
**ICANN Transcription
IDNs EPDP**

Thursday, 13 January 2022 at 13:30 UTC

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DEVAN REED: Good morning, good afternoon, and good evening. Welcome to the IDNs EPDP Call taking place on Thursday the 13th of January 2022 at 13:30 UTC. In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room. If you're only on the telephone, could you please let yourselves be known now?

MAXIM ALZOBA: Hello. Do you hear me?

DEVAN REED: We hear you, Maxim. Thank you. We do have apologies from Nigel Hickson today.

All members and participants will be promoted the panelists for today's call. Members and participants, when using chat, please select Everyone in order for everyone to see the chat. Observers will remain as an attendee and will have View Only to access.

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

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need assistance updating your Statements of Interest, please e-mail the GNSO secretariat.

All documentation and information can be found on the IDNs EPDP Wiki space. Recordings will be posted on the public Wiki space shortly after the end of the call.

Please remember to state your name before speaking, for the transcript. As a reminder, those who take part in the ICANN multistakeholder process are to comply with the Expected Standards of Behavior.

Thank you, and over to our chair, Donna Austin. Please begin.

DONNA AUSTIN:

Thanks, Devan. Welcome, everybody, to the IDN EPDP Call. And a special welcome to the members of the SSAC that are joining us today to have a discussion about some questions we have related to some of the early input that we received from SSAC. And also, the SAC060, I think, is the main document that I think we have questions on.

Before we get started, I just want to do a brief update to our members of our normal group. You'll have seen today that Ariel has sent around draft text for a response to a6. This is something that the leadership team has been working on for a few weeks now and we still think there are some holes in the language.

So following, underneath the draft recommendations, are a number of questions that we have for the EPDP team. And we will ask that in the next week, you have a look at those. And we will

come back to have a discussion with the team about those questions next week. So as Ariel said, on the 20th. So just a heads up that that's what we're going to be talking about next week. And if you can take a look at the document, that would be appreciated.

And as always, if you have any questions in the interim, please raise them on the mailing list. And maybe we can get some things squared away on the mailing list rather than do it on the call next week. But just heads up that that's there. And please, if folks could take some time to read through that in preparation for the call next week.

Any questions on that? Okay, I don't see any hands. So, welcome to the members of SSAC that have joined us. I got instructions from Rod that this isn't a call with the SSAC per se, but it's rather a conversation with members of the SSAC that have an interest in the subject matter that we're discussing. And we're really looking forward to your input.

I think, hopefully, you've had some time to look through the questions that we prepared, or the working group members prepared, for discussion today. And also, if there's anything else that you wanted to highlight, that will be terrific. Happy to have a conversation around those six as well. So I'm not sure who's going to be the lead, but if we can, I'll hand it over to whoever that—

RAM MOHAN:

Donna.

DONNA AUSTIN: Hey, Ram. How are you?

RAM MOHAN: I'm good. So internally, we did a little bit of organizing. And thank you for sending the questions ahead of time. And I think we've got individuals who are going to take a lead on each of these five questions to start with. And they know who they are, so we'll just get into it as we get started. I think, Patrik, you've got the first one.

PATRIK FÄLTSTRÖM: Yep. So, should I start?

DONNA AUSTIN: Go ahead, Patrik.

PATRIK FÄLTSTRÖM: Oh, thank you very much.

DONNA AUSTIN: [inaudible].

PATRIK FÄLTSTRÖM: Yep? Did you want to say anything?

DONNA AUSTIN: No. I was going to and then I stopped myself. So go ahead, Patrik.

PATRIK FÄLTSTRÖM: So, Patrik Fältström, member of SSAC and also liaison from the Internet Engineering Task Force to the Unicode Consortium and the main author of the IDNA2008 Standard. I would like to express an overall, very important issue that we were discussing at quite some length inside SSAC.

When we read the document that you passed to us at first—and then also in other discussions—maybe it is the case that we over-exaggerate when we say that people might misunderstand what variants can be, but we feel that we need to re-emphasize this to people, specifically to the ones that might not understand DNS and technical issues so much. That said, sometimes we need to express technical things to technical people much more to others.

Anyways, the important thing to understand regarding variants is that after two strings that might be called variants or by any other means having a relationship with each other, there is nothing technically in the DNS protocol or in other protocols that use domain names—like X.509 or SMTP, anything we use with e-mail or anything like that—that indicates any kind of relationships between the two strings.

So if it is the case that you, for example, have two strings which are variants, we see that it's very important to understand that it might be part of a business agreement that one applicant [are] able under certain circumstances to apply for one or more strings or to get two more strings, but after that, later on, is delegated. Or maybe one is delegated and another one is not. There's technically no difference between the two.

So when variants are in use on the Internet, if I use a little bit sloppy language, there's no difference between a variant and another domain name. And there's no difference between two variants or two different domain names. And that is something that I would like all of you to think about when you're talking about the policy—how things can be used, how things can be misused/abused, etc. We do see ...

That said, from which we will come back to, we in SSAC do see, and myself specifically—and Ron can explain this in so many, many more excellent words—there are some cases where, for example, two different strings might be confused. And that confusion between the two domain names might make one possible to allocate and give to one registry. And the other one, because of confusability reasons, cannot be given to another registrant.

But just because they are delegated and allocated and requested by the same entity, it might be the case that there might be different rules. But that is only between whoever the applicant is applying the domain name from. So it's only business arrangements. Two domain names or two different domain names. Regardless of whether they're called variants or not. Okay. That's an overarching thing. Now we can go back, go to the ...

Are there any questions on that? Ram, do you or anyone else from a SSAC want to add something to what I just said?

RAM MOHAN: Thanks, Patrik. I don't have something to add right now, so I think we should just jump straight into the questions.

PATRIK FÄLTSTRÖM: Yeah. So then we move into the questions. So we had this question—

DONNA AUSTIN: Patrik.

PATRIK FÄLTSTRÖM: Yep.

DONNA AUSTIN: Sorry, Patrik. Two hands are up. So I see Maxim and then Jeff. Do you want to take those now?

PATRIK FÄLTSTRÖM: Please, yes. Maxim. Now I see the hands myself. So thank you, Donna, for reminding me. Maxim.

MAXIM ALZOBA: Hello, all. I have a question. Have you had discussions if there is a need of central storage of such, I'd say, something like index of which strings are variants to each other in IANA or something like that? Because if the IDN with variants propagates, then there will be a need to check somewhere if something is variant of something else. Thanks.

