
**ICANN
Transcription
GNSO Temp Spec gTLD RD EPDP call
Thursday, 15 August 2019 at 14:00 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 also available at:

<https://icann.zoom.us/recording/play/Nt10D4vXjHME42Sm17gXCTUbpX7jfvSIKEypWoQFDIraZWYwMSwlylid3FdbkOcR>

Zoom Recording: <https://icann.zoom.us/recording/play/vtEvW-3-tuVG4kieioGJmLXZ9OeYIPDgAsKTzKVvf8gEVCrruHVdnEkw0FawGmG5>

Attendance is on wiki agenda page: <https://community.icann.org/x/n6ajBq>

The recordings and transcriptions of the calls are posted on the GNSO Master Calendar page <http://gns0.icann.org/en/group-activities/calendar>

ANDREA GLANDON: Good morning, good afternoon, and good evening. Welcome to the GNSO EPDP Phase 2 meeting, taking place on the 15th of August, 2019, at 14:00 UTC.

In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room. If you are only on the audio, could you please let yourselves be known now?

Thank you. Hearing no names, we have apologies from Ben Butler (SSAC), Marc Anderson (RySG), Chris Lewis-Evans (GAC), Volker Greimann (RrSG), and Thomas Rickert (ISPCP). They have formally assigned Tara Whalen (SSAC), Sean Baseri (RySG), Olga Cavalli (GAC), and Sarah Wyld from the RrSG as their alternatives for this call and for any remaining days of absence.

Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.

Alternates not replacing a member are required to rename their line by adding three Z's to the beginning of their name and, in parentheses, affiliation-alternate at the end, which means that you're automatically pushed to the end of the queue. To rename in Zoom, hover over your name and click Rename. Alternates are not allowed to engage in the chat, apart from private chats, or use any of the other Zoom room functionalities such as raising hands or agreeing or disagreeing. As a reminder, the alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite e-mails.

Statements of interest must be kept up to date. If anyone has any updates to share, please raise your hand up now or speak up.

If you need assistance updating your statements of interest, please e-mail the GNSO Secretariat. All documentation information can be found on the EPDP wiki space.

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.

Thank you, and over to our Chair, Janis Karklins. Please begin.

JANIS KARKLINS:

Thank you, Andrea. Good morning, good day, good evening, everyone. Welcome to 14th meeting of the team. We have the agenda in front of us on the screen. The question is, can we follow that suggested agenda? Any objections?

I see none, so we will do so. Thank you very much. Housekeeping issues. Today, the first is on the travel support for ICANN66. If I may ask staff to brief if there is an issue. Who will be doing that?

[Berry], that's your job?

[BERRY COBB]: No issues. I pasted a link of those that applied and have been improved for funding for Montreal. We're still getting the final list of those that are looking for travel support for the L.A. meeting. We'll get that posted as soon as we get it from the Meetings Team. Thank you.

JANIS KARKLINS: Thank you. Any questions to [Berry]? Greg, please go ahead.

GREG: Thank you. Do you know when we'll be contacted by travel support with our reservations? I put in my request a while back but haven't seen anything.

[BERRY COBB]: To my knowledge, the notices have gone out. I'll follow up with the SO/AC admin team and get on it. Thanks.

GREG: The notices went out, but we haven't heard if we have flights or anything.

[BERRY COBB]: You did – we can take it offline, Greg. Thank you.

JANIS KARKLINS: Thank you. With this travel support for Los Angeles, I understand that's the same issue. Those who need some help/assistance, please contact staff directly. Thank you.

Let us move to the agenda item of early inputs. An issue has been already on our agenda several times. We discussed that inputs would be put on the SSAD spreadsheet. That has been done and will be considered during an appropriate time when we could consider specific topics. That decision was challenge, and a specific request was made to discuss during the plenary meeting. We also, two weeks ago, agreed that those groups which would want to provide any input/comments on submissions of others would do so on the wiki. I would like to start by asking Marika what is the status of those comments that we can kickstart this conversation with. Marika?

MARIKA KONINGS: Thanks, Janis. I'm just sharing on the screen but I've also posted it in the chat, as it's quite a lengthy document. The Google Doc link, where we've posted all the early input that was received—

AUTOMATED VOICE: After the tone, please record your message. When you finish recording, hang up or press the pound key for more options.

MARIKA KONINGS:

Not sure where I'm leaving a message now, but anyways, sorry. So, as a reminder, input was requested specifically on the charter questions, but groups were also to provide any other input that were deemed helpful. So we organized that input along the criteria or the sections that you see here on the screen. First of all, the charter questions [rated] the purposes for accessing data, then the second charter question related to credentialing and then, thirdly, terms of access, as, of course, part of the work is also focused on the annex to the temporary specification, which is labeled "Important issues for further community action."

We also have a number of items that were deferred from Phase 1 as part of the scope of work, and then we created a category for additional input that didn't seem to specifically be focused on any of the above but still input that was provided to the group.

So this document was posted. We basically copied and pasted the input from the different groups. In the third column you can see which group provided that input. What you see on the right-hand side was basically from the original template. I think many of you are familiar with that. We typically use that for groups as they are reviewing public comments so they can indicate in their response whether they have concerns about the input provided, whether there's different viewpoints on it, whether there's actually agreement, or whether this represents a new idea that actually wasn't even discussed or considered previously. Then it is typically used to formulate a working group response and document the action taken.

As I said, the group agreed not to go down the path of doing that for each comment but instead invite the different groups to provide either clarifying questions or comments to focus the conversation and discussions.

What you see in the document ... As far as I know – of course, anyone can correct me if I’m wrong – I think we only received some comments on a number of items from the Registrar Stakeholder Group. The BC has provided their input. As you scroll the document, I think the BC comments, as you can see here, they’ve color-coded to align with their perspective on the input that was provided in line with the different categories. I think a number of the registrar comments are actually found in the margins as comments that were submitted. I’m just scrolling down to see if I can find one of those.

I think the question really is, now for the group, how to most effectively review this input and [inaudible] the subsequent clarifying comments/questions that were provided by the Registrar Stakeholder Group, as well as the BC. I think, from the previous call, staff has at least gone through this and factored some of this in in the development of the zero draft for the L.A. meeting. As I said, it’s not necessarily that we’ve just gone ahead and taken in whatever was said here but factoring that in in the overall conversation and the different viewpoints that are expressed here.

