ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 25 January 2022 at 16:00 UTC

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JULIE BISLAND: All right. Good morning, good afternoon, and good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group call taking place on Tuesday, the 25th of January 2022.

In the interest of time, there will be no roll call. Attendance will be taken by the Zoom Room. We do have no apologies for today's call. As a reminder, an alternate assignment must be formalized by way of a Google Assignment form. The link is available in all meeting invite e-mails. All members and alternates will be promoted to panelist. Observers will remain as an attendee and will have access to view chat-only. As a reminder, when using the chat feature, please select everyone in order for all participants to see your chat and so it's captured in the recording. Alternates not replacing a member should not engage in the chat or use any of the other Zoom Room functionalities.

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Statements of Interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now. Seeing and hearing nothing, 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. And as a reminder, those who take part in the ICANN multistakeholder process are to comply with the Expected Standards of Behavior. Thank you. And over to our chair, Roger Carney. Please begin.

ROGER CARNEY: Thanks, Julie. Welcome, everyone. I'm glad to see everyone's here today. It's good news, I guess, to start the January out with. I think that last meeting last week we actually ended with completing our review of our current list of recommendations. Obviously, we'll have a few more coming out of the next discussions we have. But I think we're in a good spot with those recommendations for the TAC and the losing and gaining FOA. As I mentioned, I think, [inaudible] on the lock discussion, on the NACKing discussion and the bulk discussion that we still have left to complete. But we're in a really good spot now. And I think we're going to focus this meeting, maybe next meeting, we'll see how far we get on the locking discussion that we've had sporadically throughout I think many sessions now, as early as I can remember, really, that the locks had popped up in discussion. So we've done a lot and there's some documents that we'll refer to here when we get into that.

Let me open it up for anyone that wants to bring any comments or discussions they've been having offline with their stakeholder groups or on anything around the Transfer Policy. If there's

anyone that has any items they want to bring forward could tie in and bring them forward. I know the Registries were still working on a couple of items. So we'll let them talk if they need to. Otherwise, we'll hit him up next time when they have more information. But I'll open it up now for anyone, comments, discussions that they've had from their stakeholder groups that they want to bring forward. No? Okay. We'll try to do that every meeting, as I said before. So if you have any discussions that you feel are important to bring forward, please feel free to share, and we'll discuss them.

Okay. Let's go ahead and jump into our discussion on locks then. If we can bring up the overview of the transfer locks. Yeah, that one. Just quickly, just to remind everybody we went through a lot of the locks, outline blocks that we're not even responsible for, just to get an understanding of where the locking is done. Really, our charter is tasked with answering the question around the 60-day locks that are currently mentioned in the Transfer Policy around the creation date and transfer date. If those locks still are applicable in today's environment, again, this is falling under our additional security measures section of our charter, and the question really is, is there still a place or should there be changes to the current 60-day locks in the policy?

If we can switch over to the other document—what was it? The parking lot, yeah. Thank you. We actually documented a lot of our discussions here, thanks to the staff for documenting all these. And we've had some great discussion. Brent brought up many of the items. I think that we came down to was, it seemed like the group was in favor of a period. I don't know if I want to call it 60-day lock or even locking a period after domain create and a period

after a transfer that transfers would be prohibited. And again, I think the 60-day is a questionable thing and I think prohibited being maybe even loosely defined as being prohibitive. I think that if we scroll down this list to maybe the third or fourth bullet from the bottom, I think we ended up with our best questions here is like, okay, how strict is it going to be? Is there a way out of these locks if we agreed to them? And is it as simple as X number of days after domain create a transfer cannot occur? Again, likewise, X number of days after a transfer domain cannot occur unless what? Is there reason there? I think that's where we kind of left it.

I think the big poll here was the consistency aspect. The current transfer protocol has these items as kind of maze. So it wasn't required that these locks happen. So I think that a registrant moving from one registrar to another experience is different user experiences on their side, and it's very inconsistent when you're looking at different registrars. So I think maybe one of the main drivers here is not that these locks weren't needed or can't be used as they have been for years. It's just do we need to make them consistent and do they make sense? Keiron, please go ahead.

KEIRON TOBIN: Thank you. I actually did a bit of internal research through our company, just in regards to charge backs and stuff like that. When we kind of spoke with accounts and stuff like that, I think the 60-day lock on creation seems like a perfect way forward. Thinking about it as well from maybe new accredited registrars who are coming into the business, they may not be aware of such instances such as charge backs and stuff like that. But I think

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having a universal approach across the board would help protect these smaller registrars that are just starting up as well. In addition to that, it also adds additional security to registrars. There's a lot of people who are confused out there. I think even when going back to the beginning of this group, we were trying to establish where this actual 60-day creation lock came from and whether it was ICANN policy. So I think just standardizing it across the board will help a lot of new people entering the market. But in addition, also to protect those who are also looking for at the moment.

I know a lot of the big registrars always do it. And obviously Verisign as a registrar that also puts a 60-day creation lock on. But I think standardizing it across whether it be 60-days, I'm open for discussion on that, but I definitely think there should be a minimum period as well to also protect registrars who may put a lot of money into registration periods because, I mean, if someone registers something and then is able to transfer out after a couple of days, it creates problems. Again, with domain tasting, registries are probably going to have a much higher in stake of potential phishing and stuff like that. So I'm definitely in favor of putting a minimum kind of requirement in there. Thank you.

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

ZAK MUSCOVITCH: Thank you, Roger. Forgive me if there's any background noise where I am today. Just in regards to the last conflict here, the post creation date locks are of least concern to me in the scheme of all

the locks that we're going to be going over. But I would like to get some additional clarification on the issue of charge backs in particular. Is this a live issue that registrars are dealing with even today? Or is this merely a legacy of the situation that Barbara had advised us several months ago that it was built into the Registry Agreement. I seem to recall that there wasn't any clear reason for it continuing. So I'd like to understand better what the issues are today that necessitate this post creation date lock. And if there are good reasons, then that's one thing, but if it's just a matter of making an unnecessary 60-day lock consistent across the board, then I would have to [service]. Thank you.