PATRIK FÄLTSTRÖM: There have not been any such discussions about a central registry for variants. Each registry that does handle variants today, they do have local registries for that. It might be the case that whenever some kind of technical solution is discussed, it might be the case that that is using a registry. But this is just a hypothetical discussion.

The technical discussions [that have been] done in DNS, for example, to expand CNAMEs to BNAMEs or DNAMEs, I have not seen any of those proposals leverage any kind of registry either. So the answer is no. No central registry.

And then Jeffrey.

JEFFREY NEUMAN: Hey, Patrik. On this, I actually was appointed here by the Intellectual Property Constituency. So my question has to do with, when you use the term “confusability,” I think it's important for all of us to understand what you all mean. So while I appreciate that you were defining things from a technical standpoint in terms of the variants, I think it's important for me to ask you to make sure that we all have a common understanding of what you mean [when you say] “confusability.”

PATRIK FÄLTSTRÖM: Yeah. So let me try to use different terminology and not talk about confusability at all. What I'm talking about is the fact that it might be the case that there are different rules if two domain names are

applied for by two different applicant for the same applicant. And then [I'll just] stop there.

JEFFREY NEUMAN: Okay, thanks. Yeah, I think we just should be careful, too, because we have different rules on that. So thank you for the clarification. Yeah.

PATRIK FÄLTSTRÖM: But this also one of the ... It's good that you asked the question because this is one of the most important things that we want to point out from SSAC, is that what is called variants is something that really is between the various applicants for strings and whoever approves those strings. And then later on regarding delegation, etc., it is part of that business transaction. When that is done and things are delegated into the DNS, then domain names are just domain names and there is nothing that is called "variants" anymore.

Okay, next. Edmon.

EDMON CHUNG: Thank you, Patrik. And I just want to add in the responding to Maxim's question a little bit. Yeah, that's a good question. And the answer in the census is, yes, it was disgust. And when the internationalized registration data was discussed, it was eventually not ... There wasn't any particular recommendations because this group needs to talk about how IDN variants are implemented in

the top level first before we consider what the IANA WHOIS, for example, would indicate.

I would suspect that there should be some indication of whether a TLD is a variant of another, first of all. But this needs to be something that this group takes into consideration.

I do note that in the charter ... It's not explicitly in any particular question, but I understand that there are enough catchall questions that it should accommodate this. So I would suggest that the group should definitely take this on.

The other thing is that there are relationships between the TLDs, if you will, as John posted on the chat as well. And that's the Root Zone LGR. So with the Root Zone LGR, there is the way to take a look at it. But as Patrik correctly mentioned in the DNS or in the Technical Implementation, that's not. But there are ways. And this group is ... I think it's good for this group to think through how those linkages are not only better presented, but also what policies need to be placed to make their expressions more clear.

So that that's my thoughts. Thank you.

PATRIK FÄLTSTRÖM: Okay, thank you. I don't see any hands, so let's move into the questions. Or rather the responses from us individuals and SSAC. There will most certainly be more questions. And let me suggest that we go through all of these answers from us and SSAC, and then we can have a discussion afterwards.

So the first question regarding A1 and A4. One thing that is important when looking at different characters and code points ... And "code points" is the word that I would like to use. It's important when talking about what code points can be allowed that one separate between the set of code points that are allowed in a zone as a whole, which might be a quite large set.

There might be a smaller set of code points which are now together in a certain label. For example, if you have a large set of code points, it might be the case that even though you allow a large set of code points in the zone as a whole, in one specific label it might be the case that there are certain code points that are not allowed to mix.

If I take a very, maybe, weird example, it might be the case that a zone allows code points which are both right to left and left to right, in by directionality. But you don't allow different directionality in the same label. So the set of code points allowed in a label might be different.

The third thing is that just because, for example, the root zone that SSAC [believes especially] and ICANN is specifically responsible for the root zone, you have a certain set of code points allowed in the root zone. You have a second set of code points allowed in the label. There is a separate discussion, then, that, okay, subdomains to that domain itself, to that label, what code points are allowed in those domain names? And then you have to start the whole discussion again. What code points are allowed in that zone and what code points are allowed in the label in that zone?

And when you go to a second-level root zone instead of the root zone, it might be the case that you have some specific cases that you, for example, stick to just one language and because of that, a certain set of scripts, etc. So the root zone, we think, is the most important one.

Anyway, the SSAC recommends strongly that LGR is used for all current and future TLDs to determine variant labels. This is really important so that those applications that [we see] picked up various rules for domain names and to filter phishing and all the different kinds of securities issues. It's important that it's publicly known what set of code points is allowed in the zone. So to have the LGR published and to follow the LGR, we believe, is important.

As part of that generic rule, in SAC060 Recommendation 1 we specifically recommend that the root zone must use one and only set of rules of the Root LGR Procedure. We cannot have the root be sort of a merge of everything below it. [It's there]. We see it as the other way around. The root zone is special. We should have one root LGR for the root zone. But then we can have different LGRs for the various second-level domains.

Further, and the last thing we would like to point out is that is if it is the case that an existing TLD applies for a variant TLD label whose script is not yet supported by the applicable version of the Root Zone LGR, we believe that the application should be put on hold and the community should work together to work on the LGR for the root zone for that script and integrate that into the LGR or simply say, "No, it is not possible to accept that applied-for TLD string."

And this is just because we think the root zone is very special And we encourage you, when you're working on various LGRs and other kinds of things, don't mix up the work that [you] would like to do on the second-level domain and have registries publish what they are doing, etc., with a very, very specific and very important case which is the root zone LGR. And ensure that only one LGR is used for the root zone and that every string in the root zone is following the LGR. No exceptions.

So that's the comments on A1 and A4.

DONNA AUSTIN:

Patrik, before you move on, this was a specific question for Dennis Tan. So I just want to make sure from Dennis that the question has been answered to his satisfaction. So, Dennis, do you have any follow-up on this one or you're okay with it?

DENNIS TAN:

Thank you, Donna. Thank you, Patrik for the clarification. I just want to make sure. I think I understood. I think you said repeatedly that there should be one set of rules for the Root Zone LGR for validation of TLD labels and their variant. Right? The calculation of variants.

