

**ICANN
Transcription
GNSO Temp Spec gTLD RD EPDP Call
Thursday, 16 August 2018 at 13:00 UTC**

Note: Although the transcription is largely accurate, in some cases it is incomplete or inaccurate due to inaudible passages or transcription errors. It is posted as an aid to understanding the proceedings at the meeting, but should not be treated as an authoritative record. The audio is available at <https://audio.icann.org/gnso/gnso-epdp-gtld-registration-data-specs-16aug18-en.mp3>

AC Recording: <https://participate.icann.org/p9q7tzi7okf/>

Attendance is on wiki agenda page: <https://community.icann.org/x/owtpBQ>

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Coordinator: The recording has started. You may now proceed.

Terri Agnew: Thank you. Good morning, good afternoon, and good evening, and welcome to the fifth GNSO EPDP Team Meeting taking place on Thursday, the 16th of August 2018 at 13:00 UTC. In the interest of time, there will be no roll call. Attendance will be taken by the Adobe Connect Room. If you are only on the telephone audio, could you please let yourself be known now.

Hearing no one, we show apologies from Emily Taylor of the RrSG, Kristina Rosette of the RySG, Ben Butler, SSAC, Georgios Tselentis, GAC, and (Gene Spidell) of RrSg. They have formally named Lindsay Hamilton-Reid, Arnaud Wittersheim, Greg Aaron, and Maureen Kaplan, as well as Theo Geurts as their alternates for this call and any remaining days of absence.

During this period, the members will have read only rights and no access to conference calls. Their alternates will have coaching rights and access to conference calls until the member's return date. As a reminder, the alternate assignment must

be formalized by way of the Google assignment form. The link is available in the agenda pod.

Statements of interest must be kept up to date. If anyone has any updates, please share or raise your hand at this time. Seeing or hearing none, if you do need assistance updating your statement of interest, please contact us via email at the GNSO Secretariat. All documentation and information can be found on the EPDP Wiki space. There is an audio cast and view only Adobe connect for non-members to follow the call. So please remember to state your name before speaking. Recordings will be circulated on the mailing list and posted on the public wiki space shortly after the end of the call.

With this, I'll turn it back over to our Chair, Kurt Pritz. Please begin.

Kurt Pritz:

Hello, everyone. Thanks and welcome to the call again. I wanted to let you know that these calls are at 6:00 a.m. for me, which ordinarily wouldn't be a problem at all, but it seems like every meeting something interferes with my night's sleep. And yesterday, my sons were home working their summer jobs. Came home from work to let me know they were having a party last night. So parties even at that age turn into sleepovers because nobody wants to drive home and so there you have it.

So here's today's agenda and we're going to reviewing appendices D and G, which have to do with services that are provided to registrants. I just want to note at the top of the call three things. One is, as you know, we received an email from Goran Marby of ICANN and it asked us two questions, but I really took it as sort of a reach out to establish communications between us and ICANN staff to make sure our efforts are coordinated and they understand what our scope is and what we'll be doing, because I think with the charter there remains some confusion about that.

So like I said in my email, it makes perfect sense to let you provide some advice in how best to answer that. I do want to get the email out maybe at the end of today on the West Coast and the end of here. So if you - it's not terribly important. I just want to sound smart. So if you have any comments or advice, please let me know in any way you see fit.

Second of all, I furnished a draft of the first section of a triage report that we might furnish to the GNSO. So remember, the triage report is a requirement made by the charter that we have to do. And so if we have some time left at the end of the meeting, I hope we might, but I just jinxed myself there, I'd like to go through that with you. So with that, I'll just pause for a second and see if there's any comments or questions to the agenda and context of the call.

So I don't know if I want to stall the meeting for this now, but I'll take a chance. So there's Thomas and then there's Kavouss. Thomas, could you speak up on your question about an overall GDPR implementation plan? When you say those words, what vision is in your mind? What are you picturing?

Thomas Rickert: Sorry, I had to get off mute. Hello, everyone. It's Thomas. I was thinking that ICANN, as other organizations or companies do, might have an overall plan, implementation plan with milestones when it comes to GDPR implementation. Because I understand that the temporary specification has an impact on ICANN, the organization, as well as different departments inside ICANN when it comes to compliance action, to name only one example.

And so if ICANN already had reviewed its own work in certain areas or plans to do so, I think it would be helpful for our group to understand what ICANN's thinking is in the areas particularly related to this work so that we can learn from that and make sure that what we're suggesting fits in seamlessly.

Kurt Pritz: Okay. I understand now. It's not ICANN's plan for the rest of the ICANN community. It's ICANN's plans for themselves. So thanks for that and I'll find a constructive way to include that in the letter. Kavouss, could you have a comment?

Kavouss Arasteh: Yes, good morning, good afternoon, good evening to everybody. Just on a very small point. You mentioned in part of the (unintelligible) of today that the part four is due on Sunday, 19. I wish to inform you that unfortunately due to the circumstances, the GAC will meet on 20th to finalize part four. Therefore, ours will be a little bit late if it doesn't disturb you. Thank you.

Kurt Pritz: Thanks, Kavouss. Well, the GAC has a pretty good on time record and we've incorporated some late inputs. So if you have that on Monday, we'll be able to

formulate most of the presentation and then add your input and adjust the slides. So thanks for letting us know. Marc?

Marc Anderson: Hey, Kurt. It's Marc Anderson for the transcript. Just on Goran's letter, I guess I just had a comment or a reaction to that I guess. His first item, he mentions how ICANN Org can share guidance we receive from DPAs, European Data Protection Board with the EPDP working group. And later, he goes on to say that we post all information we receive through our blogs and engage with stakeholders.

So I guess I'm wondering what Goran has in mind, if he has sort of more information he wants to share with us beyond what he's already posting on the blogs. I guess I'm not entirely sure what he has in mind there but of course, any opportunity to open dialogue and have conversations is a good thing and we should take advantage of that.

On the second one, I am kind of curious how the EPDP working group can provide input to ICANN Org. I think the GNSO Council in drafting the charter sort of envisioned having ICANN Org members directly participating in the working group discussions. And we have participation from Org in here. I think that they sort of anticipated that and were looking for that as a path to facilitate communication.

So I guess I'm wondering if we should be looking at more than just that, and maybe if our ICANN Org liaisons had any thought on what more we could be doing there to facilitate communication. But overall, like I said, I think any opportunity to facilitate and communicate between the groups is a good thing and we should take advantage of that. Thank you.

