ICANN

Transcription ICANN Johannesburg New gTLD RDS to replace WHOIS PDP WG F2F Meeting Wednesday, 28 June 2017 at 10:30 SAST

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Chuck Gomes:

Okay could we restart the recording? Okay it's ready to go so we will resume our meeting. I want to give special thanks to Lisa who didn't get a break because she was helping us prepare for the rest of our session here. You can - and by the way this is Chuck Gomes speaking. I need to follow the rules too don't I?

You can see that we have a new slide, in fact several new slides to facilitate our discussion in this part of our meeting. Now the first table you'll see in a minute I'm going to turn it over to Lisa to explain what we're going to be looking at and make some comments on that.

What you see on the first slide is from our charter and the basic questions with regard to data elements that - what data should be collected, stored and disclosed. Now we're not going to get into collection and storing and disclosing today. Again we'll have to get there in the future. What we're really going to focus on in this session now is what is this meta set of data elements okay? And eventually we'll have to answer those sub questions that are in gray there.

So keep in mind we're going to focus on what the - this meta set of data elements is yet. We're not going to talk about whether they should be gated or whether they should be in the minimum public data set. We're not going to go there yet. Let's just identify all the elements that we are think are a part of that data set as a first task. Now let me stop there and give it over to Lisa and ask her to give an overview of what we have in front of us.

Lisa Phifer:

Thanks Chuck. This is Lisa Phifer for the transcript. So what we pulled together during the break based on the agreed approach so the approach discussed just before the break is to concentrate on the superset of data elements that might be collected and possibly displayed in an RDS. So we pulled together the table from the Expert Working Group Report which just summarized all of the data elements that are encompassed in that reports recommendation.

In the table you'll see advancing this on Adobe. And I should point out for those of you who want to download or those of you remote there is a link in chat in Adobe Connect that will take you to this handout that's being displayed now. In the table you'll see there are two columns. The left column identifies by name the data element. The right-hand column I've just inserted during the break to help us identify which of these data elements we've already discussed within this working group as the what we've been calling now the minimum public data set, the thin data elements the working group has already made some agreements on.

So anything that doesn't have a notation in the data set column is something we have not yet discussed. And hopefully that's what we'll focus on as we move forward here. So you'll see in the table domain name and DNS servers, name servers we've already discussed as part of the minimum data set. The next batch of elements, registration, registrant name and organization a registrant type which was a new data element proposed by the Expert Working Group, a contact ID and contact validation, again a new concept proposed by the Expert Working Group. And as we go through each of these elements we can talk about the rationale for them and whether this group is interested in pursuing that further, a timestamp for when the data was last updated and then a company identifier, postal address, street address, city, state, postal code and country. Those are all very familiar right form today's Whois registrants contact data, the registrant phone number and as (Rod) mentioned before the break in the EWG report there were some suggestions for new data elements that would be for additional contact avenues.

So one thing you see here is the ability to provide an alternate phone number or under email address provide an alternate email address as an option. Moving on then here is a batch at the top of this page here is a batch of new data elements. I'm just introducing and we'll come back and discuss each of them. Here's a batch of new data elements representing different ways that you might contact a registrant in the EWG report these different ways where new data elements that were added but optional provided at the registrant's discretion.

And then following that you see a set of contacts. In the Expert Working Group Report there was a sort of an overarching report of a system of purpose-based contacts. An administrative contact and a technical contact would be an example of a purposed-based contact. An administrative contact you might want to use when you need to contact the administrator of a domain name to address something with the registration itself. A technical

contact you might use when you have a technical issue that needs problem resolution.

Chuck Gomes:

Lisa this is Chuck. Explain just briefly a little bit what a purposed based contact is.

Lisa Phifer:

So and that's actually what I was trying to do. So administrative and technical contacts would be two examples of a purposed-based contact. You have a purpose associated with that contact. And so when you need to make contact with someone associated with a domain name for that specific purpose you would use that contact. So administrative and technical are ones that are in Whois today that we're all pretty familiar with.

Then in the Expert Working Group there were additional contacts identified for other purposes. One of the reason that the Expert Working Group Report identified additional kinds of contacts is that it was felt that there was a bit of overloading on registrant contact information that registrant contact information was being used for other distinct purposes, two of those purposes being when you have a legal, when you wish to take a legal action associated with a domain name who do you contact about that? That was the purpose of the legal contact.

And abuse contact again when you believe that there's some abuse associated with a domain name who would you contact about that? There could be the potential of a distinct contact for fielding abuse requests or requests, abuse inquiries. And then privacy and proxy contact would be unpacking from the registrant data the identity or contact information of the privacy or proxy service provider that might be associate with a domain name.

Finally business contact. This would be in the case of domains that are associated with legal persons that a legal person a business actually might want to publish a point of contact for business related inquiries associated

with that domain. And then at the tail end of this table you see some of the thin data elements we've already covered that are part of Whois today. And then finally at the bottom of the table you see that there were additional data elements that one might consider to be thin such as the registrar and registry jurisdiction, the language that's used in the registration agreement. And those were added as part of the Expert Working Group's approach to apply the applicable laws when handling or processing and making available data elements that might be subject to those laws. So you would need to know the applicable jurisdictions in order to do that.

So that's an overview of what's in the table and turn it back to Chuck to guide us through talking about each of these data elements and the potential need or I guess the level of support of actually including this in this large dataset that then will consider the needs for collection and potentially display in under certain circumstances.

Chuck Gomes:

Thank you very much Lisa and note that you have scrolling capability if you're in Adobe so that you can - and you may want to go back to the top of the table as we start discussing this.

Woman:

(Unintelligible).

Chuck Gomes:

Oh Holly Raiche go ahead.

Holly Raiche:

Just a question but based on yesterday's discussion with data protection my understanding was you don't collect information you don't need. Now this is based on the EWG and I was not part of it so I'm not sure but my understanding is they did not start with what information is necessary to achieve the purpose of if you will domain name management. And have we gone against each one of those elements to say there's a purpose for that that is necessary and then we can say well what if that should have access or not? Seems to me we need to do that step first. Thank you.

Chuck Gomes: Go ahead.

Lisa Phifer: Holly Raiche actually the EWG did start from use cases that identified data

elements that were required for each case and then identified purposes for each of these elements. I stripped that purpose column out of the table here because the direction prior to the break was that we focus first on what are all

the data elements and then whittle it down. But there is...

((Crosstalk))

Lisa Phifer: ...actually a list of purposes for each.