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

THEO GEURTS: Yeah. To answer Zak here a little bit. The 60 days as it is now is extremely handy from time to time. When you have a fraudulent reseller, I mean, those charge backs—if payments have been made with a stolen credit card, it can sometimes take up a long time before those charge backs actually roll in or that you discovered that it was a fraudulent transaction after all. I'm not saying that it should be 60 days. Again, it could be a whole lot longer before you see a charge back. Sometimes you see people complaining two years later, "Why did you charge my credit card? Well, it was stolen two years ago." I'm not suggesting we do a lock for two years. But 60 days or 30 days, I think there should be a period of time so you have a reasonable amount of time to get

those charge backs in when there is fraudulent stolen credit cards. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. Personally, I don't like the 60-day lock a lot. It's a problem for the registrants. A lot of them are confused by it, especially in Europe, where people are more used to the ccTLDs. Most of the European ccTLDs does not have these locks and it doesn't really seem like a big problem. Like for us, gTLDs are the less of the orders. We just don't see charge backs as being such a big problem, of course, because we as a business look quite a lot on orders, and in order to try not to get any abuse. But I think the locks are making more problems both for the registrants and for our support teams in dealing with these locks. So we really need to look at this from all sides and not just only looking at it from the charge back sides on the registrars. Thank you.

ROGER CARNEY: Thank you. Great. Thanks, Kristian. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you. I appreciate that last one. I want to circle back to the issue of charge backs to get some more clarification also. I had some conflicts. The experience of the ccTLDs is interesting to me because they had a conversation not too long ago with the ccTLD

operator. And they explained to me—and I know nothing beyond what I was told so I'm looking to this expert group for additional insight—is that the anti-fraud mechanisms in place today with credit card processors are far more robust than they were several years ago, even. So instances of fraud are relatively minute or less frequent. What I was told in particular is that the risk has shifted to be borne by the credit card processors if the registrar employees certain more robust kind of verification procedures. That's all I know. These are just words. But maybe some of the registrars here are able to share their personal knowledge from their business operations about these more recent credit card processing verification procedures than they may have ameliorated the fraud situation somewhat, if at all. Thank you.

ROGER CARNEY: Thanks, Zak. Greg, please go ahead.

GREGORY DIBIASE: I have a secondary point but just to respond to Zak, even if the registrar is not incurring the charge, as a good citizen of the Internet, I think there are registrars that would like to prevent that fraudulent domain from transferring to a registrar and basically staying alive, if you will. So I think that's at least one consideration, at least from my registrar's perspective. I guess I was just going to ask a question to the group why we wouldn't make this optional for the registrar. So I'm hearing some registrar saying, "We would like this lock so we can prevent clawbacks." I'm hearing some say, "It's confusing for the registrant so we don't like

it." Maybe it makes sense to have it optional for the registrar. Just a question.

ROGER CARNEY: Thanks, Greg. Keiron, please go ahead.

KEIRON TOBIN: Thanks. Yes. So just to come back to Greg's point. Yeah, at the moment it is optional and I think there's likely ALAC out there. Definitely there was a bit of confusion in regards to whether 60-day lock was compulsory or not. So I think some people were saying as well. And it is entirely down to the individual user, they should have an entire right to choose this. I just think standardization across the board would help users maybe have a better experience. And then just to go back to Zak's point as well, where he was mentioning the potential of how it works.

A lot of the essential charge backs that we got were less than 30 days. So I can't give you exact details, just confidentiality within the department. But they were a lot lower. So I'm not opposed to 60 days. We're flexible in terms of moving that if people felt it was more appropriate to move. But I think standardization across the board would help many parties. Thank you.

ROGER CARNEY: Thanks, Keiron. Jim, please go ahead.

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JAMES GALVIN:	Thanks, Roger. Jim Galvin, Donuts for the record. I want to ask a question for a little bit of clarity here. I appreciate all the discussion about the lock being tightly coupled with dealing with financial payment issues. There was a reference made in the very beginning. And I apologize I didn't catch you made the reference to domain tasting and the need for the lock to be as a mitigation in domain tasting. I wanted to ask for some additional clarity about that. Domain tasting is something that I would normally associate with the grace period for the creation of a name, not as part of a transfer. So it's not immediately obvious to me how it's associated with this particular issue. So I'd appreciate, if we're going to reinforce that, if someone could talk about that a little bit more.
	I also wanted to, as one last point, to observe. I would think that clawbacks are a separate process and independent of the presence of this lock. If there's going to be a clawback because the transfer should not have occurred, that there ought to be some kind of process around the idea that you can call it back whether the lock is present or not. You're going to find a way to get that lock turned off and bring the thing back. So I'm trying to understand if someone could say a little more about the tight relationship of clawbacks with this particular lock. Thank you.
ROGER CARNEY:	Thanks, Jim. Theo gave you a plus one on that, the clawback being different, obviously associated with a different process. The clawback is bigger than just this one idea. So, thanks, Jim. Zak, please go ahead.

ZAK MUSCOVITCH:	Those are two great questions by Jim. So I'd like to defer my own question until we get some answers to Jim's question, if we can. Thank you.
ROGER CARNEY:	All right, Zak. Steinar, please go ahead.
STEINAR GRØTTERØD:	At At-Large, we've submitted a result of an informal survey back in November. The general feeling there at the CPWG is that At-Large was not in favor of any locks, the 60 days lock at least. This is not written in stone, as we say. But from an end user point of view, I find it very confusing if the registrars, if there will be individual terms per registrar on the locks. It will be if you have one domain name at that certain registrar, there are different rules than transferring it to another registrar, etc., it may be more understandable if the number of days for the locks are on the registry level, but not on the registrar level. Thank you.
ROGER CARNEY:	Thanks, Steinar. Kristian, please go ahead.
KRISTIAN ØRMEN:	Thank you. A couple of comments. I would like to agree with Jim that I don't really see how domain tasting should be involved in this talk because that's more with like registering a domain and deleting it within a short time and not anything to do with transfer locks.

