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ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 13 December 2022 at 16:00 UTC

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DEVAN REED: Good morning, good afternoon, and good evening. Welcome to the Transfer Policy Review PDP Working Group Call taking place on Tuesday, December 13th at 16:00 UTC. For today's call, we do have apologies. From Keiron Tobin, RrSG, Theo Geurts, RrSG, and James Galvin, RySG, and they have chosen attendants who replace them with Jody Kolker, RrSG, and Jothan Frakes, RrSG.

As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite emails. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have view chat access only. Alternates not replacing a member should not engage in the chat or use any of the other Zoom Room functionalities.

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If you have not already done so, please change your chat selection from hosts and panelists to everyone in order for all the participants to see your chat, and so it is captured in the recording. Statements of interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now.

Thank you. Please remember to state your name before speaking for the transcription. Recordings will be posted on the public wiki space shortly after the end of the call. As a reminder, those who take part in ICANN multistakeholder process are to comply with the expect standards of behavior. Thank you and over to our Chair, Roger Carney. Please begin.

ROGER CARNEY: Great. Thanks, Devin. Welcome, everyone. Looks like we're coming down to our last few meetings of the year. So, hopefully, we have a nice productive meeting. Nothing huge for updates here. I would guess probably maybe the biggest thing is any updates from small teams on anything that they've been working on.

Specifically, I know the override team has maybe come up with some language. And I don't know about the TTL if they've made progress or if they've met since then, but I'll open it up for those two teams to see if they want to provide any updates. Owen, please go ahead.

ROGER CARNEY: Thanks, Roger. This is Owen. I was just being polite and waiting to be called out as opposed to just jumping in into the void. So yesterday, Zak and I met with Keiron, and we came together with what we think is a good bit of wording for this proposal. We requested to share it with us, between the three of us first. I did that, but then belatedly realized that Keiron is on vacation for the rest of this week. So Zak is okay with it, so I don't know.

I mean, I think I can go ahead and just send that to the full list. It's got a strong end proposal in it. Maybe I can just wait to see if Keiron takes a break from vacation and checks his email sometime today, and then we can send that out. So maybe we can just put a pin in it. So I will wait to see if I can hear back from Keiron. Otherwise, I'll just send that off ahead of our call for Thursday so we have something to discuss with the caveat that if I really got something really wrong, that Keiron will correct us, correct me when he comes back. So look for that tomorrow from me. Thanks.

ROGER CARNEY: Great. Thanks, Owen. Thanks, Rick, for the update. The TTL team will be meeting today. Okay. Great. So I think that's about all of it we need to cover there. I'd give everyone, all the stakeholder groups a chance to bring anything forward. Any questions or comments they want to have addressed with the team. Please come to the mic now and let us know if you have anything you've been talking about or thinking about. Okay. I think we can just jump into our agenda then and hit on item number three we can get started on. Okay. I think, number three is touching on maybe-- oh, Emily. Thank you.

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EMILY BARABAS:	Hi, Roger. Hi, everyone. This is Emily from ICANN org. So this agenda item you'll recall from our last call that Sarah had spoken a bit about the small team proposal regarding transfer policy section 1A371. And the proposal you see on screen here was what was discussed. This was the adding the DNS security threat element to the evidence of fraud item under the category of reasons a registrar may deny a transfer? And there was some discussion on the call itself during our last call about this, and I believe the invitation at the end of the call was to share any additional inputs on the mailing list.

So the purpose of this agenda item is just a flag that there were two new items on the mailing list in response to that proposal. One from Mike, in which he discusses why he believes that this should fall under the category of why a registrants must not get transfer. And a proposal here with sort of a carve out for cases where the registrar of last resort would be the gaining registrar. And then there was one additional response from Rick responding to Mike.

So I don't know if anyone wants to comment on that further or reflect on those items, but that is the purpose of this agenda item and where we're currently sitting, I believe where we fell at the end of last week before these additional emails came in was the intent was to indeed go with this proposed language in the MAY category. So I think what we're looking for here is whether the additional inputs move the needle at all or whether the group is still settling on this language. Thanks.

ROGER CARNEY: Great. Thanks, Emily. Yeah. And I think the last time we met, we actually asked Mike to put something together if he had the time and fortitude to do that. So thanks, Mike, for doing that. As Emily concluded there, we had left this in the MAY, and Mike was trying to come up with a way to put it into the MUST or at least, the idea maybe in both places, but a higher level in the MUST if it was possible. And to Rick's point on his response, I think that yeah. I think it does get a little dangerous to start carving out specifics on it.

But, again, I think putting this in the MAY as where we left it last week, I think that's where it's appropriate now. Again, I know Mike went through this and tried to get some language in for them MUST. But I think where the group's heading is in staying with it in the MAY section. So I'll leave it up in the air and let anybody come forward. So, Sarah, please go ahead.

SARAH WYLD: Thank you. Hi. This is Sarah. Hope everyone is well today. I appreciated Mike's email.   But as I think Rick said, I'm not comfortable with calling at as a specific registrar in a policy like that. And as we said on the previous call, I think there's cases where the domain really might need to transfer. There needs to be some element of discretion here, and so I think it should stay in the MAY section. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. This is Owen for the transcript. Yeah. I agree with Sarah. Sarah, I don't like particular carve out for a register of last resort. I do know that there are other entities that like to get really crappy domains for specific purposes. I know sometimes, say that there's an algorithm which will generate domain names through registrars for phishing or botnets or something like that. Companies, say Microsoft might want to take over that so they can review it, control it, etc., stuff like that. So I'm concerned with just that carve out.

I'd also like to correct how Mike characterized what I said because that is not what I said. Owen said that would prevent registration giving domain names to brand owners who ask for them. I gave that as a potential example. I didn't say that was necessarily what we were doing or not doing from my experience for a long time in ICANN in the IPC at compliance and at a registrar.

I can confirm one hundred percent that domain names are transferred per request under agreement between registrars and lots of different entities. Sometimes it's formal. Sometimes it's informal. But putting this as a must and there might prevent some types of things in there. We need to be able to give flexibility to registrars who deal day in, day out with these types of activities, as well as DNS threats, litigation threats, etc. So we keep that in there. And also, again, that was not exactly what I said. Thank you.

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ROGER CARNEY: Great. Thanks Owen. And thanks for the clarity on that. So, yeah, I think that as much as we want to be as precise in direction, I think it sounds obvious that we need that flexibility for a certain scenario. So I think keeping that flexibility in the MAY makes sense and seems like there's a lot of support in chat. Zak, please go ahead.