Holly Raiche: But what - I mean to me to my understanding there's you start with a purpose

which is - just around the management of domain names. Was that what you

did? And actually Michele you were part of that. Could you explain?

Michele Neylon: This is Michele for the record. Thanks Holly Raiche. When - as a - when the

EWG started out we started out with a conversation because - okay first off

the EWG was the Expert Working Group was set up in back in 2000 oh God

help me, what year was it, '13, 14? Thirteen? And we started - we start off we

had multiple face to face meetings in various locations around the world both

in tandem with the ICANN public meetings and intercession ally and all that.

So we met in the ICANN offices in LA. We met in the ICANN offices in DC.

We met in London and we met at say at the ICANN public meetings plus we

had regular phone calls, et cetera, et cetera, et cetera, just for those who

aren't familiar with what we're up to.

So the - what we were asked to do was to forget about what's out there, clean slate, start from there. So the initial conversations we had started out with a discussion which was literally if you want a domain name to resolve on the Internet what do you need? So obviously data element was well the

domain name because I mean, it's rather hard to do anything with that.

Then it was like, okay what's next? If you want it to resolve then you need to have name servers and then we built it up from that. Now as (Lisa) says part of the way we were looking at it was okay, if people are- people and organizations what are they doing with domain names? And we split that out into two big buckets. One bucket was stuff that was considered to be kind of normal aka, permissible and stuff that we know people do but we've kind of decided well it wasn't.

I mean it's not permissible. This was some form of abuse, et cetera, et cetera. So, you know, criminal activities, abuse, spamming, phishing, spear phishing, sending (unintelligible) notices, I mean, I - a ton of different things. We looked at all the different use cases. Based on those use cases as Lisa tried to explain this was - we came up with this list of data elements as we built along them, you know, continue the discussions.

We came up with this list of data elements that one could possibly put into something. And the term here is possibly and it's not, oh my God you have to have this because, you know, the world will fall apart if you don't. So I mean if you're looking at say for example a - I don't know, me registering a domain name because I'm - obviously have far too much time on my hands and I want to set up yet another blog then I don't - I wouldn't need to have a ton of those contact points that were on that slide that Lisa had because, you know, why would I.

And then if say for example Kathy because I don't know if she's shaking her head and getting terribly excited about this and Kathy is bound to jump on the microphone in a minute I know. It's okay. You can put your hand up. We'll get you.

You know, as lawyer she might have a completely different sense of contact points that she might want people to have for whatever reason. So these were just, you know, data elements that somebody could use. We weren't saying at any point and Lisa can correct me if I go off the - really far off the

reservation. We weren't saying that these were all obligatory. These were just looking at potential things there.

So I mean it's, you know, the conversation we're trying to have here is which data elements, you know, can go into some kind of replacement for Whois and there's others I think somebody else mentioned earlier, you know, that with the change in technology and communications like at the moment the current Whois for example does not have the option -- and I'm not suggesting for a minute that it should be obligatory that it should be included -- but this is a statement of, you know, the fact -- you cannot put a Twitter handle into Whois. I mean you can try but it's not going to work.

You cannot put in your Facebook handle. You cannot put in a Skype handle. You can't put in a bunch of different things. And we're not - nobody's saying that you have to do this, you should have to do this but when you're - if you're being asked what data elements could somebody end up putting into something this was where we came out with this list. I don't know if that helps. Does that help you at all Holly Raiche?

Holly Raiche:

Yes and no because the listening to the data commissioner yesterday who was pretty clear about the need for purpose and you collect for the purpose -- and I know Stephanie's going to wake up here any minute now -- if we're talking about what's the purpose of Whois -- and God help us that's a dreadful question which I almost don't want to ask -- but does the collection of this data pass that first test because if it does then we can proceed because we've got the information you guys have to have. And then the next question is who gets access to it and that different, you know, we're not there yet. But I guess that was my first question. So are you comfortable with the answer yes you need the stuff?

Chuck Gomes:

Thanks Holly Raiche and I'm going to go Kathy because I don't want to do what I did in the first part. Are you not - you're...

Kathy Kleiman: (Unintelligible).

Chuck Gomes:

Or you're not in the queue anymore, okay. This time I remembered and you're not in the queue. Oh well. So keep in mind the task that we agreed to before the break. Just to come up with and I thought Michele used two key words, possible and potential. That's all we're doing in this first step is trying to identify this meta set of possible data elements.

Now you're absolutely right first of all we're not going to end up suggesting that something be collected if it's not going to be used -- totally agree. And that purpose based on what we're understanding certainly with the European requirements is going to have to be dealt with if we decide that a - there's no use picking an element if there's not a legitimate purpose. So you're absolutely right.

But as a first step remember that we're trying to keep our focus narrow so that we can make little decisions and then build on them? So everything you're saying is right. What are first exercise is here is to okay let's get this meta set of possible elements. Then we're going to have to pick them apart and go in and certainly one of the first things is to make sure there's a legitimate purpose. Stephanie?

Stephanie Perrin: Thanks very much Chuck, Stephanie Perrin for the record. And thank you Holly Raiche. I do need a poke to wake up every now and then. I have a question and we have an understanding, kind of a rough common understanding of what we mean by registration data service, right? We assume that it's the long list of data elements that will be in some kind of architecture probably facilitated by RDAP although I note that there isn't agreement in the group about RDAP but that it will somehow be disaggregated into different tiers right?

> What I'm wondering is and I'm sympathetic to (Susan)'s concern that companies have a real interest and need to disclose more data so that they

can resolve abuse complaints very quickly. That's entirely different and kind of going in orthogonally to the needs of individuals right? Can we have a twin system so that we don't have to denature the purpose, the broader in terms of if I were in the role of data commissioner here and I was examining this I would have to knock off all these voluntary elements because the problem with that is the individual -- and I know I'm doing exactly what we just agreed not to do, make the distinction between legal person and individual probably will never understand the potential use of the data. And explaining to them with yet another 70-page contract of (addition) is probably not a good option and has been shown to be constitutionally unsound in several countries now. So if we had like two different RDSes, one for the willing and one for the less willing that would be lovely.

Chuck Gomes:

So hold on just a second because I want to respond to a couple things. This is Chuck. First of all the what you're talking about really gets towards implementation. And what they need to consider implementation issues as we're developing requirements and policy so I'm with you totally on that. But that's probably a little bit ahead but that's not out of the question.

