respond to that. When we send audit questions to registries or registrars, we do not tailor them to specific business models that they are using. We stick with the approach that is relevant to what exactly the obligation in RA or RAA is.

MICHAEL PALAGE: So if a registrar was to come back and say I delegate that to my reseller network and I contractually bound them, for purposes of the audit, you would consider that the end of the road, or is there any time that you would then ask to perhaps go down to that next level of reseller? I'm just trying to get the picture.

YAN AGRANONIK: Yes, this is not the end of the road, we're saying our response would be this is your obligation. And if you delegated this obligation to a reseller, we would like to have more information

about exactly how do you delegate, what are the obligations that you put your reseller into? And we review their answers further.

MICHAEL PALAGE: Excellent. So I found that supplemental clarification enlightening, hopefully others did as well. We have a quiet bunch today. So I'm pulling teeth here. Alan, you have the floor.

ALAN GREENBERG: A follow on to that one. When you ask a registrar, how do you do something and they tell you, do you attempt any verification that they are indeed telling you the truth and sort of go through the process? And if you do that, do you do a similar thing if it's done by a reseller? Or is simply the fact that the reseller is legally obligated and you've seen the contract sufficient? Will you actually audit the actual events and verify that it is being carried out or simply that there's a contractual requirement? Because you know the contractual requirements for the registrar, there'll be no purpose for an audit, if you simply are verifying that it's in the contract.

YAN AGRANONIK: Yes, Alan, when you say events, that's the perfect word. We refer to as records in the audit profession. So we ask for examples of events. These are recorded as records. So for example, if there is an obligation to, I don't know, send a reminder to a registrant about the expiration of a domain, and the registrar says, we actually don't do that, the reseller does that, okay, show me records or examples of such reminders being sent by your reseller

to registrant. So we go as far as we can. And we do ask for actual records, not just statements of we do that kind of thing.

ALAN GREENBERG: So you do ask through the registrar for reseller records.

YAN AGRANONIK: That's correct. We do.

ALAN GREENBERG: Okay. Thank you. Now, you don't actually contact the reseller yourself?

YAN AGRANONIK: No, we don't, because we have no contractual relationship with them. So everything goes through registrar.

MICHAEL PALAGE: Are there any other questions from the floor? Marc Anderson? There we go. Thank you, you rescued me, Marc, Marc Anderson, you have the floor.

MARC ANDERSON: First, a quick thank you to Yan and Amanda for joining us today. I found it useful and interesting, what you had to say. And I think Michael, you've noticed that we're kind of a quiet bunch. And I've been sort of reflecting on what they said, and trying to think about

or reflect on if what they said can be translated into something useful for us.

And I think what I heard from Yan and Amanda is that at least under our current scenario, compliance is not in a position to measure the accuracy of the data itself, which they would need to access the data for. What they could do is they could audit registrars themselves to look at or confirm if they're following their obligations under the 2013 RAA. Specifically, the accuracy specification, which obviously, we've been talking about looking at a lot as a group.

And that's interesting. You know, as is usually the case, I go back to the charter when I'm sort of stopped or trying to decide if something makes sense. And I'm looking at item number two, which is measurement of accuracy, and we've been tasked to provide recommendations and how accuracy levels can be determined and measured, including but not limited to whether WHOIS ARS needs a revamp to make it fit for purpose and so forth.

And looking at that, while an audit of registrars to see if they're following the process might be interesting, I'm not entirely sure that helps us with the tests that have been laid out for us. And I think that the biggest one we've been tasked to figure out is how to measure accuracy.

And like I said, while interesting, my sort of initial reaction is that maybe this is not really what we've been tasked to do. So, at least these are my sort of initial reflections on this. I think it was interesting. It's a lot to think about, and maybe the lack of

conversation is that we need a little more time to think about it. But this does seem a little bit tangential to what we've been tasked to do. Curious what other people think. But I guess I'm just getting my thoughts out in front of the group, based on what we've heard.

MICHAEL PALAGE: Oh, good. We have some more hands. Thank you, Marc, for stirring the pot. I appreciate that. Stephanie Perrin, you have the floor.

STEPHANIE PERRIN: Thank you. I am attempting to respond to Marc's question here. I think that we have a fundamental issue in that if you are going to ask the DPAs whether you have the authority to measure accuracy, then you have to follow the purpose that you have stated. And you will recall that in the EPDP, we debated the purpose of this data collection at some length.

And the data commissioners have been clear in many previous documents that ICANN does not hold a mandate to do criminal investigation, we have responsibilities for managing the security and stability of the Internet but we do not have a mandate to do criminal investigation. And they've been clear about that.

It seems to me—and I could be misstating the problem, but it seems to me that we are attempting to get greater accuracy in the data of let's call them miscreants who have provided inaccurate data in order to avoid detection. And we are going to have a difficult time finding that as a purpose that validates any normal audit, because any normal audit of the data collection of this

particular data controller, which that is as I recall, the contracted parties, they're gathering that data for the purposes of providing them domain names, and putting it into play and doing all those things. And they gather the data to get paid. They have a host of uses that are not necessarily part of the RDS.

Now, had ICANN opted for taking entire control and managing the RDS itself and had it agreed to a purpose that got closer to law enforcement purposes without necessarily engaging in criminal investigation, maybe you might have an argument, but I don't think we do. So I think if you go in and check accuracy, you have to check it under that umbrella of, what does a contracting party need the data for? And it doesn't get you very far. Thanks.