Kurt Pritz: Thanks, Marc. I'll let Dan Halloran and Trang Nguyen think about your second question. For me, when the letter said we post all information we receive, it was sort of a comment that we already post everything we receive so I'm not sure what else we could do, but if you could let us know that would be good. So that's how I saw that. And then the second question, I had a lot of trouble with that myself and sort of blurted out the best answer I could.

Frankly, I think ICANN, the organization, is going ahead and creating an access model. So I think we want to sit with them and understand what they're doing and

what we think our remit is. And so anything that's provided by ICANN to the community doesn't land with a thud and everything we do takes advantage of the work that they've already done.

So those are my thoughts about that. I don't know if Dan or Trang have anything to add to that. And Kavouss is that a hand that's...

Kavouss Arasteh: It's a new hand if you allow me kindly. I just respond clarification. Do you expect a report or view from each of the stakeholder groups, and constituency and advisory group on 22nd of August in addition to what the subteam that means GAC teams provide you? Do you expect something? The first document mentioned that but it is not quite clear whether by 22nd of August you expect to receive from all of these nine subteam -- not subteams -- all of these nine stakeholder groups, constituencies, and advisory an overall report or overall views on the temporary specification? Do you expect that please? Confirm. Thank you.

Kurt Pritz: I think we do not. I think we just expect you to complete the fourth part of the survey and then we'll take those and the discussion and create - we're going to continue to create this triage report or build this triage report. So I think that's our role to put together for you. What I want to do, as if you don't have enough to do, is start to iterate the triage report so that pretty close to when we're done with discussing the last survey we'll be able to deliver that because we want to get onto the next thing.

But I want to check with Marika, Berry, Caitlin. Is there any other deliverable we expect from you guys? Gee, I think no. Farzi?

Farzaneh Badii: Thank you, Kurt. Farzaneh Badii speaking. I just wanted to make a very first comment about Goran letter about the access model. I never understood what ICANN plan is, ICANN Org, for providing this access model, why it's asking for comments, do they want to come up with an access model and receiving comments from us. And are they going to implement is it? Is there a timeline for implementation? Does that mean that the EPDP group will have less to do with access? And so I think you kind of mentioned that but these are my questions and my concerns.

I believe that if access model has to be discussed, it has to be discussed at the appropriate time when at EPDP. I don't think - I don't know why ICANN Org is (unintelligible) at contractual compliance issue but I don't know why they are so proactive on this. Or if this is only guidance for EPDP then that's fine. But I don't know the nature of this document they are coming up with and I think we need some clarity on that.

Kurt Pritz: Exactly right and those are all good questions and of course, I can't answer any of them. So I think that for the purposes of answering this letter, we're going to start this dialogue and then work into where we get answers to those. Okay, then. So I wanted to mention one more thing but it slipped my mind. But anyway, I've taken notes of your questions and we'll form some additional questions around the reply to the letter to the rest of ICANN to get some answers on that.

So let's go into the results of the survey forms you filled out and pretty much got here on time. So that's just excellent for us and we're talking about the appendices where registrars and registries support registrants and the different things they do or actions that are caused by the fact that there are registrants. So you can see there it's pretty good agreement on some of the sections but some fairly serious issues that were raised too. So I'm really interested to get into them.

So you've got your dog-eared copy of the temporary specification in your left hand and your pad on your right hand side and the spreadsheet that Berry and Caitlin keep up for us on your screen, as well as this. So here we go and the first is about how to carry on with uniform rapid suspension when the information that those filing a URS action - information they need is no longer available to them because public WHOIS is no longer available to them.

So there are some wording questions and broader questions, and then meta questions. So we listed them in order of kind of where they occur in the spec. So in 1.1.1, I'm scanning through this, but upon a URS provider notifying the registry operator of the existing complaint or participate in another mechanism to provide the full registration data.

So there's some question about other than what's listed here, what's another mechanism. Do registrars or registries in their discussions with ICANN on the

formation of this have an idea what that is? Or should it be eliminated from here? Then in Section 1.2, I'd ask a registrar to explain maybe what incompatibilities there might be with existing URS procedures or how that's caused. After I said I'd have the spreadsheet in front of me, I don't have it up in front of me. But whoever made that comment it would be good to hear from them.

Number three, we still lack a URS provider from Asia. So maybe we hear from ICANN on steps for that, although I'm not sure it affects our work here. I think we just have to assume that there will be one in the near future. And four, the specification uses the word contract details in Section 2 and should that be blown out a little bit and defined better. And then five, should language allowing the complainant to file an amended URS once they receive the registration data and kind of know who the receiving party is, should that be amended.

And then there's a question about the appendix D and this topic being more appropriately addressed by the RPM group. That's also considering URS and UDRP and I have some thoughts about that but I'll hear your first. And then it's again should we consider this after some deliberations on the access model. So for me that's a little bit problematic. It seems like we want to finish our work on this report first but I want to hear the reasons for that too, to fully understand them before I propose maybe how to satisfy number seven and continue on for the work.

And then there's a concern that this might be used as a tool to obtain registration data by following (unintelligible) complaints. So I want to hear about that. So sorry for the tedious reading. Alan from the registries, do you want to speak first? Alan, we can't hear you? Alan?

Man: Hello, buddy.

Terri Agnew: Alan, this is Terri. I noticed that you do have your phone connected.

Man: In the chat he said to skip him and go back to him.

Kurt Pritz: Okay. Theo? Maybe stepping into Alan.

Theo Geurts: Well, I'm not stepping in for Alan but since you're giving me the mic. A couple of quick comments here. As a registrar, we are pretty much okay with this. I mean it's working already. We have experience of course with the CCTLDs, which produce no personal information. In the WHOIS we have, of course, disputes about domain names. So this is pretty much what's in the temp spec. It's already working, has been working for quite a while for most registrars. So we don't see much of an issue here.

I wanted to clarify one little thing here. On number three, regarding processing agreements, that basically goes for all other UDRP providers or URS providers that are sort of outside of Europe. And I don't think that is something for the EPDP. I think we can pick that up within ICANN ourselves. Thank you.

Kurt Pritz: Thanks, Theo. Margie?

Margie Milam: Hi, this is Margie with the BC. I just wanted to share our perspective that it would be a big problem for us is the URS wasn't part of this and the changes that were suggested there enable us to do the work that we can do so that we can protect our brands and our trademarks under the remedies that ICANN has developed over the years.