And you mentioned the case of a ccTLD that want to apply for variant label that is not supporting the LGR. It should be put on hold until such LGR for that specific script can calculate any variants if any. I think A4 was in the context of a script not supporting the LGR altogether. And there is a new applicant that wants to apply for a new gTLD in data script not yet supported. I

think the comment suggest that if it's IDNA2008 valid, then it should not be prohibited from application.

So I think that's where I wanted you to elaborate/reconcile one set rules. But the comment on A4 kind of suggested some flexibility/leeway for those scripts not yet supporting the LGR. So if you can clarify that use case perhaps. Right? A script that is not yet in the LGR for some reason.

PATRIK FÄLTSTRÖM: Yes. The view for SSAC is that it doesn't matter whether the script is included in the LGR or not. If it is the case that the string is not okay according to the current Root Zone LGR, in that case the application should be put on hold. So we believe that the Root Zone LGR should be an absolutely quantifier or rule set for what strings could go in the root zone. It doesn't matter whether it has to do with the script or not.

DENNIS TAN: Thank you, Patrik.

PATRIK FÄLTSTRÖM: Okay, so let's move to the next one regarding A2 on some self-identified variant labels. So the answer there is that, yes, given everyone does remember that the DNS does not include in a technical solution which I started by explaining. This actual synchronization is something that needs to be done sort of [out of band of] the technical solutions. The intent of our side is that there must be ...

There is a real possibility for policy makers to be a little bit worried if, for example, you have multiple streams in the same zone be delegated, how do you ensure that they are transferred together? How do you ensure that you have the same policy for them or that the policy is synchronized between the various variants?

So I think that is the best way I can explain that. That this a business solution regarding finding how the actual synchronization is to be done. There's no technical solution for that.

If we do have a situation that is mentioned in A2, if that really happens, if that is the case the applicant can request a redo of the LGR to see if the LGR needs to be updated. It is important not to make ad hoc exceptions that could potentially undermine the LGR. There is a reason why there is an LGR, and there have been some discussions that made decisions that one code point or one set of code points is defined the way they are.

So the existence of the LGR is not primary to set the boundary on the strings that you can apply for. But it is to create a [predictable] environment for the users of the domain names. So there is one thing that ... It's the applications. It's the services. It's the user interfaces and ultimately the users of the Internet that use the application services that need to know and can look at the LGR and know what is allowed and not.

So once again, it goes back to the previous question thank you very much for the question about script not being in the Root Zone LGR—that we already see various implementations of software and user interfaces that do use the LGRs to determine whether there is phishing or a spam or other things going on. So

to keep the policy for allocated domain names, use of code points and LGRs is really important.

DONNA AUSTIN: Thanks, Patrik. I just want to ask Emily briefly. Emily, are we okay with this one or is there a follow-up?

EMILY BARABAS: Thanks, Donna. This is Emily from staff. So I think on this one, there was sort of a specific question about one sentence in the feedback from SSAC.

So SSAC mentioned that that to analyze this charter question, it would be helpful to look at the delegated variant labels in ccTLDs. And I think the working group was not entirely sure why, specifically, delegated variant labels in ccTLDs would be important to examine in that context.

The working group had sent in an analysis of self-identified variant gTLD labels identified by the gTLD applicants from the 2012 round and thought that was the most relevant [element]. So I just wanted to get a clarification on that.

PATRIK FÄLTSTRÖM: Yeah. The reason why I point out the ccTLDs specifically is that if you have synchronized ccTLDs that are delegated and then you might have self-identified variants of gTLDs labels, it might be the case that you have a mix of policies between then the variants of

the CCs and the gTLDs where the gTLDs are under all different kinds of contract and policies that the contracted parties follow.

We do know that the CCs and the gTLDs are already, to some degree, two diverse groups and could be two diverse groups. So what we're talking about is that by looking at the various labels and comparing them with LGRs, that might help to look at the potential gaps in these policies. That's why we point out ccTLDs specifically. Did that help?

DONNA AUSTIN: Yeah. I think it does, Patrik. I think it clears up what we thought was a typo. But it's deliberate. So thank you for that.

PATRIK FÄLTSTRÖM: Yeah. So regarding the next question, question A5. Let's see.

STEVE SHENG: Patrik, this is Steve Sheng, SSAC support. I think Lyman will be able to take this question.

PATRIK FÄLTSTRÖM: Yes, thank you.

LYMAN CHAPIN: Thank you, Steve. Is my microphone working clearly? I'll assume so. The principal idea that SSAC was trying to get across in both SAC060 and in subsequent pieces of correspondence is that

because variants create the experience that users expect, only when registry operators and a variety of other folks take some pretty serious efforts to work that way ... Okay?

So when you bundle variants together, because you don't have any tool in the DNS technology itself to make them work the way you want to, you have to go to considerable effort to make that happen. So the idea is that when you have ... And we picked, as an example, the four code points that make up the name of Taiwan University.

And if you simply go to Version 4 of the RZ-LGR, you'll find that a total of 31 different variants could potentially be bundled with the primary label for the name of Taiwan University. So all we were saying is don't just blanket, go allocate and delegate all 31 variants just because the LGR says that you can. Decide which ones are really important to create the bundled experience that you want users to have and only activate or delegate those.

So it's actually very simple. It doesn't mean that there should be a ceiling value, but we felt that keeping the number of variant labels in a bundle small would make it more likely that the methods that the registry and others were taking to keep them synchronized would actually work. The large the set, the harder it is to keep everything synchronized.

Is that a sufficient answer to the question or should we ... Donna?

DONNA AUSTIN:

Yeah. Thanks, Lyman. I was just going to ask our ALAC Team whether there's any follow-up on that one or whether they're good.

SATISH BABU: This is Satish from ALAC.

DONNA AUSTIN: Yes, Satish.

SATISH BABU: I think we're okay with the explanation provided. I'm not sure we will get another chance to raise if we have subsequent questions on this in the session later.

LYMAN CHAPIN: I believe that's what Patrik suggested, was that after we go through each of these individually that we will have, time permitting, an opportunity to ask questions that perhaps are a little more general. Yes.

SATISH BABU: Great. Thanks for that then. Thank you.

DONNA AUSTIN: Thanks, Satish. So we have Maxim and then Justine. Go ahead, Maxim.

MAXIM ALZOBA: So far, until there is no changes, each application costs a separate amount of money. And potentially if it's going to be

contracted, the applicant ... Yeah, each contract costs, I'd say, a lot. And you don't save much when you bundle because you have to pay the same amount for everything as a flat rate. Do you think that experience of the last round clearly says that this economical, I'd say, balance is not okay? I mean, to apply for 100 variants you have to pay 100 times for everything. And then on top, each quarter you have to pay for 100 TLDs and it's not easy. Thanks.