MICHAEL PALAGE: Stephanie, can I ask you a question? A follow up question. And I think this is a discussion that we've had before in the group. And I again, maybe you can elaborate. So I tend to find your argument compelling that having ICANN sit there and say we're going to audit 170 million domain name records would be rather hard to justify under Article 6 of the GDPR based upon the current construct and writing of the current legal agreement.

But one of the questions I think that was asked by myself, and I think some others, were if you were to narrow it to that set of domain names that were specifically subject to OCTO reporting associated with illegal activity, in your opinion, there, if you narrow ICANN's remit to look at data in connection with those domain names, is that something that you think would be more

appropriate as opposed to the wider net of all domain names registered under ICANN contracts?

STEPHANIE PERRIN: It does seem to me—and remember, I'm not the lawyer. So I invite the lawyers to contradict me here, particularly those more familiar with GDPR. But certainly under our regime of data protection and charter and all the rest, which is not all that different than the European one, you could justify doing that because of course, you are taking administrative action when you detect, for instance, malware, when you go through the private sector process of dispute resolution over copyright infringement, so that you're taking an administrative action and ICANN's enforcement folks, the GDD or whatever their new name is, they're taking an administrative action subject to the contract pursuant to the requirements in the RAA and the agreement that we make domain registrants sign.

So yeah, I would think that that could be in scope. And it would be interesting to find out how many of those are in scope. But the argument does remain that you're looking for more intrusive information, if indeed that's part of the follow up to verify for purposes that are purely administrative.

Part of the problem here is, how many of these actual—for instance, we talk a lot about malware. How many enforcement actions do we actually take? You don't need accurate data, if all you're going to do is take the site down. You've got the proof that you've got malware coming out of that site, you take it down. Why do you need the accurate cell phone number? Thanks.

MICHAEL PALAGE: So Stephanie, Perhaps I could answer that. I actually worked with a client recently where one of the registries actually took down the domain name. But the client was then trying to identify the actor, the registrant through the registrar to potentially take legal action. So just because harm has stopped by a domain name being suspended or taken out of the zone, there still could be situations where someone who has been harmed may still want to seek redress. And that is why in that situation, that particular client then reached out to the registrar unsuccessfully to get the underlying domain name. So I'm just trying to give you my personal—

STEPHANIE PERRIN: I understand that, and I'm not saying that the police never take an enforcement action, it's just that you can't justify it on a routine basis, because normally, we just take these things down, and don't bother trying to pursue it. For probably logical cost recovery kind of reasons. Thanks.

MICHAEL PALAGE: I would agree, Stephanie. Alan Greenberg, you have your hand up.

ALAN GREENBERG: Thank you. I put my hand up in response to marc and I'm not sure I remember what he said anymore. In terms of Stephanie's initial comment, I'm not sure why she raised the issue of criminal

investigations and addressing criminal issues. That's nothing that we've talked about at all here.

The registrars have made it very clear from the very beginning that they have no need for the information in RDDS. It's been collected because they're being told to and it's being collected for other reasons, not for the registrars' direct purpose. So I think that's clear.

What I heard, going back to what I think Marc was talking about, was from compliance, that it's quite clear that under the current understanding of the GDPR regulations and our contract, we don't have the authority to ask for information other than in pursuing a complaint. And therefore, if ICANN is to do anything through compliance or through some other area, it's going to take both verification that we indeed have the legal right to do it as some level of controller of the process, or/and we need the [inaudible] within contracts to then be able to go ahead and do it and have an expectation of responses. And I think that information is important, because it does set out the path that we have to follow if indeed we believe any level of verification is going to be needed. Thank you.

MICHAEL PALAGE: Okay, so while I wait for any additional hands, perhaps an open ended question to Yan and Amanda, as I think you've heard earlier in this call, again, what we're focusing on here is assignment one and two of our work. There is however intended to be assignment three and four where we will make proposed changes. So I guess the question I would pose to you is, in the

course of you doing your work, is there some times that you find you are unable to do your work or you that you end up in a dead end and say, "I wish I was able to do this," or, "I wish I had this tool or this resource?" Is there anything in your professional opinion that you feel would be nice to have as part of an assignment three or four to better position you at ICANN compliance to do your job better?

YAN AGRANONIK: Amanda, I would delegate this question to you.

AMANDA ROSE: Thank you. That's a pretty broad question, I guess. Are you narrowing that now directly with access to registration data?

MICHAEL PALAGE: Yeah, put it this way. I don't want Marc Anderson raising his hand again. No, again, this is trying to be very constructive here. Again, some of this is open ended. But the objective here is, in the course of ICANN compliance doing investigation regarding accuracy complaints, or audits or something like that, are there times that you find yourself at a dead end because you didn't have this ability or there was pushback, or you wish you had another tool or another provision in the contract that would allow you to better do your job for purposes of contractual compliance, ensuring the security, stability of the Internet, and all that other good stuff? So it's not intended to be a trick question. But it would really be helpful from the eyes of ICANN compliance, do you think there could be some additional tools or additional contractual

language that we as a group could look for as part of assignments three and four?