So I just want to emphasize that that's a very important thing for us that it be part of this EPDP and not be delayed by the time that it takes to do the other PDP.

Kurt Pritz: Thanks, Margie. Alan is back.

Alan Woods: Hopefully you can hear me now.

Kurt Pritz: Yes. Yes, I can.

Alan Woods: Oh, you can hear me. Okay. I'm assuming it will go on then. Thank you all. Okay, so number two there, so the language in Section 1.2, create possible incompatibilities that exist in URS procedures. Whereas this is more of kind an aside issue, following on from what Margie was saying there that I think the existence of the Appendix D is basically the temp spec caused issued with making the URS go forward, and therefore, this was in order to maybe in the transition period smooth things ahead.

So we do probably have to look at the Appendix D because it does provide a kind of - the language is not bad but it does potentially cause some issues with URS procedure itself that will - and it's a question of whether or not the community would rather fix it from an EPDP point of view or would it be more - would it be better to fix it from the URS procedures point of view.

So an example of that is for number two, it talks about the creation of a (DOE) claim, so a (unintelligible) claim. There is a problem in the procedure where it says that only the complainant is the person who can update the URS complaint once it has started. Therefore, the provider technically shouldn't change the complaint if it was (DOE) claim if you know what I mean. But there's small technical issues that wouldn't need to be reviewed and revised, not necessarily things for the EPDP. But we must keep in mind that we will have an effect of those moving forward. But generally speaking, the registry stakeholder group didn't have major heartburn when it came to the wording that is currently in Appendix D.

And also just to say that that goes for - as we go forward with the UDRP, we say the same thing about that as well. It's, again, some tweaks will be needed to that. And that should be done in the RPM not the EPDP I would suggest.

Kurt Pritz:

Thanks, Alan. I kind of think that the RPM group is, again, I'm going to try to draw this distinction but I never get any positive feedback for it so I'm probably wrong. But they are a policy group. So they are looking at the elements in the URS and UDRP claim, and the timing of that, and what is there for the parties and fashioning policy around a balancing of the benefits and the cost.

And for us here, I think we're trying to make the procedure work. So I see our role as that. So to the extent that I think we need enough detail here so the procedure works. So it's a roadmap for registries and registrars because registrars now have a role in this to make sure that the direction in here is clear enough so that it's straightforward how to do their jobs.

Alan?

Alan Greenberg: Thank you very much. I appreciate that the RPM PDP is in a better position to understand the subtleties of changes and make sure that what we're doing is an improvement and not something that causes additional problems. And they probably have far more people on it who are looking at this in depth. But I agree with what you just said that our job here is to make it work. So if for instance the need to change a (DOE) complaint to put the real name in, and the provider, we think it's reasonable that the provider does that, then I think we need to make those changes now.

The problem with tossing it over to another group is the timing. They may not be in a position to make a report that is acted on in enough time to make sure that these little tweaks are done to make sure - to ensure that the process is actually usable. Moreover, they may finish first and they won't have the full details of what we're doing to contemplate what tweaks to make.

So I think we need to use our best efforts to make the changes we need with the understanding that should the RPM PDP still be around that we can interact with them, and/or they can take action to reverse what we're doing afterwards if indeed we made a really dumb mistake. But if there's a change needed to make these processes actually work, and we already have a few months' experience with them, and by the time we deliver our draft report, there will be a few more months experience, I think we need to make those changes now and not wait for later. Thank you.

Kurt Pritz: Thanks, Alan. The only correction I'll make is if we hit our milestones and we make our draft report, they'll have a few more weeks not a few more months. The NCSG is lined up. Milton?

Milton Mueller: Yes, this is Milton. Hello, everybody. I'm kind of disagreeing with what you said, Kurt, about there being this kind of coupling of the temp spec with the issues related to URS. I haven't heard any specific evidence as to how there is a problem or conflict caused by the temp spec in terms of the execution of URS. And if I heard him correctly, I heard both of the registry operators saying that there is no problem and that these issues should be resolved in the RPM working group.

So I'm not quite understanding. I know that certain stakeholders really want to talk about access and they want to turn this temp spec proceeding into an access

proceeding but if that's the agenda, we're going to have to resist it because I don't think there is an access issue here that is not already handled by existing procedures. That's all.

Kurt Pritz: Yes. So let's just take the first part of your comment and so I don't disagree with what you said. I think if the registrars and registries say the detail in this Appendix D is good enough to go ahead with as written then I think that's fine and we'll leave it alone. And if they indicate that there might be incompatibilities with something else or there's another detail that needs to be worked out in order for the specification to match what they actually do, then we need to fix that.

You know, (unintelligible) your comment, we should kind of stay away from because I don't think that's the agenda of people that are raising that. They just, you know, it cost us to take (Marty)'s comments, she wants URS that works.

And this constituency wants URS that works and that makes sense to me. So, that's fine. And, thanks, (Martin), for agreeing with what Milton said. (Amer).

(Amer): Thanks, Kurt. This is (Amer). Yes, I think - my instinct would be to sort of approach this in terms of what we know about the URS now. I certainly think it would be desirable to sort of be in the loop on any changes or proposed changes by the (r terms) PDP on what the URS might look like in the future.

If it does at all change through most of its review, which I, if I'm not mistaken, has taken place now. But as far as our past is concerned, there are a number of reasons why different actors may - would require access to registered name holder (contact) details for the purpose of a process like the URS.

So, for example, you have trademark owners who would require those and we have the option of a (bill) complaint here but there are also other features in the URS process, for example, a trademark holder would like to file multiple complaints against multiple domain name registrations against a single registrant.

So the only way they could do that is if they have the registrant name and his or her contact details. So, at this point, we would - and then there's, of course, the actual

URS provider would need the (contact) details in order to contact the registrant and inform him or her of the URS complaint being put against them.

But our task here is to determine - or our task coming up woman start discussing access will be determined what interest exists and whether they warrant access through contact details.

At some point if we determine that, you know, one of these or both of them or none of them sort of present as - interest is backed up by a purpose within ICANN scope, and again, before anyone jumps at me, not saying that it isn't.

I'm just saying this is something we need to discuss and to what extent the access goes. I mean, which actors get access to what data. But, these are things we do need to keep in mind, I think, moving forward with access to processes like the URS or the UTRP.

And then that's just one reason, I think, that might be helpful to be able to just have a - keep a close eye on what's happening with the RPM's review. Thanks.