ZAK MUSCOVITCH: Thanks, George. Zak, Muscovitch. Just regarding Mike's proposal and focusing, in particular, on the MUST NACK suggestion. If we take away the last bit, which Rick commented on and criticize as well as others have as well and just leave it at the register MUST NACK if there's a clear and convincing levels that domain presents an active being a security threat. What is the argument against that?

Like, I want to be able to explain to my constituency, the BC, why a registrar has something that it considers clear and convincing evidence that there's an active DNS security threat that it shouldn't prevent the transfer out. It may do it, but it could let the transfer go through. Please someone explain that to me. Thank you.

ROGER CARNEY: Great. Thanks, Zak. And I think we've heard a few, but I'll let everyone come up just to help you out so that you can have some language to take back. But obviously, the last part being one of the MAY categories last sentence there. And Sarah put in chat. There's different examples of that maybe it makes sense to transfer if someone's looking for it. And as Owen mentioned, the

Microsoft example and others. So, again, I think that there's obviously some flexibility here that it sounds like it's needed.

But to your point, Zak, I think those are two big examples of the possibilities of not having that MUST. And, again, I think there's obviously a good discussion here. And, again, I think what I've mentioned earlier was being direct and being focused on how to make this execute is nice to have. But I think the flexibility here is what's needed. So hopefully, that helps, Zak, with the [CROSSTALK].

ZAK MUSCOVITCH: I'm sorry, Roger. I don't completely follow. And I'm really prepared to accept that just me. But if Microsoft might want to transfer the domain name that doesn't belong to, that's an active DNS security threat to study. That's the explanation?

ROGER CARNEY: Yeah. And I'll let Owen talk to that. I think it's, again, one of those examples of, and as you mentioned brand owner and things. They're just examples. We're not saying it happened or it happens. But, Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. Yeah. So there have been examples, and I'm using just very general names of companies that are involved with this. This may or may not mean specifically that that happens. But I do recall either this life or other previous lives where they've identified a certain set of domain names or potential domain

names based on an algorithm. They either, a, want to have registered, or if registered, they want to go to somewhere else, or they want to be locked, or various types of things. Sometimes they want to do actions in a way that the bad actor is not aware of it.

But I do know that there's a lot of security threat people at some companies like say, again, Microsoft who are dealing with command control type domains, and they may want all those domains with their own registrar. Or that may be something that Facebook wants to do if they're seeing an active campaign for a whole bunch of phishing pages. Facebook might want their own, might want those domain names. And if that's there, let's say x registrar, they may not want to host those domains or they may suspend them. I can't.

There's a number of scenarios. But I have seen where people have reached out and not through a formal public process either through litigation, but kind of a coordination in the back end to say, let's get this here. Let's do the right thing. So that's why we want to put as much flexibility into this as possible. Thanks.

ROGER CARNEY: Great. Thanks, Owen. Zak, please go ahead.

ZAK MUSCOVITCH: Thanks, Owen. Thanks, Roger. Zak Muscovitch. So just so I understand I'm going to back away momentarily, but the contingency that we're contemplating for why it should remain permissive MAY is because companies or security consultant

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companies are able to informally contact registrars, identify active DNS security threat domain names, and have those domain names transferred away from the current registry to themselves outside of any formal transfer procedure.

ROGER CARNEY: Well, not away from the registrant, away from the registrar possibly. I think is what Owen was saying. It's that it could go from one registrar to Microsoft registrar so that they can study it.

ZAK MUSCOVITCH: Oh, okay. So if that's the case, then why wouldn't we just add to Mike's suggestion subject to any transfers requested by a third party in furtherance of dealing with security threats subject to the registrar's discretion regarding that transferring? In other words, the registrar's MUST NACK the active DNS security threat domain names. Except if there's some third party company or security company that requested transfer to another registrar for some study purposes, and the registrar agrees to that.

ROGER CARNEY: Yeah. And I think that that description there just changed it from MUST to MAY. So I think that that's the issue, that flexibility. And Matt just --

ZAK MUSCOVITCH: Sorry. Go ahead.

ROGER CARNEY: No. Go ahead, Zak.

ZAK MUSCOVITCH: What I'm suggesting is it remains MUST as a general rule that the registrar MUST NACK, but there's an exception that if there's, like that contingency that Owen outlined, then the register may decide to allow the transfer of. Because if that's really the only contingency we could come up with, then it's pretty easy to carve that out as an exception and still have the register retain discretion regarding that exception.

ROGER CARNEY: Great. Thanks, Zak. Owen, please go ahead.

OWEN SMIGELSKI: Yeah. And I think one of the reasons why I'm leaning towards not including anything in here about these types of third-party things is this is kind of a very informal off the record kind of process, and we're doing things that may not necessarily violate a prescription in an ICANN policy, but it's certainly skirting around the limits that ICANN, a number of policies. If it's not prohibited, then you can do it outside of that. And so I think there's a little bit of flexibility, and so like the registrars and registries may want to do and coordinate with this. These are things that are obviously they're allowed to do under their terms of use.

My concern is the more that we put some of this into a formal policy then it puts it into a thing where these bad actors can see it, can know what's going on, it may not just be a third-party security

researcher. An example I gave was a bank might want to get if there's a phishing campaign using the domain for them. They may want to grab that and be able to redirect that to their own website, as opposed to have that out there.

So there's just a number of scenarios I can come up with that are, of course, I based in reality and from my own experience, through my various ICANN roles over the time. And so once you start and trying a policy, then it gets to be a very specific thing. You can't get around it, outside of it, etc. And so I think just giving that maybe in broad is a better approach. Thanks.

ROGER CARNEY: Great. Thanks Owen. And I'll just add one of the things that we've done through the policy making process in this PDP is we've done somewhat future proofing on several of our recommendations where we've removed specific requirements on email and the communication mechanism and things like that just to future proof that something new comes up that it can still be used then.

And I think, likewise, for this, to me, it's a future proof that we're not forcing this and making three or four carve outs specifically when four years from now, something new will come up with and we'll say, well, we can't stop the transfer or whatever, or we can't make it happen because of what we did. And with it in MAY, it works out.

And my last comment on this before I get to Zak is I'm glad that we're arguing about discussing about MAY and MUST versus the

language because obviously people appreciate that the language is in there. And it's great that all we're arguing about is that MAY, are discussing is the MAY and MUST. Just my last thing on that. Zak, please go ahead.