YAN AGRANONIK: A quick comment. It's going to be not a broad answer, but it's just going to be an example. During audits, prior to GDPR, what we did is when we evaluated during audits, accuracy of registration records, we actually tried to validate and verify every field in the registration data, because we had an access to it, meaning phone number, mail address, pretty much everything that is in there.

Now we cannot do that. Does it block our, like you said, the job? I mean, does it prevent us from doing a good job? That I cannot tell you because now we're going into definition, what does it mean, the audit job?

SO what we did back then is, again, we've we put more effort into verifying registration records. Now we have less opportunities to do that. Now, is it a bad thing or not? That I cannot tell you because the auditors do what they can do and allowed to do by registration agreement and registry agreement and registrar agreement. And that, I think, you understand what I'm trying to say.

MICHAEL PALAGE: Yeah. And again, it was not intended as a trick question. I think to accurately sum up, as auditors, you audit and verify the data that you have access to.

YAN AGRANONIK: That's correct.

MICHAEL PALAGE: Previous to the GDPR, you had more data upon which you could audit and verify. As a result of the GDPR. You now have less data.

YAN AGRANONIK: That is correct.

AMANDA ROSE: From an audit standpoint, I think, kind of similar to what Yan said, I'll first say that, of course, our processes have had to change with respect to how we process these and it is more difficult because we do have to go and follow up more with reporters and follow up more with contracted parties to close out these types of inaccuracy cases because we can't just look at registration data and confirm, for example, updates have been made or that the evidence matches what's in public RDDS, for instance. So to the extent that, has our process changed and is it more difficult? Yes, of course, that has had to adapt. But I wouldn't necessarily say that it prevents us from doing what we need to do or that we end up in a dead end.

                        I think as you said that we do have the temp spec which states that in compliance related inquiries, that such data to confirm compliance could be transferred or provided to confirm compliance, I should say. So in that respect, no, I don't think we have that dead end issue so much. Yes, there are more difficulties

in processing these, but it's just more of a time consumption matter than not being able to do our job.

Now, with respect to, again, public RDDS, there are instances where we would proactively see something and follow up with an inaccuracy investigation due to—I think I've noticed in some of the responses to this group that some information can be pretty clearly inaccurate, or at least questionably inaccurate, in public RDDS. So those types of cases have gone down. And obviously, as you've seen by the metrics, so have the inaccuracy investigations just whereby we don't have access, nor do our public reporters that submit those complaints. So as far as tools, I don't really have any suggestions, unfortunately, for you guys that I could provide. So hopefully, that helps.

MICHAEL PALAGE: We have some more hands up. So I think that did help. Beth. And then Volker, I think you put your hand down. Beth, you have your hand up, you have the floor.

BETH BACON: Thanks. Hi, folks. Amanda, thank you very much. That was super helpful and interesting. My comment is really more, Michael, on you bringing this up, this question. What we're talking about is the request for further information from ICANN Org and what can be audited, what timeframe to understand what suggestions we might make as a group.

I think the evaluation of whether there are gaps or needs is this group's responsibility, and we aren't even past question one and

two yet. So I do think that was a bit of a leading question. And if at some point, this group does want to go to compliance and say, "Hey, we think these are things that are gaps, is that something that would fall under compliance's remit," then we can think of a solution. If compliance were to say, "Yeah that's not [really—outside] our remit," then we would look for other ways to do that.

So while I appreciate the information, and Amanda, I think that your response was really helpful and spot on, I think that this maybe isn't exactly what we were on the call to discuss. I think we wanted to discuss whether there are avenues for us to gain more information right now to establish if the baseline of accuracy and see if there are things then that are missing. I don't know that we want to go jump over that step and say, are there things that compliance might want to do? That's my concern there. I do think it's important that we close out this conversation and this item. We've talked about it several times on several calls. So I just wanted to bring us back to the original discussion. Thanks.

MICHAEL PALAGE: I could give you leading questions. That was not a leading question. But I respect the difference of opinion there, Beth. Stephanie and Alan, are those old hands or new hands?

ALAN GREENBERG: Mine is a new hand.

MICHAEL PALAGE: Alan, you have the floor.

ALAN GREENBERG: Thank you very much. I found this information exceedingly good. And particularly Yan's last intervention. I wish I had had the presence of mind to ask the question that he answered. So I really do appreciate volunteering information. What I heard Yan say was that in the previous eras, during an audit, ICANN might choose to actually verify data and see if it was good, the data that they then had access to.

I'd like to presume that ICANN's auditors are not frivolously wasting their time on things they thought were stupid and not worth doing. So if they actually went through the process of, on some occasions, verifying data before, and now they can't, that's a substantive change in our ability to audit contracts. So if you presume they were not wasting their time and just filling up the day by doing that, then there was some benefit and purpose, and they can't do it anymore.

So I think that's really important information for us that we have to consider going forward. And I wish I had the presence of mind to ask that question. I haven't, but I do appreciate the insight as to the kinds of things that might happen on audits which no longer can happen because of the restrictions.

I've maintained for a long time that in these processes, although I understand ICANN Org participates as a resource, since compliance is trying to achieve a job, I find it really useful to have answers for them from as to what would make it more useful to do their job or what would make their job easier or more effective,

MICHAEL PALAGE: Stephanie, old hand, new hand?