Kurt Pritz: Yes, so (Amer), that was well-founded and this is really on unfair question but given what you said, do you have an idea for how this (unintelligible) view my change to bring it into line with what your statement was? Or are you saying we have to answer some other questions first?

(Amer): Yes, I think we should work with what we have at the time being. So right now we do have a URS process. We should work based on that. But I do think we should just, you know, just keep an eye on what is happening with the URS review and sort of try to predict what changes might take place and see if we can accommodate them in any way.

But also, of course, keeping in mind, you know, that we do need to be compliant with GDPR. And I think this really actually needs to be a two-way communication between our team and the RPM's review.

So, because we are focusing on a very specific and narrow scope of work here which is in compliance with the (BTR). They're looking at something - they're going to be discussing a lot of things that we won't be discussing.

And what they come up with will certainly be helpful to us. What we come up with will ultimately be necessary, I think, to implement. But in general, I think we should work with what we have right now.

And I'm starting to see how it would be helpful to sort of, you know, get through the triage exercise and get to the discussion on access because that's where all of this really needs to take place.

But again, this is something that we've been saying over every single call we've had. There are steps that we need to take that before we start discussing the nuances of access to data and what interests should have - should be a basis for accessing this data.

So, we did get to that part of the discussion and the NCSG, in (its responsive) data that should be deferred until that time. But, yes, this is something we need to consider very thoroughly and I believe that coordination is necessary. But, again, for now, let's work with what we have. Thanks.

Kurt Pritz: Thanks, (Amer). That was a good answer. Margie.

Margie Milam: Yes, this is Margie from the BC. I think that Alan's suggestion was one that makes a lot of sense, to essentially make whatever tweaks you need to the language that is in the appendix just to make sure it works.

That – no that the other PDP, the rights protection mechanism, can fix it if there's an issue later because if you think about it, if you take - if we don't deal with that at all, then essentially when the temporary spec is replaced by the policy that comes out of this group, there would be no changes to the URS.

And that's a problem for us because we don't have the access to the data anymore so we won't be able to exercise the remedies that are looked at under the URS.

And so that's why that language is there. It's really to enable that, you know, the policy, the works of that brand holders can submit URS complaints even if they don't have the full data set.

In the URS providers can process those requests in the policy works. So that's - I think the approach that Alan (said) probably makes a lot of sense.

Kurt Pritz: Thanks, Margie, very much. Theo.

Theo Geurts: Thanks, Kurt. I guess I'm not understanding the discussion completely here. From my point of view, I think the URS and the UDRP are working out. I mean, trademark holders can file a complaint and the process is being kicked off and it's working.

So, I wouldn't spend too much time on this on something that is working. Every contracted party has to balance the rights of the data subject compared to the interests of the trademark holders.

So, I think the balancing act is there and it's pretty much a safeguard for abuse on a couple of levels. And in regards to the RPM, I would expect that whatever that group produces is in line with the production laws.

And maybe they even have looked on what a UDRP provider actually requires in the sense of data from the data subjects, slash, registrant. Thanks.

Kurt Pritz: Yes. Stephanie.

Stephanie Perrin: Hello. Can you hear me?

Kurt Pritz: Yes, thank you.

Stephanie Perrin: Good. Sorry about that. Stephanie Perrin for the record. I just wanted to recall Thomas Rickert's excellent question about whether ICANN has an overall plan for compliance with GDPR because this discussion is a pretty good illustration of what we were worried about when the NCSG basically tried to limit the scope of the EPDP to a very narrow one.

I would recommend, and here's my concrete suggestion before you get the preamble, I would recommend that we start a parking lot or issues that need to be resolved as a result of GDPR implementation but are not necessarily part of this particular spec.

Because if we dragged everything and, unfortunately, we will have to examine all of the details surrounding all of the policies. And unfortunately, many ICANN policies will have to be rejigged as a result of GDPR compliance.

I do apologize for my phone ringing. So, let's start a parking lot, and if we have time we can fix all of these things. And if not, we leave them to the next PDP. Thanks.

Kurt Pritz: Thank you, Stephanie. That was (unintelligible). So, here's where my take away is on this that this Appendix B is essentially okay as-is. When we have our substantive discussion we'll take recommendations for any changes.

There's a question about the data that's currently being shared as part of this process, how much of the data, and we'll take that up during the access discussion. So, leave this somewhat as-is and then take that other later. All right, (Marty).

(Marty): Yes, sorry, Kurt. Just wanted to say that I totally agree with you and, yes, I see that in chat some say that it's not within the agreements of this group to talk about URS, UDRP providing access to personal information of domain name registrants.

And want to say that it is and we should talk about it when we talk about after that EPDP. Thank you.

Kurt Pritz: Thank you very much and thanks for the - second time in my life I got plus one. So, let's leave this and go on to the next topic. I'll just pause 30 seconds to see there's another hand. Thirty seconds is up.

The comments in the - this is where he might start to zoom - the comments for UDRP are - somewhere our UDRP is a registered operated model so might be a little bit simpler than some of the complexities introduced into URS.

But I don't see the need for reading down a lot of - these are similar to what's been said before. So, (Mark), please join us.

(Mark Ledarick): Thank you. (Mark Ledarick) for the record. I just wanted to make a remark before we proceed. There have been a lot of talk about whether access is part of this EPDP or whether it goes in the parking lot for something like that.

And I wanted to just, on the record, as Kavouss says, that reasonable access is definitely part of this process, not a parking lot issue. It is something that we have to address.

It's something that we have to solve in this process and it's not productive for us to keep saying that maybe it is or maybe it isn't or maybe it's something we'll get to, maybe.

So, please let's just accept the fact that reasonable access is part of this process and we have to address it as we go on.

Kurt Pritz: Yes. And thank you, (Mark). You used the term reasonable access that we - some of us, including me, don't know exactly how to define.

Is the idea that we'll, you know, read Appendix D from a process standpoint for the purposes of reviewing the temp spec now and then looking at which data is used, which data is revealed and in what way as part of the access discussion. Does that kind of match what - does that meet the requirement you gave us?

(Mark Ledarick): I'm sorry, I got a little lost in that. Could you...

Kurt Pritz: Yes. Well, I'm not surprised. So, our plan, I think, is to take one more look at Appendix D during the substantive discussion but we think it's pretty close to okay as written.

And then take up the matter of which data is revealed and see of that should be changed from the current practice but we have our access discussion after that.

(Mark Ledarick): Yes, I thought Appendix D was pretty good as written. But my comment was really more of a general comment. I mean, if we're going to state, at every turn, that maybe we don't need to get to reasonable access, that I will have to reply at a return, we actually have to. So, to be redundant and tiresome and I'm hoping I won't have to do that.