ZAK MUSCOVITCH: Thanks, Roger. Zak Muscovitch. So when I said that I would back off imminently I must have lied. I feel somewhat obligated. I don't believe Mike's on this call. Right. And so I can't make Mike's arguments for him, but I would say that it's a tough explanation to provide to those stakeholders that would want it to be mandatory, would want it to be must to say that there is a, we can't think of any big reasons, but we are familiar with some instances that relate to some security concerns in that. And I'm really unclear on how a bank might be able to redirect the domain name to their website without becoming the registrant of it or having some kind of control of it. So I don't even think that relates to change registrar.

But the bottom line is I think it's hard to explain this clearly, whereas the alternative of making it MUST with this possible exception is a very discreet policy that gives the registrars the discretion, I think, they need in those edge cases. But if there's a clear and convincing evidence of an active DNIS security threat, under what circumstances other than these vague edge cases should have a registrar not created the transfer. They should be doing in every case where there's a clear and convincing evidence. There's an active DNS security threat. So for those that are saying that a register should have a discretion in MAY, I

think they have to come up with a more compelling argument to explain that to people. Thank you.

ROGER CARNEY: Great. Thanks, Zak. Any other comments on this? Okay. Again, as Emily mentioned, when she started this and read it out for us, I think we're going to stay with the stance. I mean, the MAY was part of the evidence of fraud is a MAY, and this language was tacked on. So we're going to leave this in the MAY scenario, and we'll move on from this. And again, I'm very happy that the language is in there and that the discussion was around MAY or MUST, which is a great thing and we get that language in there. So, again, we'll leave it in the MAY, and those that want to comment on that can't. Okay. Emily, what is next?

EMILY BARABAS: Hi, Roger. This is Emily from ICANN org. The next item on our list is to go back to the section of public comments that we worked on during our last call. There was one item that we skipped because it comes from ICANN org and we wanted to have Holida on the call to be able to speak to that. So I will bring that comment up and we'll focus there first before diving into the remaining documents. Thanks.

ROGER CARNEY: Sounds great. Thanks, Emily.

EMILY BARABAS:	Sorry. One moment. Third time is a charm. There we go. Nope. I'm sorry. The way the screen share is working, it is hard to see the difference between these documents. Let me try one more time. There we go. Okay. So this is comments seven from ICANN org. And if you go over to this link here on the wiki, and scroll down all the way to the bottom of the table.
	We're looking at the second item of the ones that are sort of general catch all documents. So it's the one that's labeled other additional suggested topics and proposals, and we're looking at number seven. So rather than trying to summarize it myself, I wonder Holida, are you in a position to be able to speak to this comment from ICANN org regarding record keeping? Thank you.
HOLIDA YANIK:	Yes. Thank you, Emily. This is Holiday Yanik for the transcript. And this input is from compliance regarding properly documenting and retaining notifications of transfers sent to the registered name holder and evidence of providing TACK to the registered name holder so that such records can be provided to ICANN compliance when investigating a complaint as needed. And compliance suggests that the working group may want to further discuss this item given the higher importance attached to the TACK after elimination of gaining FOA.
	So we know that most registrars provide the TACK through the control panel. Sometimes it can be requested through the control panel and an email where the TACK is sent to the registered name holder or others, however, make the TACK code available

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within the account or control panel. So it can be seen by just logging into the account.

And when investigating unauthorized transfer complaints, compliance will require evidence that is related to when and by whom the control panel was accessed to determine that the TACK was provided to or retrieved by the registered name holder by themselves. And this evidence is usually presented in the form of time stamp system logs. And these types of records are not specifically contemplated by the current agreement or policy.

So to clarify, section 3.4 of the registrar accreditation agreement requires the registrars to maintain and provide to ICANN the data relating to the registration data submitted to registry operators, registration contracts and communications related to registration applications, modifications, or terminations, and the records of the accounts of registered name holder with the registrar.

As you can see, these do not cover, for example, the system blocks relating to the retrieval of the TACK code, which is visible again upon logging into the account or control panel because it's not the data submitted by the registrar to registry operator. It's not a written communication and not the records of the accounts themselves.

And further, the transfer policy does require that both registrars provide evidence relied on for the transfer during and after applicable inter-registrar domain transactions. However, the evidence a registrar may rely on when processing a transfer request may not be sufficient for compliance investigation.

For example, in the past, compliance received responses from registrars that the individual who knew and was utilizing the TACK was authorized by the registered name holder, and the complaining former registrant, however, denied having requested the transfer or authorized anyone to request the transfer on their behalf. And additional information suggested that the reseller had access to the control panel. And the registrars in most cases denied having specific evidence related to the retrieval of the TACK.

So as I mentioned earlier, this evidence is not listed by the registrar accreditation agreement and was not part of the evidence that the registrar relied on for the transaction either. And when conducting an investigation, compliance should not make any assumptions and needs to collect all the information and evidence needed for reasonable recreation of the steps that occurred before, during and after the transaction and assess whether each obligation attached to each step was complied with. Once again, this includes confirming that the data and evidence indicate that the TACK was made available to the registered name holder and not someone else.

For clarification and avoidance of doubt, compliance is not requesting the working group to add system logs to retention obligations, but rather, we're suggesting that the policy recommendation includes requirements related to the maintenance and provision to ICANN. Of course, upon reasonable notice of the records related to when, how, and to whom the TACK was provided regardless of the means of the registrar chooses to use to provide TACK.

Compliance suggests that the working group and especially non-contracted party members of the working group to consider this feedback. Because if the policy does not require registrars to retain and provide to ICANN upon reasonable request the records pertaining to mandatory notifications and the provisions of TACK, it is unlikely that ICANN will be able to conduct thorough compliance investigations following the receipt of transfer complaints.

And just as a note, compliance investigation may often lead to the detection of deficiencies in the processes or systems that are usually as a result of the investigation get remediated by the registrar to prevent them from reoccurring and impacting additional domain names and registrants. So I'm so sorry it was a bit long, but I needed to clarify all the elements of the rationale for our suggestion. And if you have any questions or need clarifications, I will be happy to respond.

ROGER CARNEY: Sure. Thanks, Holida. No. That that was great. That was not too long at all. I think that was nice to hear you run through that. And maybe just two comments on my part and you can answer, Holida, is I assume that this goes along with, well, and currently, and we'll talk about that on phase 2, but transfer disputes where this data is only maintained during that period of time that that's possible.