Then I would like to go back to Theo's comment in the chat where he says that optional would be great. Everything not dodgy can be unlocked automatically. I'm just thinking like, if you have a dodgy registration, I think of course you should be able to lock that because you have a suspicion of abuse that you have to investigate. So I guess that's not really something to do with the standard locks after registration and transfer. Just if you have something that looks like abuse, you should definitely be allowed to lock it but not as part of any standard. So definitely I don't like the option. I think just like Steinar just said, it should be the same across the board. But for abuse, of course, there should be exceptions. And then for the fast on to after transfer, yeah, I definitely agree both with Sarah's comment in the chat, and Jim as well. We need to look into that. But I don't remember if we're talking about that in some other place in the Transfer Policy, because if not, we should consider if we can at some point. Thank you.

ROGER CARNEY: Great. Thanks, Kristian. On that point—and maybe I'll throw it out there for the group—but I always felt that the clawback would be part of our transfer dispute discussions later on. But again, I throw that out there if others think it should be other parts, but it just seemed like that fit into the transfer dispute discussions better. So Keiron, please go ahead.

KEIRON TOBIN:	Thank you. I'm sorry. I do speak fast. English is my first language. So I do apologize if anyone isn't able to keep up with me. I do need to slow it down.
	So just breaking down a couple of things. Jim, just in regards to where I mentioned domain tasting and stuff like that, if there wasn't any form of lock on and stuff like that, my worry is that, essentially, someone would register loads of registrars a certain domain, and then they could be transferred away to a different registrar, delete it at that registrar. And then we would kind of get into that conflict of it would come off their deletion process. So it was more kind of looking at that angle. Also, as well, just in regards to how we essentially delete domains as well. So if you identify an account that's fraudulent within AGP and it's something along the lines of PayPal123, for example, we may delete that domain so that the registrar isn't charged in regards to that matter. And then just going back to ccTLDs, one of the things in terms of .eu. at the moment, I'm currently in an active group that in order to kind of look at the AGP period, because obviously they are quite restrictive tools in terms of making sure that we delete domains but we don't get any kind of recourse for that. It's not about being recourse. It's not kind of incentive. If you're going to complain to us that you want us to keep the namespace clean but want us to force delete domains, there has to be that give-and-take situation. Thank you.
ROGER CARNEY:	Thanks, Keiron. Zak, please go ahead. Zak, if you're speaking—

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ZAK MUSCOVITCH: Yes, sorry. Sorry. Just hitting the wrong button. I just wanted clarification on whether this post creation 60-day lock is currently mandatory or not. Because my understanding today was that this was a registry-imposed lock from the Registry Agreement itself. So even if, in theory, a registrar today was to exercise its option or discretion to impose or not impose it, it wouldn't make any difference because the lock is being inputted at the registry level itself, so that whenever a registrar chose to do would be of no effect. Thank you.

ROGER CARNEY: Thanks, Zak. Yeah. In the current policy, really, it's just a may on the sponsoring registrar's part. So the current policy doesn't talk about—and that's why we had a long discussion, I think, a while ago about the registry having a lock put on it early on. The policy is only specifically regarding the registrar having the capability of denying a request. Again, the capability, the flexibility of denying a request if it's within 60-days in creation, they don't have to specifically by policy. Zak, did you want to follow up?

ZAK MUSCOVITCH: Yes. Forgive me. I'm still not 100% clear. Maybe others are, maybe it's just me. Is what you're saying that if there's a creation lock that exists throughout the entire .com registry as a result of the action taken by the registry pursuant to its Registry Agreement, which I understand is the case now, that the Transfer Policy still empowers a registrar to undo that or pretend they're undoing it.

ROGER CARNEY: Again, I think if you look at Barbara's note—that's a good question Zak. But Barbara's note being, obviously that is something that is contractual between a registrar and a registry. But according to the ICANN policy, the registrar has that option. How that works out versus a contract, I won't dip my toes into that one because I am not a lawyer and I don't want to be, but just my thoughts on it. Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. Have we found out yet if it's only Verisign that have this in the registry contract, or if there are more registries that have it? Because I guess the problem is that ICANN already approved this registry/registrar contract between Verisign and the registrar. So it's either difficult or impossible to change by us doing policy. But if it's only Verisign and Verisign don't remember why they have it, then maybe we can talk with Verisign and see if it's possible to get it changed. Thank you.

ROGER CARNEY: Thanks, Kristian. Barbara, please go ahead.

KRISTIAN ØRMEN: Thank you. I can't speak for Verisign. It obviously is in our legacy .com, .net. And I believe it is also may be in .name but perhaps not because we acquired that one later. But it is a contractual requirement between Verisign and ICANN in the Registry Agreement. So while it is mandatory for us and there's not a way

for registrars to be able to lift that particular lock at the registry level, it is not something that's universal with all registries. I believe that new Registry Agreement for the new gTLDs does not include that provision at all. There may be some other TLDs that may have that legacy TLDs that may have it but it's obviously not all TLDs. And I think as some of the legacy TLDs have transitioned over to the new gTLD agreement, if it was in there, it's probably gone at this point. So I just don't know for sure. We might need to do some research there to figure that out. Thank you.

ROGER CARNEY: Thanks, Barbara. Steinar, please go ahead.

STEINAR GRØTTERØD: I recall when I was working with different application back in 2011-12, etc., that we had to define a life cycle. And all the TLDs I was working with, actually the finalized cycle, where we kind of state in the application that there should be a transfer lock of 60 days after the initial registration. So I think there are more gTLDs than the Verisign and .com, .net that actually have this in their agreement. But I will have to dig up all the wording, though, but I actually believe the new gTLDs kind of follow that model. Thank you.

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

STEINAR GRØTTERØD: Don't quote me on this. I think PIR might also have the 60-day lock. I'd have to check the RRA. But I think they have at PIR as well.

ROGER CARNEY: Thanks, Keiron. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you, Roger. So it sounds to me like because this particular 60-day post creation lock is not within the Transfer Policy itself but rather a product of some Registry Agreements. The most that this working group can do is if it wanted to make the recommendation that those Registry Agreements then to those provisions be revisited or revised or acted upon so that provision is omitted. Then the first step that this working group can do, and potentially the working group could then also say and if certain Registry Agreements currently do not or may in the future as result of our recommendation do not include the 60-day post creation lock, then this is how we would like registrars to treat 60-day locks mandatory option on sector. So it seems that your hands are tied with two, if not three, of the largest registries here. And so I think that that's the first question we should address is whether the working group has any interest in making such a recommendation because it can't really do anything about conflicts in Transfer Policy itself. Or maybe someone has a different view. Maybe someone has a view that since we're sitting here rewriting the Transfer Policy that we could write one that doesn't necessarily jive with the current state of the major Registry Agreements. Thank you.

