ICANN Transcription ICANN Panama City GNSO RrSG Membership Meeting Session 1 Wednesday, 27 June 2018 at 10:30 EST

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Graeme Bunton: Ladies and gentlemen, welcome to Panama and our three hour SG Session.

Today, we've got lots of stuff on the agenda. It's good to see everybody. I hope everybody has been having a good meeting so far. It's been pretty intense, lots of GDPR. We've got a good chunk of time set aside to discuss that.

You can see the agenda on the screen. We're going to work through a couple other updates. Talk about some - the charter and elections and the budget, which are going to be important discussions, and then we're leaving a bunch of time for GDPR and what's going on there at the Council because that's all pretty important.

I think we've got lunch. Zoe had some...

Zoe Bonython: So I think I had previously said that we were having a buffet but it turns out I

lied. We're having boxed lunches. So there will be vegetarian, chicken, and

beef available but we'll be asking anyone with pre-told dietary requirements

to get their first. So that is coming we hope.

Graeme Bunton: Great. Maybe - I was inclined not to do just a scroll of names but maybe that

is helpful. I feel like I know most of the people in the room, but maybe not

everybody else does and so that's arrogant. We're going to start with Kevin

down there on the end. Let's just do a quick around the room so that everybody knows who everybody is.

Kevin Kreuser: Kevin Kreuser, GoDaddy.

Sara Bockey: Sara Bockey, GoDaddy.

Michele Neylon: Michele Neylon, Blacknight, and I'm one of your three GNSO Councilors.

Sunny Yadu: Sunny Yadu, LexSynergy.

Volker Greimann: Volker Greimann, Key Systems-Moniker.

Vlad Dinculescu: Vlad Dinculescu, Africa.

Jacques Blanc: Jacques Blanc, ProDomaines.

Eric Rokobauer, Endurance.

Bob Wiegand: Bob Wiegand, Web.com

Greg DiBiase: Greg DiBiase, Amazon Registrar.

Zoe Bonython: Zoe Bonython, Secretariat.

Graeme Bunton: Graeme Bunton from Tucows and the SG Chair.

Crystal Ondo: Crystal Ondo, Name.com

Stephanie Duchesneau: Stephanie Duchesneau with Google.

Susan Jang: Susan Jang with Google.

Kristian Ørmen: Kristian Ørmen, Larsen Data and also the Secretary.

Jeff Neuman: Jeff Neuman, (Nom IQ) doing business as Com Laude.

Pam Little: Pam Little, Alibaba Registrar. I just want to make a note. We used to also be

known as High China, the registrar that has now been officially changed to

Alibaba's name. Thank you.

Matt Serlin: Matt Serlin, Brandsight.

Theo Geurts: Theo Geurts, Real-time Register and your NomCom rep.

Luc Seufer: Luc Seufer, EuroDNS.

Wendy Scott: Wendy Scott, Automattic doing business as Wordpress.com.

Kelly Peterson: Kelly Peterson, also Automattic and Wordperss.com.

Alex Schwertner: Alex Schwertner, Tucows.

Jacob Williams: Jacob Williams from Interlink.

Woman 1: (Unintelligible) from Interlink.

Graeme Bunton: All right, welcome everybody. It's good to see lots of friendly faces. Okay.

So let's get into the weeds. Let's get down to business. We're starting off our agenda with a 10 minute Council update from Darcy, Michele, and Pam. I have a hunch, though, that that is going to be uniformly about GDPR. So maybe what I'm going to ask from you guys as you go into these piece to just to say anything that's happening at Council level that is not specifically GDPR

and we'll save those bits at the Council level for 11:50 or so.

Michele Neylon: Bear in mind, Graeme, that councilors will have to leave because we have a

council meeting that overlaps with this, which I think begins at 1:00 p.m.

Graeme Bunton: That's great. We can get you in ahead of that.

Darcy Southwell: Thanks, Graeme. Darcy Southwell. To be very honest, all we're dealing with

is GDPR. It has been the expedited PDP the whole time. So beyond that, we do - Pam just sent the agenda for the Council meeting this afternoon with the motions. There are a couple of other motions up for - I don't even think for discussion. I think we're just going to vote. We've already discussed

them. I don't know if Pam wants to cover them but that's about it. It's been

all GDPR.

Pam Little: Pam Little for the transcript. The two items that are for vote, Item 6 and 5, I

don't know why I put them in that way, I don't think they're controversial. So and likely we're just going to vote for the. Item 8 is still under discussion. It's

probably unlikely as a Council we will be able to vote on that particular one.

that's my take. Maybe Michele, you can add more flavor to that.

Michele Neylon: Thanks. Michele Neylon for the record. Unfortunately, it is guite true that

GDPR has sucked every single bit of oxygen out of the room. So while the GNSO Council does have a projects list, which is a hell of a lot longer than a

single item, we are not at the moment able to put any effort or attention on

this.

We're also in the interesting situation of trying to write the charter and

scoping documents of this EPDP, which has meant that I think yesterday, we

were working on that from 9:00 a.m. until 3:00 p.m. We had a break of a

couple of hours and then we were at it again from, like, 6:30 in the evening

until 7:30 and I know people have been working on it since then.

Just as an FYI, we have been coordinating a lot more closely with our

colleagues in the registry stakeholder group in relation to this. Not to put a

finer point on this, we cannot allow a situation where others who are not contracted parties get to manipulate the votes and things like that. That's something we have to be very careful with this.

Graeme Bunton: Thanks, guys. It sounds like we have more to discuss on all of that a little bit later and I think it makes more sense to do it all at once. So if Council is all GDPR then we'll come back to it. Next on the agenda is what else is going around in the community that's not GDPR. So PDPs, IRTs, stuff like that. And I think we've got Sara Bockey up first on PPSAI, which is the Privacy and Proxy Services Accreditation Issues, Implementation Review Team. So the policy work is done, working on implementation. Sara is going to give us an update, please and thank you.

Sara Bockey:

Hi, there. Yes, this is Sara Bockey for the record. And so let's see, updates since we last met in Puerto Rico. The IRT has only met a few times since then. Primarily, staff has been working on finalizing all of the documents and trying to provide us with more clarity on the proposed (unintelligible). That's sort of been a sticking point.

In any event, the most current version of the Privacy Proxy Accreditation Remit is currently with ICANN Legal for review. They're reviewing the document with GDPR in mind to see if there's any issues they need to address, as well as any other items that may require clarification. I've been told that they are supposed to be done with that review by the end of June, so in the next couple of days. When that report gets published is going to be dependent on if they find a lot of issues or just a few issues.