STEPHANIE PERRIN: It was an old hand, but now it's a new hand. I just wanted to follow up on Alan's comments about how the "restrictions" are causing ICANN compliance to not do what it formerly did. Let's remember that ICANN was in complete absolute denial of all data protection law and had a procedure that in fact made law abiding companies go through their legal counsel to get permission to comply with data protection law. So the past procedures cannot be presumed to be either justified, effective or—and I'm casting no aspersions on the GDD when I say this. We just weren't complying with law.

So everybody who uses data wants more and more accurate data. That's why the data limitation—is part of why the data limitation principle is there, is to stop you going back and fishing to see if you can get better and better data.

How this is handled in jurisdictions that have data protection law is when a private sector firm needs data, or a public authority needs the private sector organization to gather that data, they will legislate to make sure that the private sector can do that. I give you the social insurance number and the banks. It became law to provide it to them. Anyway. Thank you. I'll stop there.

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MICHAEL PALAGE: I think we're done. Volker, I do see your hand up and I am going to let you speak. But I'm going to draw the line at the end of the queue here so we could get back to the proposal. So Volker, you will have the last word.

VOLKER GREIMANN: Thank you. And I also found the comments very helpful, especially from Amanda, when you clarified that basically, ICANN, even under the current circumstances, is perfectly capable of fulfilling its tasks and doing what they were doing before even though they're doing it in a different fashion. And I think that is pretty much spot on. I mean, GDPR, and the requirements that came along with it do not prevent ICANN from doing its job. It's just there's more difficulty there. But difficulty does not mean impossibility. And I think that's an important point to make. Thank you.

MICHAEL PALAGE: All right. So Marika, do you want to come back to the proposals here and help drive us forward?

MARIKA KONINGS: Sure. So on this one, I've heard, Marc, I think, say that he doesn't think there's value to pursuing this at this stage, as in may not address the questions that the group has been assigned. I haven't heard anyone say differently. So it would be helpful if maybe the group can think about it, because again, we need to include in our reports, basically, in the write up, that there are a number of proposals that were considered and if possible, attach a

recommendation to that, whether it is to pursue those or whether it is not recommended at this stage to pursue those further.

Of course, when it comes to audit, ICANN Org may decide itself whatever it wants to audit under the agreements. But, again, if there's a specific request or an urgency that's identified, that is something that the group could include. But as noted, I haven't seen anyone specifically speak out in favor of that at this point.

One of the other proposals—and maybe taking advantage of still having our compliance colleagues on the call in case there are further questions on this, there was a suggestion as well that a further review of accuracy and complaints might be helpful in better understanding current status as well as potential issues that exist, and the group basically looked—we already provided and of course compliance already provided a lot of data on complaints received, so that is already available to the group. And Owen did some additional work that was also shared with the group in relation to kind of looking further back and analyzing the types of complaints received, so that was also made available to the group.

So I think that the question here really is, again, is that something that's worth pursuing further, deep diving in those complaints and trying to see if there's something that can be learned from that that helps inform the conversation? And if the answer is yes, who is expected to undertake that analysis? Is that the group as a whole, a small team? Is that a third-party exercise? So again, I think those are the two questions that we're hoping to get input on. Is it worth pursuing further, and what would be learned from doing that? And if so, by whom is that work expected to be undertaken?

MICHAEL PALAGE: Okay, so, on the second proposal here, any questions, comments or concerns? And Owen, even though you are listed as an alternate, since you have provided data, I would not object to you chiming in on this particular topic, if you would like. So, thoughts or comments from the group on this?

We have silence. Okay, Owen is just citing to the previous data that he has shared via the list. And if there is a question, he is free to answer that. I see no further hands. So I believe there's one more, Marika. Am I correct on that?

MARIKA KONINGS: Yes, that's correct. So I'm interpreting the silence that there's no interest in pursuing this proposal either. Again, we need input here to kind of write this out. So if indeed, no one is this kind of seeing the value of this, we will note that as such, I think as part of the write up. And basically, note that it's not something that the group thinks is worth pursuing at this stage—Marc may have changed, have a different view on this.

MICHAEL PALAGE: Marc, you have the floor.

MARC ANDERSON: Thanks, Michael. And thanks, Marika. Thank you for raising this one. I didn't want to just leave it as there's nothing of value here. It feels to me like there might be some value in looking at this. But

I'm not sure what exactly we would want to get out of this. I know one of the drawbacks we've talked about here is in looking at existing complaints, that's obviously going to be only a small subset of the puzzle, if you will.

We've heard that a lot of people are not submitting complaints, because they don't think it'll make a difference. And obviously, nobody is going around submitting non-complaints when the data is accurate, right, so this is a very tiny one-sided slice of the puzzle.

It does seem to me, though, that there could be useful data here, and I don't want to just let this drop. Unfortunately, I don't have sort of a really great suggestion on what we should look at. And perhaps more importantly, what data we would expect or want to get out of it.

So I'm sorry, I don't have a better suggestion. I don't have anything productive on this, but I don't necessarily want to let this just drop altogether.

MICHAEL PALAGE: Lori Schulman, you have the floor.

