

ICANN Transcription
Privacy and Proxy Services Accreditation Issues PDP WG
Tuesday 04 November 2014 at 1500 UTC

Note: The following is the output of transcribing from an audio recording of Privacy and Proxy Services Accreditation Issues PDP WG call on the Tuesday 04 November 2014 at 15:00 UTC. 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 also available at:

<http://audio.icann.org/gnso/gnso-pps-a-20141104-en.mp3>

Attendees:

Steve Metalitz - IPC
Graeme Bunton – RrSG
Frank Michlick – Individual
Don Blumenthal – RySG
David Heasley-IPC
Jim Bikoff-IPC
Chris Pelling – RrSG
Justin Macy - BC
Susan Kawaguchi – BC
Kristina Rosette – IPC
Darcy Southwell – RrSG
Sarah Wyld – RrSG
Val Sherman – IPC
Todd Williams – IPC
Phil Corwin – BC
Volker Greimann - RrSG
Holly Raiche – ALAC
Theo Geurts - RrSG
Stephanie Perrin - NCSG
David Cake - NCSG
Susan Prosser – RrSG
Libby Baney – BC
Eric Brunner-Williams-N/A
Luc Seufer – RrSG
Philip Marano-IPC
Lindsay Hamilton-Reid-RrSG
Kiran Malancharuvil-IPC
Carlton Samuels – At-Large

Apologies :

Michele Neylon – RrSG
Alex Deacon – IPC
Kathy Kleiman – NCSG
Victoria Scheckler - IPC
David Hughes-IPC
James Bladel – RrSG
Paul McGrady – IPC
Osvaldo Novoa - ISPCP
Keith Kupferschmid-IPC
Christian Dawson-ISPCP
Dick Leaning – no soi

ICANN staff:

Mary Wong
Terri Agnew

Coordinator: Recording has now started. Please proceed.

Teri Agnew: Thank you. Good morning, good afternoon, good evening. This is the PPSAI working group call on the 4th of November, 2014. On the call today we have Libby Baney, Volker Greeman, Frank Michlick, Graeme Bunton, Theo Geurts, Chris Pelling, Val Sherman, Steve Metalitz, Holly Raiche, Justin Macy, Todd Williams, Sarah Wyld, Eric Brunner Williams, Don Blumenthal, Kristina Rosette, Susan Kawaguchi, Darcy Southwell, David Heasley, Philip Corwin, David Cake, Susan Prosser, Jim Bikoff and Luc Seufer. We have apologies from Michele Neylon, Alex Deacon, Kathy Kleiman, Vicky Scheckler, David Hughes, James Bladel, Paul McGrady and Osvaldo Novoa. On staff we have Mary Wong and myself Terri Agnew.

I would like to remind all participants to please state your name before speaking for transcription purposes. Thank you very much and back over to you Don.

Don Blumenthal: Appreciate it (Natalie). I will add apologies sent directly to me from Dick Leaning. He felt awkward about it but he - this is his second day back in the

office after a month. He went on vacation right after ICANN. So he just said he's being pulled in many directions which I can understand. And one of the directions he's being pulled in is cramming to get caught up on our prior work. So appreciate everybody's attendance. I was starting to panic there when (Natalie) was reading off the list of apologies. As the agenda says there we were going to take a little bit of time here to just look at the status of F and E and then move onto G. I think we may really - okay. Is this any better Libby?

Okay yes Libby I'm not - well. I'm on the phone. I'm not using Adobe. I don't know if that matters. I just shifted my mike a little bit. I like the easy problems to solve. Any event we've - oh good. Okay. We've spent a lot of time on E and F. I think we made some progress. There's still some issues to resolve but at some point I think we've got to make a decision as to how much it's worth continuing with issues, looking at the same issues over and over as opposed to maybe taking a break and moving onto G and then thinking about pending questions so we can come back to them. (Unintelligible) is now kind of circling back.