I mean we're a policy development body so that's fine. Let's not focus on that right now. We have to keep it narrow okay? I want to talk about RDAP. I don't think RDAP is really an issue on the - an issue of whether we're going to use RDAP or not. Many months ago many of you will recall, some of you will recall a statement by Andrew Sullivan from the technical community right that they're - the ITFs not going to develop another protocol. It's a standard. It's in our registry and registrar agreements so let's not think that RDAP is an optional element here okay, wanted to clarify that. And before I go to Holly Raiche there's a remote comment.

Amr Elsadr:

Thanks Chuck. This is Amr and there's a remote comment from Alan Woods saying making something opt in slash consent does not justify inclusion. If it is completely unnecessary for the purpose, i.e., the registration of a domain

name. Under data minimization things like social media details regardless if they could be used if so should not be even an option.

Chuck Gomes:

Thank you for that input but this is an example and we all do it of probably getting a little bit ahead of where we are okay? Good input but what we want to keep our focus on right now is let's identify these possible elements. And we're going to have to go through these elements one by one and make some tentative conclusions with regard to them okay? And we will do that. Let's go back to Holly Raiche.

Holly Raiche:

Yes I'm just really puzzled by that statement because it seems to me you've it - we all fill in online forms and usually there's a little asterisk against the things that have to be filled in and there are blank spaces for things that you can put in. You don't have to.

It seems to me if you want to and one of the key principles of the data protection regime is knowledgeable consent. If somebody want s something in there are we saying no you can't do that? I mean are - maybe this is a question for later but I'm just puzzled why you create two completely different systems which would be incredibly difficult to manage when you can have one system that has things that are critical and that's all that you have to supply. But if you are a corporation and you want more detail there why would somebody say sorry we don't want to have anything else. I'm just a little bit puzzled by that but look let's move on. Thank you.

Chuck Gomes:

Thank you for the last comment you made. Again it's so easy because there are so many interrelated issues in this topic of RDS that we can get - go off in 100 different directions and we make little or no progress. So bear with us. We'll get to those things but let's stay focused on what we're working on right now otherwise it'll be impossible to make any progress at all. Kathy I did see your hand.

Kathy Kleiman:

I am back in the queue and poor Michele. I'm going to be legalistic. Sorry about this. But I think we're using purpose in a lot of different ways. And in this room now it's a term or art. And because the purpose under European data protection laws is that the data shall be obtained -- and here I'm reading -- only for one or more specified and lawful purposes and shall not be processed in any manner incompatible with those purposes. And the data shall be adequate relevant not excessive in relation to the purpose or purposes for which they're being processed.

But here I'm hearing that there is a use and a purpose for every piece of data that we collect. That is true but that's kind of, you know, what we, you know, the hallway definition of purpose. The legal purpose is still one -- I think I've missed a lot of meetings here -- that we're processing. And the question is are these elements ones we should be collecting relative to the legal term of art, the legal purpose, not ones that they're good uses for but that might be - those uses might be far outside the purpose of data management that we're talking about, domain name management. Thank you.

Chuck Gomes:

And we will get there and talk about that. And you're right, you can talk about two purposes with regard to I mean obviously the Expert Working Group use the term purpose in a different sense than what the European requirements talk about. So well said. But again we're going to get to purpose so bear with us okay?

The so any - let me ask this question. You've seen this made a list that came from the EWG work. Does anybody think there's any possible data elements that maybe we've left out here? And we'll - that question will be asked as we go but I just thought I'd throw it open. It's pretty comprehensive list. And again it doesn't mean we're going to agree that all of these things are part of the meta set. That's what we're going to start working on.

Michele Neylon:

Chuck this is Michele. It might help to bring up the data elements again on the screen.

Chuck Gomes: Oh they're not...

Woman: You all have scroll control but I'll scroll what's displayed on the screen.

Chuck Gomes: I have scroll capability so you can look through all those data elements

Michele. Okay so if you want to go back up to the top of the table okay? Let's

go with I - Wendy is next.

Wendy Seltzer: So thanks Wendy Seltzer. Sort of a meta note, possible sort of meta data on

these elements. So if we were talking for example about legal person or natural person would you want to be able to annotate an element? I am putting in the address of a natural person as the registrant postal address versus, you know, so an extra element on that data element or extra

categories in these elements.

Lisa Phifer: Lisa Phifer for the transcript. Notice under registrant name and organization

there is a registrant type. That actually was the purpose of that element. In the EWG report the potential values are natural person, legal person, other or unknown with the concept being that when a registrant provided the data for name organization and associated contact data they could voluntarily say they were a legal person. They could voluntarily assert that they were a

natural person.

I believe there was a privacy proxy. If I'm not mistaken the privacy proxy was one value. So in the case where you registered through a proxy service and the registrant of record is actually the proxy provider you could not that or then of course the unknown. And the way the EWG dealt with that is unknown is treated as a natural person because you know nothing more. But that Wendy I think that actually goes to the suggestion you're making of having something that gives you the type of all the data associated with that block.

Wendy Seltzer:

Thanks, Wendy Seltzer again and I was suggesting perhaps we need even more granularity on every element indicating this is a piece of, a natural person's private information and because, you know, some organizations might enter data of individuals in those fields even when registering for a organization or vice versa.

Chuck Gomes:

This is Chuck. So Wendy do you think that what you're suggesting as a possibility additional granularity on the registry - maybe fit in that registrant type area or do you think that maybe there's a new data element that should be talked about?

Wendy Seltzer:

I'm - Wendy Seltzer suggesting perhaps every element needs an annotation field rather than on the block level on the data element level if we're going into this distinction. And we might decide that that's unworkable. And none of them should be annotated but it's another way of thinking about the data.

Chuck Gomes:

Thanks Wendy. This is Chuck and that's a good suggestion that we're going to have to - let's keep that in mind as we move forward. And it would apply to more than just registrant type as you just said so very good. Let's see Kathy?

Kathy Kleiman:

Hi, Kathy Kleiman. I think it was mentioned earlier that we're in a new world since we created Whois, have a lot of different contact information. There are people I know who don't' have phones they - many of them don't have physical addresses. They're students and they don't have emails. So what are we going to do with the new contacts that the younger generation is using so Twitter, Facebook and the (Morris) service?

Chuck Gomes:

Are you suggesting that those be added in the meta set to consider?

Kathy Kleiman:

That we may be talking about kind of a person's choice of what their contact

is...

Chuck Gomes:

Okay.

Kathy Kleiman: ...for their contact, you know, what's the best way to contact them.

Chuck Gomes: So I guess for now we should add those to the meta set. I don't know, you

don't necessarily have to do it on this slide but let's capture that. You wanted

to comment?