If it's just a few issues, it will probably be in the next month or so by the end of July that the report will get published. If there's more, it will obviously take longer to address all of those issues. We still have some remaining unanswered questions, the primary one being the discussion that we've been having with law enforcement regarding the high priority response time for the privacy proxy provider. The registrars in the group are still asking for one-day turnaround and the law enforcement is still wanting their 24-hour at the very most. If they could have it an hour that's what they would want.

So that is going to be going to public comment for feedback on what should be done. The other issue that's sort of been outstanding is the proposed fees. We provided ICANN staff with a lot of feedback as to why we think they're a little excessive. We've asked for clarification of why they're so high and what's driving that. They've provided us some itemized feedback but really isn't horribly helpful. They're saying that the program fees are a fixed item. There's not a lot of flexibility and they're anticipating 250 providers to apply to satisfy that. So if only four were to apply than that money is going to have to come from somewhere.

In any event, they're looking at new entities, including affiliates of existing accredited entities to pay a \$3,500 application fee and then there would be a \$4,000 annual fee. Any existing entities would be paying a \$2,000 application fee as well as \$4,000 annual fee. So we are looking at - I think the main sticking point is more the annual fee because it seems like a lot given that we're already paying as registrars that fee as well.

In any event, I believe that Volker had a discussion with Cyrus and Akram today and was able to at least get them to think about looking at the fees and taking our feedback into consideration, and I don't know if Volker is able to provide any more flavor on that. But I'll turn it to him in case he does.

Volker Greimann: I talked to Cyrus and Akram yesterday and basically reiterated our concern about these fees and the likelihood of these fees doing an active part in sabotaging the intent of the program, which is to get as many providers as possible on board with this program. And they were quite adamant that for the setup frees, these were actually cost-based because of all the due diligence that they allegedly had to do as well as the annual fees being seen as a cost recovery based on an assumption of 200 accreditations over time, at least, which was what they said for compliance function.

I reiterated our impression that current compliance functions would be able to deal with this easily and that at least the annual fees should be significantly reduced before this program goes live. Raised some concerns about (unintelligible) of ours and ourselves, of course, as well that operate these services that these services for a lot of us, some companies here exclude of course are not big profit machines, but rather loss leaders that do not run any profits. And therefore, adding additional cost onto that would be unwise, that this is something that the community has asked for and therefore the community should also be paying for it.

And that the original review team, one recommendations that this entire process and program has been based upon, also foresaw that the accreditation should be - that entities should be enticed into the accreditation by a system of, paraphrasing here, carrots and sticks, and we've seen a lot of sticks but no carrots. And I asked them to look into the pricing again and provide a couple of carrots for us in the form of a reduced annual fee. Because we don't believe that, A, those fees will be necessary, B, these fees are excessive, and C, something that should come out of the ICANN budget as a whole, not the providers that are not making money off of this anyway.

And they at least agreed to look at those prices again.

Graeme Bunton: Great, thank you. This is Graeme for the transcript. Thank you both for that update. I think 200 providers sounds pretty high at the moment. I would be pretty surprised if we see a quarter of that. Okay, anybody have questions on where privacy and proxy is at? There's going to be some interesting overlap there between it and GDPR and access to data. I think maybe there's some reasonableness models. If you look at the appendix for intellectual property, that's probably a thing everybody should take a few minutes and do from the actual original policy because I suspect we're going to see that come up in future discussions of GDPR.

I saw a hand I think from Michele.

Michele Neylon:

Yes, just a couple of quick comments. Michele for the record. Just echoing some of the points Volker and others have made, the costs both in terms of getting set up and the ongoing costs that ICANN are putting forward, for a smaller registrar such as ourselves, it's a bloody nightmare. We don't have a very - we have a WHOIS privacy service that we offer. We make a small amount of money from it. If this - if the fees that they're proposing continue then that pretty much wipes out any margin that we were making.

In terms of how this interacts with GDPR, and, well, just privacy in general, privacy laws, this entire thing finished years ago, like the actual working group. It's been - the implementation has been incredibly slow and ICANN's responsiveness to our questions around this entire thing have been, how can I put this diplomatically, far from stellar. We asked, I think Volker or somebody else might be able to confirm, I think we asked maybe four times for a breakdown of the fees and it took four separate attempts and five months to get something which actually was a breakdown of fees. Up until then, we got crickets.

Graeme Bunton: Okay. SubPro. I'm going to pass over to Jeff Neuman. For everybody's sake, brief description of what SubPro is and then just where that's at if you wouldn't mind.

Jeff Neuman:

Sure, I'm just going to be real, real brief. SubPro is basically work for the next round that the GNSO is doing and so we are going to release an initial report, which is going to be quite length, well over 200 pages, next week. So look out for that. It's going to have a 60, 6-0, 60 day public comment period. So the only thing I'm going to say is I'd love to set up a call not for next week but the week after with the registrars that are interested in working on a response, after you've had a week or so to digest what it is so that we can just work on getting some comments.

And there's lots of questions in there. Some preliminary recommendations and at the end of the day, those areas that have consensus for change will be changed for the next round. Those that do not have consensus will likely result in no changes, but it covers everything from the registry agreement, to vertical integration topics, to fees. So strongly recommend you all read it next week when it comes out and then we'll organize a call and talk in much more detail about it.

Graeme Bunton: That's great. Thank you, Jeff, and I'm sure there are people who care about that. So we'll get that going. Anybody have any questions for Jeff on that brief update on subsequent procedures? My laptop just totally borked itself, so if there's someone in the queue on Adobe, I can't see it. Great. Across field validation. I think you're up, Darcy, and I think (Jangor) is in the room so we can beat up on her a little bit, which is always fun.

Darcy Southwell: Thanks, Graeme. Darcy Southwell. So just to give you all a little history, I think the last time we actually met was prior to Puerto Rico. Early in May, the Registrar Stakeholder Group sent a letter to Akram. It was when we knew the temporary specification was in development and we asked that the temporary specification include language that paused the across field validation working group given its impact or GDPR's impact on the whole across field validation process.

> As you all know, it was not included in the temporary specification. We got a letter back from Akram in early June, I believe, and that it suggested that we needed to continue our work and review the possible providers. There's been some talk about whether or not we need to do another ask and that draft is sort of in development for consideration. There's also some who have suggested to us that we should vote on pausing this or vote on the fact that it's not technically or commercially feasible, which is the requirement in RAA.