But also, I think when we talk about control panel access, I thought and you can correct me or whoever can correct me, I thought in our recommendations that if it was provided by the

control panel, the registrants still had to be notified via another mechanism. I think, is what we said. So I just want to make sure on those two things, Holida, anything on that retention?

HOLIDA YANIK: Thanks, Roger, for the question. So this is the main issue that we are seeing currently when investigating our complaints. We have the registrar's explanation that this is the only registrant has access to the account or control panel. However, we have evidence that the reporting person is was listed as the RNH, but they deny of having completed such action. So in those cases, the registrars have difficulties in proving that this was exactly the registrant who accessed the domain control panel or otherwise. Yeah. So this is the main difficulty. I don't know how to explain.

ROGER CARNEY: Okay. No. That's great. Thanks, Holida.

HOLIDA YANIK: Yeah. Some of them -- I'm sorry, Roger, some of them do provide us the logs and then they somehow relate that this log is linked to the account that belongs to the registrant. In those cases, we accept the evidence. But otherwise, we are working for the registrants to make their work easier, and this is why we are requesting such requirement.

ROGER CARNEY: Okay. Great. Thanks, Holida. Any comments on this? Sarah, please go ahead.

SARAH WYLD: Hi, this is Sarah. Thank you for raising this. I definitely I think I would just need a bit more time to think about it, and probably it would be helpful to see specific language. Just it's always a lot easier to argue something more specific. I'm hesitant to require logs for control panel access. It just feels a little bit outside our domain, but that's just my first impression. I'm not married to the idea. And also, I just have to say, for all of this, we should keep in mind that we would need a data processing agreement before we can share any personal data. Thank you.

ROGER CARNEY: Great. Thanks, Sarah. Is there any other comments? I think that it's probably how I try to get some good discussions going as to throw language out. So maybe Holida, or staff, if we could come up with some language about this documentation maintaining whatever is needed. If we could come up with that and then present it to the working group, maybe that makes it easier.

And I can't remember, and I that ask Barry, because he's got a better memory than I do. I think that we had actually had talked about this from the beginning. I guess, not necessarily audit trails, but documentation and things like that. I don't know that it actually made it into any of our scoping documents, but I know that that was a discussion that we had. And I think at every PDP is what physical data can we use going forward. Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. This is Emily from ICANN org. I'm not sure if this isn't entirely what you had in mind, but I think the group has previously discussed this question of record keeping and whether it should be in the recommendations. And I think part of that was prompted by some early org feedback that that would potentially be helpful.

I think where the group landed if I'm recalling correctly is that the group had concluded that the keeping of records was already required of the registrars. And therefore, it wasn't necessary to put in new recommendations in that regard.

So I think that ICANN org clarification here is to sort of provide additional details for why the existing requirements in the existing agreements are potentially not sufficient in conjunction with the new recommendations to allow compliance to conduct the necessary investigations of compliance with those new requirements. So my understanding is that this comment sort of adds a new layer to discussions that have previously happened in the group to provide that additional clarity. Thanks.

ROGER CARNEY: Okay. Thanks, Emily. I appreciate that. Okay. Yeah. I think you're jogging my memory now about the topic of the record keeping, and Holida even playing them out here. There are some requirements within our contracts. So I think I'd go back to what Sarah said is, it would be good if we could come up with some text that provides that additional layer that is perceived to be missing.

And again, I think that that's the key is that everybody agrees that there's some record keeping within the contract requirements.

But is there another thing that helps resolve transfer complaints that is missing from that. And I think that for this working group if we could see what those specific things are, language again, like Sarah mentioned, to me, it's the easy way. You draw the line and everybody can discuss on one side or the other how do we get to the middle of it. Steinar, please go ahead.

STEINAR GRØTTERØD: Yeah. Hi. This is Steinar for the record. I can actually recall that there were some registrars that did have a low volume that they didn't have something a control panel but use more like the regulatory office service like the RSP interface to do their domain maintenance. So in this respect, evident have a mix between the registrar doesn't have any log in-house, so to speak, but it's depending on the regulatory service. I assume it's not quite common, but those registrars also has to be in compliance with this discussion or this policy wording. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. This is Owen for the transcript. I'm responding to Steinar's comment or question, I guess, in the chat, can registers log all the ICANN compliance wants. And so, yes. I certainly think that type of thing can be logged, but my concern is what is

the benefit of logging that? You know, right now, registrars do log when somebody logs and accesses a control panel that's logged. There is a generally, for any or at least, I think, name sheets, other registrars as well. There's a section where you can go see what your AuthInfo code are, but to be called, TACK. I'll use the new wording there.

In theory, you could create a way to log that somebody looks at that specifically, but I guess, what is the benefit of doing that? What type of thing is added on? What type of security protocol? Because this is going to take a lot as with any change to a policy where it requires how a registrar functions, there's going to be time, effort, money, dedicated in there. And for registrars, we do not have infinite sums of money and we need to decide what we're going to do and what we're going to agree to, especially when we come into these negotiations and we cope with these policy changes.

All these policy changes recommend a lot of work, time, effort, money that registrars are going to have to spend. And we're arguing for things that we're willing to agree to things that make sense for us or helpful or beneficial. And I don't really see what that added benefit is of putting a specific requirement in that the access of the TACK is also logged in addition to the access to the control panel because it's, I'm going to go out on a limb here and say, it's probably one on the same person doing it, one after the other.

It's same thing. I don't think someone's going to log into a control panel and suddenly a different person's going to come and look for a TACK. So that's my concern that that could be logged, but

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why is the point or what's necessarily the big benefit from that? Thank you.

ROGER CARNEY: Great. Thanks, Owen. Yeah. And I think Sarah touched on it as well. I think the registrars would need to go back and talk about that because if it's not the registrant, then what's the data privacy for the non-registrant having access. And Sarah brought up the day of process agreement. And I think that that will cover registrants, but if it's a non-registrant that has access, I'm guessing the data privacy or the data protection agreement won't cover those people, but they still have data privacy rights.

And again, I'm just trying to think through it. I think that that's some unanswered questions that the registrars would need to think about. And I don't even know if they can get the answer or anything quickly because the level of not knowing who it is at the time.