Woman: So just to point out even though it's not displayed on the screen right this

moment, the beginning of the second page of this you have scroll control you

can look where alternative contacts like SMS, Instant Messaging, social

media handles. And so that was a sort of not in that direction that may not be

a comprehensive list.

Chuck Gomes: All right and I'll try not to get so close to the mic. Thanks for the feedback on

that. Francisco. Let's go to (Francisco) before we go to the Adobe gueue.

(Francisco): So one - (Francisco) for (unintelligible), just one suggestion if considering to

have multiple types of contacts, ways to contact a contact if I may way that? There is, yes telephone, email, Skype, Twitter -- whatever you want to add. There is one generalized forum you could use which is you have URI. And the URI can be Skype, telephone, email, et cetera, et cetera. There are plenty of options there that you can use so you can make that general feel and it

could be - and you make it - and you allow it...

Chuck Gomes: Okay.

(Francisco): ...to be multiple so just an idea.

Chuck Gomes: Thanks (Francisco). That's I think a good helpful suggestion just in terms of

organizing the data -- much appreciate it. Going now to Maxim.

Maxim Alzoba: Maxim Alzoba for the record. I have a question about expiration dates. Is the

reason why we see only registrar expiration date, expire date of the domain...

((Crosstalk))

Chuck Gomes: So let me suggestion Maxim that we talk about that when we get to that

particular element.

Maxim Alzoba: Okay.

Chuck Gomes: Next in the queue is Stephanie.

Stephanie Perrin: Stephanie Perrin for the record. I really support Wendy's suggestion that we add an additional field because I think it would be very helpful to annotate all of the considerations about a data element so that we can have it on the record. That would save us doing it again later because these things do come up and are registered as concerns. And as I said during our last year I would like to just footnote my derogations on these things. And so that'd be a handy field for me to do that in.

I just want to go back in time to the EWG the way they tackle this. And they basically started with use cases. And I disagreed at the time. I was newbie at ICANN and fairly unfamiliar with all of the processes. I disagreed at the time because a lot of these uses cases were kind of wish lists that had been added to the RDS as it was over time without any particular focus on whether they were legal or not. So we already had all these use cases that were in my view quite outside the bounds of data protection law.

And I endorse this approach of having the super set as the - as (Rod) put it this time because it will help us go through the process of weeding out the ones that are already out of bounds. I think that's maybe the most convenient way to go forward. So we need that extra column so that we can at least mark down what - if we're going to look at purpose we need to know whether the purpose fits in.

And I know we're trying to divide this into single threads but it is - this is an exercise for people who think horizontally frankly because I don't see how given the complexity you can actually manage it unless you have that ability. So I would just like to put in a plea for that horizontal thinkers bucket. Thanks.

Chuck Gomes:

Thanks Stephanie. This is Chuck. Now I think it's important we clarify because to me at least I heard two different things. At the beginning it sounded like you were suggesting a new data element. But at the end you said adding a column. And that's what I thought Wendy was suggesting is a third column here that could be used for multiple data elements. Did I get that right Wendy?

Wendy Seltzer: Yes you're as a column or as a compound entry for each element yes.

Chuck Gomes: And what would we call that?

Man: Data element meta data...

Wendy Seltzer: Yes meta data but I think we're trying to capture some of the sort of beta

subjects view of the purpose and publicity of data being submitted.

Stephanie Perrin: So I think you're looking for maybe the data subject type?

Wendy Seltzer: I'm not sure we're ready it limit it that way yet. And I think it's useful for us to

capture all of the elements that we could possibly want to see in this

database that is the RDS. And then it is useful for us to have a place where we can talk about what the submitter believes that they are and what we as

evaluators believe that their purpose is. We may condense some of that

down to something that should be included in the database and, you know, it

might be the natural person or legal person is the best condensation. I'm not

yet sure of that label.

Chuck Gomes:

Stephanie do you have a suggestion in terms of what we might call that (com)? Keep in mind we need I - what I'm getting at is just for capturing this concept in a third column we need something there. We may change that later but we want to capture it. Go ahead Stephanie.

Stephanie Perrin: I think I would call it because we're going to go through every single data element and I think it's more like meta data about each data element. I mean this is where you would put information about how it could be abused, information how it could be used, beneficial why this - why did this thing might be useful, why this thing could be detrimental because and here again - and I didn't win this argument but my starting point here is that every single data element that we're talking about on a file even if - and I realize file is not the right word so come up with another one for me. In a data set in the RDS in the case of an individual that is information about them and therefore personal information for the purposes of the GDPR and many other data protection laws. That does not mean it doesn't get released but it does mean that I have an interest in it.

> And so in that column I would put the particular interest of the data subject. And in many of these cases obviously in the, you know, servers there's very little interest from the data other than having the name resolved obviously. So the interest in that case would be data subject needed to resolving and that kind of thing. But I think that there are many data elements that we're going to get to where the color commentary is determinative in terms of whether it gets displayed. Thanks.

Chuck Gomes:

Thanks Stephanie. Lisa do you want to jump in here before I go to Volker, Volker has been very patient as I ignored his hand so thanks for that but I'm coming to you next.

Lisa Phifer:

I think I want to ask – this is Lisa Phifer for the transcript. I think I want to ask a question. So Stephanie are you suggesting when a data element is

collected that the data subject that provides that value also would say what purposes their data could be used for?

Stephanie Perrin: No I'm just asking -- Stephanie Perrin -- for the record. I'm just asking that as we go through this process of sorting through all of the data elements we annotate it. There's no way you can actually date a subject to figure out, you know, obviously the skilled ones sure fine, most people don't even know what ICANN is, you know?

Chuck Gomes:

So what I - this is Chuck. So what I'm starting to think is that this third column at least for simplicity right now is the remarks column where we can put different things. We don't want to narrow it down, there may be different kinds of remarks for different kinds of data elements okay? Let's go to Volker because he really has had his hand up for a long time.

Volker Greimann: Yes I'm - personally I do not disagree that a lot of these elements would be useful and even helpful. I have - I can even see a lot of use that we could put them to as a registrar. However we should bear in mind that the primary reason for collecting this data and that also creates an expectation is the provision of our service. So if we for example asked the customer for a certain contact ability method we probably create the expectation of the customer that we might try to contact him through that even though we do not offer that method of contact. That could create some consumer confusion. Another point is that a lot of these fields have duplicate uses. For example the SMS field usually is also the mobile number.