You know, as we move forward - oh no let me reverse that. You know, I see a couple of issues that still are outstanding in addition to what (Graham) mentioned. We spent a lot of time on burdens of proof on the list. I don't know how much that's for us to discuss or if that's going to be something for the implementation crew. I don't like to play that game but sometimes it can be useful. We talked a bit but not in great detail about issue of whether we should be looking at different requirement sets for and I'll use the short hand term reveal. It seems that there are different requirements I think particularly in the context of pre lay before reveal or not requiring it when we talk about taking electrical property, community versus anti-abuse, usually your law enforcement. And let me note there is a difference there. I'm glad to go into detail either today or when we do the circling back.

We really haven't discussed much. I don't know if it's - I want to toss it out if there's - if those issues or anything that (Graham) suggested or something

else that people on the phone have in mind are worth discussing now before we do move a little bit onto - excuse me before we do move onto G. I'm just going down the chat. I can't see the entire chat for some reason. I'm playing with my screen settings here. Okay well just in terms of I'm getting phone calls that are driving me nuts and they're quite distracting. Maybe I should have used Skype or Adobe again. I did notice that Phil posted a question concerning - to (Graeme) concerning one of the points. I wanted to toss it out. (Graham) you have any thoughts on that? Or again should that be a circle back deal? Have you seen it? (Graham)?

(Graeme): Sorry. I've been talking for a moment on mute.

Don Blumenthal: I kind of figured.

(Graeme): I think (Phil) was just trying to clarify the question I was asking.

Woman: That's (unintelligible) that your iPod because I have to answer a question. Could you?

(Graeme): Is anybody else just getting that weird cross talk?

Woman: Yes.

Man: Yes.

(Graeme): Weird. Okay. One call for technical problems today. Sorry backing up. (Phil) I think was clarifying what I - the question I was trying to ask which was I really am looking for insight into it seems like IP rights holders don't know who they've granted IP rights to. So a lot of the - it is useful for us to discover if someone has a legitimate use for this string and to me I don't understand why they don't already know who has legitimate use to that string. So there was - that's all I think (Phil) was clarifying and that was just a question I had. But that is something we can park for a bit and take offline and people can

respond via email if we - and maybe we should continue to move forward with G. Thanks.

Don Blumenthal: Okay. Just making sure. Steve?

Steve Metalitz: Yes I had my hand up several minutes ago so I was responding to this but I will respond to this first which is just to say you may know who you've granted rights to but you don't know who the registrant is. So you don't know whether he's in that category or not. That's why you do a reveal request. So I'm not - I don't understand Phil's point on this.

Don Blumenthal: Yes I'm just briefly - Steve I apologize. I inadvertently scrolled down. The list of participants wasn't at the top there...

Steve Metalitz: That's okay. I mean I initially raised my hand just to endorse what you're saying about taking a little break from this. But I think also there's probably a lot that can happen offline on this. We have a lot of material in front of us. We have, you know, a detailed proposal. We have some detailed comments on it from Volker and from James. We have a good summary from (Graham) about some other discussions that have taken place. So I think I hope we can use the time that we're not discussing this on the call to try to make some progress offline and maybe we - when we do come back to it we will be farther ahead than we are now. That was my only point. Thanks.

Don Blumenthal: And I appreciate it. I will - I'll add one document to your list of things to look at during the in between review which is appendix H of the TWG report. The more I've looked at it - I shouldn't put it that way. It's got some really useful constructs I think in terms of framing how we might want to approach things, come up with our conclusions. So it's worth taking a look also. Any other thoughts, comments?

Okay let's move on to G. If you could bring that up Mary. Great. Okay it looks like everybody has control of the document there which will help because at

least on my stream inside the document doesn't - or the entire width doesn't show up. Again I'm a little - just to start the discussion I'm a little confused by the which types of services should be covered. Or is that just the initial thought that was that yes privacy and proxy might be treated differently.
Mary?