LORI SCHULMAN: Yeah, I'm kind of coming down in Marc's camp. If we find there's no real value here, of course, let's not pursue and waste time, but the fact that the questions were raised is there some kind of notation we could put in the report that this could be an avenue of exploration or maybe put some sort of pin holder in it once we get

to the three and the four? I feel a little—and I've missed a couple of meetings. So I think that's part of it too. And my apologies to the group for that. But I'm just getting back into this. And this was a lot of work. And we've had ICANN staff weigh in and are kind of on the fence about it too, to be frank, which is why I haven't really spoke up very strongly today. I'm not sure. Is there a column for not sure? Or does not sure automatically mean no? I guess that's what I'm wondering. I understand your need for advice, Marika. I'm trying to respect that need.

MICHAEL PALAGE: I will try to answer that question, Lori, and then Marika will opine. Hopefully I get this right, Marika. Again, we're an advisory group. So I think part of what we all agreed to at the beginning was we were going to set out to do a factual analysis. These are some questions that we asked. I think we will summarize in the report, these were the questions that were posed by the working group, they were shared with ICANN Org, and after consultation, there was, I would say, they were not strongly endorsed or there did not appear to be strong support for moving forward with these initiatives. That is at least what I think would be the current state. If other people feel differently, again, we could articulate this on the mailing list. But I think all we need to do is actually reflect what the level of support was within this group. Because at the end of the day, this is a recommendation that is going to go to the GNSO Council and the GNSO Council will do what the GNSO Council needs to do. Marika, is that a fair assumption of what I think what we're trying to achieve here as a working group and our obligations to the Council under the charter?

MARIKA KONINGS: So basically, of course, the group can indicate in this write up that these are some proposals that are considered, but for some, the group is just not sure that it will add value or result in data that will help inform the deliberations. And they can leave it to the Council to try and make a determination. But I suspect the reason why the Council created this group is to receive recommendations on how to proceed. And although the assignment does foresee that basically after two recommendations go back to the Council, because that was in anticipation of that there might be further work that would require additional resources in order to gather the data, for example, restart of ARS or some kind of other study that is a bigger decision that requires a number of approvals before something like that, of course, would get done.

And if the group based on all the proposals—and there's still indeed one more that we're looking at—kind of isn't sure whether it's worth the effort, it could definitely note that, but I'm guessing the Council may then also say, "Well, if you don't know, how are we expected to know?" So they may say in that case, there doesn't seem to be anything to move forward with at this stage.

And then of course, the question arises, how do you get to assignment three? Because that is really intended to be informed by data that's gathered to make a factual analysis of the situation and be able to identify, are there indeed gaps or objectives that are not met that need to be addressed through other work, whether it's policy development or something else?

So I think those are some of the questions that groups may need to think about. And of course, you all may have some time to think about these proposals and further think about how they could be made useful or result in valuable information. Or, of course, if the conclusion is that at this stage, it doesn't—and of course, there's still the parallel track as well that involves proposals that would require access to registration data, and maybe that's where the value will lie and it is just a question of waiting for—getting some further guidance on whether or not that avenue is open for consideration.

MICHAEL PALAGE: Okay, Marika, I think that yes, I would concur with what you had said. Alan.

ALAN GREENBERG: Thank you very much. Becky made a particularly relevant comment in the email the other day in relation to the European Data Protection Board questions. And she said she didn't think we should ask them about questions where we weren't convinced we're going to get something useful out of the process, even if they say yes.

And I think the same is true here. At this point, we have not seen any real value in delving into ICANN complaints, or any of the other related things because we just don't see the value. So there's nothing wrong with saying drop it. If the skies open up later on and we suddenly find we missed something important and there's a treasure trove of information we can get, then fine, we

can bring it back onto the table and reconsider it. But at this point, it looks like it's a dead end that's not going to give us any real usable information that will help us in our task, or help us to assess accuracy. And so let's drop it. That's fine. It's still in our records and we can still go back if we see some reason for doing it later. Thank you.

MICHAEL PALAGE: All righty. There was one more, I believe, Marika. Correct?

MARIKA KONINGS: Yes, correct. And that is the registrar survey. And I'll just [inaudible] down because that is actually the proposal that has been developed in the most detail where the small team has identified kind of what the goal or objective would be of such a survey, the specific questions that it would be expected to be asked and kind of the timeframe for it, what data would be collected and shared, kind of how dissemination could take place.

But again, here also the question is of course very much focused on kind of obtaining numbers and information on the kind of processes followed and kind of verification and validation rates. Of course, it doesn't involve access to personal information. This is a voluntary survey. So it's dependent on registrars responding. And some have identified that that may result in maybe only the good registrars responding as some have said.

But I think we also had a commitment at the same time from registrars to help with the promotion and encouraging registrars to participate in this and then the group considered as well some

incentives that could be considered. But again, the question here is this, of course, also takes time, takes time from staff side to do this, takes time from registrars to fill this out and help with the promotion. And the responses to these questions, will they help inform assignment three?

And I think that's, again, the question that the group needs to answer to see, is this something you want to kind of pursue and suggest this is taken forward? Or is this also something where a pin may need to be put into it and maybe at a later stage, once there's clarity on kind of the other track that would involve access to registration data, then only at that stage, maybe it's pursued in combination with something else? So I think that is again the question here on this specific proposal and for the group.

MICHAEL PALAGE: All right, thank you, Marika. To this point, are there any questions, comments, concerns? Alan, you have the floor.