Curious about others' thoughts. I know Greg, are you here? Greg, do you want to add some flavor to that because I know you and I have talked about that.

Greg DiBiase:

Yes, we're just kind of - so we got a response from some RFIs. I'm pretty sure all of the RFIs have fees that make it commercially unfeasible. I think it was \$.08 or something per check. So I feel like we have enough information to vote that this is not commercially feasible. I guess the wording in the addendum, the vote is to approve or not approve, so I guess that's not the exact wording in the addendum. And then I mean the other thing I was thinking that we sent a letter to ICANN asking for a delay until these GDPR issues are resolved, but we're the members of the working group. Can't we just say, as members of the working group, we're pausing this until the temp spec is finished and these GDPR issues are ironed out?

Graeme Bunton: Thank you, Greg. Thank you, Darcy. This is Graeme. That's a good question. That would seem like a sensible thing to be able to do. I can see Jen is approaching the table so we'll hear from her in a sec. Also on this, while it's in my head, there is a bit of language inside the GDPR, and this is another example of where the GDPR impacts every little bit of our business, where it says that data needs to be accurate.

> There are, and admittedly I'm not the most sophisticated reader of GDPR in the world, and is Crystal Ondo in the room because she might have a clear opinion of this. The GDPR language on accuracy people are using to say we need cross field, registrars need to be verifying all the data that they're getting, and that's not I believe what the law actually says. The law says that the data has to be accurate from the data owners, the registrants' perspective.

So what they put in is what they think should be in there. And for us to then go and take that data and say, no, no, we think this is wrong, is probably

GDPR non-compliant. Does someone have a clear bit on that piece of accuracy and as it relates to this?

Michele Neylon:

It's Michele. There's conflicting views on this one. I personally was of the view that the accuracy was in relation to the data subject. If the data subject believes that the data they're providing is whatever it is that we have to respect their right to provide us with their data. However, I've also seen some lawyers in Ireland specifically, because this came up in conversations we're having with our local CCTLD, and this part of the way that that bit of the text is worded, some of them are viewing that as forcing a degree of validation on the data.

I don't know exactly where that's going to end, to be honest with you. But just on this thing around the cross-field bit in the contract in general. Even if we vote now against it, there's no language. The way it's worded in the contract, there's nothing to stop them bringing it back up again in six months' time.

Graeme Bunton: Thanks Michele. Someone told me to harass Kevin about this.

Volker Greimann: I think that's a pretty big perversion of the law to suggest that cross-field validation is GDPR required. It's - your obligation as a controller is to ensure that the data they give you is kept accurate. You can't take John Smith and then call him Jane Smith, right. That's the accuracy. It's internal. There's not this external obligation to go back out and say, hey, are you sure you gave us the right information. So I just think this is terribly twisted to try and get that in there. So it's Article 5, Section 1 something if anyone is interested.

Graeme Bunton: Thank you, Kevin. I've got Volker in the queue. We might need - because I think that's a pretty common perception amongst the community, including members of the GAC. And so we might need to come up with a one pager about what that means to help educate some people. And maybe I'm going to make you do that because that's how I like to roll. Volker, and then we'll come back to comments from Jen I think.

Volker Greimann: Yes, Kevin is absolutely correct. I mean, this accuracy provision has to be seen in context. GDPR is a law that's designed to protect the data of the customer, the data of the data subject. The customer of the data subject has a right to access the data, see if it's accurate, make corrections to it, and in the context of all these customer and data subject rights, this accuracy subject, accuracy provision has also to be interpreted in this way. Meaning that the data subject has a right that we as a provider keep his data accurately that he has provided to us and not make any changes to it that would cause an inaccuracy.

Graeme Bunton: Thank you, Volker, and this is one of our concerns, and I see Jen, so I'll address this to you, is that actually proceeding further down the road of trying to do, like, oh no, someone gave me this address and actually, I'm now changing it might get us in trouble, might have liability under GDPR. So I think there's a couple things we could hear from responses on from you, Jen, one, to Greg's point of can we just pause this while we sort of continue GDPR issues? Has ICANN looked in - A, does ICANN understand this data accuracy component and the liability risk that it might entail? And/or other thoughts on cross-field from you, please and thank you.

Jennifer Gore:

Thanks, Graeme. Jennifer Gore, ICANN staff. So related to Greg's question, if the volunteers that are participating in the registrar working group are unable to participate. I don't think ICANN has a position to be able to push for additional work. So by that, I mean if at this point in time, if you feel as if you're inundated by GDPR, I'm not sure what we can do as an organization to encourage the volunteers to participate in the sessions.

Jeff Neuman:

So that's interesting. I guess. So it would be, I guess, argument would be, A, we don't have time and then the other argument would be as working group members, we need to make an informed decision regarding GDPR and until these questions are settled, it is not prudent to continue working or something to that extent.

Jennifer Gore:

And I will take that back and come back to the working group with a more official response from staff. But I actually haven't been in this situation before, the last twenty some years. So that's a good question and I'll come back with an answer on that. But I don't see a way that the organization itself can force the volunteers to participate if they're unavailable.

Graeme Bunton: Thanks, Jen. I don't think we would want to phrase it quite like that. There's probably a more productive way to communicate that to staff and the rest of the community. But we can take that on. Has, on that second piece around the interaction of data accuracy inside the GDPR and the requirements of cross-field, has ICANN done any legal analysis on that?

Jennifer Gore:

So it is on the list of legal analysis to be conducted, but at this point, it has not been completed as time. The prioritization at this point has been around GDPR and as Sara mentioned earlier, all the legal documents related to privacy proxy are in that same queue as well as the interpretation of the GDPR language as it relates to address accuracy. So it is in that gueue but the work has not been completed.

Graeme Bunton: Thank you, Jennifer. This is Graeme again for the transcript. That feels like a good gating piece of when we should next take a look at cross field, which is we need that analysis to come back before I think it makes any sense to do any more work. Because if it comes back and says, oh yes, we can't just go about changing what information people have given us, then that sort of murders the viability, I think, of cross-field.

Jennifer Gore:

Thanks, Graeme. May I suggest to the point that was made earlier around the registrar working group or the registrar stakeholder group, together their analysis of what that means and then submit that to ICANN along with that request.

Graeme Bunton: Zoe captures all the to-dos. So I think she's got that. Yes.