Yeah. Holida's note in chat, I think, is important, and that registrar should be able to provide evidence of compliance with all of these requirements. And I don't know. Is that the simple recommendation that is in there? Is that registrars need to be able to provide evidence of compliance with these evidence. I don't know if it's evidence or documentation or how you call it. Is it something that simple? I agree, Sarah. I think it needs to be thought out. And I think that we have to look at that. To me if these are here, you would think that there has to be documentation. Again, I'm a probably air quoting documentation. Whatever that means, that you are in compliance with these.

And I think that majority of the registrars probably already provide that record keeping, that level of record keeping. But taking it to the next level, should that be an embedded piece of the requirements. I think the group needs to take a look at that and think about it. So I think that's a good idea.

And I think, Holida, I think your statement is probably the precise thing to look at. Is that inherent to our recommendations, or does it need to be a specific recommendation along those lines? So again, if anybody wants to talk about it, I'm free to talk about it now, but definitely something to think about for the group. Okay. I think that let's leave this open and the group can think about it, and we can touch back on it again when we need to. So Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. Hi, everyone. Emily, again, from ICANN org. So next up, let's just come back to the agenda for a moment. The next item on our list are feedback items about process and modalities. And again, you can go back to that wiki page that I shared earlier in the chat. Let me bring that up for you again. And you're going to want to go to the second to last row in that table, process modalities. So these are public comments that, again, not specific to a particular recommendation, but are either about the working group's process, its methods, its participation model, or other items along those lines.

And if you don't mind, we're going to start with taking actually quite a large chunk of these comments all at once. So comments 1 through 10 on this page all have a component that's about

extending the public comment period. So you'll recall that there were a number of requests to extend the public comment period and some of those were requested.

So the public comment period opened on June 21st of this year. Was originally set to close on August 1st. There were requests to extend the public comment period to mid-September. And the working group did extend the public comment period by two weeks to August 16th. So that's sort of the process element.

Some of the comments in one through ten have other pieces to them. So there might be a paragraph of text and a piece of it is about extending the public comment period and a piece of it is about what the comments are, the plans to comment on elsewhere in other sections of their comment. We've duplicated the substantive elements elsewhere in these public comment review documents.

So this is just about the process element. And so one through ten is just these specific requests to extend the deadline. So if there's something to discuss here, please raise your hand. But if you feel like that's noted and we now know how the working group responded, then we can move on to some of the other elements. Thanks.

ROGER CARNEY: Great. Thanks, Emily. And for our PDP, I think that unless anybody has anything to say, I think that we looked at it. Yes, we thought extension was useful and productive. I don't know if this is bigger than this PDP and that maybe needs to go to Council

and during their next PDP discussions, see if comment periods need to be longer, things like that.

But I think from our perspective, we walked through this purposely and extended it for good reasons. And we got to actually good comments back on it. So I think it was useful and it was a good step to extend it. But to extend it more, I think that I don't know if we would end up with better comments or not. So that's my comment. Anyone from the group thoughts on our extension specifically? Okay. Emily, I think we're good on those then about extending.

EMILY BARABAS: I will note a comment 10, which does have a section of it about the time frame for the public comment period. Also does touch on a couple of other items here. So I will note those here, although they come up again in some of the comments we'll be talking about shortly. Concerns about the perspective of registrants being underrepresented and the lack of balance in the recommendations as a result.

And also, about implicit security assumptions in the report, which are incorrect or complete. And do not handle various attack scenarios so that echoes some comments that we talked about on the last call and we will talk about the representation comments in a moment because those will come up again. And I think those are the key elements. So maybe I'll just touch on the next few and we can take them as a cluster. Does that work for you, Roger?

ROGER CARNEY: Sounds great. Thanks, Emily.

EMILY BARABAS: Okay. Number 11 is from the NCSG. This is a comment about noting that the non-commercial stakeholders participate in this group on a voluntary basis and cannot always be present in meetings and that the working group should more seriously consider comments on the mailing list from the NCSG so that members who need to participate asynchronously can do so. And there's just a couple more here. So I'll go over these altogether and then pause.

Number 12 is from Leap of Faith Financial Services, and FLY's concerns about the composition of the working group. Again mentions the lack of balance and domination of registrar interests and underrepresentation of registrants. Also note some of the different interests that registrants have compared to registers and that the outcomes can't be balanced if the representation is not balanced. And that public comment doesn't ameliorate this concern because the working group itself is reviewing those comments and deciding what to do with them.

There's a call for more an automatic metrics on participation and analysis in that regard. And then a call for several items here. One is about greater outreach after the public comment period, especially with respect to stakeholders who might be impacted, such as domain name holders. Considering another common period that is more widely publicized and longer, expanding membership of the working group, to make sure registrants are

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more fairly represented and rethinking their restricted membership working group model.

And then there's a concern also from Leap Of Faith about the fact that the undue procedure will be considered in Phase 1b, has interdependencies with the Phase 1a recommendations, with the suggestion that it should be passed to comment on phase 1a again after the phase 1b work is complete.

And then the final segment here also from Leap of Faith is about the need for data and that metrics are really important to policy decision making. And I'm just paraphrasing here the expectation is that everyone has read these comments in full so that you can reflect on that meant and respond appropriately because there's quite a bit of text here and I'm not going to be able to represent every statement in here fully.

So, yeah, the emphasis here is on the importance of seeking out and obtaining data to support the policy making of this group. And this comment also touches on concerns about composition and ensuring that there's a diverse skill set and a diverse interest represented.

I believe that that is the end of that comment. So just coming back one more time. So there are the Leap of Faith comments that are primarily about representation, data and participation, modes of participation, and then there's the NCSG comment that is about the importance of asynchronous work and mailing list contributions. Thanks.

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ROGER CARNEY: Great. Thanks, Emily. And hitting that specifically on the NCSG things, I hope that we didn't talk over or past anything that was suggested on list as the list is important to do work on the mailing list. If things get posted there and clarifications are needed, that can be done on list. And hopefully if clarifications are needed that can be done in the calls as well. But hopefully, we didn't miss anything and didn't discuss it thoroughly that was posted on list. So if we did, we should take a look at it.

The other things about representation, and I know that that was a discussion that we've had probably well over a year ago now. And it does seem like we do reports attendance and everything, I think, monthly, Berry. And I think that you do see the representation work out fairly equal as to the numbers that are participating versus those that are actually actively working. And you can see that in there. And I think that when the group set up and there was more registrars, the point of that was to get that diverse viewpoint of the different registrar models you know, not all of registrars are retail, not all of them are resellers, not all of them are either one of those. So the reason there was a shareholder registrars was that.