> Now I'm not sure if a customer agrees to have himself contacted by SMS also agrees to be called on his mobile at any time so that may something - maybe something that we should bear in mind. And finally a lot of registrars do author two factor authentication through a method that is published nowhere. And we usually use SMS or similar methods contact ability methods. It if these are now in the RDS the security of that secondary contact ability method that is part of the authentication process might be compromised.

Chuck Gomes: Thanks Volker. It looked like (Mike Palize) is next.

(Mike Palize): Hey Chuck. How are you doing? Can you hear me fine?

Chuck Gomes: Yes (Mike) we can.

(Mike Palize): Excellent. Sorry I wasn't able to join you at this meeting, only the fifth meeting

I've ever missed but here we go. So one of the things I wanted to try to contribute to this discussion here is I believe it's important for the group to make a distinction between mandatory collection fields and those mandatory collection fields across all TLDs and fields that a specific TLD operator may want to add because it feels that it has specific value either for business needs or for potential innovation needs. And what I'd like to do is one of the first things I ever did back in ICANN was back in 2001 when Afilias was launching .info and we added additional Whois data elements that involved trademarks. So this was kind of the precursor to the trademark clearing house. Afilias used that, collected those fields and that was something that was used for specific business purposes.

What I'm concerned about what I've been hearing here is that this working group may potentially impede the ability of a registry to innovate and try new services. So for example with the advent and growth of crypto currency can we have a situation where a TLD may want to add someone's digital wallet into the authoritative Whois? Is that a good idea? Is that a bad idea? Let our business try that. I don't think this working group should potentially be impeding a registry operator from trying that.

And just one other example that I want to raise it is kind of relevant as far as data elements that currently appear in the RDS. Again this is speaking in the individual capacity and not on behalf of any one client Alibaba in connection with .xin, X-I-N. one of the things that they have done is they filed an RCEP to add another RDS output field. And in particular what they added was a credit

score. So what happens is registrants in the .xin TLD have the ability to have their credit score appear in the authoritative Whois output.

So again what I'm trying to stress here is the ability for registries to innovate and try new things is a good thing. That's what ICANN was created for. That's its purpose. And I just want to add that word of caution that we do not want to be prescriptive to impede that innovation that's yet to come.

Chuck Gomes:

Thanks (Mike). This is Chuck and let me point out it's been quite a few weeks now but this topic has come up and I think there was general agreement although we didn't do a poll or anything else that what we're doing in this working group is establishing requirements for an RDS. That should in no ways be thought of as a limitation on contracted parties in terms of what they do understanding that they will have to abide by laws and policy requirements and so forth. So a point well taken and I don't think I've ever heard any disagreement in that in the working group so far so thanks for pointing that out. Kathy?

Kathy Kleiman:

Kathy Kleiman and it's nice to hear (Mike Palize)'s voice from afar. If we do add this third column listening to kind of the uses one thought that came to mind was whether with public-private, that it might be a flag for public-private whether the registrant considers the data to be public or private. And even for companies there may be a flag that says private. So if it's a new merger and it's the name of a new company through a merger or a new product or service name it may not be launched yet. There may even be legal reasons why you can't announce it yet but so even the company name might be private so kind of a flag for that. Thanks.

Chuck Gomes:

I think that remarks column is going to be really handy for a lot of these things. So okay let's start unless somebody wants to go a different direction, let's take a look at...

Woman: (Unintelligible).

Chuck Gomes: Oh good Amr go ahead.

Arm Elsadr: Thanks Chuck. There's a brief comment by remote participant. Justine Chew

says that all registry operators will also be subject to their own personal data protection rules. So they should not be doing anything that would contradict

those rules.

Chuck Gomes: Thank you for that input. Do you have any more Amr? Okay thanks. All right

so now I've been racking my brain here trying to see okay how - what's the best ways to approach this? Now keep in mind what we're doing right now is trying to kind of agree on this metadata set before we start getting to specific in terms of do we think that's needed. We're going to get there okay but are there any elements - and I rather than it's a long list and maybe that's the best way rather than going one by one for this question. Are the – there any elements that you wouldn't include as part of this meta-set understanding that we're going to have to decide is there a purpose for collecting it and so forth. But are there any that you think are just totally off base and we shouldn't

even spend time on? Just scroll through the list yourself and raise your hand. I think the three hands in the queue are old hands if not okay Stephanie yours

is new. Go ahead.

Stephanie Perrin: Yes I'm sorry, Stephanie Perrin. I just wanted to comment on (Mike Palize)'s

example which I think is a great example that of putting your credit score up there. Given the new vigorous focus on the GDCR I think it would be useful and I don't know whether ICANN lawyers are going to start attending the RDS meetings and it would be useful to remember that anything ICANN supervises and controls puts them in the role of data controller. That would include the policy that we come up with through this process. What an individual operator, what an individual registrar does with their customers is

their business. They're accountable under whatever the local law is for that.

But if we accept it in a contractual agreement here at the registry or registrar level than ICANN is responsible and accountable for that. And I cannot imagine that it would want to take on the liability of saying yes put your credit score in an RDS feed because boy that's sensitive information. So I just think we should keep that idea in mind as we talk about these things. Who's accountable, who's the controller? Thanks.

Chuck Gomes:

Okay Volker are – is that old? Okay Michele.

Michele Neylon:

Thanks Chuck, Michele for the record. As Stephanie I have to disagree with you a little bit here. The – I would 100% agree ICANN would be the data controller for what it's mandating and its contract. So what's in the RAA 100% agree and we've - we are completely aligned.

But if I as a registrar enter into an agreement with a registry and that registry's contract contains specific data element requirements and all that kind of thing then it's the registry that's acting as the data controller not ICANN. So maybe for example I've had the conversation with a couple of new TLD people that let's say they want to if you want to register a .microphone which is a terrible example. I need to come up with better ones but if you want to register a particular in a particular TLD you need to provide since certification that you are qualified whatever the hell that happens to be for that TLD. And that's an extra stipulation in the contract that the registry provides to the registrar. So that's ICANN is not a direct party to that contract so they wouldn't be the data controller in that instance unless somebody can point out to me where I'm completely wrong which I'll let Kathy or somebody do. Thanks.

Stephanie Perrin: May I respond to that? I was under the impression that in the – and totally possibly a false one that ICANN administered the contracts with the registries. When I get a successful application for a new top level domain...

Michele Neylon: Let me...

Stephanie Perrin: ...explain it all to me thanks.