Kurt Pritz: Okay, thank you. (Alex).

(Alex): Thanks, Kurt. It's (Alex). Yes, I just wanted to, you know, make a statement that I made in the past and made in the chat several times this morning, is that it sounds like everyone agrees that the temp spec requires reasonable access.

But it's up to us as an EPDP to be fine with the policy should be for reasonable access. I think that's what our job is here. Clearly, I understand there are larger issues of access and we have been getting questions to answer. That's not in dispute.

But the term reasonable access, defining what that means and coming to an agreement, is something that we, as a team, need to do. Thanks.

Kurt Pritz: Thank you, (Alex). Milton.

Milton Mueller: Yes. So, let's just clarify this. It's all in writing about reasonable access. Registrars are already required to provide reasonable access under the temp spec.

Now, the leap that (Alex) and (Mark) were making is that, oh, it's part of our mandate that we have to have a policy to define what reasonable access means. That is actually not necessarily the case.

If we agreed that this is going - reasonable access is going to be defined by registrar by registrar basis based on what jurisdiction they are in, what policies they are, that would be the status quo under the top spec.

Now, I know that a lot of people don't want that, have uniform access policy. But the question of whether we get or need a uniform access policy is not demanded by EPDP's charter.

Instead, the charter says you have to answer - or that is, we have to answer a bunch of gating questions before we decide whether and what the uniform access policy would be.

So, yes, I think this issue seems to be a sticking point and it doesn't need to be. If you want to talk, you know, what we do first is we decide what parts of the top spec we're going to keep and what is now a consensus policy.

And then we answer the gating questions and then we get into the issue of, do we need a uniform access policy or how to redefine reasonable access? I think the sequence is very clear.

And we can avoid going over this again and again if people simply recognize the sequence and the question of defining reasonable access is, indeed, an open question, not one that we must do.

Kurt Pritz: Thanks, Milton. Kavouss, you're next.

Kavouss Arasteh: Yes, two questions or issues. First, please kindly read all yes answers of (GAC) as a qualified yes because there are always comments, clarifications and suggestions for some improvement or change of (plan) - is number one.

Number two, I don't share the views that reasonable access is clear for everybody. For some people, it may be clear. For some others it is not. I don't know who is going to define that what access is reasonable and what is access is not reasonable.

That I don't think that will we should not discuss the uniform or unified access. I don't agree that is part of the group. I agree that we should discuss that at a later stage and so on and so forth.

But I don't want to totally disassociate this issue. And that is also discussing GAC and we're going to provide comments on this unified access - unified, accurate, reliable access. Thank you.

Kurt Pritz: Thanks, Milton. You know, well, let's go on to the end of it - and of the comments. But I think a lot of us are - is an area of intersection in this Venn diagram that we're on this topic. Alan.

Alan Woods: Thank you very much. Look, we all have different opinions on what reasonable is. It's going to - it may well also vary by jurisdiction. I think where (unintelligible) and ultimately I hope we will decide those, and we can decide whether an intellectual property lawyer will get access to information, under what conditions.

And, you know, that all has to be done somewhere, hopefully in my mind, in this group. But that remains to be seen. The difference in, when we're talking about things like the URS or UDRP is if implementation of the GDPR temporary spec causes ICANN policies to break, then I believe we have absolutely no choice but to integrate the changes in those policies.

Or somewhere along the way to make sure that the other policies don't break. So, there's some reasonable - it may be discretionary and we're all going to have different opinions on it.

But if it breaks and another ICANN policy, as some of these things have done or will do without the changes, and those we need to address. And that goes back to what I said before off if there are additional things that the temporary spec left out which experience has now shown needs to be changed, those are not - no longer judgment call reasonable.

But changes must be made one way or another to make sure that the policy is operable. Thank you.

Kurt Pritz: Got it. Thank you, Alan. (Mark).

(Mark): Well, as promised five minutes ago, if we're going to state that access is not an appropriate topic, then I will have two, of course, intervene and say that I think it is.

So, thank you to Dr. (Mueller) for clarifying his position. I have to say, I feel like this is - I've not really understood where he's coming from. So my understanding is that he's

saying that there is no requirement that we will eventually end up on a particular unified access model.

And I suppose that's correct. But I think perhaps we should be very careful about the words we use woman talk about this because many of us are saying the word reasonable access and other people are perhaps making much broader, more sweeping statements that could be interpreted as we don't have to talk about access at all.

And I think those sort of disconnects are resulting in a lot of overhead in the discussions and confusion and concern.

Kurt Pritz: Thanks, (Mark) and if it's okay with everybody, I'll bring this part of the overhead discussion to a close. You know, I appreciate Alan's comment that you're trying to pay attention to URS and UDRP here to make them work in some way under the new regime.

And, you know, I see, you know, I'm being over simplistic, but I see – and I think (Mark) was alluding to it, I see the intersection then what everybody says.

It's, you know, that there's an order to the work in the charter and that work includes answering gating questions that are a prerequisite to having an access discussion which will be had at that time.

So, I'll close with that, and does anybody have any specific comments about UDRP and the questions here? Does the party that says – say that the language about participating in other mechanisms, do registries and registrars understand what that means - participate in another mechanism?

Is that something that you're comfortable with in this or is it something but there for a specific reason or is it, you know, just sort of a catchall that should either be better defined or eliminated?

So I would really like to hear from a registry or registrar on that. (Mark), if you're done, I'll do want to Kavouss.

Kavouss Arasteh: Yes, with respect to your question, please kindly read the (GAC reply). All participants in the team, they have questions about what does it mean to participate in another (unintelligible) so on and so forth.

What another (unintelligible) we start? What - with that, so there are questions about all of the - all three of us mentioned the clarification in different languages, some of them go a little bit further that (they are). But please, can't we (unintelligible) clarification so (it is ICANN). Thank you.

Kurt Pritz: Yes. Theo. Theo, you're up.

Theo Geurts: Hi. Good. I'm reading that sentence. I have no idea what it actually means. So, that's my input as a registrar. If we could get some more clarification on that, I mean, I'm not sure what it means. Thanks.

Kurt Pritz: Alan.

Alan Woods: If you can hear me. I'm sorry. I'm going to make a suggestion. I do not know if this is correct or not but it seems to me that it is actually, in fear of going back into any of the discussion, but it is deferring to if, say something like the (RPMs) decided a new mechanism by which this could be fixed.