So that’s where this document currently stands. As Janis noted, some had indicated that they would like to review and discuss this. I think I probably need to hand it back to Janis to see what the best for doing that is.

JANIS KARKLINS:

Thank you very much. Is there any questions/comments on Marika's introduction? Take into account what Marika said and take into account that the document is lengthy. We do not have sufficient time to allocate for plenary discussion on everything that has been submitted and then commented.

I see two ways of proceeding. One is that those comments, especially opposition expressed by other groups on initial submissions/early submissions – those who would like to engage to provide written comments ... Then maybe it makes sense to do a few rounds of those until a common understanding appears on specific issues, and we would take into account all those comments once we would get to discussion of specific policy recommendations which have a direct link with the comments provided and the early input provided.

So that would be my suggestion because I hardly see how we can go through all the comments and inputs provided and get any agreement in time allocated for this exercise and the time that we have in general at our disposal. So that would be my suggestion, but of course I'm in your hands and am happy to hear your opinions.

I see Greg's hand is up, but I'm not sure whether that's an old hand or new hand.

It seems it was the old one. Anyone want to comment?

I see no one. May I take that that would be an agreeable way forward? I can repeat again that those groups who have provided initial inputs and

whose initial inputs in part have been contested or objected by other groups would engage in written comments [and] on wiki and try to get to some kind of level of common understanding. Then we would use that material at the time when we will discuss relevant parts of the zero draft. So that is the proposal.

I see Alan. Alan Greenberg has raised his. Alan, please go ahead, please.

ALAN GREENBERG:

Thank you, Janis. If we do that, then what we're really doing is that the review of these comments becomes the substantive discussion on each of these sections because, if a group that doesn't agree with it doesn't raise the issue then, they're deemed to have accepted it, I gather, from what you seem to be saying. So really we are now expanding the discussion of these early comments to be the discussion on each of these topics. Am I missing something?

JANIS KARKLINS:

The thing is, once we will get to discussion of specific substantive issues as a part of discussing draft zero, that will be really substantive conversation. We would pull, from early inputs as well as comments on early inputs, all the material, and we would see whether there has been any disagreement. And we would take discussion of comments and early inputs and discussion of zero draft at the same time because that would be the same discussion. If we could engage now on substantive conversation on every opposition, then we would need to repeat it at the time when we would go through the zero draft. So it's simply to avoid repetition of the same discussion that we potentially will have.

ALAN GREENBERG: So I think you're agreeing with me, that this is really moving the substantial discussion now because, if we don't, then we're going to raise the objection at the later point, which is something we want to avoid doing.

JANIS KARKLINS: No, we will get to the zero draft in Los Angeles, I hope, and then we would go through and the zero draft will contain all substantive issues, including from early inputs. Then will discuss each of those substantive issues one by one but with the full information [and] divergence of views in order to try to prevent or try to smooth this divergent. Prior to the Los Angeles meeting, I suggested that we could try to do rounds of exchanges online through the wiki. But, if not, we would take it as we discuss the zero draft.

ALAN GREENBERG: I'm still not sure I'm convinced, but I'll let others speak.

JANIS KARKLINS: Okay. Thank you. Margie, please?

MARGIE MILAM: Hi. I really have a little bit of skepticism on this approach. We have so much work to do, and I recognize the e-mail that the contracted parties submitted how we need to get things done. Just what you suggested,

which is that the folks that have submitted go and work it out, will take hours and hours and hours because there's many places where it's simply we agree and they disagree, depending on what the issue happens to be. So we would essentially be having a discussion on every single topic or most topics offline, and I don't see how that would be productive in any way. I think the input we submitted as the BC and the others is instructive, I think, for staff to know where there's disagreement. I think that helps guide the work you're doing, but I feel that it's just an added layer of work. I'm not sure it's going to accomplish anything, so I really don't think it's a good approach.

JANIS KARKLINS:

We have two options. One option is, according to, I don't know, rules that I understand from staff, we need to review inputs. We posted inputs online. Two groups – the registrars and the business community – provided comments. Some of those comments are opposing ideas that other groups have submitted in early input. So there is a disagreement on certain points.

So we have two options. Either we now go through early inputs submission by submission and see if there is opposition and then talk through the opposition and try to agree on something – probably that will take not 45 minutes but four or five hours at the minimum – or we try to exchange views on those points of disagreement online and then take them up once we discuss the zero draft. We would then be fully taking into account early submissions/[oppositions]. Then, discussing the zero draft, we would flesh out all this divergence of views. So that is the way how I propose because we cannot ignore early inputs.

Otherwise, why would we ask them? Now the question is how we handle them.

Amr, please? Your hand is up.

AMR ELSADR:

Thanks, Janis. I'm going to suggest a radically different way of handling this document. It's fine if everyone disagrees with this. It's okay. I just wanted to throw this out there.

To me, it seems like only the groups directly participating in the EPDP submit its comments. Insofar that we get to read them and understand the different groups' perspective, that's very helpful. But we do really have very little time to get our work done, especially if we want to have a draft ready before the face-to-face in L.A.

So I would propose as an alternative to go through with this document is to really do nothing with it. Like I said, it provides a good reference to all of us when we want to explore each other's viewpoints. It can be used in that sense as a reference, but I think it would be better, since all those who submitted these early inputs are represented in the group, for us to just focus on the work that we're doing [in] helping us get an initial report ready or a zero report and just keep this document aside as some sort of reference to discussions that we're having that will help us get our report ready. Thank you.

JANIS KARKLINS:

Thank you. I'm not sure that we can simply put it aside. So we need to review it. I understand, the question is how to review it? My proposal is

to review it – all the points that have been raised – and the opposition to those points we review during the reading of the zero document, which will be circulated in ten days' time for now and discussed in Los Angeles, hopefully, a basis for our future deliberations. Then, once we read the zero document, from every issue which has been contested in early inputs, we would bring those early inputs as reference material for our conversation about the zero draft.

Alan, please?

ALAN GREENBERG:

I'll note there was a comment in the chat from Brian that a lot of people have agreed to. We can't ignore the document. We don't have to review it as a separate step. When the issue of the early input came up a few weeks ago, I think I and others raised the issue that I thought we were going to deal with the items one by one. The ALAC, among others, chose not to submit in detail the input on a point-by-point basis, saying we would simply raise it verbally or in e-mail as we went through the topics. Now essentially what we're saying is we have to go back and do that so that we can comment when these are discussed.