ALAN GREENBERG: Thank you. I was part of the small group that worked on this. And I went into it—I think I was quite candid on the group. I went into it because Michael said you wanted an ALAC person there. And I did it. And I went into it quite sanguine thinking that this was a useless endeavor. I came out with thinking it may well have some value, that the questions we're asking, if indeed we get answers from enough registrars, might give us some insight.

I don't think it's one of the more important things we're going to be doing. And if we can find something else that is more practical, it

might take a higher place. I would not want to scrap it right now. I think what we did needs some review of this group to make sure we have general support.

I'm not sure where I put it on our priority list going forward. Is it something we really recommend or something to keep in mind as an option? Because although I think it may be useful, it may not be as good as other things that open up as we investigate questions three and four. Thank you.

MICHAEL PALAGE: I thank you, Alan. Thomas, I see you have some concerns in the chat about whether the benefits will outweigh the efforts. Do you see any alternatives other than what has been proposed that perhaps could provide substantial benefits to justify the efforts?

THOMAS RICKERT: Hi Michael. If only I had my crystal ball with me today. I think setting up such a survey is quite an effort. I think that the questions are well crafted. But the benefits will hugely depend on the number of responses that we get and the quality of the responses and whether we would actually be able to limit this to one person per company responding or whether we might get something where the well-meaning registrars will jump on it with multiple people not knowing of each other responding. So I have my doubts whether this will actually be meaningful at the end of the day. Do I have a better idea? I'm afraid, not at the moment.

MICHAEL PALAGE: Excellent. And then I guess this really goes back to the point that Marika was saying, is if we can't undertake any analysis, then it's going to be difficult, if not impossible, to get to assignment three and four, which I know there were a number of particular members in the group that were focusing on that. So I just again want to be mindful. I don't know. It's a little bit of a chicken and egg. But Lori, and Alan.

LORI SCHULMAN: Yes, hi. I think Thomas's point is well taken about not getting multiple people or being clear about who should be answering or how the survey might be escalated. Or perhaps there needs to be one on one reach out to a fixed number of registers. And I'm going to harken back to INTA study from the CCTRT back in the day where we worked very closely with ICANN to get very, very specific questions, very well meaning questions to scope a problem.

We proceeded then with the survey and because of the complexity of the questions, and the fact that all of the parties being queried were not keeping data in the same way, we didn't get the response that we had hoped for.

With that being said, though, there was some data collected, some found it useful, some didn't. But what I like about the questions, though, if we could figure out how to get some sort of uniform and not complicated way to answer, is that Sarah has repeatedly said in the chat she wants to understand the problem rather than work on a solution. I agree with her that we need to have a documented problem. I do see that these questions could

help in documenting, is this issue of how many times domains are suspended if they're not validated? I mean, that would give us a question of scope, if it's 1%, if it's 10%, it's 40%. That makes a difference. So I tend to be kind of more in the camp of if we can figure out a way to create clear, uniform methods for responses, could be very helpful. But absent that, we could end up with a mush. And that may just depend on who designs the survey itself.

MICHAEL PALAGE: Thank you, Lori. Alan, and then Sophie.

ALAN GREENBERG: Thank you. One of the measures of how valuable this might be, will obviously depend on how many people respond, and we can't really definitively answer that right now. But the other thing is, how long will it take? If this is a six-month effort, then it's not going to help our job, I don't think. It may provide interesting information. On the other hand, if we think we could turn this around in three or four weeks, by an intensive effort and just get it done, that might have some more value. So I don't have a feeling at all for what kind of timeframe we might be talking about in a practical, real situation. Thank you.

MICHAEL PALAGE: Sophie, you have the floor.

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SOPHIE HEY: Yeah, thanks for that. Michael. I just want to build on something that Lori was saying about how it's quite difficult to assess and the mixed statistics they got from the INTA survey a few years back. I'm wondering if it might be the case that we look at the survey to actually focus instead on the steps that registrars take to ensure that the data is accurate.

So for instance, is there a JSON requirement in a field when registering a name to say that the email address is valid? Or is there a captcha thing that needs to be filled out? Or is there a link that needs to be clicked in an email?

Those sorts of steps to find out what is being done by registrars so we can work out, are there things going across the ecosystem? Are they consistent? And what chance of getting information do we have? If we were to phrase them about, what percentage of domains you have that are currently verified?

So we know what might help at least—now, it might be that this ends up that nothing comes from it. And it might also be that it's a two-part survey where we get one bit to work out how to inform the questions for the second one. I just thought I'd flag that one. Thanks.

MICHAEL PALAGE: Thank you, Sophie. So I think we are done with this portion of our assignment unless there are any additional questions to our ICANN compliance colleagues. Marika.

MARIKA KONINGS:	Yeah, I'll just note that based on the conversation today, will basically write up this conversation or try to translate it into kind of what would go into the write up. And I think we may use it as a standalone document for now to kind of facilitate a conversation and see, indeed, if there are some kind of conclusions or recommendations we can draw from it, or at least have those further discussed by the group, if that makes sense to everyone.
MICHAEL PALAGE:	I think that sounds as a prudent proposal. Beth, you have the floor.
BETH BACON:	Yeah. Thanks. Marika, that sounds, as usual, perfect. I was just wondering, on the other two proposals, we sort of got a definitive yea/nay on. Before we kind of move on from this one, I was just wondering—it sounded like Lori made some constructive comments, and Sophie did as well, on maybe kind of getting some value out of this. Are we going to keep discussing it or are we going to say that this is kind of on hold as well? I just wanted to clarify for myself.
MICHAEL PALAGE:	So my understanding is I think what we do is to Marika's point, we're going to write it up. I would say this final one, I would say if I had to pick between the three, which one had the most support, yeah, I would say number three appeared to have more support than one and two. And maybe we just document that appropriately. And once Marika and ICANN Org draft that initial

summary, we as a group then could opine to either strengthen or soften the language, and then we just include that, reference it or include it in our submission to the GNSO Council. Marika.