Mary Wong: Thanks Don. Hi everybody. This is Mary from ICANN staff for the record and I would imagine that most folks would have gone through this document. So Don just to follow up on what you were saying, you know, when looking at the question in the abstract can be a bit confusing and difficult. So what we tried to do here was to put in some additional background information particularly in relation to the origin of this question which as we note here was the joint GNSO (ALAC) drafting team for the RAA in 2010. So hopefully that helps explain where the question came from but I think that the group in its initial discussions also moved on a little bit and expanded it such that it now covers, you know, cancellation of the service to a customer as well as potential termination of accreditation.

On the former, on the cancellation of customer service I think there's some relationship to the reveal category because our discussions there showed that a lot of - well not a lot. Some of the providers that we had surveyed, you know, would cancel customer service in certain circumstances which would result in publication. So I don't know how that factors into this but I thought that the explanatory note that we put in this template will hopefully be helpful.

Don Blumenthal: Thanks Mary. Sometimes I toss questions out for to get things on the record. But yes no you're - the explanatory note was every helpful. You know, we had gone ahead and well it might not have been in the scope of the question to begin with. James I think it was early on raised the issue of termination of for lack of a better term the client service as well as termination of the proxy privacy. So I see your point about including both in our discussions here. Anybody have any thoughts on what should - Steve?

Steve Metalitz: Yes this is Steve Metalitz. As I look through this document if you just look at the top of the second page there's a little excerpt from the who is review team final report. And maybe this would be a good starting place for us. Basically it says ICANN should develop a graduated and enforceable series of penalties for proxy privacy service providers who violate the accreditation requirements with a clear path to de-accreditation for repeat serial or otherwise serious breaches. And then in considering that process they should take into account maintaining the privacy and integrity of registrations in the event that major problems arise with the privacy proxy provider.

So I wonder if this is sufficiently, you know, first of all a good starting point to set a general principal and then I'm not sure how much more detail we would necessarily need to get into. You know, whether it's three strikes or four strikes or, you know, just how many steps there would be in the graduated process. I'm not sure that we need to deal with that. But it strikes me this is - this top of page two is a good starting point for us. Thanks.

Don Blumenthal: Sorry. I did the - forget to un-mute your call. So yes I appreciate that. I agree. Looking at this I think a lot of it is going to wind up in the implementation process. (Stephanie)?

(Stephanie): Thanks Don. I'm a little uncertain here. It seems to me that what you're talking about in removing the accreditation of privacy proxy server providers you're basically putting somebody out of business, however limited that business might be, and you're impacting all of the customers, some of whom might be, you know, completely innocent of whatever the heck is happening. So it seems to me that I'd like to see a little due process here and as this notion of three strikes or four strikes. What the heck is a strike and what's the independent review mechanism where you plead your case? And I'm unclear on this. Maybe we already have these systems at ICANN but I'd like to know what they are before we get too much further down the road. Thanks.

Don Blumenthal: My favorite phrase, due process. Going back to last week well even - Steve?

Steve Metalitz: Yes this is Steve Metalitz. We certainly have systems like this at ICANN in other areas and the question is whether, you know, to what extent they are transferable here. But we have registrar accreditation and we have a whole process for, you know, breach notices and so forth that can lead to putting somebody out of that business and making arrangements for the care or the handling of the registrations that they've sponsored. You know, that's certainly one model to look at. There are other ways that it could be done. But so ICANN has some experience with this in some other settings and perhaps that could be transferrable here. Thanks.

Don Blumenthal: Thanks. Holly?