When it was raised several weeks ago, I think it was Marika who pointed out that, yes, some of these are point-by-point issues and we can discuss them when we come to the [subset] topic. But there are also some other injections that we're not answering specific questions, and those would not be covered in the point-by-point review, so we had to do those. So I thought, when we were going to looking at the early input, we were going to be restricting it to those items which did not

respond to charter questions, and the rest we would be handling point-by-point.

So I thought that's where we were heading on this. We now seem to be going back. If we have to address these points separately from our "substantive" discussion, then I would suggest we add some columns to the spreadsheet and let everyone go through. If there's one saying, "The BC agrees with this," we say, "We support it," or, "We don't support it," and get all of our comments with simply checkboxes because, otherwise, the early discussion is going to take as long as the late discussion and we just don't have that many weeks of time to this. Thank you.

JANIS KARKLINS:

This is exactly the point, Alan: we do not have much time to do things twice. Let me then suggest the following. If anybody from the team now would like to provide any general comments on the early input, then it would be time to do it now. Otherwise, we would take every input into account, first of all drafting the zero draft, and then every input and opposition to input when we will be discussing the relevant point of the zero draft. So that is my Chair's ruling.

Alan Woods, please?

ALAN WOODS:

Thank you, Janis. Just going through it very quickly at the moment, I think one of the things I suppose that gives me pause about the early inputs is that they're effectively positions we have taken on a legal

interpretation. I really do think that, even looking at some of the BC's responses to the Registry Stakeholder Group, it calls into question a lot of the legal questions. I think the proverbial cart is definitely in front of the horse here. Before we can even look at this in any way possibly throughout the zero draft, we really need the answers to the legal questions [inaudible].

So I would personally say that we need to prioritize getting clarity from a legal point of view and then – as our agreement is that, when the legal advices come through and if there's sufficient material, we'd be able to say, "Okay. That gives us the direction" – that will lead us to a much more direct point of view when it comes to looking at that zero draft. So I urge us to frontload the legal questions and see where that leads us because I think that will give a lot more context to this particular document.

JANIS KARKLINS:

The Legal Committee is working, and one question has been already agreed to. We heard about that last week. We are expecting more outcomes from the Legal Committee next Tuesday. Then we would review those proposals on Thursday and would send them, if approved, to Byrd & Byrd. So that would be the course of action on the legal issues. Of course, that takes time. Also please do not expect that the zero draft will be even close to final. So it would take some time from our side to go through the zero draft, identify what are the missing elements, and also to see whether we can accept what is initially proposed by staff that they have extracted from our conversations.

Ultimately, the answers to legal questions will come as we progress also in our conversation. This is how I see it. If we just now wait for legal questions and put everything else aside, then we're running probably on the horizon of the 2022 for delivering the initial report. Certainly, I'm not prepared to do that.

Any other comments?

Amr, please?

AMR ELSADR:

Thanks, Janis. Just flagging Matt's question in the chat about whether [Gunther] will be at L.A. or not. Now I see Berry has just put the answer in the chat. Thank you.

JANIS KARKLINS:

Alan Greenberg, please?

ALAN GREENBERG:

I'll just make a note. Having spent too much of my life writing contracts, whoever writes the first draft of the contract is in position to, if you don't like it, you have to convince to make a change because whatever words get down tend to be the ones that have a fair amount of permanence. So, if we're going to do a zero draft based in inputs from some groups, then we have to be prepared to not have to fight tooth and nail to change something. It just makes it much more difficult if we already have words that are sort of cast in concrete or cast in modeling clay if they don't agree and put those who did not give their input at this

time at a strong disadvantage. But I note that and we'll live with it.
Thank you.

JANIS KARKLINS:

Thank you, Alan. I think that you know how professional staff is. They have proven their professionalism during the first phase, so you can trust me that staff does the most impartial work they can do. So, if something will be wrong, you have my word: this will be thoroughly discussed. Nothing is carved in stone. The document, what we will present, hopefully will be nothing but the base for further work. It is Alan, much easier to start working on something that is already written down rather than, in a group of 20+ people, to start drafting a document. It simply doesn't work like that. So there's always somebody who holds the pen, who is impartial, who is knowledgeable, and who is an expert on the subject matter. So this is how I would describe staff. Please be patient. In ten days, the first draft will be out. Then you will see that this is hopefully something we can start working on and going then one by one on all substantive issues.

With this, I see no hands up for any general comments on early inputs. Again, I would encourage those who want to engage in online conversation about comments to please feel free to do so. Everything that will be written will be taken into account at the moment we will discuss appropriate issues of the zero draft.

With this, I know would like then to move to the next agenda item, and that is the case. That is processing personal data in the context of UDPR

and URS. I would like to see if Brian would like to introduce the case.
Brian?

BRIAN: Hey, Janis. Sure. Can you hear me?

JANIS KARKLINS: Yes. Please go ahead.

BRIAN: Okay. Happy to do that. While I have the microphone, I just want to tell Amr that I'm going to respond to his list and sorry for the delay. I was traveling to Boise yesterday. I'll get a response there. Happy to walk through this one.

Let's start with A. I think we tried to cover everybody who this applies to and nobody that it doesn't. What we're looking at here is UDPR and URS, so the folks that are involved there would be the person or company who owns the trademark, their attorney, agent, and participants in the UDPR or URS process, including the complainants, respondents, panelists, and the dispute resolution service providers.

As we go through this, do you want me to just pause and see if there are any questions? What do you guys think is the best way?

JANIS KARKLINS: I think if you would walk us through the whole case, then I would open for general comments, and then we will go one by one.

BRIAN:

Okay. I see Sarah's question in the chat. Sarah, I am one of those colorblind we were talking about earlier. I didn't realize that that text was red when we were cleaning up the document, so it's not more meaningful than any other text or shouldn't be set aside. So we'll clean it up. I actually have another draft of this that I think will anticipate some of the questions that we'll have today. We can circulate that before we do our second walkthrough. But let's go through this one. We're happy to make any changes needed for the next reading.

I don't want to read this to you guys, but the concept here is that the data is needed to know against whom the UDRP would be filed. What we mean by "what method," is we really mean whether multiple domain names can be tied together into one UDRP filing. So we have some language in the next draft that, I think, makes that a little bit clearer to the reader about what we mean there.