MARIKA KONINGS: Yeah, and my current thinking is, indeed, to kind of reference that the group discussed a number of proposals and probably include a link to the document, but note that at this stage, there didn't seem your sufficient value in pursuing that further, but also kind of adding a note that the group reserves the right to reconsider that. Also, I think, in light of what may come back from the conversation with the EDPB is, of course, there are a number of other proposals that are in the camp of requiring access to registration data.

And of course, I could envision, for example, if a response comes back and says, "No, in no circumstance whatsoever you may access registration data," the group may say, Okay, well, then we may need to review the other items that we have, because that's the only avenue that's open to us. Or if a response comes back and says "Yes, in these different scenarios that you've identified, we think there's value in that," maybe at that point, you can then definitively discard some of the other ones where there's less value compared to the proposals that do include access to it to registration data and what they might deliver.

So that's at least my current thinking at this stage, to write it up and indicate that there is support for pursuing the registrar survey that is noted in the chat. Some further investigation may need to be done in relation to kind of the resources needed to do this.

Of course, it depends because the questions as currently defined, that would be a copy paste into a survey tool. That is not, I think, the complicated part. The complexity is more in kind of getting it out, promoting it, trying to encourage people to respond. And then of course, analyzing that data and kind of trying to derive conclusions from that. I think that's at least from my perspective the complexity. Again, of course, there is some work that would need to go in to do that. So we'll try to write it up in the way I just outlined. And of course, you'll have an opportunity to review that and indicate if you would like to see things differently.

MICHAEL PALAGE: All right. If we go back to the agenda now, we have three, the scenarios for the EDPB. Do you want to click on that document, Marika, for that update? Or—so I believe this was Brian had shared this to the mailing list earlier. I believe there was an exchange between Becky and Volker. So I would like to open the floor now to the group on questions, comments, concerns on what we do or not do. And Marika, there we go, I will start with you.

MARIKA KONINGS: Yeah, thanks. So I think from a staff perspective, we would just like to see, indeed, there have been already some individual responses. And of course, Brian is on the list and can share those directly with the colleagues working on these.

Alternatively, we don't know if there's interest of the group of working on kind of a common approach or response. Of course, I think from ICANN Org's perspective, that would be ideal, that the

scoping team kind of provides its guidance on what you think will be helpful, will be useful, the scenarios that you expect to be checked, as they are expected to help inform your work.

But of course, if that is not feasible or you may need to discuss as well how to do that, I think that the request is to provide an input by the 23rd of May. So that's in 11 days from now. And so it'll be helpful to hear what the group would like to do and how you think that can be done, basically.

MICHAEL PALAGE: Okay, Alan, you are first. Stephanie, you're next in the queue.

ALAN GREENBERG: Thank you very much. I may have misunderstood something completely here. But I'm having an awful hard time understanding why we would consider asking European data authorities about scenarios one and four. One is talking about publicly available information that anybody could do. And the second one is a voluntary survey which clearly, in the way we're talking about it anyway, does not involve any access to private information. So I'm not sure why we would even consider asking for opinions on one and four. Am I missing something? I guess the question is aimed at Brian, but if anyone else has any insight, I welcome it.

MICHAEL PALAGE: So Brian, I know you're probably the messenger here. I don't believe you actually participated in the Board workshop if my

recollection is correct. But are you able to perhaps give any insight into Alan's questions? Becky is not with us today.

BRIAN GUTTERMAN: Hi, Michael. And I don't know, I don't want to respond with insight in terms of like legal or in terms of anything like that at this stage, Alan, but I think we welcome and urge everybody to sort of give these sort of questions and comments to what we've laid out so far and what we've asked, this is the sort of feedback we want.

And then I think it could be possible to maybe bring on other colleagues that are more involved in this work and who have been part of previous engagements with DPAs to share further thinking to respond to why we might want to do that, Alan, for example. So I hope that's helpful.

But I guess for the exercise over the next whatever it is, two weeks, as Michael was saying earlier, and Marika, if the group could kind of discuss amongst themselves, respond in writing, to sort of have positions or suggestions on the record, I think that would be the most helpful. And on our side, we're sort of tracking the thoughts that you guys are all providing. And then we'll sort of go from there once we feel there's sort of alignment from everyone, if that makes sense. And I'm sorry, Alan, for not responding directly to your sort of question on as to why.

ALAN GREENBERG: Just to be clear, I will respond in writing. But I thought if there was something I was missing that everyone else obviously saw, I thought I'd take the chance to ask.

MICHAEL PALAGE: Stephanie, you have the floor.

STEPHANIE PERRIN: Thank you. I have a question. And I do apologize if this was in a letter and I failed to read the right spot. But do we understand why the Belgian data protection authority or authorities told the Board to go to the European Data Protection Board? Obviously, there's two aspects to that question, because of course, the European data protection supervisor is the one with authority over law enforcement issues. And so if anybody has an answer to that, I'm curious.