DONNA AUSTIN:

So Lyman, before you respond to Maxim, I just want to make a point that our charter question A5 is something that we had quite a lot of discussion around. And I note that a lot of the questions following here are related to that. And Maxim, I think what you just asked will be picked up as we go through those questions, so are you okay for the SSAC members to work their way through it and we'll see if it's answered at the end? And if not, we can come back to it? Okay, great. Thanks, Maxim.

Justine, do you want to go ahead?

JUSTINE CHEW:

Yes, thanks. Firstly, in terms of question #1 here that you see on the screen, just for argument's sake if the registry is interested in applying for many, many, many variants—maybe they have a particular business case use for that and they have a way of managing the challenges, then is there any reason why they should be prevented from doing so in terms of technical risks or something along those lines? That is something that I would like an understanding on.

And I'm not sure if we've covered the second question. Thanks.

PATRIK FÄLTSTRÖM: Trying to answer part of that. From SSAC perspective, we think what you just asked is just far too hypothetical to be able to answer because, as we said—which I started by saying—there is absolutely no technical ability to differentiate between two variants and two different domain names. It's exactly the same thing. So there is no question about if they have solved the technical challenges. There are no solutions as of today. WE have not seen ...

And that is the context in which you must work on the various policies regarding the business relationship. Should there be different prices? Should there be different kinds of arrangements. All of those different kinds of things. That is not part of what SSAC is chartered to deal with. The only thing we want to point out is that there is no technical solution that can ...

Say, for example, when you look at one domains name, you either get a response or not. It doesn't matter whether that domain name was a variant connected to some other kind of domain name. So two different domain names or two different domain names.

JUSTINE CHEW: Okay, thank you.

DONNA AUSTIN: Back to you, Lyman.

LYMAN CHAPIN:

Yeah. I put my hand up. I'll put it back down again. Justine, a little bit more useful answer, or a complete answer might be that in a particular language community, the concept of variants is actually very important. And I want to be sure that no one gets the impression that because we're a bunch of technical folks and there's no technical solution to this problem, that therefore we don't like variants or we think they should go away or anything else.

They're extremely valuable when you talk away the way in which language communities want to use the Internet and the Domain Name System. So taking that as the starting point, really what we're saying is that it's hard to make that work because there's no technical tool where you can just say, "Okay, let's set these parameters in the zone file a certain way and the DNS will make this work."

There's no technical way to do that. And because of that, if you're going to make it work in the way in which a different language community wants and expects, it's going to take a lot of effort. You've got to work with application developers, with browser manufacturers. You've got to work with your registrars. You have to have all sorts of policy enforcement mechanisms in place to ensure that when you get down to the second level and beyond, that things are still synchronized. That's hard work. And the only thing we were pointing out was that if you're going to try to make that work, it will be a lot easier to do if you limit the number of variants that are in the bundle.

But, again, because we're not making a technical point, SSAC, from a security and stability standpoint, we have no reason to want there to be a limit. Okay? So from our perspective, purely from a security standpoint, you can have as many in there as you want as long as you can figure out how you're going to keep them synchronized. So we're not interested in any artificial limits.

PATRIK FÄLTSTRÖM: Yeah. Let me continue what Lyman said and give another practical example. Let's say that you have a language community which has exactly two strings in a variant that two labels are variants of each other. They are so extremely important, everyone in that community understands it. So they really believe that those two strings can be used, one or the other it doesn't really matter.

We from SSAC don't see any problem whatsoever, for example, for that community, that registry to come up with a policy to say, "You can get both of those strings for the price of one." Okay? Now I'm really extreme here.

But what happens technically—and this is what we say in SSAC—after that decision is made, that this transaction is made, what will end up technically is that there will be two delegations in the DNS. And that is when this technical sort of synchronization that Lyman and myself have been talking about. But at the end of the day, after that business transaction when you get two domain names for the prices of one, whoever has those two domain names has two different domain names just like two domain names today. That's what we are saying.

So as you will see when we are going through the rest of the answers, we are absolutely, do we understand the need for variants for multiple different reasons. We just want to remind everyone that there is no technical solution that can keep those variants together. Thank you.

RAM MOHAN: Thank you. So just to add that, we already have examples in ccTLDs where they implement policies where two variants do not actually point to the same location or to the same website. We don't see a problem with that from a technical point of view. That has to do with business and policy and things like that.

PATRIK FÄLTSTRÖM: Let me suggest that we are moving forward because we will come back to this from SSAC perspective. It's technically really hard, if at all possible, but from an end user perspective it's absolutely needed.

JUSTINE CHEW: Yes, okay. So do you have answers to the second question?

RAM MOHAN: Lyman, did you want to take that second one as well? Suggested criteria.

LYMAN CHAPIN: Yeah. This follows from the more general suggestion that we make in SAC060 and have reiterated which is, only actually instantiate the variants that your language community needs in order to satisfy their expectations for how the variants that they're familiar with ought to behave. So there isn't any ...

From an SSAC standpoint, from a security and stability standpoint, we don't have any criteria for what constitutes necessary or important. It's part of recommending that in order to limit the size of the job of synchronizing everything in a bundle, that you have in that bundle only the ones that you really need.

Now that's not for us to decide. Okay? So deciding what constitutes widespread usage or ... These are linguistic and cultural issues that, presumably, the relevant language community would be in a much better position to answer.

The important thing from the standpoint of the conversation that we're having today is that there's no reason from an SSAC perspective, there's no security and stability reason to have external criteria for necessity or widespread usage. That's entirely up to the language community that wants to make these variants work for the people that are using them.

DONNA AUSTIN: Thank you, Lyman. Jeff, go ahead.

JEFFREY NEUMAN: I was going to wait until after the Lyman went through all of the responses to question 2, all that stuff. Or was that the response?

LYMAN CHAPIN: Jeff, I think—

DONNA AUSTIN: Jeff, I believe it was the response.

LYMAN CHAPIN: Yeah. I think that's pretty much it.

JEFF NEUMAN: Okay.