The next thing that the data is used for is to identify whether the alleged infringer acted in bad faith. Then we listed out some of the problems there: whether they had actual knowledge of the trademark, whether their business name uses the trademark, if they're a competitor, if they are a repeat infringer, and then if they have any other domain names that could be combined with that. Number three, based on who the person is – if they're someone who's known to the reporter of the claimant – whether this can be resolved without even filing UDRP. So it's, I think, involved in the same context here.

The fields that would be necessary are the name, the organization, postal address, phone number, fax, e-mail, and then, for the tech contact: name, phone, and e-mail address.

Getting to the lawful basis of the entity disclosing the data, when we were going through this, I took some of the feedback we saw on the e-mail list and reread this. Sorry that we didn't get an updated draft out to everybody. We just got to this last night to talk through it. We would look at probably mostly just 61B and 61C here, and we would probably remove A and F from the list here. So we're looking at the contractual basis and then the legal obligation. That's what we think are probably going to be the two legal bases here.

In the next section, in section E there in the chart, we would actually probably skip A – I don't know whose screen we're sharing. We can probably go down to the next page. So we look at 61B, where everybody knows the contractual obligation flows down to the registrants. That happens in the registration agreement, which is required by the registrar accreditation and then flows through contractually there, and then 61C there, if there is a legal obligation. The context here, to just give an example is, if the UDRP decision is appealed in court, for example, and the data needs to be provided there based on some subpoena or some legal action that requires the data be processed in this process.

I see James' point in the chat. "The requester isn't a party to that contract." What we're thinking about here is the discloser of the data, who ideally would be part of that contractual change. I think we're looking at the requester having their own legal basis and the disclosure

being based on the 61B. So I think that's the distinction we would make there.

We're going to skip 61F for this one. We'll probably remove it in the next draft. If we go down, then we talk about the safeguards. A lot of these are repeats that I think everybody has seen and talked about. I hope everybody can get onboard with the efficiencies that it seems like we're finding going through these use cases at this point. Safeguards are – you always have to process the data in compliance with law, and then you have to make representation. This is the data processing agreement – that's the term I like for this – where you agree that you'll only use it for the purposes, that you'll only issue disclosure requests appropriately, like where the trademark is actually involved, and then the terms of service for the ... I think that we [meant that] for the UDPR provider there. Essentially the data processing agreement would describe how the data is used. Of course, you'd be subject to de-accreditation if you abuse the data.

The next one, if we go down a little more ... The entity disclosing only supply the data requested. Obviously then everybody has the opportunity to prevent abuse. If the registrant ... Once the [inaudible] objects, then we have that safeguard there. That's captured in 4 and 5.

If we go down some more, we have safeguards on data subject. These are the usual ones. I don't think any of these are a surprise that no one has seen before today.

Is there anything else noteworthy to mention here? Entity disclosing the data must have a specific request. We talked about bulk access and how

that's defined. We have that same citation below of how we've defined bulk access before.

Accreditation of user groups. I don't know. I think we're at the point where we all agree that accreditation could be useful in some cases. If WIPO or the arbitration forum get accredited, then that might be helpful. That might speed things along, but we'd have to think about what benefit that would provide.

We talked about accreditation here. if the EPDP wants to embrace the concept of accrediting trademark owners to make the requests, we have some bullet points here about how that could be done. But we'll see what problem that solves.

I think that's about it. Is there anything else below that we need to talk about? Yeah, a couple more regular things that we've all seen before. I'll take any questions now.

JANIS KARKLINS:

Thank you, Brian, for walking us through. Now I open the floor for any general comments team members may have on the suggested case.

I see a few hands up. First Alan Woods, followed by Amr.

Alan?

ALAN WOODS:

[Dublinese]. Sorry. I'm here. Thank you, and thank you, Brian, for that. I'm just going to go more to the substance of this. This is where we need

to think about the use cases a little bit more analytically as opposed to just going through what the use case is. We see that this is one of the use cases. Yes, I get that. But the problem is that what [inaudible] there and what this doesn't show. In fact, when you said there, Brian, that the safeguards we just accept at this point, that's not what we need to do here. The safeguards are actually where the policy comes from. From that policy, that's where the process comes from. What are the steps that the person reviewing this particular use case, if it was to come in, will have to go through? The justification, again, is a case-by-case thing, Yes, it is a use case. It is a valid use case. I don't think any of us are going to come to a decision in a particular case whether or not this use case is an automatic yes or an automatic no because, again, it depends on the individual case.

So what we need to be focusing on are what are the steps we need to test this case? How do we ensure that those safeguards are there? What questions need to be asked? What information needs to be provided? I do think that we're missing that on that.

So, again, I appreciate the use case. I think we need to apply the analytical view to this. This is what the [CPH] letter really was getting out that. We need to actually see what we do to process to this use case. Thank you, Brian, but I think we need to get a little more in-depth as to what are the questions we need to ask whether, [in] any individual case, this would accepted or not. thank you.

BRIAN: Janis, if could [inaudible]?

JANIS KARKLINS: Yeah, please go ahead.

BRIAN: Thanks. Yeah, I agree Alan. I apologize if I glossed over the safeguards there. If anything, that's a symptom of perhaps use case fatigue on my part and not a disregard of the safeguards. I do agree that it's important and we can get into those in more detail here. I hope everybody reviews the document and gives it the level of thought that went into creating it. The safeguards are very important and, in fact the safeguards are, as Alan suggested, what will make this viable. Thanks.

JANIS KARKLINS: Thank you, Brian. Amr next, followed by Sarah.

AMR ELSADR: Thanks, Janis. Thank you, Brian, for the use case and the introduction. Just as a general comment, I think it's important to note that the UDRP was designed in a way that doesn't take into consideration data protection law at all. It's definitely a valid use case. It's ICANN's first consensus policy, if I'm not mistaken. It presumes that domain name registration data is freely available or publicly published.

Sure, we need to do what we can now in order to bridge the gap that exists post-GDPR, but I think it's also important to note that not everything within the UDRP's existing procedures might be done in compliance with data protection law at this point. The procedures

themselves need to be reviewed. If I'm not mistaken, this is meant to begin shortly, if it hasn't already. Thank you.