Holly Raiche: Yes Holly Raiche (unintelligible). I think we need to back up and say yes we are actually dealing with this particular issue which is about accreditation or de-accreditation of the actual providers and not the customers because my understanding was I'm not sure that we actually are dealing with and well haven't decided whether this is in with the actual privacy proxy. Is it - is do we actually require some kind of general rules about connecting or not - sorry disconnecting or not disconnecting a customer? In terms of the issue that I think we're now on which is accreditation or de-accreditation I guess my comment to (Stephanie) is the basis of the recommendation of the who is report and I'm sure she's aware of this was to actually require some kind of set of rules for all the providers such that some of the issues that were raised by the who is report can be deal with by accreditation and ultimately that does mean de-accreditation. I think it's up to this group to say for what, under what circumstances and what process. So my understanding is that's really where we are now, you know. I'm free to be corrected.

Don Blumenthal: (Stephanie)?

(Stephanie): Yes I'm just a little - I do understand that and it goes without saying and don't get me wrong. I'm not trying to defend those who ought to be un-accredited. I

think the - clearly this is an area that needs to be cleaned up. The problem is that you have collateral damage in that you need to, you know, if I got an email that said your proxy service provider is being de-accredited. You need to move your registration somewhere else I might write that off as spam because I get so many other blessed marketing emails, you know. So this I think that the collateral damage in the case of the de-accreditation of the proxy service provider is a slightly harder problem to solve than some of the others. Although I don't know. How often do we de-accredit registrars? What are the stats on that? If the abuse is as fine as we were told it was when I was on the EWT then we will be de-accrediting a few privacy proxy service providers. And so, you know, we'd better get this right or there's going to be collateral damage. That's all.

Holly Raiche: No. Agreed.

Don Blumenthal: So I mean yes okay. You know, there are - the registrar compliance system I don't have the numbers. The registrar compliance system does have some protections for existing registrants. So I guess the question would be whether those provisions could be transferable. Steve?

Steve Metalitz: Yes this is Steve Metalitz. I was - that was my point. There is a system in place. Basically the registrations - some other - when a registrar is de-accredited some other registrar that is accredited takes over those registrations. And I don't know the details of how they communicate with the registrants and whether the registrants think it's spam and just what happens. But there is - again there is a process in place to recognize that even if though, you know, the entity, the registrar may have violated ICANN's rules that doesn't necessarily mean that you want to avoid any undue prejudice to the registrant. I think the same would be true here. I don't think it's a harder problem. And I don't know whether it's easier but I think it's kind of similar. And so and that might be something we would want to recommend that in implementation you look to the de-accreditation process for registrars and adapt that as needed to handle this situation. Thanks.

Don Blumenthal: Thanks. Phil?

Phil Corwin: Yes thank you. Can you hear me okay?

Don Blumenthal: Yes fine.

Phil Corwin: Yes. Presuming that our group comes up with accreditation standards of course they should be enforceable and the enforcement in my view should be predictable. It should be escalating. If an accredited provider violates the terms of their accreditation maybe the first time they get a warning. The second time a financial penalty and the third, you know, at some point if there's continued violation they should lose the accreditation. I think you want that for two reasons. One for predictability and two because, you know, ICANN is challenged in terms of the number of compliance enforcement staff they have. So you don't want something that puts a great subjective burden on limited lengths of compliance staff.

However, I would observe though in the document we're looking at we seem to be mixing apples and oranges. There seems to be a mixing of standards for de-accrediting a privacy proxy provider mixed in with suggestions for barring particular registrants from using this service. And I'm not against discussing the latter but I think they need to be separate discussions and not mixed in together. That's all I had.

Don Blumenthal: Yes. Thanks. Yes they are different questions. (Graham)?

(Graham): Thanks. This is (Graham) for the transcript. Just a thought to put out there that we may need to consider and it's not exactly this topic but it's maybe close enough around what happens if an associated or affiliated registrar is de-accredited while their proxy and privacy service is not which might be an interesting scenario that off the top of my head I have no idea how we'd deal with. Thanks.

Don Blumenthal: Might be an interesting scenario? Welcome to the swamp. Let me also just raise something that Holly did in chat. That however we go with this we will have to just tie it back into our discussions about transferring privacy proxy registrations from one registrar or one service to another and just keep in mind the inadvertent reveal or however short the possibility of the registration details being opened up.