Michele Nevlon:

Sorry Michele for the record again just to explain that. So you've got two sets of you got - okay how do I explain this simply without my head exploding? Okay so you have ICANN sits in the middle. So as if you want to become and ICANN accredited registrar you sign a contract with ICANN after going through the accreditation process. On the other side if you want to run stephanie you need to go through a process with ICANN at the end of which you end up and up with a contract with allowing you to run .Stephanie okay? So both the registrar has a contract with ICANN, the registry has a contract with ICANN. Now the bit that's kind of missing is that the registry will then enter into contract with the registrar directly so that really that's the relationship there is black night with .stephanie LLC or whatever it is. ICANN does not control that contract.

Stephanie Perrin: So Stephanie again. So basically in the RAA we have an explicit list of data elements that you are required to collect and that is very clear. In a contract let's say I don't know pick one, .pharmacist...

Michele Neylon:

Okay. Look I can give you it's Michele again. I can give you a concrete example. In the case of .triple X you if you wanted to your .triple X domain name to resolve you have to go through a process of validation just saying where yourself declare that you are part of the adult community. In the case of .eco-you have - if you want your domain to resolve you have to go through a separate process where you create a profile on the dot eco-directory thing or whatever it is. And those stipulations were not in the 2013 RAA, they're not mandated by ICANN. They're mandated by the registry operator. Does that help you?

Stephanie Perrin: It helps...

((Crosstalk))

Chuck Gomes: I think this is should go...

Stephanie Perrin: Go...

Chuck Gomes: ...really on the focus that we need right now. It's again like always it's good

information there we're probably going to have to dig in later but let's stay focused. So and I am looking here. So Holly Raiche and Kathy I'm going to call on you. Let's be relatively brief and let's start wading through these. I've got a question that I'm going to ask people to respond to on the various

elements.

Holly Raiche: I think Michele answered the question. If the contract that ICANN has with the

registry saying by the way you must collect this information then it

automatically makes itself liable for...

Chuck Gomes: Yes.

Holly Raiche: ...in some way the collection of that information that's but if what you were

doing in terms of your contractual relationship between the registry and the registrar is what is necessary for you to contract then it will only be those two parties. So the only way Stephanie that I think probably you would involve the

ICANN as a data controller is if ICANN is saying you need to collect this

information.

Stephanie Perrin: Thanks Holly Raiche.

((Crosstalk))

Stephanie Perrin: That's exactly what I'm driving at. I think there will be cases where there is

still the controller.

Chuck Gomes::

And that's probably going to be a legal determination that ICANN is going to have to do to protect itself and that. So Kathy and then we're going to go through a little exercise and looking at these elements.

Kathy Kleiman:

I was actually responding to your question, not the data controller issues. So if there's still anything more on that I don't want to get in the way of that. Okay to your question Chuck about what data elements do we need or not need, let me give this a try. Assuming the purpose because we don't - I mean the purpose is always a baseline right? So assuming the purpose is administration of, you know, creation management of domain names let me submit that registrant address is probably no longer needed. When I registered my Gmail account, my Facebook account I didn't provide my address. So for DNS why do I need my address?

Let me also suggest that dating back that this field dates back to I forget NSF net or ARPA net when it was very useful to know the addresses this was particularly about that EDU and it was very useful to know who was in the database and where they – who was in the Whois and where they were located because if you were near Harvard for example Harvard had a T-1 down to MIT, MIT was connected. Somehow the (May east) you want to know where they were so that you could throw a T-1 line down to them and connect into the larger network.

So physical location was actually important in the early Whois. Again I can register lots of services now that neither the creation management or management of the DNS seems to have anything to do or rely in any way on my physical location. Thank you.

Chuck Gomes:

Thanks Kathy. We're probably going to come back to your suggestions in a different way in a little bit with regard to which ones may not be needed. I'll come back to that but (Peter)?

(Peter Kintin):

I'm very sorry, (Peter Kintin) and regarding the list and the elaboration or at least the assessment on of this list of personal data or not personal data and to elaborate a little bit more of what Stephanie just pointed out what does it mean exactly accountability? Maybe everybody knows this. I mean and what are the particular respects of accountability. But let me reiterate that and it's not only in regarding the GDPR according to GDR are where there are at least seven or eight rights for the data subject numerator which for which the data controller can be held accountable for but in every other international data protection legislation there are at least four. The right of information, right to access of data which consists of right of deletion, right of rectification and sometimes right of blocking as well.

So for all of these data controller has to put in place kind of mechanism to ensure this right. And data protection authority would look at how directly or how easily they can exercise those rights. And this is also be - I mean to bear in mind when we are deciding on these lists. Thank you.

Chuck Gomes:

Thanks Peter, Amr?

Amr Elsadr:

Thanks Chuck this is Amr here. And there are a few comments some of them probably pertaining to earlier discussions. For (unintelligible) virus participating remotely in and is asking to please stay on task and the task at hand and that we are so far off what we said we'd be doing here Justine Chew has a comment and well too short ones. One is we are talking about minimum data elements from ICANN's perspective are we not. And she follows that up with anything outside ICANN's remit is not within ICANN's remit. And finally (Lema Lu) -- and I hope I got the name right -- says given the existence of IDN gTLDs we might need the language of the domain name as a data element.

Chuck Gomes:

Thank you for those comments. Now and I'm assuming that that's an old hand Kathy. Okay, so I'm going to try something. If it doesn't work I'll switch directions okay based on some - a suggestion by Lisa and also what Kathy

just said. Notice that scroll control is that – it should be fixed now right? So we're not going to let you scroll because we want you to stay with us on this.

So starting with the third row under data element there the one that starts with registrant name and/or organization there are five data elements there. Does anyone in the room remotely or in person think that there's no rationale? Don't worry about - don't confuse it with purpose yet. We're going to have to dig into the purpose and get very specific about that and make sure we're all on the same page with regard to definition of purpose. But is there anyone of those five data elements starting with registrant name and or organization did anybody in this meeting remotely or in present here thinks there's no rationale for it? And so Kathy what I'm going to do is I'm going to your – jump in with the ones you suggested when we get to them okay? I told you I come back to that so raise your hand in Adobe or in the room if you think there's no rationale at four any of those five elements? Sure, Lisa go ahead.

Lisa Phifer:

I just suggested perhaps - Lisa Phifer for the transcript. I suggested perhaps I should tell you what they mean. So I believe we've already talked about registrant type a bit that that would be a way of this differentiation - differentiating between the type of registrant being a natural person, legal person, privacy proxy provider or unknown. Could of course be something else but that was the intention here. Registrant contact ID that is a reference to a unique handle for the entire block of contact information about the registrant so a short hand way to pull that from another provider such as a validation provider.