JANIS KARKLINS: Thank you, Amr. Sarah, please?

[BRIAN]: Janis, if I could just respond to that.

JANIS KARKLINS: [Brian], please, yes.

[BRIAN]: If I could respond to that, I'm not sure if I agree entirely with Amr. I think that the UDRP might not have been drafted with data protection in mind. I think at the core of the UDRP is the concept of proving that one entity has rights in a name, and the person who registered the domain does not, and that the person who registered the domain acted in bad faith in doing that. Two of those three prongs do rely very heavily on who the registrant of the domain name is. Whether you have rights on not depends on who you are and. Whether you register the domain in bad faith or not really takes into consideration in many cases who you are.

So I think that the identify of the registrant is a very important thing. I think, if we're going to have that conversation, the way that we should perhaps have it is a legal look at whether the notice to the registrant in

advance when they're registering the domain name – the required notice that requires the registrant to agree that they're not infringing on someone's rights by registering the domain name and agree that their data might be processed by the UDRP provider and the complainant in the event that they are alleged to be infringing on somebody's name. if we look at those things and we can think about, is that sufficient? ... But the UDRP is drafted now to really require a look at who the registrant is in order for the UDRP to function. So I'd address it that way. Thanks.

JANIS KARKLINS:

Thank you. Sarah, please?

SARAH WYLD:

Hello, everyone. Marika, could you scroll up to the first page for me, please? Thank you. While you're doing that, I do want to just mention that the registrar group will provide more comprehensive comments in the document. My understanding is that the process for these use case reviews is that we will discuss it as a team here today and then provide comments by end-of-day, I think, tomorrow. If that is not correct, please do let me know.

More specifically, just for Point B – why is non-public data necessary? – I want to emphasize that a UDRP or URS complaint can be submitted without the registrant data. There is no reason that this data should be disclosed prior to a submission of that claim. So it might be perhaps more appropriate that the data would be disclosed to the UDRP provider and not to the complainant.

Specifically to Point 2 on Section B, this really does seem to require discussion with the domain owner, and that can be achieved, as [Donna] said in the chat by the required contact ability method that every registrar will provide, not by necessitating disclosure, so that the complainant can contact the domain owner prior to submitting a complaint.

As I said, we will have further comments in the document. Thank you.

JANIS KARKLINS:

Thank you, Sarah. Your understanding of the procedure is very correct. At the end, I will ask everyone to submit comments in writing in the Google Doc, and then Brian will take that into account working on the next version of the case, which then we will use during the second reading.

BRIAN:

Thanks, Janis. If I could respond to Sarah, I do think her understanding is procedurally correct. A UDRP can be filed and then probably needs to be amended once the identity of the registrant is disclosed, but I think we have a pretty fundamental disagreement there on the continued viability of UDRP at a large scale because trademark owners are being asked to prove that the registrant of domain name does not have rights and that the registrant registered the domain in bad faith. It's really hard to do that if you don't know who the registrant is. The burden on trademark owners has increased tremendously, and the data already suggests that there are fewer domain names per UDRP case file because it's so hard to tie the domain names together.

But to prove that someone doesn't have rights and that they registered the domain in bad faith is a pretty difficult thing to do if you don't know who that person is, so pretty strongly feel that the complainant needs to know who the registrant is. We can continue that debate in writing, and we'd love to see the comments that the Registrar Stakeholder Group would put forward. We can move on if that's the case.

JANIS KARKLINS:

Thank you. Next in line is Mark Sv.

MARK SVANCAREK:

Thanks, Janis. My hand's been up for a while – I guess the queue got long – so my comments are actually going back a little bit to Alan's earlier intervention.

Specifically talking about specificity in earlier conversations, I felt that this intervention was actually indicative of the thing that I was concerned about. Namely, Alan said, "We must be more analytical. We must do this. We must do that." Those things are all, of course, factually true. But it was a missed opportunity to actually provide some of that information rather than simply say, "You didn't do it right."

For instance, rather than saying, "Safeguard are an important thing, and we can't just rely on the things that have been in the templates before," you could have suggested, "Here's a safeguard that I propose." I think, if we take that approach, rather than giving blanket criticisms of something but say "I believe that the following would be a good

addition to this use case,” we would have a more productive conversation going forward.

Now, I know everybody is going to be giving written feedback on this in the next few days, and I’m hoping that that will be the nature of the written feedback that is given rather than what to my mind has become a fairly rote process of, say, “You did it wrong.” Thanks.

JANIS KARKLINS:

Thank you. James is next. James Bladel.

JAMES BLADEL:

Hi. Thanks. Sorry. Looking for the mute button. It was moved to another screen. Look, I don’t want to dive into some of the things that have already been said. I just had a couple points relative to the contractual basis being put forward in this use case and also the note, I think if we scroll down, regarding an agreement that the recipient of the data would use this data only for the purposes outlined in the use case, namely for the filing of the UDRP or URS.

I’m not a data protection expert like some on the calls, and I’m certainly not a contract lawyer, like some on the calls, so forgive me if I’m getting this wrong. When you assert that this is part of a contractual basis, doesn’t that entail that the contract exists not between the registrant and some other party or the disclosing party or even the registrant and their agreement to abide by the UDRP process and the arbitration panel but that the contract relationship should exist between the data subject and the recipient of the data? I don’t think that exists in this use case, so

I would question whether or not that basis is applicable in this point. The other ones? Maybe, but I think that one probably needs to come out of the discussion.

Further down, when we say that the recipient of the data would agree only to use it for this particular purpose, my question is, if the recipient of the data – the requester – then decides not to file a UDRP or URS, has that agreement been violated if they then continue to retain that data, they've reviewed it, and they decided against using it for the purposes that they were granted access to that data? I'm not clear on that point.

As Sarah mentioned, we will probably be submitting some more comprehensive comments to the document itself, but I just wanted to raise those two questions in our call today. Thanks. And thanks for presenting this, Brian.

JANIS KARKLINS: Thank you, James. Brian?

BRIAN: Thanks, Janis, and thanks, James. I'd make two points. To your first one, James – when we went through this, we gave it quite a bit of thought – I think the 61B (the contractual basis) vis-à-vis data subject in data protection language pertains to the data subject and not necessarily the entity who processes the data because I think the law is designed to focus on the data subject and the expectations they have about how their data will be processed. So I think that's the case. If I'm wrong, then I'm wrong and we'll figure it out from there. So I hope that answers

your questions and it doesn't necessarily have to be a contract with the ultimate process or the data.