Jennifer Gore:

Thank you.

Graeme Bunton: Okay, anybody else have questions or thoughts on across field validation? No. Great. Thank you, Jen, for your input there. Thank you everybody else. All right, moving right along, five minutes ahead of schedule. Doing good. I'm sorry, I missed this the other day so I'm very interested in the update from our compliance group, and I'll set this up, which is some time in the last six months or so, I would say, the registrar stakeholder group has created this compliance subgroup where registrars interested in engaging with ICANN compliance and engaging with each other on improving ICANN compliance and the way we interact with them have gotten together. And I think we've run two or three meetings now with ICANN this way, where we are setting an agenda. We are approaching ICANN with what it is that we think are concerns and want to improve.

> And the goal there is to really make, A, those meetings of compliance better because they have historically been unpleasant and unproductive, death by PowerPoint I think is the expression we typically hear. And long-term to help make ICANN compliance better because we all know that there are material problems there and that there are things that should be fixed and we can help them fix them. We all have help desk queues and manage things like that, and so there's expertise that we all have we can help give to compliance.

> So they had a meeting yesterday morning. Greg and Kristian are the cochairs of that. Thank you both for your work there. And let's hear about what happened yesterday. Thanks.

Greg DiBiase:

This is Greg. So the focus has shifted on asking compliance how they've changed their processes after GDPR. We brought this up at GDD Summit and they didn't have good answers because the temp spec wasn't implemented yet. Now, it's been implemented for a month. We kind of followed up and said, all right, what's happening basically.

And their response was that we haven't really changed anything. They don't have any new complaint types. They said they're open to receiving compliance about the temporary spec but they haven't defined something like a transfer complaint where X, Y, and Z means a valid complaint and they'll send it. So it sounds like they're sending inquiries if these issues come up before they've officially established complaint types. Thus far, they've said - they've told us that they've not received any complaints regarding reasonable access and most of the complaints they've seen are from registrants confused as to why their data is missing, redacted, and they've been responding that registrars have taken these changes to comply with the temporary specification.

But yes, we're I think hoping for more that should evolve as they receive - if and when they receive complaints, they'll change their processes. But for now, we didn't get a lot of great detail on exactly what's changed. They did say if they need data from us that is redacted, they will make it very specific and put it in an inquiry. So for example, if there's a renewal complaint saying the registrar didn't send the renewal reminders, they will send an inquiry asking only for the registrant email and the information necessary to resolve that complaint specifically.

They also said that their processes aren't going to change. So if someone submits a WHOIS accuracy complaint, they still have to provide evidence, which might be harder now that all this data is redacted. So I would suggest to this room that if someone says a name is incorrect, ask for evidence. That will likely be pretty difficult for the complainant.

So then the next big thing is we kind of identified some gaps in the temporary spec and I think the biggest one, the temporary spec did not correctly transcribe the tech ops recommendation on gaining registrar FLAs. So the policy says that if the registrant email is available, you still have to send the gaining registrar FLA. That is not technically feasible. I think that's the

general position among registrars that you can't check the data every single time before a transfer. But nonetheless that is the policy right now. So that's just kind of a gap that's hanging out there. They recommended that we, every 90 days the temporary specification if up for review, and they said there's a method to submit comments on what should be changed and they recommended flagging this.

So that's one thing we can do. I mean the only other thing I can really think of to resolve this issue is we could create internally a blacklist of everyone's emails that are unresponsive and check against that. I could send out an email asking for what your redaction email is that is not responsive. Other than that, I'm not sure how to resolve this issue. I guess the last detail on that is if ICANN does ask for evidence that the registrant email was not available, there's not a lot they can ask for because we're not responsible for logging another registrar's WHOIS at the time of the transfer.

But maybe I'll stop right - I have a couple more things but maybe I'll stop for comments or questions.

Graeme Bunton: I've got Jeff and then Michele.

Jeff Neuman:

Thanks, this is Jeff Neuman for the record. Yesterday during a session with the GAC, Facebook had represented that they had filed several complaints in the last week or so on unresponsive registrars. Has anyone seen these complaints? Has compliance said anything to us about these complaints? And if not, can we get compliance to let us know what the status of those are?

Greg DiBiase:

So compliance did mention they may have received some in the last couple days that haven't been reviewed yet. It sounded like they received some literally on Friday of this week and they're still...

Jeff Neuman:

So just a quick follow-up to that, so there is a session this afternoon. The contracted parties are going to get to present to the GAC. It wouldn't surprise me if someone from the GAC asks us about that interaction and if there's a way that we can get with compliance to have them kind of step in, instead of us answering and being on the defensive about that. I don't want the registrars to have to be on the defensive when the GAC is questioning us, when we haven't seen any of those complaints and I think that' a compliance issue as opposed to ours.

Graeme Bunton: Sure, all right. Queue building quickly. I think so we saw - while I'm talking, this is Graeme for the transcript, Tucows saw a bunch, I think Elliot talked about this in a previous session, all in the past week. Previous to that, we'd had like a dozen and if people want to search the queues, I can help you because they were not coming from a very obvious place. You would be surprised, I guess.

((Crosstalk))

Graeme Bunton: Understood, yes, but it sounds like they're going to compliance on these. So you may well be missing some of these because they're not coming in obviously. I think it's a good idea to have compliance step up in front of that instead of us. And so yes. And I have some other thoughts on compliance but we'll go through this issue first I think. I'm going to go James and then we'll get over there.

James Bladel:

Yes, just real quickly, I mean Graeme very similar experience to yours, as I mentioned in the previous session. I think the one thing to point out is that these weren't just WHOIS reveal requests. They were requests for additional data associated with whatever came back from that initial. So it was almost like a two-tiered request, which is why we responded the way we did, which we need a subpoena.

But I think to your point is did that go through compliance. I think we have received a couple of compliance requests and I'm looking down here now to Sara. We'll probably track those down and see if we have. We did receive a compliance request that was escalated to the U.S. GAC rep, I'll just say it that way, and turned out to be more of a content issue. And prior to this week, we had received two and then we received about 130.

Michele Neylon:

Thanks. Michele for the record. It's more to Greg and the others dealing with the compliance subteam. One of the issues I raised with compliance in Vancouver and I still have not had a satisfactory reply from them on it. they seem to be laboring under the belief that we can transfer personal data to them outside the European Union and I'm having serious issues with that, especially since they're conducting compliance from countries that do not have equivalent controls. There is no way in hell that I am going to start sending my client's data to Istanbul or Singapore. And they don't seem to understand this. They keep on thinking that they can just ask for everything and say it's for, what is it, completion of the contract, whatever the terminology is.