ROGER CARNEY:	Thanks, Zak. So thinking about what you said there and thinking about that and it wasn't just this call but many calls now, we said if it's optional, it seems to work better. In the middle of this document, actually the second bullet on the screen now, there's a proposal for consideration which says, "Include in policy a 60-day lock post creation and post transfer but with an opt-out feature." There was a question here for registrants or for registrars, what if the answer is an agreement with registered name holder and registrar? So the policy would be, okay, yes, you can't transfer within 60-days of creation or transfer. But if the registrant and the registrar agree, then you can do it. And again, that affords the few contracts that the registrar will say, "Well, we're contracted to hold it, so we can't do it." So they could explain that to the registrant at the time, that they're not allowed to do it at that time by their registry partner. But also it affords that idea that Theo put in chat of maybe some of them can just be transferred away. So just a thought. Kristian, please go ahead.
THEO GEURTS:	Thank you. I think we should consider decouple registration and transfer because I think we have a problem with after registration lock because of the contracts. So I think that has to be handled in one way. And then the lock after transfer has to be handled in another way. And for the lock after creation, I really believe we should have consistency. So if we end up in a situation where it looks like it's not possible to change the creation after creation lock on .com, I really think we should make that a mandatory lock for all registries so we have consistency. And both registrars,

registrants, and so on, know exactly what's the case after a creation no matter the TLD involved. After transfer, personally I think 60 days are way too long. I think we really need to look at why we need 60 days. Thank you.

ROGER CARNEY: Great. Thanks, Kristian. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Could someone from staff just pull Owen's report, if possible? I think that might add some context for us. Thank you.

ROGER CARNEY: I'm sorry, Keiron. What were you looking for? I didn't catch that.

KEIRON TOBIN: Owen did a report in regards to locks. I think it was maybe about a couple of weeks ago now, maybe even longer than that. There was a poll that went out to registrars.

ROGER CARNEY: Oh, okay. The registrar poll that Owen had.

KEIRON TOBIN: Yeah. Thank you.

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

ZAK MUSCOVITCH: Yes. Thank you, Roger. Once again, I think that it's almost like a waste of time, to be frank, to fashioning a post creation lock policy that registrars may—it may be optional. Registries are mandatory or consistent. It's a waste of time to be doing that almost when the three big registries have a Registry Agreement creating lock. So what are we really working on other than some [inaudible] that no one has yet identified? But certainly not the big one, certainly not the ones that affect most registrants. Are we really going to be going down a path of coming up with a solution that that whether it's optional mantra, consistent, whatever it is, that only is applicable to the most minor segment of the of registrants?

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

KRISTIAN ØRMEN: Thank you. Just to reply to Zak, even though .com, .org, and so on, is the biggest TLDs, all the new gTLDs are growing all the time. Some of them are pretty big. I think it's really important that a simple recommendation can make sure that after creation lock is consistent across all TLDs. That's a great thing for us as PDP to do, and it should be pretty simple.

ROGER CARNEY: Thanks, Kristian. Zak, please go ahead.

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KRISTIAN ØRMEN: So maybe we miscommunicated. Once again, the post creation lock is the most minor consequence or concern to me in the scheme of things. But just to note the last point, how can this working group make a consistent policy across all registries as a positive development when the actual policy is written in the stone of the Registry Agreements themselves? Thank you.

ROGER CARNEY: Thanks, Zak. Kristian, please go ahead.

ZAK MUSCOVITCH: Yeah, just a quick reply. The problem is that it's not written in all Registry Agreements. So if we determine, well, we can't change in the ones that they are written in, what we can do is that we can make sure that it's consistent for all the Registry Agreements it's not written in. If we don't do anything with the post creation lock, we will maybe or most likely have registries where it's possible not to have a lock. And we will have registries where it's because of the Registry Agreements, we have to have a lock. I would prefer that it's same for all registries. That will make it simple to understand for everybody, and that's something we can do in this Policy Working Group. Thank you.

ROGER CARNEY: Kristian, what you're saying is, if the group says that the 60-day lock is not something that what the group wants, we would go back to those that have an RA and ask them to amend it?

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ZAK MUSCOVITCH: Well, I don't really think we can go into contracts. Personally, I would definitely hope that not any Policy Working Group would start looking at registrar contracts, for example, that's between the Registrar Stakeholder Group and ICANN Org contract, and I don't want a Policy Working Group to start looking at that because that's not the Policy Working Group's field. So we can't really do that. If we determine it's only Verisign that has this and Verisign themselves say that "We don't mind moving it," then it's a whole other thing. But if we determine this is in some agreements, we can't really change it. Then what we can do is that we can make policy to make sure that all the registries that doesn't have it in the agreement, they would follow the same. That's what we can do as a Policy Working Group. Thank you.

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

ZAK MUSCOVITCH: Yeah. I think that's correct. But the corollary of that point is that if the only available option is to impose via the Transfer Policy the 60 post creation lock on those registries that don't currently have in their Registry Agreements, then implicitly that means that the lowest common denominator of the 60 days must apply. So if there's some people in this group, for example, that thought that it should be 55 days, 40 days, 30 days, whatever, that really wouldn't be an option. It would have to be the 60 days by default.

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

KRISTIAN ØRMEN: Yes, I totally agree. I'm one of the persons that thinks it should either not be there or way less than 30 days. So that's definitely me. I think that, but I also think it's much more important that it's the same for all TLDs. So if, for example, we decided on 30 days, but .com would still be 60 days, that would be amiss. So that's why I think we really have to just do the 60 days post creation. Not that I like it, but because it's better to have consistency than to look at the less than 60 days that I would personally actually like. Thank you.

ROGER CARNEY: Great. Thanks, Kristian. Berry, please go ahead.