To your second point, this use case in the context of a UDRP or URS. I don't think – I might get my hand slapped from folks at the IPC for this – that we intended this to be data processing in the context of, “Hey, we think this domain might be infringing and we might file a UDRP.” I think this was intending to be processing in the context of a UDRP or URS has been filed. So this is the use case of processing data through the dependency of that UDRP or URS.

So I think that's what we're getting at here and not necessarily – so I hope that eliminates some of the concern that might exist about what if the person or the complainant or requester gets the data and then doesn't file a UDRP, which, as we mentioned Marrakech, would really – was it Marrakech or Kobe? Either one or the other – be a non-started. So any conversations about what the requester does with the data or doesn't do once they have it are really outside the purview of ICANN here. That's to the DPAs and whoever's processing the data. So that'd be a non-starter for us. Thanks.

JANIS KARKLINS:

Thank you for your answers, Brian. Margie, please?

MARGIE MILAM:

Hi. A couple of things I wanted to comment on. Brian is correct that the contract is with the registrant. We actually have legal advice from Byrd & Byrd on that topic. So James' concern about there having to be a

contract with the requester is simply not the case. So, James, please take a look at the Byrd & Byrd memo that we got in Phase 1.

The other thing I wanted to highlight is that it's simply not acceptable to wait until you file a UDRP to get the data. You have to pay attorneys to draft the UDPR and you have to [allege] back that relates to the registrant. So there's obvious costs associated with that, and you don't want to file a document incorrectly and [allege back] that aren't true.

So what the process needs to include is the disclosure of the data prior to the following. That means, though, that there could be situations where you do not file. If it turns out, for example, that, when you get the data back, you find someone who has legitimate rights and that the domain name is related to some legitimate rights of the registrant, then, as a reasonable owner, you're just not going to file the UDRP. But you'll make the decision. So [inaudible] use case is related to getting the data before you file to be able to understand who you're going to file against and make the decision as to whether or not you're going to file. So I just wanted to clarify that since I'm not sure others really fully understand the process.

JANIS KARKLINS: Thank you, Margie. Brian?

BRIAN: Thanks, Margie, for saying that more clearly than I think I did. That's all I have. Thanks.

JANIS KARKLINS:

Okay. Alan Woods is next, followed by Milton.

ALAN WOODS:

Thank you. Just two points. First, obviously, as I was called out by Mark, just to say, Mark, absolutely. That's why I did [send] what believed to be what the process we should be going through today [to the left] [inaudible] bit early for you so you probably haven't read it. No problem there. So perhaps a look at that and then come back.

What I will also say we're not here to test whether or not this is a valid case. That's the point of this. That's what I'm trying to say. We're not coming with a "When somebody does this, they're going to get the data," because that's the cookie-cutter approach. This is just for us raw material to feed into the policy that we want to come up with. That's what I sent you in an e-mail today. These are the considerations. We should be asking these questions, feeding this raw data to it, and seeing whether or not the policy that we are discerning is going to work or not. I would love to be the person who could just say, "Hey, I've written the policy for us. Let's all go home," but I don't think that's going to work. So I suggest that we should look at that.

One other thing I just wanted to point out as well – I know I'm going totally against what I just said there – is that, with regards to the specifics of this use case, Brian, I just want to point out that the continual argument that we want to come up with – just because it's been done in the past and it's now more difficult does not mean that we are going to go back to that because, again, we need to pay attention to what the law says. Because there was reversed lookup in the past and

you could build this case [perfectly] beforehand based on data which you got from somebody who it was either illegally [scraped] or it was just provided incorrectly because the law did not allow it, even though it was there, does not mean that we're going to be able to get back to it. That's where we need to, again, critically think – again, I'll refer back to my document – about where the data is, what are the legal requirements for releasing that data. I'm not saying it's not possible in certain situations.

Margie, I think you're absolutely right that these are the kinds of cases that need to be built and these are the sort of considerations that need to be built into the request, saying, "I need it for this reason. I built my case. This is the balancing test. I'm pushing it over the edge because I have a legal right to this. I have a trademark and I want to ascertain that." All we're asking for is that you provide all that data upfront as opposed to the current state of affairs, which we get "I have the trademark. Now give me all the data." That's never going to wash because it doesn't allow to do a balancing test.

So, again, these are actually really good comments because we're getting to a point where we're considering what policy will enable us to make a proper decision at the end, not whether not this is always going to be a yes or no in every situation.

JANIS KARKLINS:

Thank you. Immediate reaction, Brian?

BRIAN: Thanks, Alan. I think I agree with 99% of what you said. I think that the 1% where I think we have a little more work to do is the last thing you said about whether it's automatic or whether the balance shifts to one side or the other. I think that kind of 61F wouldn't be in this particular case because it's a 61B scenario. But I think what you might have meant and what we would definitely agree with if you did mean it was, in cases where all of these boxes are checked and all of these requirements were met – you have a trademark, you allege in good faith that this domain name is violated, you're probably going to file UDRP or you're considering filing UDRP; I think this maybe gets to Amr's question to Margie in the chat, which I'm happy to let her respond to directly online or offline – that, in such a scenario, the data can be processed legally by a third party. I think our work here is to build out that scenario where that's possible. Thank you.

JANIS KARKLINS: Thank you, Brian. Milton?

MILTON MUELLER: I think that this debate is really boiling down to the question of legal basis. Based on what I heard, I totally think that this use case is based on a legitimate interest of a third party. I think the debate is just that this seemed to me to be obviously a 61F case or a B case or a contractual case. I know that the registrants have signed a contract that submits them to the UDRP, but that doesn't mean necessarily that a third party has the right to contractually obligate the registrar to reveal their data.

I'd also like to make the point that we of course would support disclosure of data in a legitimate trademark infringement case so that the trademark owner can decide whether or not to file a UDRP. I would not want to see any kind of an incentive structure set up that would punish the trademark holder for not filing a challenge under the UDRP. I don't want to create an artificial incentives for people to be filing UDRP cases. I think I'm agreeing on Brian on that case. It's perfectly legitimate for them to request the data to request disclosure, to get the disclosure, and then decide, "Well, we don't really want to do a UDRP." There shouldn't be any penalties for that. I'm not sure why anybody would say that would make them liable.