It could be alluding to that again as a forward-looking statement. But I'm not certain but absolutely I would read it in my mind.

Kurt Pritz: So, we could add those words you just said. In the event that some other mechanism is proven necessary or something like that. Okay. All right, I'm going to leave UDRP behind and go on to the transfer policy.

I think we're up to the Version 17 of the transfer policy or something like that. And, you know, the concerns here and the one we put first because all of us that don't understand the security risks created by the revised transfer policy should understand them.

So, there were, I think, registries and - or registrars and (SSAC) pointed this out in their comments, so I think we would like to hear about this. Again, there's a question

about other policy work, the transfer of Policy 18 that's underway, whether that affects us or our work.

In Section 1.2, we're - there is a requirement in the transfer policy for the registrant to intercede twice, to provide their own data rather than having someone else provided.

I think that's the purpose for it. So, was there any reports that that might discourage transfers in some way? In Section 1, there's language to be offered. And I don't know if I'm going to be able to find it. I found it last night.

But should that be removed? Oh, yes, it's kind of - it almost looks like that was a phrase that was in an original draft that no longer fit within there. But if anybody understand why that language is in there to be offered, that would be great.

And there's a question about both changes or both transfers and how that might be done. And I don't know, is that a (pacapa) thing? So - from something that happened about 13 years ago?

And then, you know, in Section 3, refers to best practices, and if that's a term of ours from, say, the RAA or something like that where registrars understand what that means, that's fine.

But if that's an undefined term, then it should require clarity. So, great opportunity, everybody. The queue is empty. But, first I would like to hear about the security issues that are raised by the new transfer policy.

Can someone speak to that? (Benedict), I was just going to ask if he would speak to that. Great. Go ahead.

(Benedict): Hello. I hope you can hear me.

(Mark): Yes, we can.

(Benedict): So what happens is, if you rely just on the (unintelligible), you're effectively just saying the whole security, the whole process relies on having a (ticketed) number.

And those numbers, the combinations of numbers and letters, can be hacked or brute forced or stuffed. And so you're taking the - you're severing the relationship between the (gaming) registrar in the registrant, (if perhaps we have them), even though the registrant probably initiated that transfer.

They've got no one - no relationship with the (gaming) registrar and (unintelligible) sort of up out of (band way). And, in fact, in the policy does specifically say you shouldn't rely on this (IMS) code as an authentication mechanism.

What's the difference, I guess, is that there might actually be an easy solution which is that there is an extension and (BP) that allows you to say - that would allow the (gaming) registrar to say, using (EPPs) for the losing registrar and say hi I'm the gaining registrar. I've got this code for my registrant and can I have the contact details please. And here is the (auth) info code which is provided for us optional extensions respect that allows us to get that information.

As long as that process if we feel that that processes GDPR compliant then we have a way to do it. And technically although obviously I'm a tiny registrar and I'd love to hear from people who are doing this every day as to whether that's feasible or not, does that make sense?

Alan Woods: Kurt you're muted.

Kurt Pritz: Okay so I said some complementary things to (Benedict) and - for his clear explanation. So Alan and I - do you want to make a comment on this or I really want to go to a registrar to get feedback. But I'll tell you what let's march down the list. Alan go ahead.

Alan Woods: Yes I don't mind coming in later. You asked is there a security problem? The last time that transfer policy was discussed in a PDP and there was extensive discussion on whether the form of authorization was still needed or not. And the decision was that it was still needed. This - the temporary spec says if you can't - don't have it you don't need it. So that's going directly against the conscious decision that was made in the last PDP and I believe that is problematic. Thank you.

Kurt Pritz: One of the reasons that (Benedict) stated. Theo?

Theo Geurts: Can you hear me Kurt?

Kurt Pritz: Yes I can.

Theo Geurts: Excellent. So what is in a temporary spec that has been created by the TechOps group from the registrars and the registries. We were looking at the situation on the transfers that we needed to come up with a solution. This - well the temp spec is currently the solution and it's working pretty good and when there is a transfer there is always in FOA from the losing registrar to the registrant do you want to transfer? So there might be not an incoming FOA at the start of the transfer but there's always at the end of the process a FOA to the registrant do you want to transfer yes or no?

So there is a process there. If you look about - take a look about security our – when we talk about security we see an issue and it's been a very old issue. The Whois is redacted now and it becomes extremely - it becomes more complex to deal with unauthorized transfers to get that sorted out. It used to be a problem in the past pre-GDPR if you will but the problem is a little bit amplified. And that is growing because we can't look in the other registrar Whois vice versa. So in terms of audit trails et cetera, et cetera. And our suggestion is to make sure basically that we do that outside of the EPDP because it is a very complex process on an operational level. And I think if we're going to try to fix everything when it comes to transfers in a GDPR fashion I think we're going to be running out of time. Thank you.

Kurt Pritz: That gives me pause for (unintelligible). So (Matt) – all right everybody mute. So (Matt), do you want to follow-up with Theo? I note that in the registrar comment, you know, you do make the comment that the transfer process is working but it creates new vulnerability. So I assume they're the same thing sorts of thing (Benedict) described. But then, you know, I heard Theo's interventions so maybe he can go ahead and bring that all together. Go ahead (Matt). Yes...

(Matt): Thanks Kurt. Can you hear me?

Kurt Pritz: Yes (unintelligible).

(Matt): Yes just to pick up on what Theo said and to provide a little more color. Actually out of all the comments that we received from the stakeholder group we probably got the most specific comments on this point. A lot of specific ideas and things to put forward and we sort of dialed that back and left the comment pretty high level because we did feel and feel kind of touched on it that while we firmly believe that the transfer policy needs a relook at we think it's outside of the remit of this group.

And we're concerned that if we go down the rabbit hole of trying to address the totality of the transfer policy in PDP group that we'll just run out of time. So while we think it needs to be looked at generally what's in the temp spec is working for now. But we would absolutely support a move to relook at the entire transfer policy from start to finish as (Benedict) mentioned there is certainly technology that could be deployed to make it a lot more both secure user friendly. Thanks.

Kurt Pritz: Thanks Matt. Alan, go ahead.

Alan Woods: You know, I just want a clarification. I think I heard Theo say there is always a form of authorization today post a temporary spec. And in that case if I heard that correctly then why do we need 1.1?

Kurt Pritz: Go ahead Theo sorry.