(Holly) I think yes, I think that is what we are talking about is just the de-accreditation of the provider here - focus on - I am following the chat here. It could - some could be really useful if we could bring it on line. Susan?

Susan: Yes, actually the - one of the questions (Stephanie) raised is interesting and I hadn't thought about it before was - I mean there are registrars that have been de-accredited. Dynamic Dolphin was one that was de-accredited this year and I was wonder if ICANN staff could check and see if - I can't remember if Dynamic Dolphin had proxy registration, I would assume they did. But if they did what happened to all of those registrations, you know, they are usually handed over to another registrar and if the proxy registrations were maintained by the new registrar.

So that would be an interesting question to find out because ICANN has de-accredited several registrars in the last few years. So we may have some practical experience to base some of our thoughts on.

Don Blumenthal: Appreciate that - it adds some interesting little twists to the point that (Graham) raised just in terms of how transfers might be done in the accreditation, depending on if the acquiring registrar has a proxy privacy service or not when the original one did and this could tie back into just some of the basic registrar de-accreditation acquisition rules.

I will mention Dynamic Dolphin was a little bit different from most of the terminations. It was - that happened because it was discovered that one of

the principals had a felony record - an old nemesis - a long-time nemesis in the anti-(unintelligible) world, (Guy Richter), a little background color, not critical.

Well should we - I guess this might work best for, you know, (Blater), should we just look at the termination provisions - take some time looking at the de-accreditation provisions of - for registrars and see the extent to which we can just adopt them or to guess they be adopted? No, okay - I will suggest we do that.

I think we have done a good job here of identifying where there might be some situations where they can't transfer over as is. Let's see if anybody wants to bring up the link that Mary just posted we could even do that now. I don't know how feasible that is if their people participating weren't - aren't on line. Yes, a lot of really good stuff is going on in the chat which is distracting but also the nice folks could bring it up front on the call. Mary?

Mary Wong: Thanks Don. Unfortunately I don't have a PDF copy of the RAA that I can quickly bring up so that is why I pasted the link in the Adobe Chat. I can try and copy some of those provisions into the Notes Pod but essentially like I have noted in the chat it is termination of the agreement is in 5.5 and the grounds has faded in various subsections thereof and I think (Steven) stand up so he may have a follow up.

Don Blumenthal: Yes, I saw that - no, I appreciate it. I don't know how that - that can get kind of detailed. I don't know how feasible it is to really get into it in depth but I am reviewing up front. Steve?

Steve Metalitz: Yes, this is Steve. I would just hesitate for us to plunge into the intricacies of the registrar de-accreditation process when there are people on the staff who are quite expert in it.

I wonder if we could just ask the staff to what extent could they adapt the existing registrar de-accreditation process to deal with proxy service de-accreditation. How would they address the problem of protecting registrants in that context - basically again, just looking at who his review team recommended - how would, you know, is that implementable.

And I am not sure we need to get into a lot more detail beyond that - but and I mean I sort of hesitate to say we ask the staff for that because I thought we had asked the, you know, the staff for that a while ago and we came back with a chart that was extremely detailed and had three different models and I still don't understand what they are driving at there but maybe we could just ask them, you know, look at this and say does the - look at the who his review team report and say could the registrar accreditation process be kind of a template for a proxy service accreditation, de-accreditation process.

Again, I think if we on this task force try to delve into the intricacies of that - that could be a big job. Thanks.

Don Blumenthal: Oh, no I agree. I was more suggesting it as for familiarity and to see if it raised other possible areas where it would have to be adapted to address the different realities of proxy privacy. No, I - a deep dive is - well deep dive isn't what I had in mind.

And just real quickly I will suggest the models- we can blame the registrars for the preliminary model staff (unintelligible) as what they had done - they had tossed out early on. Mary?