And one thing is and I agree that registrants' points of interest are different, could be differently aligned than registers. But I'll also add that that they are aligned in several areas. So I wouldn't say that registrants aren't being represented by their registrars as well as other groups. So Just my comments on that. But Steinar, please go ahead.

STEINAR GRØTTERØD: Yeah. Hi. This is Steinar for the record. And I think I have to say it for the record that at the very early phase of this working group, there was some comment from At-Large about the low number of At-Large representatives in this working group. Maybe the numbers should have been a little bit more pointing higher due to the fact that we should also represent at least some of the registered name holders, the end users for this topic. Thank you.

ROGER CARNEY: Right. Thanks, Steinar. Any other comments on these groupings here? On my screen, it disappeared. So I don't know, Emily, if we can. Just seeing basically the title or the header bar of that doc. But any other comments from anyone? I saw a few in chat, and I guess they weren't minding without me reading them. Oh, thanks, Emily. Raoul, that's an interesting point on increasing meetings, does change it. We're still covering the same amount of work, but increasing the number of meetings. Could have an effect. So that's something definitely to think about when we do that. Okay. Any other comments? Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. This is Emily from staff. I was just reminded by Raoul's comment that it's probably not a bad idea to mention that in the New Year, we're going to be resuming once a week calls. That was a bit of a short-term change to our schedule to get through the review of public comments.

And while this push is almost over at this stage, it's probably also a good moment to remind folks that if you're not able to attend a

call for any reason, you're always welcome to bring in alternates to ensure that your groups are represented on the calls if you're not able to make it as a member. So any questions about that, please do follow-up with us, of course. Thanks.

ROGER CARNEY: Great. Thanks Emily. And again, I think the one note I take from Raoul's comment is when a schedule does change, it's something that obviously, everyone needs to think about it. It's that everybody signed up at the beginning for a certain level. And if we're changing that, then just have to be cognizant of making those changes and making sure we understand them. Okay. Let's go ahead and move on to our next set Emily.

EMILY BARABAS: Hi, everyone. Emily again from staff. Is this displaying okay? This one should say general comments at the top.

ROGER CARNEY: Looks good, Emily.

EMILY BARABAS: Okay. And again, you can find this document. It's a Word document on that same wiki page. This one is at the very bottom. So the majority of comments in this document are resubmitted in a very particular fields that's standard across the public comments that asks the submitter to summarize their own comment in their own words. And so many of the comments in this document just

briefly refer to comments that were made in response to specific recommendations elsewhere, and we've done a cross check to make sure that they are actually covered elsewhere where that's happened.

So our thinking is that to the extent that that is the case that someone has basically said I oppose recommendation 13. I've made some suggestions about recommendation 16, whatever. And then we've already gone through the details of those elsewhere that we don't need to go over them again here. So that's applicable to comments 12 to 23 and 25 to 33.

And so we think that those don't need to go because they're just briefly summarizing what's been said elsewhere that they don't require additional focused review, but we'd love everyone to sanity check that and, of course, speak up if that's not the case. Or the remainder. If you don't mind, I'm going to take these slightly out of order because some of them are thematically clustered.

We'll start with numbers, number 1, 2, 5, 6, and 11. So all of those, 1 is from Andrew Aleman, 2 is from datacube.com, 5 is from Jason Banks, 6 is from incredible names, and 11 is from M Omar Farun. And all of those comments raise concerns about the elimination of the losing FOA. And specifically, that they have concerns about the implications of that from a security perspective.

So it's our understanding that because at this stage, the group is reintroducing losing FOA, that those comments are addressed by the modifications to recommendation 2. But if there's something further that folks think need to be discussed there with respect to

recommendation 2 or with respect to the desire to reintroduce the losing FOA, of course, we can about that here as well. I'll pause for a moment. Thanks.

ROGER CARNEY: Great. Thanks, Emily. Yeah. And I think our discussions that we had over the past few months and adding back in the functionality of being able to ACK or NACK in opinion state does touch on all these. But if anyone else has any comments, please let us know. Okay. Emily, I think we can move on to the next set.

EMILY BARABAS: Okay. The next ones we're going to focus on are numbers 3 and 4. These are both from Leap of Faith Financial Services. So there's a number of themes here that some of which we've discussed elsewhere, but I'm going to touch on what's in here and then also mention a couple of items that I don't recall us discussing previously.

So this comment mentions the concerns about the security of the TACK and the suggestion to eliminate the TACK in favor of the counter proposal that we've previously discussed, advocates for maintaining the losing FOA, bringing in knowledgeable members of the community to participate directly in the working group on behalf of domain registrants.

One item that I don't think we've previously discussed is the suggestion for SSAC to do a review of the recommendations. I will note that SSAC has read the initial report and did provide a public comment on one item that was something that the SSAC

wanted to flag and that the SSAC, of course, is encouraged to do public comments through the other public comment periods and, of course, also, is free to provide advice as an advisory committee to the Board.

But I did want to flag that as it hasn't been discussed previously, the x price style competition. I think we've touched on that, but, of course, if folks want to discuss further, it's mentioned here as well. That's the idea of a competition for people to bring in new ideas and solutions, in particular, I think, with respect to security models.

And number 4, again, from Leap of Faith, provides a little bit of context about what Leap of Faith does as an entity, discusses the concerns about the outputs in the report, and suggest that they should be discarded and rethought. Concerns about the public comment process and that those comments will be ignored rather than being taken into account in revising the recommendations and an explanation of why in good faith the submitter will be submitting comments anyway.

Again, here about the security concerns of the TACK, the maintenance of the losing FOA, bringing community members into the discussion, review by SSAC. And that is the full summary. So I'll pause here if there are any reflections on those. Thank you.

ROGER CARNEY: Great. Thanks, Emily. And again, I think Leap of Faith provide us a lot of good comments.   Hopefully, the comments about not reviewing the comments has been eliminated.   But I think that x prize or a holistic look at flipping everything around, I think is

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outside the scope of this group, but I think it's a good idea and can be conducted by another group. The reference to SSAC, I had to admit that I never thought about pulling them to see if they want to actually write an official report versus doing comments.