And I don't know if this has been raised with them and if they've provided a slightly more satisfactory response. Also, the entire kind of approach they were taking to which contractual compliance issues they were prioritizing, which they presented in Vancouver, seemed to be completely disassociated from reality with WHOIS accuracy complaints at the top of the list, considering there's no public WHOIS. And when asked about this, Jamie Hedlund. Talked about people not replying to emails.

Graeme Bunton: Thanks, Michele. I've got Alex and then Pam in the queue.

Alex Schwertner: Thanks, Graeme. Alex from Tucows. Briefly on another thing that Greg mentioned about the transcripts. So the language that we see in the temp spec goes back to a proposal at the CPH Tech Ops Group except for that the language wasn't copied over. It was kind of wrangled and that is why we

ended up with this situation where the tech ops group suggested we assume email is redacted. It's no longer available, therefore we do not need to use it anymore.

And in the text back that wording went into if WHOIS is not available, then you don't have to use it. So that is something that we may want to make sure we definitely bring up in the PDP and it may even be something that if we all agree, ICANN Org and us, that this was not really intentional to change the language that way, it may be something that could be changed in just the language of the temp spec as it stands.

Because it creates some sort of inconsistency within the temp spec where it says it's fine to redact emails, but you've still got to use them if you think they're not redacted. So it's kind of a conundrum that's hard to solve and we may want to clean this up.

Graeme Bunton: Thank you, Alex. This is Graeme. I think probably inside that EPDP is a - the first thing that EPDP should do, because it's so simple and easy. I've got Pam and then probably I think Greg had a couple more thoughts. We should wrap this up.

Pam Little:

I was just trying to respond to Michele's question about sending that onto compliance. I think it did come up yesterday and Greg, correct me if I'm wrong, Jamie Hedlund was adamant that they have a legal basis to obtain data from us based legitimate interest and it's in the temp spec, therefore we have to send them data.

And so my question to our group is (unintelligible) a processing agreement between registry and registrar. We are doing the RAA addendum for data processing. But between ourselves, what are we doing? Should we do something? Should we push for something from a drafting team to have a data processing agreement between ICANN, and registries, and ICANN and registrars, thank you.

Graeme Bunton: So I've got some usual suspects in the room on the joint processor agreement conversation that have happened quite a bit about this sort of transfer of data. And we leaned on ICANN really hard to try and get that. And I don't think we have it in a satisfactory manner yet.

> I had a conversation this morning with Jamie Hedlund about this issue, which is what constitutes a legitimate basis for compliance to ask. Just because we have a contract with you is not enough. I don't think we can also just say eff off compliance, you get nothing. There is probably some sort of middle ground that requires an agreement and some legal analysis. So I asked Jamie this morning if they could look at that, give us what kind of legitimate purpose, and it's never going to be get in there and scrape. It's going to be on a per request basis and it sounds like that they will be sending requests through on very narrow issues, which might be okay. But we need more to wrap this in and we don't have it there.

I've got Volker and then Jacques in the gueue.

Volker Greimann: Well, if ICANN is of the opinion that provision of private information to compliance under the GDPR provision of performance of the contract allows them to ask for the contract - ask for the private data of our customers, they're sorely mistaken. Because that GDPR clause only refers to the contract between us and our customers, to which ICANN are not a part. So therefore that as a basis of legitimate transfer of data is inconceivable.

> Therefore, we need a different basis for such transfer. ICANN has not provided such a basis yet. We will await their further work on this. Until that time, we have also an obligation to provide them with that data, at least in my opinion.

Jacques Blanc:

Jacques Blanc for the record. May I just point out that we might end up with the smallest denominator as each of us have got different national laws. And for us all, what is going to be paramount is the national law we are under. As a registrar, I don't see us agreeing to a global process even between us in good faith that would go against the French law we've got to abide by. So that's not going to make things easier.

Graeme Bunton: Yes, what fun this will be. So I'll have another conversation with Jamie about getting that basis from them that they think is legally solid and then we can do some analysis on that. And that might be another question that we need to point a lawyer at for some guidance to make sure that we have covered our liability in transferring data to ICANN and that their rationale is robust.

Michele Neylon:

Graeme, the equivalency has nothing to do with rationale at all. They can have a legitimate purpose for wanting to ask for the data but if they don't have legitimacy of protection, we can't give it to them. They're two different things.

Graeme Bunton: Greg, some closing comments on the compliance stuff?

Greg DiBiase:

Yes, so I think we have a couple of questions if and how we can transfer data to ICANN when requested. I don't have a great answer on that. I think that's something we have to discuss with Jamie. The transfer issue, we can resolve an EPDP but that is still a year away. I heard there's a mechanism where we can change the temp spec. It sounds like we should write a letter sooner and say, hey, this looks like a miscommunication. Can we go back to the original (unintelligible) suggested.

Volker Greimann: I guess that was my suggestion, write a letter to ICANN and have - upon renewal of the temp spec, maybe just change that language.

Graeme Bunton: Thank you. I believe ICANN has the ability to amend the temp spec when they renew it. I haven't even thought about whether there's crazy risks in doing that. Is it like opening up our contracts? Do we want ICANN to just not touch a thing so that we can continue that work? If we open up the temp

spec to tweak language, is there - does that - suddenly pours all their hopes and dreams into that editing. This is new ground. I don't think anyone knows the answer to that. So I'll take that one, again, to go have a chat with some senior staff on that particular piece. Thank you.

Anything else? Going once, going twice on compliance. Kristian?

Kristian Ørmen:

Kristian from Larsen Data. I just want to round it out that telling people that they are welcome to join the compliance subgroup if they want. They can just write to Zoe and also that if you have any compliance tickets that have anything to do with GDPR especially and there's any issues with it, the subgroup would like to see those tickets so that we can bring it up at the next meeting with compliance. Yesterday, we did ask compliance that we do another meeting in, like, two months' time. That would probably be a web meeting but we don't know the dates yet.