LYMAN CHAPIN: It's a very general comment that this is a matter for the relevant language community to decide. Our recommendation is that in making that decision, the people involved keep in mind that every time they add another variant to the bundle, they have increased the challenge of managing the synchronization within that bundle. There may be really good reasons to do that. And if that's the case, then by all means add another label to the set. But just keep in mind that every time you do, there's a range of management issues that you're going to have to solve. If it's important enough, then you'll solve those problems and move forward.

But just don't do it willy-nilly. Don't just say, "Oh, the LGR says I can have 31 variants on this name, so just because we might someday need them, let's just instantiate them all now." Because you're buying into a major management headache. That's all.

JEFFREY NEUMAN: Yeah. Thanks, Lyman. So this is where it gets really for us. Right? Because we have to set policy and when we're setting policy, we have to assume that all the actors are going to act rationally. We can't assume that registries are going to come in and apply for all 31 variants just simply because they can.

And when I say we need to assume they're going to act rationally, it doesn't mean that we shouldn't get an explanation as to how they're going to handle everything and make sure that there's a satisfactory answer that they can or have the ability to manage all of this. But I think it becomes impossible for us to actually impose any kind of limit because any limit, by definition, is going to be artificial, as I think you were saying anyway.

The other thing is, it's impossible ... I mean, you say it should be up to the language community, but no one really speaks for a language community. I mean, yes, we have LGR teams and it's great and we try to involve experts. But when you're talking about evaluating a TLD application, you can't really find people that have the authority to say that they speak for a particular language community. So I don't see that as being actually feasible to implement either.

So I think what needs to happen, probably, is that criteria for what it would look like to be satisfied that a registry could "manage" the number of variants that it has proposed, I think that is the only way we can really go about handling it.

I don't see any other way because a) any limit is artificial, b) it's not like we can just go out and say, "Okay, who speaks for the language community? You can tell me if this is necessary." And c) I think we have to assume that registries are only going to pay for applications and they're going to try to make their business succeed. And I don't think registries are going to intentionally take on things that they don't think they're going to be able to manage.

I guess that was the point of my question. We appreciate the advice and we understand that it should be conservative, but I think it's better to focus on how do we set criteria for what it means to evaluate that someone could manage that as opposed to looking at the number of TLDs because you're just going down a rathole that we'll never be able to get out. Thanks.

PATRIK FÄLTSTRÖM:

Let me add that I agree with what you're saying, Jeff. You should have whatever kinds of rules you have where you actually can apply the rules as well. There must be measurable and quantifiable, and you need to be able to make a decision on whether you pass the rules and whatever.

But this is also why we in SSAC say that for the root zone. As I said earlier, the root zone has one Root Zone LGR and any string that you add to the root zone must be supported by the Root Zone LGR. That's one strict requirement. It's a different question of what LGRs to use inside your second-level domain. That's a completely different kind of thing.

And regarding the ability to keep things synchronized, it's also a little bit different if you have the applicant for multiple TLDs which are variants to each other or whether you're an applicant for a TLD and you say that you will have variants within your TLD based on certain LGR for whatever reason you choose to use those LGRs. Those might also be different kinds of evaluations on the different quantification of what you just said, Jeff. Is the registry able to handle this synchronization or whatever in the non-technical situation or not?

DONNA AUSTIN:

Thanks, Patrik. I think it's really helpful that we're understanding the thinking behind the SSAC advice. So I think it's really helpful that we're understanding the thought processes that went into developing the advice. I certainly find it very helpful.

And I think Jeff has raised a good point that maybe within an application process. If somebody wants a bundle of variants and they need ... Perhaps there should be some technical question that helps or that gives some level of comfort that they understand what would actually be required to do that. I mean, it seems a pretty reasonable thing to do.

But Lyman, I just wondered whether some of this thinking was done with ccTLDs in mind because they had the fast-track process to maybe go a little bit faster moving in this than what Gs have been because variants weren't allowed in Gs. But I think, certainly, the synchronize has been used within CCs. So I wondered, when you're discussion this, whether there was any kind of thinking about CCs over Gs in development of the advice.

LYMAN CHAPIN:

I don't recall, Donna, that there was a specific comparison of potentially different discussions we might be having if we were talking about CCs or Gs. The issue that Jeff raised is one that I don't think we really talked about enough, which is that it's one thing for us to say there's no technical reason to put a limit on how many strings a registry might apply for as a variant bundle. It's another thing for somebody—ICANN or whoever—to determine as they're reviewing an application whether or not it's feasible for that registry to actually do what it says it's going to do.

Now you can rely on applicants for new TLDs to be rational actors. And Jeff mentioned that. Presumably, a registry would not apply for a bunch of strings and pay the fees and take on the management burden and so forth unless it felt that it had a realistic business solution to the issues that are raised by trying to do synchronization.

But from an application evaluation standpoint, which is what you guys have to think about, how do you figure that out? What constitutes proof or satisfactory demonstration that an applicant applying for a number of different variants to be bundled together for synchronization is actually capable of making that work? From a technical standpoint—and we keep coming back to this—we don't have any technical tools to make it work.

So just sitting here as folks who are concerned about security and stability in DNS technology, we don't have any criteria where we can say, "Well, technically this passes muster and this one doesn't." Because, again, there isn't any technical means of

implementing it. So that leaves you with a lot of very tricky, thorny questions about how does an applicant demonstrate to the satisfaction of an evaluation team that it can in fact implement the policy measures necessary to achieve the end result? The result being that users see something that works the same, regardless of which variant they use.

That's a tricky problem. And I think it's an interesting problem. It's definitely not an SSAC problem. It is definitely a problem for you folks as the EPDP folks. But I don't think we should minimize it. For us to simply say, "There's no technical limit," that's fine. That's a great answer to have, but it doesn't solve your problem. And I understand that you still have a pretty serious problem. I wish we could help you with it, but we can't.

DONNA AUSTIN: Thanks, Lyman. Jeff.

JEFFREY NEUMAN: Yeah. Thanks, Lyman. Actually, I think you can help us. Right? So something I was just thinking about and I put in the chat, I think Patrik started out earlier in the call talking about all the things that need to be thought of in terms of what needs to be synchronized other than just the strings themselves and the policy. I think Patrik mentioned certificates or X.509 and a couple other examples.

Maybe giving us a list of all those kinds of things that we might not be thinking about that need to be synchronized from a business policy perspective. That's a start. Right? Because you can ask a question in the application basically saying, "How are you going to

work out all of these things? How are you going to synchronize all of that stuff?” That is something that ...