But it only works if it's 61F, and I can't see any reason why we wouldn't view this as primarily as a 61F case. I think, if ICANN wanted to disclose data or the UDRP provider wants to get data, then there would be a contractual issue, but I think, for a third party, it's really a 61F case. Thank you.

JANIS KARKLINS: Thank you, Milton.

BRIAN: Janis, if could?

JANIS KARKLINS: Yeah, Brian. Please go ahead.

BRIAN: Great. Thanks. To Milton's point, I also think that we agree where he indicated that we probably agree. So that's good. We do disagree on whether it's a 61B or a 61F. I'm happy to continue that conversation based on any kind of comments that folks want to make on the document which we'll get around shortly. I think it's pretty fundamentally simple that we think it's 61B. Happy to have that conversation. Thanks.

JANIS KARKLINS: Thank you. Now Mark's hand is up. Mark Sv, please?

MARK SVANCAREK: I apologize to everybody that Alan and I are having a dialogue alongside of everybody else, so please bear with us. Alan, thanks for sending your document. I did of course read it. I've been waiting for it eagerly and it would have been disrespectful if I hadn't read it.

The point I was trying to make is that your document describes how 61F works. That's even the title of it, I think. Well, Step 1 is what it says: Preliminary assessment of the request 61F. I think this will be valuable if people didn't have a good understanding of 61F. So, if nothing else, this document or some later version of it should become our shared understanding of what 61F is. This is pretty much of how I think of 61F, so I don't have a problem with it.

My point was that, except for I think 3.3 – the way the data is processed – I don't see how this actually plays into the use cases because, whenever I see in a use case "61F," is my assumption that all the steps

that are happening in this document are in fact what is happening because this is also my understanding of 61F.

In this particular use case, where we were debating whether there might be a different basis, such as 61B, the safeguards might be different because the 61F safeguards wouldn't necessarily be in place. So that's why I was saying there was an opportunity to say, "Because this may not be 61F, blah, blah, blah."

But, yes, I agree. Everybody should read this document if you don't know how 61F works. I think this is a good place to start. Since this was very similar to how I had always interpreted 61F, whenever I see 61F written into a use case this is my assumption of how all that works.

So that was what my feedback was. It was not to dispute anything in this document, which I think is useful. It was just to say that, in terms of understanding a use case, I had hoped that everybody already understood how 61F worked. When I see 61F, Alan's document describes what I am thinking. Thanks.

JANIS KARKLINS:

Thank you, Mark. Alan, any immediate response from your side?

ALAN WOODS:

Sorry. So many unmute buttons. I appreciate that, absolutely. Again, all I'm saying is that – for instance, with the safeguards, we're not asking the right questions. So let's go straight in say, "Okay. The first question is, must process data in compliance with data protection [inaudible] secure transmission." We shouldn't just be stating that. We should be

using that as the raw material and saying, “Well, what in our policy do we need in order for us to ensure that that is brought together?” So, again it’s using this as the material. I’m not questioning whether or not this is a good or a bad use case. I’m just saying we need to use the raw material of the use case and filter it through the questions, not state them as they’re a given. That’s my point.

So I think we’re actually talking across [inaudible] here. Thank you, Mark, but I just wanted to be more focused on what policy would bring us to the decision as opposed to what are the things that are going to invoke the policy from occurring.

JANIS KARKLINS:

Thank you. When I’m listening to this conversation, one question is lingering in front of me all the time. How on earth would we be able to reflect every possible life situation in the policy recommendation that we are supposed to produce? Shouldn’t we, based on these cases, draw more general conclusions and think in terms of simply stating that both the requester and the information discloser should act based on a legal basis provided in GDPR and then do some kind of general description on what that would entail in terms of the decision-making process and then let, once implemented, each use those legal purposes and decide by themselves or create an algorithm that would make decisions for us? So we really need to think about generalizing more in this conversation and bringing more to policy based on our understanding from a case like this, which is very specific. Just a thought.

Alan Greenberg?

ALAN GREENBERG:

Thank you. I'm intervening with some trepidation. I'm not an expert on any of the subjects, nor am I professional in any of these subjects. But it strikes me that our policy really has to say there has to be a legal basis. I don't think our policy is going to give the specifics of what you need to include in a particular case to make the balancing test satisfied, if there's a balancing test, or what the right words are. I think, following the policy, there's going to have to be a lot of work done on best practices and "This is how you want to do something if you want to get it responded to." But I don't think that's going to be part of the policy. I think, if we're looking at that level of detail in our policy for this particular use case, when you extrapolate it to all of the use cases that we're looking at and all those we haven't documented, that's an impossible task.

So I think we have to separate what is going to be in the policy from the guidebooks that we're going to have to provide for people who actually are looking to disclose information, which I think is going to be a lot more detailed and will be refined over the years based on experience. So I think we need to set our sights properly. I agree with Alan Woods that someone is going to need more information to do it properly, but I don't think it can all be in the policy. Thank you.

JANIS KARKLINS:

Thank you, Alan. I see no further requests for the floor. We got very detailed comments, and I wonder whether, Brian, you would like to take now time and provide your feedback, or we simply ask everyone to file

their comments online in the Google Doc and then you will produce the updated version.

BRIAN:

Sure. Thanks, Janis. I have the e-mail with the new file attached here ready to go. As soon as I stop talking, I'll send that off to everybody with the updates. I'd say, in conclusion, I think I'm really encouraged to, by some of the recent conversation in the chat – not about timing. What if I scroll up a little bit? I'll see it. About Milton's point about the trademark owner filing a request based on a [patent] infringement. And James, I think – he did. James had some helpful comments here about a precursor process. That's the kind of thing I think we need some real collaboration on.

So I think we're probably all pretty clear that the data can be processed when a UDRP is filed. It sounds like we have some work to do. Amr and others, if I'm getting this right, have some questions about whether that disclosure could happen before the UDRP is filed. We think that's legally sound, but it sounds we have some work to do to shore that up. So I'd love to see comments about that specifically and any other comments that folks have on the document once we get it out. Thanks.