Graeme Bunton: Thanks, Kristian. All right, let's move on. How are we doing on time? About four minutes behind. Pretty good. All right, guys. And we're hearing, I say this, I think every meeting, we are hearing a lot from the usual suspects. If you're new to the group or new to the room, stick your hand up, we're pretty friendly, ask a question. If there's something you don't understand, don't be shy. There's a lot of expertise in the room and we kind of tend to assume that a little often that - and not everybody has been doing ICANN meetings for 30 years and remembers all these arcane debates.

> So if you're confused or would like to understand something a little bit better, please put your hand up. We're happy to explain an acronym or go into something in more detail, or find myself or anybody else in the room afterwards and we can dig into stuff. But I want to make sure everybody feels like this is not a room of just a bunch of experts sharing their bits. This is a room for everybody to participate.

And speaking of participation and changing how we do things, it's now time for a little chat about the charter and elections. Raise your hand if you have voted on the new charter? There's probably some people who aren't voting members in the room and that's okay. I think that vote closes today. If you haven't voted, please go do so. I think we have enough, like literally right now, it closes in, like, three hours. I think we've got enough votes to get us over the line, which is to say the vote will be valid. I don't know what the actual - yes, we need two-thirds of the people who voted to get this thing passed. It is a foundational document for this organization and so the low voting numbers doesn't feel great when we're really changing who we are and how we operate. So I really, if you haven't or know someone who hasn't, go smack them and tell them to vote because it's important. But I think we will know later this afternoon whether we have approved our new charter or not and that is very exciting.

Kristian?

Kristian Ørmen:

This is Kristian. Just to say that the voting mail comes from election party and the voting is a two-step process. You put in your vote and then in the next page, you have to submit. You'll get an email to say that your vote is recorded. So if you didn't get that email and you think you have voted, you really didn't. So please go check for that.

Graeme Bunton: Right, thank you, Kristian. That is a very good point, which is the last voting round, there was some controversy because people thought they had voted when they hadn't actually completed the full process. Please complete that full process. So this is exciting. We'll have a new charter hopefully, hopefully, crossing my fingers. I'm pretty optimistic. We worked on that thing for a year, more, and it's great. And so we'll find out this afternoon whether that's been approved or not.

> Now, the full process requires the ICANN Board to vote on the charter once it's done. The ICANN Board is pretty busy these days. And so it could take

quite some time to get that on the Board's agenda and formally approved. However, our plan is to operate under the new charter, assuming it's approved, going forward. Because we as members have written it and approved it. and that sort of Board final stamp, while important, I don't think it should slow us down as we continue to try and get stuff done.

And the getting stuff done includes our next round of elections and approving the budget. So if anybody has any super red flag or alarms on that, I'm happy to hear about it. But the plan is to, despite the Board having formally stamped it, that we're going to operate under the new charter. So that's where the charter is at. Elections, and I floated this out to the list a couple of weeks ago, which is we wanted to wait until after the new charter is approved to start the next election round. It changes a couple things. Some minor changes in how the actual election cycle works and then some more substantial changes in the number of ExCom positions. We introduced a new ExCom position, which is the Vice Chair of Policy. And so people should be thinking about whether they want to run for any of the positions and/or that one especially because we need more bodies to fill these roles.

We move to two years terms instead of one year terms. And so currently, under the old charter for the next three hours, you can do three one-year terms before you term out. Under the new charter, it will be two two-year terms. And consequently, we also need to begin staggering our elections because right now, we turf everybody out at the same time and then re-elect because they're one year, they're annual elections. And so we want to begin staggering that so that we don't lose that entire expertise of the Ex-Com every time we have an election.

And that provides an interesting one-time problem to solve, which is I think most of the Ex-Com now has done two years, and in theory under the new charter could do another two. But we need probably people to do three and I don't think anyone wants that, or to do a year and step aside for the next election cycle. I will be very upfront. I'm going to run for Chair again under

the new charter and then I will most likely step aside in a year. So we all need to -- there you go -- think about that and how that's going to play out. And then we are continuing to discuss inside of the Ex-Com who wants to run again, if they do run again, and when, would they step aside in a year so that we can begin to get that staggering under way and everything moves smoothly forward there.

So I think we decided in our little ExCom chat on Sunday that the election would begin or the nomination period would begin on the 2nd. Is that correct? And then we run that for a week, I think, and then there's a discussion period, and then I think the vote, I think we don't have a ballot inspection period anymore because no one understood what that was for.

So expect those nominations to open up on the second. Does anybody have any questions or thoughts on either the charter or upcoming elections? James? July 2, yes, what did I say? Oh, July 2. James?

James Bladel:

Hi, thanks. James speaking for the record. And perhaps you covered it and I missed it, but when we approve the charter and when we're on the other side of this particular election cycle, are we then moving into, or reopening, reexamining this incorporation as an association? Because I think one of the things for the benefit of the members is we keep bumping into this problem that we want to hire people, we want to engage experts, or advisors, or advocates, or whatever, and a big question always comes up, who is signing the contract and what is - and so I think I would love an update on that.

And I fully appreciate and understand if the answer is let's get through the charter. Let's get through the budget and then that comes as a fast follow.

Graeme Bunton: Thank you, James, and that's an excellent segue into our next section, run by Ben. Oh, there are some questions in the chat. So we're going to come to that but let me see if I can get my Adobe open and look at the questions in the chat. Chris is asking what if the Board disapproves it. I don't know. I

don't know that that's ever happened. I think it would be outrageous of the Board to materially meddle in how we choose to run our stakeholder group, because it's not like we're inventing craziness. It's pretty straightforward. Darcy I think had a comment on that.

Darcy Southwell: Thanks, Darcy Southwell. I just wanted to add, this is one of the reasons why we chose to work closely with ICANN staff when we first started the drafting team, which I eventually left. But staff has worked with us to create what has become sort of their standardized charter or in some respects mirrors, not exactly, but mirrors I think it's the business constituency. So this is something the Board has seen before. They won't be surprised by what we've put in there and ICANN staff has advised along the way, including it's (Bob Hogar's) team. So from a legal perspective as well to ensure we're in line with ICANN's bylaws and everything else. I wouldn't expect that they would be surprised by anything in there. Thanks.

Graeme Bunton: Thanks, Darcy. Pam?

Pam Little:

Pam Little for the transcript. Before we leave this agenda item, I just wanted to give a shout out to the ExCom, excluding the GNSO Council members obviously, is their term is coming up towards the end of the June and before we embark upon the election for new officers. I just want to say I witnessed firsthand how hard they have been working and working well as a team in a very trying and difficult times over the last year. So a round of applause for our ExCom.