Theo Geurts: No worries. Yes Alan that is correct. There is always a mechanism. It doesn't have to be an FOA in the sense of an email but there's always a form of authorization from the losing registrar to the registrant do you want to transfer. That is in the temporary spec as such as defined in following the losing – following the transfer procedure which is part of IRTPC I think And there is articulated that if there is a transfer this and this and this is what the registrar has to do. So the losing registrar still has to follow that process of our IRTPC. Thanks.

Alan Woods: But for clarity do we need 1.1 which says if the gaining register cannot get one?

Theo Geurts: I wouldn't personally go there because that is – then we're getting into the data protection issues because we don't know if that is completely legal for a registrar to sort of download the information from another registrars, from another registrars listserver to compile that FOA. And it's pretty tricky I would guess. I mean and talking

about Chapter 5 cross data transfers, et cetera, et cetera, is there consent it's a minefield I guess. So I wouldn't go there. So that's why we are advocating put this outside of the EPDP because you're going to be (unintelligible) here thanks.

Kurt Pritz: Did that answer your question Alan?

Alan Woods: Not really but I'm willing to leave it for the moment and investigate off line and pursue it when we come to the substance discussion if necessary.

Kurt Pritz: Okay thanks. So is the interpretation of this 1.1 that the losing registrar still has to furnish a form of authorization but the gaining registrar is not required to furnish instead of obtaining a form of authorization because they don't have the contact information? Is that the way to interpret that 1.1? Evidently not. So Milton?

Milton Mueller: Well I would have been happy if your question that responded, that got the crickets response was answered Kurt...

Kurt Pritz: Well...

Milton Mueller: ...before I spoke.

Kurt Pritz: ...I think Theo did in the, I think so yes.

Milton Mueller: Yes so my comment is simply from the noncommercial registrants point of view this is an extremely important issue. If there's one area where we want to protect security it's in, you know, preventing unauthorized hijackings. And, you know, privacy concerns are in that case secondary to the security concerns because you're not publishing the data you're just releasing it to the registrar.

However based on what Theo has been saying I think I agree with him that these issues are things are working, they're workable let's say now. If there is a need to revise the transfer process it should be done on a separate PDP and therefore this is what Stephanie has called a parking lot issue. And I would support any...

Terri Agnew: Hi. This is – can you hear me?

Milton Mueller: You guys are just testing...

Terri Agnew: Go ahead Milton I can

Milton Mueller: No we couldn't hear anything.

Terri Agnew: We did lose you for a few moments.

Milton Mueller: Oh that's – okay. So I was just saying that even though we're deeply concerned about the security of the transfers process it seems to me based on what the registrars are saying that this is a parking lot issue. This is something that may need to be addressed but could be properly addressed within the framework of a transfers PDP. And we can't get into the details of it now. It's not clear that the temp spec itself is causing any particular notable problems it could be fixed. It's more of a broader review of the transfers process. Thank you.

Terri Agnew: And Kurt, this is Terri. It looks like your mic is muted.

Kurt Pritz: Yes of course when (unintelligible) went mute I thought it was my problem so I hopped off those hopped on my phone. So yes I just want to acknowledge Stephanie's comment for pending this issue on keeping it. And so we've - I already captured it but I didn't let her know. Kavouss?

Kavouss Arasteh: Yes I think the issue of transfer of data is very important. I don't agree that it should be dealt with under the separate PDP. So there are many things that we could be treated separately. Access should be treated separately, PDP this transfer should be treated separately I don't understand and what remains. It's an animal that we hire you cut the head, you cut the hand, you cut the feet and what remains? So I don't think this that what does it mean separate PDP?

Transfer of the information should be quite clearly in this specification. And I don't understand when they say hijacking unauthorized, hijacking in any case is not allowed. But unauthorized is important to be addressed and should be addressed within the specifications. And I don't think that we should try to associate that and make our life simpler that, that would not be a complete specification so it is not possible to do that. Thank you.

Kurt Pritz: Thanks very much Kavouss. And I think you're right. And what we're saying I think is that this transfer policy is currently working and for the purposes of the temporary specification is okay. And that if there's not transfer of data concerns but if there's security concerns with how the transfer policy is currently implemented under GDPR we can either look at that after we finish the examination of this temp spec where we have a workable solution or defer it to the other group. But as far as the transfer of data I think you're exactly right and we should not let those issues go. But thanks. (Benedict)? (Benedict), I'll channel Terri here and tell you you're on mute.

(Benedict): Old hand sorry.

Kurt Pritz: Oh I always look forward to your comments. So...

(Benedict): Just pointing out it was an old hand but just to point out that Theo had done a really good explanation for me – from of the previous (unintelligible) questions around...

Kurt Pritz: Yes can you guys hear me?

(Benedict): Am I audible now?

Kurt Pritz: Yes.

(Benedict): I'm sorry this, I'm going to mute it's not very clear. If you didn't hear the previous comment I was just saying that Theo really nice explanation by Theo that the FOA in the chat it would be great if staff could capture that please.

Kurt Pritz: Yes we will. Theo?

Theo Geurts: Yes good. Can you hear me?

Kurt Pritz: Yes I can.

Theo Geurts: Excellent. And I wanted to respond on a couple of things that are happening in the chat regarding security, transfers, domain name hijacks and I would like to point out that now that Whois by most registrars is redacted that one of the biggest attack

factors used by criminals and hacking folks is now gone because now there's no details that give a hacker the ID on which email address or which email account he has to hack. It's no longer visible. It makes it a lot harder for a criminal to hack such accounts because it's no longer displayed.

So what we see and feel and we don't have any numbers right now as registrars but we do have the feeling that domain hacks actually has gone down. But that is a little bit of a gut feeling here we have to see of course at the end of like 12 months to get more details about it. But we do generally feel that now that attack factor is gone in the Whois because as everybody knows on this working group or on the call a lot of control panels and email address is mostly used in the authentication of a user to gain access to his or her account. So having the email address no longer in the control – in the Whois mentioned is like making it 50% more sure, that I'm not sure I'm correct in the percentage but it makes it a lot more difficult to hijack or steal a domain name. Thank you.

Kurt Pritz:

To the extent you can if it's at all possible take that 50% number and attempt to quantify it even though the plus or minus sign it might be very large. That would be terrific but I wouldn't know how to go about that but I'd be - your statistics are very – your comment is very interesting and to the extent we can attach numbers to it it would be even more so.