My next comment is that we can't assume that there is no personal data implicated or personal data gathering in scenarios one and four. If you are going to analyze operational accuracy, I presume you have to test it and see whether it is operational and works, which is the equivalent of spamming the registrants.

And then scenario number four, the registrar, this may not be a coerced new data collection by ICANN but if the registrar chooses to be a good boy scout and do a data accuracy survey, then presumably, there will also be testing in that, and you have to have a justification for doing that.

So I think that I said, rather flatly, and I hope to write a rationale, but just in case I don't get to it, the problem with any of these scenarios is you're immediately going to get a flood of questions back if the data protection authorities bother to respond, because

they will need to know such questions as why are you doing this, what good does it do, what rationale are you doing it under, etc.

Like I said earlier, fine tuning the quality of the data that a data controller is gathering is part of the whole data limitation complex of issues, and you have to make sure you can pass those. And I don't see that we can even benefit from the data if we got it at the moment. And I wonder about the quality of the data. If key players don't respond, or if we get a like a weighting, sort of the kinds of things that Lori said earlier, if we do a survey, it all depends on who answers and how intelligent the answers are and whether those answers are from somebody who actually understands the kinds of issues we're looking for answers for. Thank you.

MICHAEL PALAGE: Thank you, Stephanie. So I guess the point that I would make is, what can we do as a group either as a whole or as a small team—and again, we have asked for something, we have been provided this. I would not like to waste or miss or not fully utilize the opportunity to provide comments.

So I guess the question here—and I'll leave this to the group to consider over the next day or two, but perhaps we can do something to provide comment. Ideally, we can do it via the mailing list or if we can even do it within a subgroup of people. We just need to do something as a group. We really need to wrap up assignments one and two, and this is a key deliverable in being able to hopefully get some type of actionable guidance from the European Data Protection Board.

So Marika, based on your experience, do we perhaps start a Google Doc and see if we can get a small team? What do you feel is the best way to motivate and help us meet our timelines heading into ICANN 74?

MARIKA KONINGS: Maybe as a starting point, we can put the email in the Google Doc and already add, I think the comments that were made on the mailing list. I think, Volker, Becky, I think Stephanie already provided some responses. And I encourage everyone to add to that. And I don't know if on that basis, it's possible to come to kind of a common position or input that everyone agrees on or if not, that will become just a collection of kind of individual viewpoints, which, of course, may be the less helpful.

Of course, if anyone is willing as well to kind of take up the pen and draft a response from the perspective of the group, maybe also taking into account the conversation that we've had today, as well as maybe looking at the other proposals that the group has developed, would these scenarios as well cover those proposals or are there other areas in which to group thinks it would be helpful to get a response on whether or not access to registration data would be permitted in those specific circumstances?

So that may be a starting point. I do note that there is not a whole lot of time. And I don't know, maybe Brian can check as well as if there's any kind of flexibility on that. But of course, the longer this group takes, the longer it will take to get the questions to the EDPB and the longer it will take to get responses. So that is something to factor in as well.

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MICHAEL PALAGE: Okay, we are at time. Brian, before I wrap this up, since you were the one that initiated this, do you have a preference on what you would like from us as the group and what would be helpful?

BRIAN GUTTERMAN: Thanks, Michael. First off, in terms of we sort of put that deadline there trying to give the group two weeks or two working meetings to discuss this, but I would say there is flexibility on sort of the date of providing feedback. We don't want it to be a hard cut off. We want this exchange to be productive for everyone in terms of what we all think was going to be useful to ask when we do initiate that.

But in terms of the best way for the group to respond, the options that Marika just set out seem good to me. I can ask, again, if this would be more helpful to bring on colleagues that we're working closer on sort of this stuff to give more insight or to field questions. I can ask that as well. If the group thinks that talking to somebody else or multiple people from ICANN Org would be helpful, I can try that as well. But if somebody would like to take up the pen as Marika suggested—and I'm also happy to work in a small group, if that's helpful.

MICHAEL PALAGE: Okay. And so with this, Marika, you have the last word before we wrap up this week's meeting.

MARIKA KONINGS:	Yes, I just want to very briefly on the write up for assignments one and two. I really appreciate the input that people have already provided. You may have seen or some may have received rejection notices for your comment. Please know that we didn't reject your suggestions, we've just moved them into the form of comments. So that makes it easier for the group to review.
	I would like to encourage everyone to have a look at that, and especially where substantive edits are made, I think substantive edits are probably more clarifying or just editorial, but for others, especially where you may disagree with what is being suggested, please kind of respond to that comment. So again, we can already see that in advance of next week's meeting potential issues that need further consideration, and others where there seems to be agreement about changes that are being suggested. So that would be really helpful.
	And if you have any further comments or edits you want to suggest, please do that in the form of comments. That makes the document a little bit more manageable and the group can then discuss and review before actual changes are applied.
MICHAEL PALAGE:	With that, I think we have concluded. You can stop the meeting. Stay safe, everyone. Look forward to next week's meeting. Bye.
TERRI AGNEW:	Thank you, everyone. The meeting has been adjourned. I will stop recordings and disconnect all remaining lines. Stay well.

[END OF TRANSCRIPTION]