Graeme Bunton: Thank you, Pam. That's very kind. It's a very interesting time to be Chair right now. I will definitely say that. Right. So James brought up a good point about incorporation and the budget. And so we, and by we, I mean Ben floated a draft budget to the mailing list yesterday. Everyone should go take a look at that and I think Ben can walk us through it a little bit more, talk more about it in a second, but I don't want to bury the lead. We're proposing to

raise our fees and that has historically been a troubling issue and we did it not all that long ago.

But if I can editorialize for a brief moment, the world in which we operate here is not getting simpler. It is increasingly rapidly in its complexity and its intensity. And in order to be able to participate fully, we require more resources to do that and that requires more money. And so some of that resource ends up being in the form of Zoe taking notes, sending updates, reminding the ExCom of all the things that we haven't done that we're supposed to do, and beginning to participate there in drafting letters, and drafting comments, and reducing the burden on all of us. And so that's a hugely important piece of work.

And then there is also clearly under GDPR in the past six months, we have required legal advice, and input, and documents that none of us have the time or expertise often to write. And so I don't see any way for us to continue in ICANN as it exists right now without having the resources we need to do our jobs well. So that's my sort of thoughts as chair and I'll kick it over to Ben to give you a little bit more input on the budget.

Ben Anderson:

Thanks, Ben Anderson here. I think that's all been explained so we can just move onto GDPR. No, thanks everyone. I sent the budget out to the list yesterday and I'm just going to condense really what I wrote about. Our accounts are in reasonably good health and that's because we've been quite prudent in the way that we spent but also recognize that we need to maintain a balance in case there are issues. I think Luc raised a point on the list, you know, the inevitability of the renegotiation of the RAA. We're going to need some cash and some help for that. Thomas Rickert has been extremely helpful in terms of the temp spec, GDPR, and the Common Net amendment as well.

So we go out and we seek external advice to help the entire membership.

And whilst we're not providing legal advice, let me just make sure that that's

fully understood. We think that this is helping the membership a great deal. Zoe has been amazing and it takes a special kind of person to be able to this role. Zoe is that person. Yes, round of applause. Why not. And we'd like to keep Zoe doing this.

What it also affords us is some continuity within the stakeholder group. What happens is - and we're trying to do that by staggering the positions, but the ExCom come and go. And you take a great deal of time trying to work out what to do over six to eight months from the people that have left before you actually get to doing stuff. So by having a Secretariat position where we have some continuity within the ExCom.

And so all of that is our rationale behind asking to increase the fees so we can employ Zoe and also maintain the work that we've been doing today. You'll see that based on the budget, we expect our spend to remain the same. We will continue to pay for lunches and house social events with other members of the community to help our position within the community. And I think by doing that over the last couple of years, our voice has become stronger. I think it's been heard a lot more whereas previously it wasn't. And I think that's all for the good because everyone else is getting themselves organized and we need to get ourselves organized as a group within this ecosystem.

And so we feel this is the best way for us to do that. I understand and I've seen - I've had a few messages earlier that the increase in fees may be a barrier for some of our registrar colleagues in different regions, and as an ExCom, we will look at that and see what can be done. I've seen some other suggestions, and those are good ones. So keep them coming on the list.

In terms of the incorporation, we've spent a great deal of time over the last few months seeking outside advice on how we should set up and more importantly, where we should set up. A lot of that has revolved around needing a charter as the underpinning document of the formation of our

association on nonprofit. Where we hold that entity is still up for debate but once we have the charter, and hopefully once it's approved in two hours and 46 minutes time, we'll have a clear path forward.

And then that will allow us to engage properly with contracts, with signatures, and with expectations. So we have been working on that, James, in answer to your question, and we will look to wrap that up as quickly as possible. So if anyone has any questions about the budget then please jump in.

Graeme Bunton: Thanks. That's exactly what I was looking for, Ben, and I was mainly questioning the timing. Since January we've been talking about this so it was most just the sequencing. I just wanted to point out to your point, I did respond to the list in favor of the proposed budget with the proposed fee increase. I think it brings us in line with all of the other stakeholder groups and constituencies, at least some of the ones that I know of that offer business membership versus individual membership.

> And I want to point out that I don't want to dismiss the impact that it would have on recruiting new members. I think more impactful in recruiting and outreach is to be able to demonstrate a clear value to membership and I think that this increase gives us the ability to do that. So I think actually in a roundabout way, a backward way, having a little bit more funds to engage, and organize, and get our work done a little bit better is going to make a stronger case for new recruits that might overcome the resistance to the higher fees. Thanks. And thanks to your work on this budget.

This is the most - I was a treasurer once many years ago. Maybe a lot of folks don't remember. This is the most professional last couple of budget cycles that we've had that I can remember. So thank you, Ben.

Ben Anderson:

My pleasure. Just to respond to that, and I just want to - I don't want to make guarantees but I want to say there will be cost out of our spend because of our formation. And there will be some economies of scale. There will also be

some legal requirements on the amount of cash we can hold and what we can spend and how we can spend it. So there may be a time where we will need to reduce again based on our projected spend and what our income will be.

So it will be a balancing act and this will be the year where we hope that we're able to level out the accounts and understand what it is that we spend, understand what it is that we make, and know what it is legally we can hold. And so therefore, after this year, we will look to reforecast and make sure that the savings that are there are passed back to the membership. This isn't about growing a healthy bank balance that just sits there for people to look at. It's just about making sure that we're prudent and we save for the future.

Graeme Bunton: One second. Two people in the queue. Just to James' point about providing value, I hope that people who have been on the list for some time have seen that already because I think we have been putting out way more comments than we have historically. Our ability to communicate with our members is better than I think it's ever been and we're engaged on more issues than we ever have before, and I think it's really positive. So I see that value happening already and the ability to grow that I think is really important.

Sir, sorry, I don't know your name?

Man 1:

Hello. My name is (unintelligible). I'm a member of the non-commercial stakeholder group finance committee. So I'm still (unintelligible) in terms of understanding the GNSO and how it operates, but I just wanted to find out, how is the finance committee of the GNSO structured and how does it work with the different stakeholder groups within this GNSO? Thanks.

Graeme Bunton: Thank you. Interesting question. So each stakeholder group has its own budget for its own existence. So everything we want to do that's not paid for by ICANN, we have to pay for ourselves and those fees come from our membership. The GNSO as a whole gets all of its funding from ICANN,

which gets all of its funding from contracted parties. But we can probably take that offline I think a little bit more people, and probably some people from the GNSO can explain that a little bit better than I can.