BERRY COBB: Thank you, Roger. Just to clear one aspect of that, if this group were to form consensus around a creation lock for however many different days, the point is, is that consensus policy once adopted by the Council and adopted by the Board and implemented as a policy effective date would, in effect, trump or supersede anything that exists in the existing agreements today. So, hypothetically saying flashing forward ahead, let's assume that it was a 30-day lock applied on the creation of the domain name, once the policy effective date comes into force, that policy will supersede the requirement in the agreement. But that provision, as an example, that exists in the .com agreement today would probably not be amended until the next cycle of renewals or perhaps there would be a small amendment or something that ICANN Org Legal would

work out with those registry operators that have those provisions in their agreement. But, again, to be clear, the consensus policy defined here would supersede any requirement that exists in the agreements once the policy effective date is hit. Thanks.

ROGER CARNEY: Great. Thanks, Berry, for the clarification there in the present setting. Zak, please go ahead.

ZAK MUSCOVITCH: Berry is 100% correct as far as I know, because each of the Registry Agreements currently includes a provision, as far as I recall, that they must adhere to any ICANN consensus policy. So as ICANN develops consensus policies, the Registry Agreements, as Berry indicated, are updated. That really changes things. Because what that means for us is that we have a free hand, so to speak, to make it 6 days, 30 days, 40 days, mandatory, optional, whatever it is. The Registry Agreements are the tail and we're the dog. So we get to set the rules here, rather than have to comply with the existing Registry Agreement. Thank you.

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

BERRY COBB: Thank you, Roger. Just one additional point, it seems like the group might be starting to coalesce around something, but I think what will be important here, and maybe this can be taken up on a

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future call, but I'm thinking along the lines of Maslow's hierarchy of needs. Need number one is security, and I think we need to document the pros and cons of what a creation lock for whatever duration means for us. The second level is consistency across the industry and the pros and cons of that. I think that that will help the group come or coalesce to some sort of maybe draft recommendation to consider for the initial report, because it still seemed to be targets on both sides of the fence of the pros and cons when I'm hearing things. Thanks.

ROGER CARNEY: Thanks, Berry. I agree with that. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Could someone from the RySG potentially reach out to their constituents and just see if it's possible to see which of these actually have a 60-day lock and potentially break it down from ccTLD?

ROGER CARNEY: Jim, please go ahead.

JIM GALVIN: Thanks, Roger. Actually, I think it's probably better if you want a complete picture to ask staff to collect that data. I mean, it should be available in Registry Agreements. I assume that's the question you're asking. Keep in mind that not everyone is part of the Registry Stakeholder Group, just like not everyone's part of the

Registrar Stakeholder Group. There's always those that'll be missed in this process. And we don't have any way to compel people to answer a question when we ask. So maybe my question back to you is how complete do you want that response to be? If you want an accurate picture, I'd like to suggest that maybe staff would go through agreements and come back with that summary in that way. Thanks.

ROGER CARNEY: Again, as Berry pointed out for us, this working group has the power to set that so I'm not sure what the advantage of going through all the hundreds of contracts and trying to find them does when it's really up to this group to set that. But again, I'm not saying not to. I'm just trying to think of what the benefits are. It may be quite a bit of work to go through each of those to find that. Zak, your hand's still up. I think that's an old hand.

ZAK MUSCOVITCH: Old hand. Thank you.

ROGER CARNEY: Thanks. Jim, please go ahead.

JIM GALVIN: Thanks, Roger. I want to latch on to something that Berry said and bring it out here and highlight it. I've been listening to this discussion. It's been very informative. I've learned a lot here about this creation lock and the various things that go around it. But

Berry said something which I think is important and I guess I want to raise it up and test whether or not this group thinks it is important. I think the real question before this group is, why would you want a lock after creation? What is it that you're trying to achieve with that? And Berry suggested that security should be the number one guiding principle for why we do things in this particular context. I don't want to misspeak for Berry. I'm pretty sure that's what he said. I don't want to overstate it. Even as much as I've learned from all of this discussion, I want to say that I haven't heard a solid security reason for why there is this lock after creation. I wonder if we could explore that a little more. I could be missing something and that's fine. I'm happy to be informed here. But I wanted to call that out and raise that. Thanks.

ROGER CARNEY: Thanks, Jim. Actually, that goes along with what I was going to mention. I think it was Kristian that mentioned it earlier that the creation—Zak and I think there were several people agreed—and the transfer process should be separated. And I think it gets to your point, Jim, that the creation lock is less about security and more about consistency, whereas the transfer lock definitely has a more of a security aspect to it. Again, obviously, consistency is important there as well. But registering a domain and transferring in a way, security-wise it's not as big a concern as transfer that happens and then six more transfers happen in the next day. So I think you're right. Even if the solution is the same, it's for different reasons, most likely. Steinar, please go ahead.

STEINAR GRØTTERØD: I do understand that a transfer lock can be argued in a way of preserving security. But the one question that arise to me is whether 60 days is the number of days to create the ultimate security. Will we have less security if we, as an example, set 30 days, 15 days, 10 days, etc.? Of course, going down to zero is reducing the security level totally, but not necessarily, in my opinion, 60 days is the best thing. I think the 60 days is more historical, and I don't think that's the number we should base all of our argument on. Thank you.

ROGER CARNEY: I completely agree, Steinar, that the 60-day, that time period is a different idea compared to if there's a prohibition of transfer for any reason, the reason is separate from the duration. Barbara, please go ahead.

BARBARA KNIGHT: Thank you. I guess my question would be is—and I apologize, I don't recall who brought it up—relative to the AGP policy, I do think that there is some interaction between the two. Because if we were to remove the 60-day lock altogether and a domain name was registered on day one and it was transferred to another registrar on day four, do we lose the ability to be able to determine whether or not a registrar is complying with the AGP limits policy as it's written today? So I would say whatever we end up landing on, if it ends up staying at 60 days, obviously, I'm fine with that. But I would just caution us to maybe make sure that we're looking at it holistically and what the repercussions of changing that may have on other consensus policies such as the AGP policy. We

may want to consider something like 10 days. So you're beyond that five-day AGP grace period. I don't know if there are any statistics in the registries that don't have a 60-day lock that could tell us how often they're seeing domain names that are transferring within that AGP window. I think that might be good information to have for us to be able to make a good decision on that.