As Emily mentioned, that they did provide some comments on it and they typically do provide comments on any other reports anyway. But I guess I would ask the group. I don't know. I know a lot of SSAC members are involved in other areas. And so we hear from them. The changes we're making, we did for multiple reasons, but a lot of it was for security reasons. So maybe it does make sense to see if SSAC is interested in doing an official thing outside of comments. But again, I didn't have that.

Any thoughts on that? Others? Yeah, Rick. Exactly. They did have an opportunity to comment. And I would think, SSAC, I know quite a few of the members there. If they were concerned or even if they had a different direction that they would have let us know that they were going to write a report on it. Rick, please go ahead.

RICHARD WILHELM: Sure. Thanks, Roger. Rick Wilhelm, Home Registries. So I'll just offer a reiteration of an elaboration on the comment made in chat. SSAC is rarely shy about contributing to community discussions. They've offered a variety of comments and a variety of topics that concern both the registries and the registrars. They've weighed in on the RDAP contractual amendments, they've weighed in on SLAs, they've weighed on RDAB reporting, things that I would offer perhaps maybe even more peripheral and that they've they

certainly had the opportunity. This had a lot of airtime in the community, and they've chosen not to.

So I don't see why, at this point, where we are, there'd be a special request. I think if the group did that, I think that people might accuse us of trying to delay the process. And I think that would be the wrong optics for this group to be engaging in something that would be looking like it was slowing it down. Because if you if you ask them, they would probably feel obligated to do something. And it's going to be hard for that to cost us less than six months by the time they would offer comments. And then we would have to deal with them and things like that. So I think that it would be the wrong optics for the group to do that. Thanks.

ROGER CARNEY: Thanks, Rick. Yeah. And again, I think that if they had seen concerns in the comment period, they provided relatively light set of comments on it. That if they did have those concerns, they would have stated them. And as Rick says they're not shy, so they would've initiated something on their own.

The one thing I'll say in response is, I think that our initial report was good, and I think the public comments in the review and the process has made it better. So I think that this process has been good and has been fruitful, and it shows that it does work. So any other comments on this? Okay. Emily, I think we can move on to the next group.

EMILY BARABAS: Thanks, Roger. Emily from ICANN org again. So the next cluster we're going to take is 7, 8, 9, and 10. All of these are focused on security concerns with the recommendations as a package. So number 7, you see here on screen notes that there are some of the recommendations raised issues such as security of domain names that need to be ironed out in the policy. It's a relatively brief comment, but does raise a concern about security of the recommendations.

Number 8, notes that the working group has more critical work to do. And those are elaborated further in the contributors' comments on specific recommendations and also notes that comments specifically indicate the importance of terminology and consistency with RFC 9154. And we've gone through a number of those specific comments in going through feedback on particular recommendations.

Number 9, states that there's concerns that there would be a new fragile and less secure transfer policy as a result of the recommendations. That cybercrime and thefts are on the rise and not decline. And that this discussion of security should be more stringent and carefully debated and not rushed.

And then number 10 notes that an issue of this important could lead to an increase in domain hijackings. And again raises a concern about the length of the public comment period and the time of year that the public comment period was held. But again, discusses the importance of preventing hijackings. And that is the next cluster. So, again, that was 7, 8, 9, and 10. I'll pause.

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ROGER CARNEY:	Great. Thanks, Emily. Any comments from anyone on these? Again, I think a lot of the process that we went through hopefully addresses a lot of these concerns here, but Owen, please go ahead.
OWEN SMIGELSKI:	Thanks, Roger. Yeah. I just agree with that. We have certainly taken the time. We've considered this and I guess I'm surprised to see that a number of these comments are suggesting that security was not considered or is not involved. Because my recollection is that a lot of our discussions were involved with making the transfer process more secure as opposed to having things go via plain text email. Now things we've done via F2A and other things like that, text messages, etc. So I thought we're actually very deliberate in our approach in ensuring that security concerns and any changes modifications we made were actually to enhance security.

And then also we did look to see how much of concern are these types of things like domain hijacking, etc., stuff like that. And while there is anecdotal evidence, my recollection is that we were not even able to find through ICANN compliance or ICANN itself hard data that showed that either there was a lot of these unauthorized transfers or that it was a substantial portion of the number of transfers that occur on a monthly/annually basis.

So, yeah, I understand that people might think that just coming and looking at a quick report, they may not think that we've considered that, but actually, I think we went at great pains to take a look at how security was implicated by the various changes proposals that we suggested. Thanks.

ROGER CARNEY: Great. Thanks, Owen. Yeah. I tend to agree with that. We did put a lot of focus on that. But is it as secure as everybody wants? Is it security should always be more stringent. Obviously, it should be as stringent as it needs to be not more or less. But I think that that's the balance that we walked through over the past year and a half was making sure that we were looking at the security reasons and making sure that they made sense. So, Jothan, please go ahead.

JOTHAN FRAKES: Hey, thank you. I think that this is a complex system with a lot of gears and a lot of dials that we're turning and making changes that can have a affectation. If you turn a dial with your left hand, it might affect something where you need to also turn a dial with your right hand in order for things to work in the expected way. And we are introducing a lot of security in the process of doing this. I don't know that we should be dismissive about the concerns that are being raised related to the security of a domain name. I think that the security here is a different context.

You know, as I read, for example, Ron Jackson's comment, the concerns about increasing domain hijackings, and again, this is going to remain in the realm of anecdotal until we might switch to this new process, is that this would or would not changing how TACK works, for example, would or would not increase hijackings. We don't know until we actually implement this without some review or going through some of the hypotheticals.

So the security, sometimes I think the security has a different modality. I love that word. Here in that, it's being addressed as how secure as a registrant is. Am I from somebody taking my name away from me? What's it going to be like if I need to work with my registrar to get my name back if it was taken away from me?

And I think this is why there's so much effort and emphasis on trying to preserve the losing FOA and some of the agency of the registrant who has some out of band means to keep the name, or at least halt a transfer they don't recognize, or do something before a name has gone away from registrar A to registrar B.

And I still say possession is not intense to the law that the losing registrar from the registrant standpoint, when it's hijacked name, it is not the losing registrar, it's the registrar. And that registrar loses their ability to bring back that name. We don't know what that's going to look like.

So when I see concerns about security here, I'm not going to necessarily applying the SSAC modality. I'm applying the integrity of registration modality. So I don't want to be diffusing what they're saying here. And I do appreciate that we were inclusive of these comments. Thank you.