I also had Darcy in the queue. Please, Darcy.

Darcy Southwell: Thanks, Graeme. Darcy Southwell. I think the other thing is sort of evidenced by all the things we've talked about so far and we're getting to the most complicated issue next. As a stakeholder group, we need to become far more proactive and less reactive. And I think a lot of the challenges we've had with the changes to GDPR, the temporary spec, we've definitely done better than we ever have before.

> But we need to become a more active participant and I think part of this budget issue, this fee increase helps us do that. Zoe's work helped us do that. Thomas Rickert's help has helped us do that. But we probably need to do more because we're not on part with the rest of the stakeholder groups and I think that puts us at a disadvantage. We're a contracted party. We cannot be at a disadvantage as a contracted party and I think we're struggling with GDPR, doing the best we can.

But this is the first of probably a number of issues that are going to come at us that are this complicated. So we need to find a way to help us be more proactive. Thanks.

Graeme Bunton: Thanks, Darcy. So with that, go to your list emails and vote on the charter if you haven't, and do take a look at the budget. It's pretty detailed but also not hard to read. It's good. And get in there and give us some feedback and we'll kick off a vote on the budget in the near future. I don't think we've actually decided on a date on when that's going to happen.

Jeff Neuman:

I was just going to recommend that when we vote for the officers just include another question on the budget. It's all in one vote so you don't have to worry about two votes. Or is that too late?

Ben Anderson:

I'll defer to Kristian on whether or not we can bundle. That might cost more in election body and we haven't budgeted for that. What we wanted is we want to be able to vote for the budget under the new charter, which because the previous charter had - it's not to try and get around things. It just makes it a lot easier. So we will run a vote on that based on what Kristian says we do.

Kristian Ørmen:

So this is Kristian. It really depends on the timing. I don't remember in the new charter when we can actually vote on the budget. We already decided on when to vote for the new ExCom and the NomCom and all that. And if the timing matches up, we could definitely do that in election body. It wouldn't be a technical problem but it's all about when we actually go to the budget road and I don't remember the dates on the new charter on how long time we have to wait.

Graeme Bunton: Thanks, Kristian. Any other thoughts from people on budgets, charter, elections, all of those bits and bobs? Michele.

Michele Neylon:

Michele Neylon: Just very briefly supporting what others have said. As a small registrar, I have absolutely new issue with the increase in the fees. I went through our expenditure as a company on memberships of various things. So now, we have Chambers of Commerce in a lot of cities and towns. I'm paying more for that than I am for membership to the stakeholder group. So from my perspective, it's a no brainer and I know a couple of people are raising issues with it. But I just think it's a silly problem to have.

Graeme Bunton: Thanks, Michele. And if people have concerns about the budget that they don't feel like raising publicly, that's fine. You can hit Ben and I off the list and we can talk about that because not everybody wants to say publicly that it's maybe unaffordable for them. I do think, and I come from a very large

registrar so it's easy for me to say that \$1,000 is not an outrageous expense. Probably Elliott is not in the room so he doesn't mind me spending \$1,000 willy-nilly. So if someone has concerns and you don't want to bring them up here, you can bring them up to myself and Ben privately and that's just fine. We can talk about those and raise them with the rest of the group. But just sending a single person to a meeting like this costs more than \$1,000 too. So there is a barrier to participation and we don't feel like we've raised its significantly. Kelly?

Kelly Peterson:

Thanks, Graeme. Kelly Peterson for the record. Automattic, obviously a large company, a large registrar. We have no problem paying \$1,000, \$5,000 in order to be a part of this group. What I think is really important is that we are thoughtful about any increases but it's incredibly important for us to be a part of this group and to have a meaningful voice. But we so appreciate the efforts of the group, the ExCom, Zoe, for keeping us in the loop. Because we're a large organization but we run really lean. So while Wendy, myself, and other colleagues can often come to these meetings, we can't participate at the level that we would like to. So we desperately rely on the help of this group to make sure that we are heard in a meaningful way. So thanks.

Graeme Bunton: Thank you, Kelly. Anybody else? Any last thoughts on that before we get into the fun stuff?

Michele Neylon:

Just one thing very briefly, Graeme. In the EPDP sessions we had before this session, one of the things that we were talking about was representation, et cetera, et cetera and that encouraging people to go somewhere. So it actually might be a good recruitment tool because quite a few registrars are not members of this group, and if they want to engage on the EPDP, the only they'll be able to do that is via this group.

Graeme Bunton: Thanks, Michele. And that's a fun point. There a few bits and bobs around where participation in these important decisions relies on your membership inside of the SG. And I believe there's a couple pieces in our contracts with

ICANN that also reference the SG. And so not being a member means you don't get a voice in those often pretty important matters.

So there we go. All right, charter, elections, and budget all done. Go take a look at those things. Please provide us feedback. You can do so on the list or off the list directly and that is just fine. And we'll sort out when that - how and when to do that budget vote process in the near future.

So I've got us at 11:52. We were going to do GDPR from now until 12:15 and then 12:30 to 13:30. And included in that was a working lunch, but is the lunch fully here? And it is fully here. So it feels like before we start that topic, maybe we should - sorry, one second. Sidebar. Sidebar.

Zoe Bonython:

So just quickly, counting in the room, I think we're just over the numbers that we ordered and that is because the numbers that we ordered were based on the numbers that I was given in my request of who's attending. Sorry. When we get lunch, I would ask, like I said, first, there's a couple of people and I won't point them out that will get their lunches first because they have dietary requirements. The next round will be anyone that actually sent me the form that filled out the Google doc saying that they were going to be here. And then whatever is left over is for everyone else who is a registrar stakeholder group member. Thanks.

Graeme Bunton: That is an excellent reminder that if you don't fill out these things before an ICANN meeting that allow us to adequately manage our budget and spend, you don't get the free lunch. So why don't we do that now? Let's - because it's - we're running a little bit early but I think it makes sense to, if the lunch is here, that we should just go ahead and do that, take a few minutes to get settled and start eating, and then we can start back up and leave the rest of our time for GDPR.

Let's do our lunch now.

Zoe Bonython:

Okay. So that means that Graeme, it's you, Michele, and Sara, if you can go grab your lunches, and me, because I'm veggie. There's only a few veggies. I know there are a few veggies in the room, well, might be some others. There's four. One of them is mine.

END