Mary Wong: Thanks Don. So following up from Steve's comment we can certainly check with our registrar colleagues on both the questions about compliance that Susan raised earlier and Steve made a point.

My sense is that at this point in their considerations of the models it is really very preliminary so I doubt if they will have much to suggest. I think what we

did do in template G was to put in three bullet points where the chart that (Amy) and (Mike) presented to the working group in LA - the notation as to, you know, which of the different models might be something that would eventually be adopted they did take into account termination considerations but my sense is that is probably as far as they have gone but we will check on that.

Don Blumenthal: Okay, yes, and I appreciate it. And certainly of those models I think we will have a (unintelligible) or implementation, however, it is tackled, have a much cleaner existing set of approaches to follow using the registrar model that is I guess to be determined.

Are there any other thoughts here or are we kind of agreed that at this point we will just generally follow the standard accreditation, de-accreditation approach that ICANN has used with registrars but spend a little time offline and later in discussions just identifying where proxy privacy raises issues that don't exist - coming up with suggests on how do - how those might be addressed?

Okay, then let's move ahead to the kind of second topic that was raised fairly early in our work but has again, we talked about 15 minutes to the hour does fit in here. What we should be saying about standards for terminating a proxy privacy registration itself. And when I say that I think we should be - well, I shouldn't say that - do we need to be distinguishing termination in this context from termination that happens because of the processes involved being published through publication?

Is just requiring proxy privacy services - published terms of service going to cover every possibility or do we need to come up with some base line requirements concerning - I am being very careful here - concerning rights to challenge termination decisions, rights of appeal - clarity of standards? Do rules concerning termination of just registrations give us - provide us any guidance - things that we have got the (Allie)?

(Allie): I guess my thought is that if we are looking at why you would terminate we sort of have to stand back and say, "Well what is it that the final document on the final specification requires?" And then looking at that say, "Well what are the things that should be grounds for termination," and would it be that somebody's privacy details have been revealed in inappropriate circumstances or that the details have not been revealed when they should have been? I mean those are the sorts of things that we would be looking at I think but I think the starting point has to be the actual specification, both what it is now and what we think it should be in the final document. Thanks.

Don Blumenthal: Thanks. Let me ask does - would inadvertent publication be an issue for termination of a registration or is that something we should - one of those not registrar issues that we could include when discussing possible grounds for termination of the service? Is that a new hand (Allie) or old?

(Allie): No, that is a new hand.

Don Blumenthal: Okay.

(Allie): I would have thought any circumstance in which details have been revealed would be something that would be looked at as a grounds of given that I would assume, specification will be very clear on your responsibilities not to reveal details except in agreed circumstances and that is what we are writing now I think. Then even inadvertent what you are doing is putting somebody's privacy at risk and I would have thought - now what is done about it and whether that is grounds for termination or grounds for some lesser thing. But since I think we are looking at a graduated response then surely that would be grounds for some kind of response. Thanks.

Don Blumenthal: Okay, just clarifying that this is one of those additional points for, you know, possible criterion for termination privacy proxy service. And I think we keep using the word "termination" - I am going to throw out my assumption that

what we are talking about here is compliance review - types of things that could lead to termination, kind of like the registrar compliance. Types of things that could lead to termination but don't necessarily require it. It is part of the - just the compliance process. Anybody have any concerns with that approach that we won't have mandatory termination - these are just standards to be considered for possible termination or other sanctions? Okay, great.

Quick and easy ones are fun.

But again though what should we be doing just concerning rules that might guide a privacy proxy service in terms of grounds for terminating a privacy proxy registration? Do we have any requirements for putting items into terms of services to provide guidance? Do we need to be any of - is that sufficient to be anymore specificity in terms of what should or shouldn't lead to termination of a registration or what processes should be followed before that happens?

I wish (James) were on the call - he is the one who raised the issue to begin with. Mary?