JANIS KARKLINS:

Brian, I would like to ask you to either send out the document – the updated version – immediately, but then I would like to ask the group to work on not the basis of this document but on the updated version, or, Brian, you just hold on and wait until every comment will be provided as requested by Friday evening or, at the latest, Sunday evening, and then

try to incorporate those comments and accommodate those concerns in the next version that you would then circulate on probably Monday. It would be up to you to decide what course of action you would like to take. But to send out the updated version now and everyone would comment on the old version I don't think is very rational.

Which option would you prefer?

BRIAN:

Thanks, Janis. I agree. I just sent the updated version out to the team, so everybody should have it in their inbox shortly. Thanks.

JANIS KARKLINS:

Okay. In that case, I would like to ask the team to provide comments. First of all, I would like to ask staff to put the updated version in Google Docs and then the team to provide inputs not on this version but the updated version. We will then ask Brian to look at those comments on Monday and send a new version Monday night or Tuesday that we could look at during the next meeting on Thursday.

Would that be okay?

I see no objections. That is the case. For once, we have exhausted the agenda before the end of the call, and we still have some time on our hands. I would like now maybe to ask one question, if you wish, under Any Other Business. That is in relation to the proposed course of action with the zero draft and the structural outline of the zero draft that I put in e-mail.

Is there anybody who violently disagrees with that proposed course of action, that we would circulate the zero draft and see whether we would agree and use the zero draft in Los Angeles as a basis of conversation? Because this is important for us when we're thinking about the agenda of the Los Angeles meeting. If, conceptually, somebody thinks that this is not the right way of doing things, then it would be either now time to voice that opposition or immediately after this call to put it in writing and send to the list to the team because I would not like to have a situation when we come to Los Angeles and then one or a few or many team members start to challenge the approach we are taking in organizing and planning that Los Angeles.

So any thoughts or any comments on the proposed course of action on how to get to the initial document?

Brian is supporting the zero draft in Los Angeles. Okay, I don't see any ... oh, no. There is one. Amr, please?

AMR ELSADR:

Thanks, Janis. This is Amr. Would it be okay if you provide a bit more detail on what you expect what your draft documents to include? Going through the 61F process steps document that Alan Woods shared on the mailing list, that's a document that I would personally like to see more of or see more of our document start to look like. It gives a solid understanding of what a [inaudible] request might need to include and how it would be handled. So I'm hoping that the zero documents would include something like that and could possibly evolve as we continue our work. But we would need continuous access to that. I think we went

through a similar sort of exercise on the RDS PDP, which I believe was helpful in terms of a live document that reflected tentative agreements between the different groups on the EPDP team. Thank you.

JANIS KARKLINS:

The idea of the zero draft is, first, to outline those high-level policy principles that have come out from a series of our conversations examining use cases and others. That of course will be just an initial list that we would examine and would edit and add additional points in, if need be, or strike out, if need be.

For instance, one thing that comes to my mind, for example, is that the request – I’m just talking off the top of my head just to illustrate what those high policy principles could be – must be proportionate to the performance of the task at stake and made only if the requested information is not available through any other sources or something like that – high principles, or, for instance, if accreditation does not provide automatic access to information or it does not provide automatic disclosure that we have agreed on on many occasions.

So that would be one part of the zero draft: the initial list of those fundamental policy principles. Then it would be followed by a description of each of the building blocks that were talking about. Those building blocks partially you can see in the template for the cases. Again, the description of those building blocks, which would be made in the form of text, which would potentially turn in the policy recommendations, would give an initial outline. Then we would take them one by one and we’d go through them and, based on our

knowledge that we learned going through cases, we would discuss thoroughly each of them and would edit and add things that are missing and so on.

Those building blocks, as I tried to suggest, would belong to three categories. One, building blocks that make the demand side, from the requester's point of view, then building blocks that make the supply side, and then this interface in the middle that would describe the way how demand reaches the data holder, and then how response is given. That would be of discussion of whether that is one gate, where there's one controller, or if it's multiple gates, where the actual decision is made, either on this interface side or at the supplier's level. So, for all these elements, these building blocks, there would be an initial description of those. We would then work on the basis of those building block descriptions and would take them one by one, hopefully closing them at one point in time but also demonstrating progress in our recommendation making.

So that's the plan.

AMR ELSADR:

Thanks, Janis. I just typed a thank you note in the chat as well.

JANIS KARKLINS:

Thank you. Anyone else would like to comment?

Then I take it as acceptance that we would try that way. In the meantime, of course, we will continue working on work cases. I now would like to call on Hadia and Ben to finalize – sorry, to Greg – their

use cases so that we could see whether we could close them during next Thursday's meeting.

So I would suggest that, next week, we try to close the SSAC case, and then we try to close this case that the IPC provided and that we examined today, and then that we open and do the initial reading of the case of when the network is undergoing an attack involving a domain name and the operators of the network need to contact the domain name owner to remediate the security issue. So this is SSAC Case 1, belonging to Group 3.

So that is my proposal. Maybe it sounds ambitious, but I hope, since the first SSAC case had been already discussed online, that we would be able to close it down rather quickly. As well, the current case we would try to close in a reasonable time. So that would be my suggestion. All that depends on how good the updated versions we would get and how quickly we would get them. On the ALAC case, we would take it the week after.

Any questions?

I see no further questions. Any other business from team members?

If none, then may I ask Caitlin to recapitulate the action points?

CAITLIN TUBERGEN:

Thank you, Janis. The first action line captured is that all groups are welcome to keep providing additional comments in the early input Google Doc, and support staff will use feedback provided in that Google Doc as it builds out the zero draft. Secondly, I believe Brian just

circulated the updated IP use case, and groups are asked to provide additional feedback in the Google Doc by tomorrow. The IP members are asked to take all comments into account in producing an updated version by Tuesday in advance of next week's meeting, where we will discuss the updated use case.

Additionally, Greg and SSAC colleagues are to take a look at the comments on the SSAC 5 case and produce an updated version for distribution on Tuesday. We'll be discussing that next Thursday. That's all from me, Janis.

JANIS KARKLINS:

Then we will also circulate the case that I read out, which belongs to Group 3 on DDoS and botnet attacks.

With this, any other comments from team members?

In absence? That brings us to the end of the meeting. Next week, we also have a Legal Committee on Tuesday, and then we will meet as a team on Thursday with a rather hectic agenda.

With this, I thank all of you for active participation in the meeting and for your inputs. Back to homework. Thank you very much and have a good rest of the day. This meeting is adjourned.

[END OF TRANSCRIPTION]