So and I just want to point out to people that we are, you know, we capture everything in the chat. We cut and paste it into a page, go through it as part of our notetaking. So please even if it's not acknowledged right this minute that it occurs much as I find it's distracting as you can tell. So to close out this discussion on the transfer policy there's a couple (nits) on language right? Should the language to be offered be removed? Should the language best practices be improved? Are there any comments on that? All right well I'll make you talk about it later. Finally I want to bring up the fact that is there a sense that this makes transfers harder or easier for registrants and whether it's a bar in any way to transfer requests? Is there any sense of that in the experiences to date? Theo?

Theo Geurts:

Yes thanks. So in our observation -- and I'm going to speak as a registrar and not for the group so personal capacity I guess -- what I see is support world went down for us, we're getting less complaints, the transfer process got easier, our resellers are

more happier so that simplification in the process I was kind of amazed how that worked out on an operational level. So, so far we are pretty positive. And of course then compared to ccTLDs where transfer happen on off code or transfer code only we already had an experience, so for us it's working out really, really great. Thanks.

Kurt Pritz: I'm just reading the (unintelligible) comment. All right is there anything else on this? No but I learned a lot during that discussion, so that's good. I think we're perilously close to wrapping up. So if there's – I had reserved some time here to talk about either the pro forma triage report or the response to Goran at ICANN if there's any more comments or people have put any more thought into that during the call we can talk about that now or, you know, please comment on those two documents in any way you see fit. We'll - and I hope to like I said I hope to get the response back to ICANN on the email today and we will continue building the triage report as we get more and more surveys in. Kavouss?

Kavouss Arasteh: Yes. I respectfully request you to kindly spare a few minutes allowing us to prepare ourselves for another meeting which will be at 15:00 hours UTC (unintelligible) ten minutes to get prepared for that if possible. Thank you.

Kurt Pritz: Well there's nothing I'd rather do than be quiet. So, you know, I've also been asked to remind us that while we use the chat and it's chunk full of good information on this one there are people in – that are on the phone or listening only so I really encourage you to, you know, picture us sitting around the table and just talking back and forth and bringing up points that are made in the chat. I also want to point out that this is the first meeting where those that are alternates or observers can see the chat and the slides. And we'll get a report back and see how that's working and if we can make improvements we will.

So the – is it in the wrap up is a Part Four of the temp survey submissions are due by Sunday? I think so not part three. And for the GAC they're due Monday? And the next call will be Tuesday. So my vision is that we'll wrap up this triage discussion. We'll continue to build the triage report over the weekend to include what we've discussed so far and hopefully have it done, you know, pretty darn close to the close of our call on Tuesday. As I said the triage report is a requirement of the charter and we want to fulfill that requirement and then get onto the substantive talk.

For the next meeting the ICANN support staff and the leadership team have had some spirited discussions on how to conduct the discussion going forward and bring, you know, to get us through this temp spec and amend it in a way that it can be published in an initial report before the meeting in Barcelona. So we'll unveil our thinking as soon as possible hopefully in the Tuesday meetings. Hopefully - well reading and trying to talk at the same time which is beyond the scope of my ability. So, you know, Tuesday if there's time we'll upend that sort of discussion on to the end of the results of survey four. Alan did you have a comment?

Alan Woods: Just a quick question with regards to how do people see the Adobe room? Did we...

Terri Agnew: Alan, this is Terri. We're unable to hear you. Can you speak a little closer to the mic?

Alan Woods: Sorry. Can you hear me better now? Apologies.

Kurt Pritz: Yes.

Terri Agnew: We certainly can. Thank you.

Alan Woods: Yes okay. Just in relation to the discussion about the alternates seeing the room did we agree lastly that there was going to be a question posed to whether or not certain alternates could attend the LA meeting the face to face meeting in the place or not in the place could they attend the LA meeting? I just wanted to clarify that.

Kurt Pritz: Yes that's a topic of lively discussion that I working through. So, you know, given the way the charters written I just want to make sure the GNSO Council leadership agrees with a position we're creating. So, you know, somewhat stunningly and amazingly complex issues and we will be back to you in a couple days on that. But...

Alan Woods: Marvelous, thank you.

Kurt Pritz: ...we're unfortunately I spent as much time on that as other stuff. (Caitlin), do you want to review the action items and questions that we had for ICANN?

(Caitlin): Yes. Thank you Kurt. Can you hear me?

Kurt Pritz: Yes and so can everybody else.

(Caitlin): Okay great, thank you. Excuse my voice I'm a little bit ill. But the first action item is in response to Goran's letter Kurt distributed (unintelligible) of like any EPDP team member feedback by close of business today so that he can send that out close of business Los Angeles time. And as Kurt already mentioned the EPDP team members should respond to Part Four of survey by Sunday, August 19 at 19:00 UTC. And we do know that the GAC will be late there. For Part Four of the survey I did want to note that there was one part of the temp spec added to Part Four which is Section 8. And so the Word version of that has been posted on the wiki.

In terms of the questions for ICANN org I captured the following two questions. The first question is, the council envisioned via the charter to have direct participation of ICANN org liaisons within the EPDP team. Is more needed with respect to the EPDP team's engagement was ICANN org? And the second question is if ICANN already reviewed its own work in certain areas or plans to do so specifically with respect to GDPR compliance implementation it would be helpful for our group to understand ICANN org's thinking in relation to the EPDP team's work. And just as a note these action items and questions have been pasted into the note pod of the Adobe room so the members can review those if they would like. Thanks Kurt. Back over to you.

Kurt Pritz: Yes. Thank you very much (Caitlin). And in addition to that they also – they'll also appear in the meeting notes that go around. So if you have amendments or especially improvements to questions we have for ICANN because we want to make them clear enough so that they can be answered forward, straightforward manner, so with that unless there's any other comments thanks very much.

I want you to know that there is a scorecard that measures the quality and timeliness of responses to the survey. And it's a neck and neck race so the fourth part of the survey is a chance for you to win the prize. But more seriously thanks for, thanks very much. You know, you're filling out the surveys. I'm asking you to comment on a letter back to ICANN. I'm asking you to think about this triage document that, you know, we're trying to make more meaningful than just a color coded chart of agree, disagree but actually create some building blocks for us. So thanks for taking the time review that and I'll be seeing you on the next call and probably in between. So if

there's no more questions thanks very much for your time today everybody. I'll be talking to you soon.

Terri Agnew: Thank you everyone. Once again the meeting has been adjourned. Please remember to disconnect all remaining lines. Operator (Mary) if you could please stop all recordings. Have a wonderful rest of your day.

END