Mary Wong: Thanks Don. So this is really just to circle back to where we were and this is I guess, as you know that the overlap between Category F and G in that the interim specification currently obliges at least those PP services that are covered to publish the terms and conditions and as part of that to publish the circumstances under which they will terminate a customer registration, as well as circumstances under which they will terminate a customer registration, as well as circumstances under which they will publish via customer details. And I think it was Steve on an earlier call and I think (Holly) was just echoing that the - who raised the question for a working group whether or not we need to do more than that or simply stick with that.

And Don I believe your question is a varying of that - do we want to specify at least certain circumstances that specifically would lead to termination of the

customer registration. In that regard the working group's recommendations for Category F so far cover much the same ground. I think the addition that we have is - well two additions - one is to define a publication and secondly to require that a provider must explain what that means but other than that we haven't gone into further detail as you noted.

Don Blumenthal: Right, I appreciate that. Yes, we have spent a lot of time looking at E verses F but F does wash over into G. Even from what you just said, I think even a little more than I was thinking of about 20 minutes ago - Steve?

Steve Metalitz: Yes, I think there are - this is Steve. I think there are other things that we have dealt with that also have an impact on this. For example we - I don't remember in which letter category it falls, but we have now the requirement to verify contact data of customers and presumably some obligation for customers to keep their contact data that they provide to the operator current and functional.

You know, I - again we have looked at a lot of terms of service that is compiled quite a bit - I think they all say that but if you breach that you can lose your status as a customer of the privacy proxy service. That is kind of the status quo in terms of what is in the terms of service but in effect we are saying this has to be part of the terms of service. So we are putting - if we - if our conclusions are ultimately adopted then there are some things that become mandatory as terms of service for these operators.

That doesn't mean they can't have other terms of service as well, as long as they don't contradict those. That would be my expectation. I assume that is the view of the providers as well. Thanks.

Don Blumenthal: Yes, we have talked to the use to base line in earlier discussions. I think that would apply here also. Any other - I think when we were talking on the chair's call yesterday we thought that this category could go fairly quickly. I think we were right in terms of covering most of the important points.

I think we still have some to consider here. As I said the chat is just - I have seen a lot of good things pass by. I think we need to take time to look what was in there before we say we come up with some preliminary conclusions, preliminary (unintelligible).

And I think we pretty much covered everything there is to lay out there with a few minutes left on the call. If there are - anybody wants to suggest anything to add to what we said or contradict what I just said please bring it up, raise your hand, put it in chat if you must. Okay, not seeing any hands. I will just - we will wrap early today.

Let me just mention one thing. Originally the law enforcement presentation was going to be next week - something that also came up on the Chair's call and was supported when I did some reaching out is that - that is not just going to happen because of the number of people which is basically everybody who works for a federal government and is going to be off because of the Veteran's Day, - Armistice Day, wherever - where you - whichever you might have to live - whatever term is used where you live, holiday next Tuesday.

I also want to toss out that it is going - (Dick) is thinking about just make - doing the presentation himself. Yes (Chris) I assume we will have a face to face. You know, if (Dick) is going to be a contributing member from now on and I think he will and he was thinking about doing it himself - even that if (Dick) is going to be a contributing member do we still need the law enforcement presentation? And that is something I am tossing out for everybody's consideration, how useful it would be and to be honest I also asked him that question in an email.

We finally got some contact information this morning or last night on possible people to talk about data privacy. We will do some reaching out. I am not quite sure the feasibility of getting it done but we will our best - any other

thoughts, questions, concerns - any objection to wrapping early? I didn't think so.

Okay, we will talk to you all next week and have some things out before then for further consideration -so long.

Woman: Thank you.

Man: Thanks Don.

Man: (Unintelligible) thank you very much.

Man: Thanks Don.

Man: Thanks all.

Woman: Thank you Don.

Woman: Thank you everybody.

Coordinator: (Damon) if you can please stop the recording. Once again the meeting has been adjourned. Thank you very much for joining. Have a great rest of your day. Please remember to disconnect all remaining lines.

END