The validation status would tell you whether the data in that block of contact information was syntactically valid, operationally valid or perhaps another kind of validation. But that would - it would just tell you sort of what level of validation that block of contact information had passed. And then the last of course would be when that contact information was most recently updated.

Chuck Gomes:

Thanks Lisa. This is Chuck. And please understand that some of these things for right now we may leave them in there but for example -- and I'm not suggesting this will happen -- but let's assume that we decided to recommend against gaited access. Well then some of these elements might go away. I'm not saying that's going to happen or should happen or that I even want that to happen but just bear with us we could always come back later and change decisions we make as we're going through this process. So again the question is does any - would anybody argue against even including any of these five elements? James you can start.

James:

Thanks. Can I just ask clarifying question? So there's five items. If we disagree with one of them do we say no to the whole block?

Chuck Gomes:

No I want - I'm asking you to identify any that you any of the five okay? And excuse me, if you'd like to do that go ahead James.

James Gannon:

Okay James Gannon for the record and in the case of natural persons and their individual capacity registrant name I would feel to not have a valid purpose, a valid justification or whatever rationale and particularly when there are other things inside that block such as contact ID that can be replacing of that to allow it to be.

Chuck Gomes:

Okay I'm going to come back to you now. This is Chuck. Stay there. Stay there please. I'm getting the impression that you're thinking about disclosure or access to that information rather than it being in the RDS. You don't think that the registrant name in the case of a natural person should be in the RDS?

James Gannon:

James again. So in the context of the block that we have up here there are alternatives such as a contact ID which could be - could serve the purpose without having to store the registrant's name in the - or DS, specific to the...

((Crosstalk))

Chuck Gomes: Okay. Did you want to add? Okay all right okay so now I know what you're

saying. So in other words some of them are redundant okay? We've talked about that a little bit in the working group in the past and not too distant past that redundancy obviously if you want to get literally technical you don't need that but it might be beneficial, make it easier for people to use the system if it was there. So redundancy isn't necessarily bad. Technically you don't have to

have it okay?

James Gannon: Right.

Chuck Gomes: Does that make sense?

James Gannon: Yes.

Chuck Gomes: Okay now James has suggested then that registrant name may not be

needed. Does anybody want to give a rationale for including it? Vicki

Sheckler?

Vicki Sheckler: I think as we've discussed several times and as we heard in the Cross

Community Working Group there are – am I close enough to the mic? Is that

better? Sorry about that. As we heard in our Cross Community Working

Group and some of our preliminary agreements within this group some of the

overarching purposes for the RDF include public safety issues, include

accountability issues. You need to know the person or the contact -- whatever

the name is whether it' a company or otherwise or way to access that. So I

completely disagree with you. And I do not think content ID or content ID, the

contact ID is at all the same as the name of the person. Thank you.

Chuck Gomes: James do you want to respond to that?

James Gannon: Yes James Gannon again. So I'm very sympathetic to the concerns of law

enforcement for public safety issues. That's, you know, not something I

disagree with. But the methods for being able to get access to that I think need to be more modern. And I'm not saying that the registrar does not need to have that information somewhere. Well for example let's take an anonymized contact ID that law enforcement can say to a registrar we need access to this for our valid purposes. And then the registrar from their billing and contact info which they will obviously have as a business they will then be able to provide that under, you know, legal justification.

Chuck Gomes: So again James you're jumping ahead to access which we're not getting to

now.

James Gannon: Yes.

Chuck Gomes: But if we decide that there's legitimate access purpose it would need to be in

the database.

James Gannon: So it – I'll let Vicki Sheckler go first.

Vicki Sheckler: Yes absolutely Chuck. Right now we're just talking about what data is going

to be collected not necessarily how it's going to be accessed where the it's gated or not but for accountability purposes you absolutely have to have the

name. The contact ID is completely insufficient.

Chuck Gomes: Go ahead Michele.

Michele Neylon: Thanks Michele for the record. So I was in the queue. I think we're actually - I

think what James is getting at is something which I think is something that's definitely worth exploring. It's not a - he's not suggesting that the data is not collected at the point of sale, the point of activation registration or what have you. It's what he's talking about is the RDS being an external system to all of that. Instead I mean I would actually say, you know, following his thinking through to its logical conclusion so if I may channel my fellow countrymen you could actually collapse that entire block down to the registrant to a registrant

ID because the registrant ID contains all of those elements. It can contain whether if whether it's validated or not the last update, the name the organization, et cetera.

As for Vicki Sheckler's concern around the name I understand where you're coming from but and in the ccTLD space from there are several registries included the .fr registry where you can - the name can just completely disappear. It's still, you know, all of the data is still accessible via other means but it isn't necessarily appearing in that place because I don't think any of us are - is going to argue in favor of the RDS holding for example credit card and other payment information or in the case of say my own company if we flag an order as being potentially fraudulent we ask people to provide us with a variety of different things in order for us to actually process their order.

None of that information would ever end up in an RDS. It doesn't end up in a Whois or anything at the moment but we do have the information if somebody comes to us with through proper channels. And just for the record this is me speaking as a member of the working group not as a vice chair or anything like that. And I know you're not going to agree with me but so there's no point to - and then with all due respect I don't think there's any point between us going backwards and forwards but it's just a different viewpoint.

Chuck Gomes:

But feel free Vicki Sheckler if you want to add something okay? All right. Okay (Peter) and keep it brief because we're just about at the end of our meeting and we have to get out of here at noon because there - quite a bit of preparation for the GNSO Council meeting that's going to be in here. Okay all right so let's record a note in this block of information that we first of all there are mixed views. That's okay. We're going to have to zero down and see if we can come to some common agreement. We're not going to have time to do that today.

So we've got some mixed views in this block and in particular on the registrant name with which was identified that we're going to have to probe

further on. I think let's see, we've got to more hands up. Let's let Volker and Greg very briefly jump in. Let's start with Volker and then we'll do a wrap up.

Volker Greimann: Yes just one minor comment to the registrant ID contact. This was not a contact that we as a registrar had any need for prior to the 2013 RAA. We were then required to collect it and put it into Whois. We had not had that contact before then and we do not have any use for it as a registrar so it's not a contact point that we would need for business purposes for ourselves.

> I would certainly say that is personally identifiable information because combined with other domain names that we will find or that you will probably leave - be able to very quickly find out who that person is. That's my thought on that point and I'll leave it at that.

Chuck Gomes:

So let's flag those as being identified as maybe not needed. Again were not making any decision okay on that so...