ROGER CARNEY: Great. Thanks, Barbara. Thanks for bringing that up that we definitely need to take in consideration the other ongoing consensus policies. Again, as Berry mentioned, the newest policy overrides the oldest policy but we don't want to inadvertently change a policy that we didn't even think about. Thanks for bringing that forward, Barbara. Theo, please go ahead.

THEO GEURTS: That is a very important point that Barbara brought up. Imagine you don't have any locks and the domain name gets registered on day one. And on day one, the domain name gets transferred to another registrar. And then the other registrar on day two, domain name gets deleted. There's still fall under the grace delete period, which is five days. That's going to be messy. Thanks.

ROGER CARNEY: Great. Thanks, Theo. I would agree that we can look at the AGP but it sounds like it's probably smart to avoid that because of all the things that are wrapped into it. Keiron, please go ahead.

KEIRON TOBIN: Thank you. I'm also going back to ccTLDs, as well. This is a very, very different area. Obviously, they're set by their own rules, they implement their own space. I mean, some even ccTLDs actually asked for documentation upon registration. So I think trying to compare a ccTLD to a gTLD is completely different fields and they're not even in that same area. Unless we want to go down that route realistically of actually looking at each ccTLD and saying, "They asked for a government issued ID," I just don't want to fall into that trap of somehow this some correlation because they are completely different. And even in terms of NACKing back from registrars as well, just thinking some of them off the top of my head, also have their own way to claw back domains as well, which obviously is a completely different market to us. Thank you.

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

STEINAR GRØTTERØD: I just want to add a little comment on the ccTLD world, that not all the ccTLD will have this requirement that a transfer will add another year to the life cycle of the domain name. As far as I understand, I think one year will still continue in the Transfer Policy as the way we discuss it. Thank you.

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ROGER CARNEY:	Thanks, Steinar. That is what I would say as well, no one has mentioned removing that and I think we've already had support of staying with every transfer has a plus one year.
	Okay. It sounds like the group is heading toward keeping—and again, we've talked about this being two separate ideas, a creation idea versus a transfer idea. But it sounds like the group is heading toward a shorter, mandatory period, but possibly keeping the mandatory period. It's what it sounds like so far. I think that that's where we're heading. If others disagree, please speak up. I think if we look at it and say, "Okay. There's a minimum five-day creation lock"—and again, I don't know if lock is the right term. Lock is a mechanism, not necessarily a function or a policy. Obviously, I think that you can simply say that the domain can't be transferred in the first X number of days of creation. Zak, please go ahead.
ZAK MUSCOVITCH:	Thank you, Roger. I agree that it seems that based upon that minimum ... The appearance of the five-day minimum would seem to set a five-day minimum. Of course, this is an assumption because I'm not familiar with the AGP then in great detail that I can conclude that. But from what I've heard, it seems that the five-day would be a minimum. And if we were as a group to lower the 60 days, I think that it would be incumbent upon us to be able to clearly and concisely explain our rationale for keeping whatever period we decide to keep. So we may have a very good reason for the five days at a minimum right now. So if there's other clear reasons for going to 20, 30, 45, or even keeping at 60, I think those should be clearly delineated. I think we've fallen short as of

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now on that count because I know that there are some issues about charge backs, there may be some issues of security, there may be other issues. But I think that wherever we land, we should be able to support it with a clear a rationale. Thank you.

ROGER CARNEY: Great. Thanks, Zak. You made staff's life happy right there by saying that. I know that whatever changes we do, they want to be able to have documentation that shows that the discussion was had and here are the reasons for that change. Again, when we go out with initial report, if we just say, "Well, we changed it to five days. You're going to live with it," we'll get a lot of questions if we don't provide that rationale. And to your point Zak, I think that we have some rationale and we still need to look at it. I encourage everyone to look at it. But rationale for at least a five-day—again, I don't want to say lock on it, but however it is, the ability to transfer within the first five days should not be allowed. And again, I think that there's been several conversations about, okay, but are there exemptions to that rule? That's something else that should be thought about. But today, right now, I think that if we look at five days as where the minimum is, to Zak's point, I'll just say a rationale that 10 days was better, or what is that rationale or reasoning? Berry, please go ahead.

BERRY COBB: Thank you, Roger. Just to pick up on your point about the initial report and going to public comment, I'm not presupposing any outcome or decision here. The group should aspire to have its draft recommendations as nailed down as possible. Some sort of

indication around some sort of level of agreement, not saying as far as a consensus call or not, but if there's broad agreement, we basically will say so. If there's mixed agreements, we probably need to put that messaging down. But my comment here is more about the opportunity during the public comment. Most of you that have participated in public comments in the past, the format was very general and broad, "Here's the initial report, give us feedback." And the feedback would be very long letters, different statements of support or against different parts of the report that were most times not in any particular order.

The opportunity this group has moving forward based on the new public comment platform that was launched in September of last year, we have the ability to do what we call a targeted type of public comment. So instead of seeking input in a very general nature, it almost takes the form of a survey format. And we can allocate each of the proposed recommendations its own mini segment so that we get very targeted and precise response for each one of those recommendations. And in this particular case, let's say hypothetically this group coalesces around a standard X number of days that the domain can't be transferred after creation. I like your point that you made, Roger, about not saying lock, but making it a more definitive statement about what can or can't happen at that particular time. The statement is the working group recommends the following, the domain can't be transferred after creation for X days, see page whatever for rationale to the group's thinking. And please, the first question to that would be, "Do you support this recommendation—yes or no or maybe—with possible edits." So the responder, we can get a quantitative type of feedback about how many people support or against it. And then

the secondary question is, "What kind of qualitative input can you provide the group based on this draft recommendation?" This provides the ability for the respondent to provide some extra call or commentary on something that we may have missed when trying to formulate this particular recommendation. Thanks.

ROGER CARNEY: All right. Thanks, Berry, for bringing that up. Keiron, you asked for the registrar thing, the number survey to be pulled up. I didn't know if you wanted to address anything specific. I think it's showing similar discussion, really, of what we're doing here. And maybe, again, it was a little more or a little less context to the survey than what we're discussing. Keiron, please go ahead.