I’m not the technical person here, so I’m not aware of all of the things that need to be synchronized. But that would be a help to us, I think, in trying to set this policy and trying to set criteria or things for an evaluator to consider. Thanks.

PATRIK FÄLTSTRÖM:

Jeff, it is not possible to make a complete list because we don't know what people use domain names for. And to some degree, you who are businesspeople that are selling domain names, you might actually can come up with more interesting ideas of what people use domain names for than we.

So let me just re-emphasize what we are saying from SSAC. Two variants have to be treated technically in the World Wide Web, in the world on the Internet as two different domain names. Really, two different domains. And then we from SSAC then go pass back the ball to you and say, “If you talk about synchronization ...”

And we say, “Technically, there’s no synchronization whatsoever that exists,” then you have to come back and say, “What do you mean? Explain to us what you mean by synchronization.” So it’s a little bit easier for us as well, of course, to tell you that, no, there are two different domain names. Nothing more, nothing less.

And to some degree, let me take an equivalent example. All analogies are bad, but let me try. On the Internet today when you go a web page, should you type in “www.icann.org” or just “icann.org”? Those are two different domain names, and we know

that people are using the two domain names sometimes as equivalent, sometimes as not equivalent. If you send e-mail to a person at icann.org, can you also send e-mail to a person at www.icann.org? That's one example of two different domain names which, to some degree, is synchronized.

So I'll pass the ball back to you, Jeff. Sorry.

RAM MOHAN: Jeff, I think at best we can provide some thoughts on some illustrative examples. But I would be quite concerned if those illustrative examples get converted into the required criteria.

DONNA AUSTIN: Did we lose Ram?

JUSTINE CHEW: I think so.

JEFFREY NEUMAN: I think Ram accidentally hit Mute.

RAM MOHAN: No, that was all I had to say. That was it. We can provide some illustrative examples. We just don't want to have those examples then morph into the criteria or the requirements.

JEFFREY NEUMAN: Yeah, understood. And I understand the concern. But like I said, Patrik mentioned certificates which maybe others in the group already thought of. I didn't think about that. But yeah, just a ...

Not a comprehensive list or not something that we would use as authoritative, but just to help us think about some of the items that an applicant would need to address regardless of what they're going to do with the application—certificates, e-mails, obviously. But there have got to be examples that we just haven't thought of that may be behind the scenes or at a different layer.

But obviously, it's up to us to think about all the business and policy aspects of what would need to be synchronized. Thanks.

DONNA AUSTIN: Thanks, Jeff. Steve, go ahead. Steve Sheng.

STEVE SHENG: Thanks, Donna. I think the discussion also goes to the next question. So perhaps we can move on to question A5 and then Ram can provide some additional perspective there. Thanks.

RAM MOHAN: Sure. Thank you. So look, the practical implementation here is to initially allow the minimum number that is absolutely required.? So in the minimal case, what you identify is that there is a primary label. It has a variant, and the variant—or variants—are treated as blocked and they're part of a bundle. And only one of the strings, the primary label, is delegated.

And in that model, we're avoiding the problem of phishing and confusion for end users. You allocate to the same applicants, but you block the variants. So that's the minimal case.

Another example would be where only the primary label and the variant labels that are uniquely differentiated from the primary label and widely recognized in the community as an equivalent. You allow those to go forward.

So if you look at the Chinese community example, there are three labels. There's the label that is applied for, the simplified Chinese version, and the traditional Chinese version. And at the same time, we also know that in the script set, we can have a lot more variants be identified and applied for.

So our thought is to apply a very tight limit at the start to ensure that you have a conservative start to this. And as the community gains experience, as operator gain experience, from the policy side you could decide that you want to loosen those restrictions.

Now there's a question on, what does "as small as possible" actually means? But from our point of view, it's reasonably easy to assess. You start with the question, "Is one label necessary and sufficient?" If it's not, then you need two. And then you apply the conditions that I mentioned earlier. Is it uniquely differentiated from the primary label and is it widely recognized as used in the community?

So from the perspective, we actually think "as small as possible" is definable. It's not something that is just arbitrary.

The last point that I want to make is that the combinatorial explosion at registries/registrars/registrants, we think it has the potential to create a stability problem. Jeff was saying earlier that there is economic self-interest at work here. But there are certainly cases where one could look at where more variants than are minimally required are applied for because they have an economic value associated with it. We're not here to stop economic growth or expansion or anything like that. But we're concerned that the management of hundreds of variants or even 10s of variants associated with the primary label poses technical as well as management challenges for the parties involved.

As an example, if you have to take a bundle that has multiple variants in it that are more than just a minimal set. You take the example of 31 variants. And if you want to apply compliance cations on individual variants while still maintaining the primary label status in a different places or in a different state, we think that, as an example, can get quite complex—takedowns or transfers or law enforcement tracking, things like that. And these are not edge cases. These are everyday occurrences in the Domain Name System.

So that's kind of why we look at "as small as possible" [as a] real thing [inaudible] rather than just to be a radical or a hypothetical case.

DONNA AUSTIN:

Thanks, Ram. Jeff.

JEFFREY NEUMAN: Yeah. Thanks, Ram. So we understand the concept. The problem is applying it. So Ram, you work for a registry. Or did. I'm not sure. Sorry, I don't know what the status is.

RAM MOHAN: I still do.

JEFFREY NEUMAN: Okay, great. Cool. Sorry. So if you were to submit an application for a TLD and two variants, I'm assuming you'd make the argument that it's necessary. Right? And that's my point. We can't assume that registries are going to apply as bad actors or apply for things that are not going to be something that they haven't thought through and can't provide answers as to how they're going to manage it and all of that.

But it is impossible for us to find an evaluation or an evaluator to determine what is or is not necessary. Because if you talk about what is the minimum amount of variants necessary, the answer is always going to be zero. It depends on what you mean by "necessary." There's no TLD at this point that is "necessary." You can never have another new gTLD process and if the criteria is, "What's necessary to be delegated," the answer is zero. Nothing.

So I think that what we need to do, and I thought we were sort of getting there before, was to look at evaluation questions and potential criteria for responses that would give the evaluators, and ICANN obviously, comfort that they can manage all of the issues that we think will arise.

And, of course, some of the examples you use like what happens with takedowns. We're going to be discussing that. We're also going to be discussion what happens with UDRPs where the primary name is the one that is ordered to be transferred. But let's say that the non-primary or one of the variants, it wouldn't be infringing at all. We're going to be discussing those issues and we're going to figure it out.