Vicki Sheckler:

I will object again just for the record for accountability I think it's absolutely necessary. And, you know, I expect a lot of people would feel that way also so you can write maybe not needed but I think you're going to have strong opposition to that as well.

Chuck Gomes:

No I appreciate you bringing it in. So again we've got mixed views, be really brief.

Michele Neylon:

I will be. Thanks, Michele for the record. Vicki Sheckler you said accountability that I know that some people may understand that but could you expand on that briefly? Accountability to whom?

Vicki Sheckler:

I think there is lots of different ways that we can think about accountability, you know, from the very broad sense the public may have an interest in knowing who they are communicating with. From a consumer safeguards sense you want to know, you know, if that domain is being use to sell things who is selling those things? If you're thinking about it from, you know, my narrow view we want to know if someone is infringing our rights who is behind who is infringing our rights? From a public safety perspective again, you know, is there fraud going on? You want to be able to know that.

Now that's a separate question about access. And I understand that we'll get to the point where we talk about access. And, you know, is it public? Is it only law enforcement? Is it something in the middle? I understand there's lots of different views on the but if it's not even in the database you foreclose the question.

Chuck Gomes:

Thanks Vicki Sheckler. And before I go to Greg and I will try to be brief on this but I want to encourage us all as part of this working group when we're deciding whether for example in this case to include something or not we can get really precise and legalistic and say well the, you know, it's probably not literally needed but is it helpful? The question I want you to ask yourself okay is it worth our while? Are we really gaining value by even arguing that? Is it going to matter that much? And if it does we want to identify that.

But if we're - let's make sure there is real added value in spending time on debating some of these things unless there's some very objective reasons why not. It may not be totally necessary. Is it going to matter? If it does we better identify it. You get the concept of what I'm trying to do? So let's make sure that what we spend time on matters enough that we want to spend the time because we have a huge amount of material to cover. Greg?

Greg Shatan:

Thanks, Greg Shatan for the record. I'll be brief. I think first we shouldn't conflate the data that a registrar collects internally for its customer relations with the RDS, two different purposes, two different sets. I think two different data sets obviously overlaps but not the same. And secondly I find it ironic as we're sitting here replacing Whois one of the first things people want to get rid of is the thing that answers the question who is?

Chuck Gomes:

Thanks Greg. So a real quick poll okay? Looking at this block of five data elements and again this is not a vote. We're not making any final decision, want to get a sense of the room including remote participants of possible. Hopefully they're in Adobe.

How many of you are comfortable with these five data elements at this point? We're going to debate them further so there's a lot more information to come and we haven't dealt with purpose yet which is essential.

If you're okay with (unintelligible) green check mark in Adobe or raise your hand if you're not in Adobe? Okay got a few – hold your hands up so everybody can see them like this okay unless you're handicapped okay?

Woman:

Could you repeat the question?

Chuck Gomes:

The question is how many of you are comfortable with the five data elements registrant name or organization, registrant type, registrant contact ID, registrant contact, validation status, registrant contact last updated time stamp? At this stage you're relatively comfortable with those five data elements being a part of the thing.

Man:

(Unintelligible).

Chuck Gomes:

Just preliminary good okay hands up. Go ahead Volker brief.

Volker Greimann: Just one clarification question. I mean the registrant contact ID is not a field that we would be collecting from our customer because he doesn't have that data. That's the data field that's a sign by the...

Chuck Gomes:

Don't worry about the source. We'll deal with that okay? Okay again raise your hands if your relatively comfortable with those and in Adobe or and we've got quite a few green checkmarks. And then remove your green checkmarks. I see a red X already. Add red Xes if - and you can leave your

green checkmarks if you're not with one or more okay? Thanks. Okay we just wanted to get a sense and give you a chance to respond. You can clear those marks. We need to wrap it up and get out of this room for the GNSO Council preparation. So let's talk about next steps. And staff is going to take an action item and so that I don't miss describe it Lisa would you share that action item please?

Lisa Phifer:

Lisa Phifer for the transcript. So by the table that we've been looking at was cobbled together really quickly to enable us to continue our deliberation today but is not a really fulsome description of these data elements. So the action is to provide to you further information describing each of these data elements and some of the qualifiers on them such as whether they are mandatory or optional to collect and to give you all an opportunity to review that as basis for further discussion on each of these data elements.

Chuck Gomes:

Thank you. Our next meeting will not occur next week. We'll follow the practice of taking a week off after the face to face meeting. I don't think anybody has ever objected to that. So the next meeting will be in what's the date of that next meeting?

Woman:

The 11th.

Chuck Gomes:

The 11th. So the 11th July will be our next meeting. It'll be at our regular time. The meeting after that will be at the alternate time, the third meeting of the month or third Tuesday Wednesday of the month. So please be aware of that. We didn't reach any tentative conclusions so there probably won't be a poll for people to respond to but please watch for this information to staff is going to present to the working group list. Review it before that meeting on the 11th so that we can jump right in and continue this task of identifying this metadata set okay? Lisa do you have anything to add or anyone on the leadership team?

Man:

My apologies (unintelligible).

Lisa Phifer:

Lisa Phifer for the record Chuck. So I just wondered do you wish to run any sort of poll after this meeting to gather further information as input to the next meeting? For example people have raised their rationales for wanting certain data elements accessible - accessible is a terrible word isn't it, want to get in the data set. Do you want to try to collect information on the through a poll?

Chuck Gomes:

I always like collecting information but I'm not sure we have enough definition and there's been enough discussion on it to do that. Do you think of it – I'm not opposed to doing that. It seems to me the most important thing is for them to review the information that you're distributing but what do the rest of the Leadership Team think? And what would you poll (Susan)?

(Susan):

I basically ask the - basically ask the questions we've asked today, give the opportunity...

Chuck Gomes:

Okay.

(Susan):

...to put their green check or a red X and their rationale, not get into is this a purpose is this not but just let's just collect some raw data on what people are thinking?

Chuck Gomes:

Okay. So we will work as a Leadership Team to come up with a poll. But I don't think the poll can – usefully be done until this information gets out that staff's taken the action item on. That will make it a lot easier to do the poll. So the poll may not come out real quickly but keep in mind we have a two-week period though instead of a one-week period so thanks for that, that's good. Anything else we need to cover?

Okay. I want to say thanks to all of you for participating both remotely and in person. I want to thank the technical people who supported us and all of you for participating. Have a good rest of the week here and we will meet again in a couple weeks. Thank you.

Woman: The recording can stop.

END