KEIRON TOBIN: Thank you. I've just been using it as a guide. I'm not sure if other people have as well but it has definitely been useful during this conversation. Just also in regards to the 60-day lock as well. I do just want to add also as well that it may be worth reaching out to the PSWG, just in regards to legal stances for investigations and stuff like that. I just don't want to close that off in its entirety, as well as there are legal disputes that sometimes arise within usually more newer domains. Thank you.

ROGER CARNEY: Great. Thanks, Keiron. Okay. Any other comments or questions? Again, we really focused a lot of this discussion on the creation, which is great. Before we move on to the transfer, I wanted to see if there's any more comments or questions about the create.

Again, I'd like to avoid calling it a lock just because, again, that's more of a mechanism of how to do something versus the policy, so a transfer window or whatever we call it, or non-transfer window, I think we need to come up with wording that says basically, the transfers prohibited during this time X number of days from creation. So, again, thoughts on that as well, if people like that or don't like that. Again, I think it separates the idea of what occurs in the background physically or systemized versus what the intent is.

Okay. So I think what we've agreed to or what we're moving toward is most likely shortening that 60 days up front, but maintaining, especially through AGP, of the idea of a transfer not being able to be occur during the first five days or X days. As Zak mentioned, also we need to do is, if that five days is right, great. We have rationale. If it's six days to get us past AGP, I think that makes sense. If it's 10 days, is there reason for it? Again, as Zak mentioned, if it's 20 or 30, whatever it is, what is that reason? Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. I just wanted to give a reason for seven days instead of five. With five days, sometimes people are unsure if it's five calendar days or business days. But with seven days, people are more like, okay, it's one week. We get that. That's fine. So it just works better with one week exact than the five days. Thank you.

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ROGER CARNEY: Yeah. That's a good point. With all of our dates, we'll have to be pay attention too is specifying, obviously, if we mean calendar days, business days, what that is. Again, I understand there's reasons for business days. And if we can, sticking to calendar days makes it a lot easier. So, just to note on that. Theo likes hours. Keiron prefers seconds just to make some math thought in the policy. Okay. Steinar, please go ahead.

STEINAR GRØTTERØD: I have a question. Would it be possible to have in the WHOIS output an indication of when the transfer lock period is been finalized and finished? Because as of today, we see the transfer lock and the general user calculate 60 days after that. If you change it, it will be kind of a good thing to have an indication when it's been removed.

ROGER CARNEY: Okay. Thanks, Steinar. I guess I'll open it up, what people think on that. I mean, obviously it's a process to get that added to WHOIS output. But if there's benefit to it, a discussion should occur, I guess. Sarah in chat. "Maybe that goes into the registrar resellers control panel." Okay. Yeah. Jim, please go ahead.

JAMES GALVIN: I'm sorry, Roger. I'm going to open a door here that you probably don't want to talk about, and that's fine. Strictly speaking, there is nothing that prevents any RDAP server from adding anything in response. So if you happen to want to stick that in there, you can do that. The complex side of this, as Sarah was referring to, is

getting the server to want to put that value there. Because the protocol is designed for all these things to just be able to [inaudible]. And then the other side of it is clients displaying it. So it really is just about do you want to require the publication of a value or you could just do it. There's no harm in doing it. It all works. Thanks.

ROGER CARNEY: Thanks, Jim. Yeah. That's a good point. Going back to Port 43— Jim jumped ahead to RDAP—but there was ways to add data to the end of the page anyway. So if someone wanted to display that, they could. Sarah makes a good point. Does that open up security issues by doing that? I don't know if it does or not, because today it's the same as Steinar mentioned was, okay, they take the create date and add 60 days, so they kind of know that number anyway. Does it help them? I don't know.

Okay. Any other comments, questions? Again, I think that five or seven, ten even, it seems realistic and explainable when you start to address AGP. So I think that what we're leaning towards here is saying, okay, yes, let's keep a create lock, let's shorten it to what the rationale can exist. And today, we know the rationale it exists for AGP so that there's no complications in timing-wise there. Again, if anyone has any other timing that comes up, obviously, we can add that or any other reason. So any other comments or questions on creation? I think we've got something solidified so that we can write up something on the creation. Again, I think it's going to be important to get the rationale in there, as everybody mentioned, so that it's not just for us to believe that it's when we

release this, that everybody can see the thought process that went into it and the logical reasons behind it.

Okay. So that was a good discussion. We've got 15 minutes left. Let's go ahead and get into the transfer lock. Again, I don't know if the lock is appropriate, the transfer window availability around when a transfer occurs. As many have indicated, there's more security issues here, just that it does become known that when someone's trying to steal a domain, again, that doesn't happen typically at the creation. It happens at the transfer that obviously you see linked transfers. And then the problem is when you can't link them anymore, when there's five or six transfers that happen quickly, if that's allowed, so that the transfer window, it has a bigger security feature to it than the create seems to. Again, I think that we get back to the same question of is that 60 days really appropriate? And can we can we provide rationale that says that it should be shorter or that it should stay there. So, I'll open it up for comments on transfer window. Should we keep it at 60 days? And there's no way to change that? Should there be a shorter period? Should there be 60 days is okay but we need to have a way to allow for exemptions to it. Open it up to the floor. Anyone have thoughts? Comments? Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. Can we see the next slide? Because I think that's the central one.

ROGER CARNEY: Okay. Thanks, Kristian.

KRISTIAN ØRMEN: If I recall, I think for the registrars that they chose 60-day lock less on this one than the—

ROGER CARNEY: Can we go to the survey?

KRISTIAN ØRMEN: Okay. Perfect. So here we see that registrars that have participated in this survey have chosen 60-day lock, way less than in the first one. So there is definitely leaning towards shorter lock. I agree that it's maybe not a good idea if a transfer would happen like 20 times per day so it makes sense with a lock. The exact amount, I'm not sure. But if we would end up seven days for the registrar lock, then I think it would be nice to have the same on the transfer lock. Then it would make sense. Thank you.

ROGER CARNEY: Great. Thanks, Kristian. That's interesting. And keeping the same one, obviously, the reason I think would be different, the rationale behind it. But keeping the create and the transfer the same would provide a lot more consistency, that would be good as well. If it doesn't, obviously, that can be worked with, but it does provide us some consistency there. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you, Roger. So with this question on transfer locks, one question—it's really two persons. So the first question is what the

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length of time should be for a transfer lock. But the second question, which is arguably more important, is whether that length of time is a fixed rule, or whether registrars can say, "I know both parties, the current registrant and the prospective registrant, and I feel very, very comfortable allowing them to transfer, notwithstanding that the period of X days hasn't elapsed."