And to me, once you answer it for one variant, it's pretty much going to be a similar problem whether it's two, three, four, or more. Yes, it get magnified a little bit, but it's still the same issue and the same answer.

So I guess from a policy perspective, I don't think we can say, "We'll start one and then go propose another and the propose another" because we all know that ICANN doesn't work that way. By the time you'd be able to propose another, you're going to be talking about years from when you probably want the other one. So we need to work within the current existing environment as we know it.

And, like I said, focus the minimum amount of variants necessary, the answer is always going on what the applicant needs to answer and what the evaluators need to be comfortable with those answers, I think, is the only thing we can do. I don't see us in any way being able to come up with some kind of number that is anything other than arbitrary. Thanks.

DONNA AUSTIN:

Patrik.

PATRIK FÄLTSTRÖM: Yes, Jeff—

RAM MOHAN: And they're a good point. Sorry, just let me briefly respond to Jeff, Patrick, and I'll come back to you. Is that okay?

PATRIK FÄLTSTRÖM: Oh, absolutely. Please go on.

RAM MOHAN: Okay, thank you. So Jeff, I understand the problem that you're facing and I think what you're seeing is that the SSAC's advice is to Council as much as possible. A very conservative approach to start with a minimal set rather than make ... There will be a self [inaudible].

JUSTINE CHEW: Did we lose Ram again?

RAM MOHAN: [inaudible]. The SSAC is not making any assumptions, really, about whether the actors are good or bad. The actors are just actors. They're doing whatever they're doing. I think our focus is on making sure that the prospect of having many variants that result in a combinatorial explosion—that that probability is reduced.

PATRIK FÄLTSTRÖM: Yeah. Ram explained this really well. And let me continue. I think in this discussion that we have based on the questions that you asked and also the discussion that we have now on the call, honestly I think, Jeff, that, as I said earlier, the ball is coming back to your side of the court because if we from SSAC reemphasize saying that if an applicant is getting multiple domain names delegated and multiple domain names to manage as part of an application for a variant set, then you know much more than me. For example, what kind of policy do you put on the applicant on management of whatever domain names the applicant has?

And then suddenly when we have ... The word “variant” is tied to the word “synchronization,” I don’t know what you mean by synchronization between those variants. But it’s something that I would like to pass back to you. You define what synchronization means and then you look at how that synchronization is to be implemented given the that, technically, the different variants are just like different domain names.

During my years as chair of a SSAC, I don't know how many times I talked with registries and representatives of registries that are non-technical that were absolutely honest people. They did not want to try to fool anyone. So that is not what I'm saying.

But they did think that two variants, by being defined as variants, that they would, for example, if you resolve one of them you get the response on the website for the other one. That this not the case. They are distinct domain names, which means that if it is the case that you have two variants and you have some kind of

definition of synchronization, regardless of what it is, there is, by definition, if nothing else administrative overhead.

And you mentioned a couple of examples yourself. If you have a takedown notice and takedown an application that is coming or one of the domain names in the variant group, what is supposed to happen to the others? And then SSAC is saying, "We don't care." But they are bundled in a group because they're called variants.

And then the question is up to you guys to define what you mean by "synchronization." Thank you.

DONNA AUSTIN:

Thanks, Patrik. I think this is a really good discussion and I'm finding it very helpful just to understand where SSAC is coming from. And Jeff is identifying some of the challenges that we need to overcome in developing the policy. But I think this is really helpful in getting a sense of what some of those challenges are and perhaps some of the misconceptions around what is a variant and what it does. So this is a really helpful conversation.

So I'm not sure where we are, whether we've answered all of our questions here or whether we still have a few more to go.

STEVE SHENG:

Donna, I think there's one last question, B3 and C4a. I think John Levine can provide answers for that.

DONNA AUSTIN: Okay, great. Thanks, Steve. John, go ahead.

JOHN LEVINE: Yeah, thanks. The questions are a little different, but the answers are going to be pretty much the same. In C4a, the syntax is kind of tortured, so I'm kind of guessing what it means.

For B3 I have to kind of just echo what Patrik says. We call them variants, but in fact they are different domain names. And so whatever you do to make them seem to be similar is, in practice, entirely up to the registrant. We can say, "Well, you have to use the same name server." Well, that's fine. Or you can say, "Well, you need to have the same name server and the zones have to have the same content," which in fact is probably not what you want.

For example, if you had a traditional Chinese and a simplified Chinese version of a name, you'd probably want simplified second-level names under the simplified name and traditional second-level names under the traditional name. So any policy you make basically has to be a non-technical policy that people have to perceive the results as being similar. And that's entirely a matter of human perception and it's simply not something you can do mechanically.

My usual example is, okay, you have a traditional and a simplified version of a name pointing in a web server. And they're supposed to return the same website. Now I don't know whether the same website means literally the same bits, or whether the simplified name gives you a website with simplified text and the traditional

name gives you a name with traditional text. And that's entirely a question for the linguistic community.

So the answer to both be B3 and C4a is that you can make rules about what you want the result to be, but the rules have to be phrased in ways that are simply not technical. There's no technical definition of the results of domain names being the same just because they're pointing it at an unlimited number of services to do an unlimited number of things. And people's understanding of similarity is a human thing. It's not a technical thing.

I can go on, but it basically is going to be more explanation of the same thing which is that this not a technical question so it doesn't have a technical answer.

Jeff, do you have a question?

JEFFREY NEUMAN:

Yeah. I think that is a good answer. That is kind of the answer we wanted, that this is really a policy question that you don't necessarily see that it needs to have necessarily the same registrar or the same name servers, as you said, or the same RDDS information or whatever it is. I mean, that is an answer and that's kind of what we were looking for. So I appreciate that.

JOHN LEVINE:

Realistically, if the names or not allocated to the same registrant, the chances of them being the same, I would say, would be considerably lower. And you could sort of come up with hypothetical situations where there's a registrant and there's a

separate company that's in the mirroring business or something like that. But again, now we're talking about business practices. We're not talking about technology.

JEFFREY NEUMAN: Right. I think that's what we're looking for, so thank you.

JOHN LEVINE: Yeah. And also, one other thing that I think we should keep in mind is that, overall, the efforts to make variants work in similar ways has largely been a failure. An interesting example is NGO and ONG which are not variants but act like variants. And I've gone through and looked at the web servers in those domains, and there's one provider that does a pretty good job of making them resolve the same. And everybody else basically activates one or activates the other and ignores the other one.