ROGER CARNEY: Great. Thanks, Jonathan. Yeah. And I think the key to Ron's intervention here, his comment was that the public comment period did not fall in an ideal position he thought to receive the comments back. And I'm not saying it wasn't long enough for

those things. He's just suggesting that it didn't fall at a good time when people may be less focused.

And I think that that's something that's hard, that you'll you're going to hit on no matter what time of year you actually are looking at. You know, this time of year is the exact same issue with people not paying as much attention or having as much time. So I think that that's a tough one to solve, and I think that's what Ron was trying to say. So, Barry, please go ahead.

BERRY COBB: Thank you, Roger. Barry Cobb from staff for the record. Thank you for your comments, Jonathan, as well as Owen. I picked up two kind of aspects from those responses, which is lack of data or anecdotal data and I'd be remorse not to mention it again even though it is classified as broken record now.

The previous IRTPs also ran into the same issue, and hence why those previous working groups came up with the recommendation they did about additional reporting. It's unfortunate that probably for a variety of reasons that that never really got implemented. And we're essentially confronted with the same situation for these deliberations today. And to that point the common saying is you can't manage what you don't measure.

I'd encourage this group to seriously think about considering some sort of recommendation that maybe can be considered in implementation or maybe through sidebar contractual negotiations to capture some sort of aggregate reporting that can complement, or is in addition to only the limited field of vision that contractual

compliance can see. And I say this because well, I think we all would like to believe this will be the last time we discuss policy around transfers. An important component to the policy development process is to be able to somehow measure the effectiveness of the policy changes.

And so as long as I'm around, I'm still going to constantly remind this group about how suggestions and or recommendations can be made in that regard. I understand that there are complexities about aggregating data in the same way across the variety of different business models and the variety of domains under management and those kinds of things. But all of those likely have solutions that we can work around. And one way or another, sometime in the future, I don't know when, but it is part of the overall end to end policy development process that the policies be reviewed again to determine if there are issues with it.

And I'll conclude by saying, which is a topic that's going to be in front of us again here in the context of the post transfer restriction of 30 days as well as the existing or current policy under the change of registrant discussions that we still have to have with the more or less optional 60 day what is labeled as a lock, but essentially should be a post core restriction. Those two aspects are going to be very important to understand how the change impacts the overall industry.

The reason why I'm mentioning specifically change of registrant is if we had better metrics about how disruptive that it's understood to be across the industry due to inconsistent application in those kinds of things, perhaps the community, the ICANN community would have been in a better situation to address that problem

much earlier on instead of letting it continue to, for lack of a better word, fester to where it is today. So, again, I encourage this group to really keep that in mind. Staff will continue to bring it up, but that's about as far as we're allowed to take this. Thank you.

ROGER CARNEY: Great. Thanks, Barry. Thanks for the reminder. And I think that every chance that we get in a scoping exercise, and I know Barry did this, and staff did this, when the charter was being created, was the thought of, can we include anything? Is it obvious? Is it not obvious? But essential that we include any metrics or data collecting that we can get. Okay. I think we've got just a few minutes, but I think we're down to our last couple points here so if Emily can walk us through.

EMILY BARABAS: Hi, Roger. Emily from ICANN org again. So I think the last comment we have on this sheet, I'm taking into account that as mentioned, a number of these RND self-provided summaries of comments detailed elsewhere. There's one comment here that was provided as a general comment or a summary comment, but actually has some specific points in it that aren't raised elsewhere. So I did want to just flag them.

This was a comment from Philip Busker, and he talks a bit about the value of two factor authentication. He talks about sort of the volume of emails and notifications and the challenges around that. He discusses the importance of all parties working together once a domain has been transferred, stolen or transferred in an

unauthorized manner, that parties need to work together to investigate and resolve. So that's sort of a phase two issue, I think, that he's touching on there. And that in general process element should be applied to ease the day-to-day domain management and usage experience without too many complications.

So I think those are my key takeaways from this comment, but, of course, others are welcome to weigh in here. Obviously, some of these things have come up before, for example, two factor authentication and the role of that, and also to the extent that that's within the discussions here, the working group has considered that out of the scope of policy development. But definitely, the phase 2 piece seems like something that can be taken into account in later discussions. So I'll pause here. Thanks.

ROGER CARNEY: Great. Thanks, Emily. And any comments on this one? Jothan, there's a lot in here, and I won't think he's saying anything people don't know, but if you did put it in here nice and neat and laid out some nice opportunities that some registrars have taken to help out registrants here. Okay. With no comments, Emily, I think, I'd like to take it from here.

EMILY BARABAS: Roger, I think that that's it for comments. I'll just ask folks take one last look in their own time if they haven't already had comments 12 through 23 and 25 through 33 and just flag on the

mailing list if there's anything there that you think we haven't sufficiently covered in the recommendation discussions for the previous public comment review tools and working documents. And we can certainly circle back to those. But in our analysis, it seemed that these were just brief summaries of comments that were flashed out elsewhere. And if that is the case, then I think we're through the public comment review. I will hand it back to you to close. Thanks.

ROGER CARNEY: Great. Thanks, Emily. And again, just as Emily, said take a look at those specific ones, but I would even say take a look at these three documents if you haven't read through them. Again, there are a lot of general comments, but there are a lot of specific things, which we have covered luckily.

But if there's something that you see that you don't think got covered or didn't get covered well enough let us know and we can touch on that quickly so we can move forward. But we are at time today. Sarah says there's no meetings, the 22nd, 27th, 29th, 30th, is that right? Staff, Emily? Thank you.

EMILY BARABAS: Hi, Roger Emily from staff. So, Sarah, you're correct that we are meeting next Tuesday and not next Thursday. So that following week, we are indeed off. We're resuming on Thursday the 5th, I believe. And it looks like we need to get invites out for that. And we're going to be just meeting weekly on -- oh, I'm sorry. That's not correct. We're back to a just Tuesday schedule.

So I believe that we are, oh, Barry corrected me. First call is going to be the 10th. So we are breaking for the first week of January. First week is the 10th. And I do believe, actually, now looking at this, that there should be calendar invites on your calendars. But if you haven't received those pleased do let us know, and we will make sure to get those over to you. Thanks, everyone.

ROGER CARNEY: Great. Thanks everybody. And sorry about, dragging over a couple minutes here, but thanks for your time, and we'll talk to you all soon. Bye.

DEVAN REED: Thank you all for joining once again. This meeting is adjourned. I'll end the recording and disconnect all remaining lines.

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