So the real question that maybe is the second question, maybe that should be the first part of it, rather than look at how many days, what is our policy in terms of permissiveness, mandatoriness? That kind of thing. Thank you.

ROGER CARNEY: Great, thanks, Zak. Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. I think that yeah, there's also a question like, should we have a lock? So there's several questions here. But I would like to go to Sarah's comment in the chat, that we need more than seven days for a dispute, and then I will go back to my own comment from earlier that if there is any abuse, we should always be able to lock a domain.

So for example, if there is a transfer dispute, then of course, the domain would be completely locked as long as this dispute is being investigated. So that's the same with the creation lock. If there's like some kind of fraud involved, of course, we'd lock it down, investigate it, and that takes maybe longer than the normal lock. But that's fine, because we have an investigation and we have valid reasoning for it, that if Compliance would come after

us, we could definitely document why the domain is locked for longer than the normal period. So I don't think we should look into like how long we need to solve a dispute, only how long we need to give a give a registrants to file a dispute so that we can lock the domain for longer.

And, Sarah, just commented to what I was saying, that the gaining registrar is not responsive. And I would just say, well, I can't remember we also looking at the TEAC at some point, but currently the TEAC says that we have to respond within four hours. I think that's extreme and should be changed. But if we would, for example, end up on seven days, and we have a mechanism where a transfer emergency contact, that you should look at something, then as long as that period is shorter than the transfer lock, then I think we should be fine. Thank you.

ROGER CARNEY: Great, thanks, Kristian. Steinar, please go ahead.

STEINAR GRØTTERØD: The way I see this is that we can actually separate the transfer lock, the transfer prohibited lock and the lock that needs to be set due to abuse or a dispute, whether the present registrar are able to NACK a transfer. Because then in that case, you can use the other lock mechanisms. Not necessarily the transfer lock, but other kinds of locks. I think that is possible. So it will be a little bit confusing in my mind if there is a different timing in the RDAP WHOIS output than what is being defined as the business rules,

because of some factors that the general public doesn't know about, because it's abuse, there is a dispute, etc. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Yeah, and I think really what you come down to, and I think Sarah pointed it out, I think on the transfer window is affording enough time for a dispute. And I think that what is that time—does seven days seem like enough for that? If we were trying to be consistent and we started with the creation transfer window as a [inaudible] window of seven days, it seems like that's too short of a period for the transfer dispute for a dispute process. Obviously, it can happen that fast. But to allow them in there. And if it's less than that, then you're talking about, it's probably been transferred multiple times now, or could be transferred multiple times, which increases that complexity. So, Kristian, please go ahead.

KRISTIAN ØRMEN: Thank you. Disputes can take months and months and months and end in courts. So we can't make the transfer lock long enough to make sure all disputes will be handled. That's why we should only have the transfer long enough for a dispute to be filed so the domain would be locked because of the dispute and not because the transfer. Thank you.

ROGER CARNEY: Thanks, Kristian. Yeah, and I completely agree. Again, going back to the thought, is that seven days enough to file a dispute? I think that's the bigger question. So Zac, please go ahead.

ZAK MUSCOVITCH: Thank you, Roger. So this is very interesting to me about the sufficient time to file a dispute, because whatever number we end up landing on isn't going to be sufficient for all parties that have lost a domain. And, really, this is one area where registrars have been assuming all of the burden on dealing with unauthorized transfers, because they have the only tool available to deal with it, other than the court system, with the transfer dispute policy.

And so I raised this a long time ago. I said I'd be coming back to it. But I think that this working group should seriously consider a recommendation. And I don't know if I'm in support of it myself, but at least I would like to think through it and consider whether there should be a more robust transfer dispute policy that takes the burden off registrars, empowers registrants to at any point in time, not just within seven days, 30 days, six months, two years, whatever the policy ends up dictating, but in the hands of registrants to go recover the domain name that they say they've lost. It seems like a much more rational system than leaving it up to registrars to action something at the behest of registrants. And then when we get caught up in one transfer after another, it becomes an impossible situation.

And the UDRP is kind of a model for this. The UDRP actually has been used wrongly, I believe, for domain thefts, because it wasn't set up to respond to domain thefts. But the need has clearly been there to address unauthorized transfers and domain thefts. And UDRP is the wrong tool to do it. But there may be an opportunity for the right tool to do it, and that might cause registrars to sign a big sigh of relief, because they don't need to deal with this

anymore. And then we don't need to be concerned about seven days, 10 days, 30 days, etc. Thanks.

ROGER CARNEY: Great. Thanks, Zak. Yeah, and just to mention that Emily put in chat—Yeah, we'll definitely be getting into those disputes, and again, all those things related to that, in phase two of this PDP. So we've got just a couple of minutes left. I'll give Theo the last word here, it looks like.

THEO GEURTS: Thanks. I'll make it short. I think you need to make a distinction between the seven-day lock that a registry sets after a transfer and if there is a dispute—and I don't really care what kind of dispute it is, but within our procedures, if somebody is complaining about a domain name not being renewed, or is being stolen, or it is whatever, what is happening according to the registrant or former registrant, we just lock the domain name. Sometimes you run into trouble with ICANN Compliance, but if you have a solid process and a solid understanding why you put on a lock, or why you did something, that usually goes very well, as long as reasonable, very well documented. And when there is a dispute, I think as a registrar, you can just lock it till the dispute is resolved through courts or whatever. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Okay. We have just a couple minutes left. So I think we'll finish here. We'll start the conversation back up next week. And I think, think about those things. Is it important?

Can we keep that time period the same? Is that enough? And again, the point made was that for a transfer, it's not necessarily solving the dispute, it's initiating dispute so that that process can get kicked off. So, again, will that seven days provide that? Does that make sense? And again, just think about those things, and we'll pick up next week at the same spot. Okay. Well, thanks, everyone, and we will talk to you next week.

JULIE BISLAND: Thank you, Roger. Thanks, everyone, for joining. This meeting is adjourned.

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