Taiwan has a DNAME to make two versions of the Taiwanese ccTLD look the same. And again, when I looked there, in practice the implementation of variants has been poor. And I think if we want people to have a good user experience, we're going to have to ask for considerably more effort and better non-technical standards than we've had to date.

DONNA AUSTIN: Thanks, John. Have you got any other examples of where you think implementation of variants has been poor? I asked earlier in the chat whether we had any case studies, but it seems like that could be valuable input.

JOHN LEVINE:

Yeah. I never wrote it up, but you may recall that [.cat] used to use DNAMEs to try to make the accented and unaccented versions of names sort of the same. And I did a similar scan there. Like, did the websites actually produce the same result? And in most cases, the web server responded reasonably to one name and the other name either didn't work or it gave a default Apache page or something like that.

I don't have any particular number. I was saying I went through a little bit and people are trying hard enough even to be worth trying to write this up. It just was not ... They didn't they didn't take it seriously. And I presume that's one of the reasons why the DNAME is gone.

PATRIK FÄLTSTRÖM:

To continue on what John just said, the DNAME which is operationally one thing that at least has been tested, and to some degree one could say that in certain cases it might be the case that it actually, for some definition [of "work,"] worked.

But let me take another example. If you look at the libraries all over the place that use URIs and URMs for persistent URIs to documents. How do you do comparison of those if you have two different URLs with two different domains names which are defined as variants? So every time when you try to compare anything that includes a domain name, that is when you get a problem.

The DNAME/BNAME issues that John talked about, that is just about lookups in the DNS. And that's only a fraction of cases where you have comparison of two domain names with each other.

DONNA AUSTIN: Thank, Patrik. I see Jeff has a question in chat. It's just slipped off my screen. "So most registries now just activate one name and block the variants. Is that correct?" Jeff, did you want to speak to that? And I would note that we're seven minutes from time, so getting close to wrapping this up. Go ahead, Jeff.

JEFFREY NEUMAN: That's the question. I did have another one after, but if that one could be answered first.

PATRIK FÄLTSTRÖM: I don't really know who should answer that, but the very few cases I've been looking at—and that is definitely not a complete list of user variants—I can, for example, not say how they do in the variants between traditional and simplified Chinese. But what I see elsewhere, where people deal with variants, that is, you have the primary. First of all, you very well define what the primary domain name is for various reasons. And then you block the others.

That is what I have seen as the most successful and most easy way of handling variants. But other people on the call have more experienced than me.

RAM MOHAN: Speaking as a registry operator, to Jeff's question, yes, that's the common mode. Reserve the variants and block them.

DONNA AUSTIN: Thanks.

JEFFREY NEUMAN: The other question I had which actually came up in an actual case. I can't remember if the one that was initially delegated ... It was traditional and simplified. I just can't remember which one was which. But there was a UDRP action where the party actually won this UDRP against whatever version was delegated or live at that point and not blocked. But they wanted to switch and switch which one was primary and which one was the variant so that they could use it.

There was no policy. There still is no policy that allows for the switching of which one is primary and which ones are blocked. Do you see any security/stability issue with setting a mechanism whereby a registrant can switch, or a new registrant of that name—or transfer, upon a transfer—can switch which one is the primary and which ones are blocked? Is there any kind of issues that you see there that we should be looking at? Did that make sense?

RAM MOHAN: [inaudible].

DONNA AUSTIN: Sorry, Ram. We seem to be having some problems with your audio [inaudible].

RAM MOHAN: [inaudible] cause for concern is, if the variant is going to a different registrant than the primary label, now you've got the situation where you can have phishing or other kinds of issues that come with two labels that perhaps have the same semantic meaning or perhaps even look alike. But beyond that, I don't see a technical issue in this area. And I recognize that there is no policy treatment for this at this point.

JEFFREY NEUMAN: Okay. Yeah, understood. In this case, it was a UDRP. The name was transferred, but what made more sense for that company was one of the variants. And the registry in this case would not allow because there was no mechanism to switch. So it's still a case that's in limbo at this point.

RAM MOHAN: That may have to do with [tech debt], Jeff, more than technical problems.

DONNA AUSTIN: Okay. So I'll go to Edmon and then we're almost at time. Edmon, go ahead.

EDMON CHUNG: Yeah, just quickly. Jeff, you asked the question about if a TLD uses the primary and a blocked variant and it transfers and it reverses it. I think there would be pretty big concerns because the names that are out there using suddenly doesn't work after the transfer. So that's the part that we probably need to think about. If both were actually active, then the concern would be less. But if it was the primary that was active and the variant blocked and then you transfer and then you turn off the original primary and make it the variant and turn it off and activate the new primary, then that would be a very different situation. I just want to point that out.

DONNA AUSTIN: Thanks, Edmon. So we're almost at time and I noticed that Patrik has dropped off the call. On behalf of our working group, I just wanted to thank the members of SSAC for joining this call. I think it's been really helpful, particularly the conversation that we had around A5. I think the context that you've provided to your thinking and the reasoning behind your advice has been extremely helpful.

I would note that in terms of working through our charter, we're only getting to the end of Topic A, so we've still got a long way to go. And I would hope that perhaps we can have a regular touch point with SSAC, particularly if there are more questions that we are struggling with in the context of the question but also some of the SSAC advice or input that's been provided along the way. So I hope that we will be able to make that contact semi-regular in some way.

I don't [see] ...

RAM MOHAN:

Donna, I can speak for myself and, I think, for my colleagues. We definitely welcome this dialogue. Far easier to have this kind of a frank and open interchange and to understand what we're trying to say and to get to the bottom of it rather than have it all get codified and then regret it later. So we'd certainly be open for it.

DONNA AUSTIN:

Terrific. That's great. To hear, Ram. So thank you, again, for your time. We really appreciate it. And we're one minute over so I think we'll call it.

So thank you, everybody. And to the IDN EPDP Team, just a reminder that A6 language is sitting in your e-mail box and we will be discussing that next week. So thank, everybody, and have a good rest of the day wherever you may be. Thank you.

DEVAN REED:

Thank you all for joining. Once again, this meeting is adjourned. I will end the recording and disconnect all remaining lines. Have a wonderful rest of your day.

[END OF TRANSCRIPTION]